

MAY 19 2006

GORDON PARK-LI, Clerk
BY: JUN P. PANELO
Deputy Clerk

CASE MANAGEMENT CONFERENCE SET

OCT 20 2006 - 9 AM

DEPARTMENT 212

1 REUBEN YEROUSHALMI (SBN 193981)
2 DANIEL D. CHO (SBN 105409)
3 BEN YEROUSHALMI (SBN 232540)
4 YEROUSHALMI & ASSOCIATES
5 3700 WILSHIRE BLVD., SUITE 480
6 LOS ANGELES, CA 90010
7 213-382-3183

8 Attorneys for Plaintiff, Environmental World Watch, Inc.

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SAN FRANCISCO

11 Environmental World Watch, Inc.,)
12 in the public interest,)

13 Plaintiff,)

14 v.)

15 Swiss International Air Lines, Ltd., Polar)
16 Air Cargo, Inc., ASTAR Air Cargo, Inc.,)
17 Hawaiian Airlines, Inc., Bax Global Inc.,)
18 Amerijet International, Inc., DHL Holdings)
19 (USA), Inc., Aer Lingus, Limited, Air India,)
20 Ltd., China Airlines, Ltd., Evergreen)
21 International Airlines, China Eastern)
22 Airlines Co., Ltd., China Southern)
23 Airlines Co., Ltd., Compañía Panameña)
24 de Aviación, S.A., (a.k.a.) Copa Airlines, El)
25 Al Israel Airlines, Ltd., EVA Airways)
26 Corp., Korean Air Lines Co., Ltd., Lan)
27 Airlines, S.A., LTU International Airways,)
28 Inc., Malaysia Airlines, Thai Airways)
International, Ltd., Midwest Express)
Airlines, Inc., Philippine Airlines, Inc.,)
Qantas Airways Limited, Singapore)
Airlines, Limited, Song Airlines, Spirit)
Airlines, Inc., TED Airlines, and)
DOES 1-100,)

Defendants.)

Case No. **CC06452413**

Action is an unlimited civil case (amount
demanded exceeds \$25,000)

COMPLAINT FOR VIOLATION OF
PROPOSITION 65, THE SAFE
DRINKING WATER AND TOXIC
ENFORCEMENT ACT OF 1986 (HEALTH
AND SAFETY CODE SECTIONS 25249.5,
ET SEQ.)

COPY

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15 Swiss International Air Lines, Ltd., Polar)
16 Air Cargo, Inc., ASTAR Air Cargo, Inc.,)
17 Hawaiian Airlines, Inc., Bax Global Inc.,)
18 Amerijet International, Inc., DHL Holdings)
19 (USA), Inc., Aer Lingus, Limited, Air India,)
20 Ltd., China Airlines, Ltd., Evergreen)
21 International Airlines, China Eastern)
22 Airlines Co., Ltd., China Southern)
23 Airlines Co., Ltd., Compañía Panameña)
24 de Aviación, S.A., (a.k.a.) Copa Airlines, El)
25 Al Israel Airlines, Ltd., EVA Airways)
26 Corp., Korean Air Lines Co., Ltd., Lan)
27 Airlines, S.A., LTU International Airways,)
28 Inc., Malaysia Airlines, Thai Airways)
International, Ltd., Midwest Express)
Airlines, Inc., Philippine Airlines, Inc.,)
Qantas Airways Limited, Singapore)
Airlines, Limited, Song Airlines, Spirit)
Airlines, Inc., TED Airlines, and)
DOES 1-100,)

Defendants.)

Case No.

Action is an unlimited civil case (amount
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COMPLAINT FOR VIOLATION OF
PROPOSITION 65, THE SAFE
DRINKING WATER AND TOXIC
ENFORCEMENT ACT OF 1986 (HEALTH
AND SAFETY CODE SECTIONS 25249.5,
ET SEQ.)

1
2 **GENERAL ALLEGATIONS**
3

4 1. Plaintiff Environmental World Watch, Inc. ("Plaintiff") is a corporation qualified to do
5 business in the State of California. It brings this action in the public interest as defined under
6 Health and Safety Code section 25249.7, subdivision (d).
7

8 2. Plaintiff is ignorant of the true names and capacities of defendants Does 1-100, and
9 therefore sues these defendants by such fictitious names. Plaintiff will amend this complaint to
10 allege their true names and capacities when ascertained. Plaintiff is informed, believes, and
11 thereon alleges that each fictitiously named defendant is responsible in some manner for the
12 occurrences herein alleged and the damages caused thereby.
13

14 3. At all times mentioned herein, "Defendants" include Swiss International Air Lines, Ltd.,
15 Polar Air Cargo, Inc., ASTAR Air Cargo, Inc., Hawaiian Airlines, Inc. Bax Global, Inc.,
16 Amerijet International, Inc., DHL Holdings (USA), Inc., Aer Lingus, Limited, Air India, Ltd.,
17 China Airlines, Ltd., Evergreen International Airlines, China Eastern Airlines Co., Ltd., China
18 Southern Airlines Co., Ltd., Compañía Panameña de Aviación, S.A., (a.k.a.) Copa Airlines, El
19 Al Israel Airlines, Ltd., EVA Airways Corp., Korean Air Lines Co., Ltd., Lan Airlines, S.A.,
20 LTU International Airways, Inc., Malaysia Airlines, Thai Airways International, Ltd., Midwest
21 Express Airlines, Inc., Philippine Airlines, Inc., Qantas Airways, Limited, Singapore Airlines,
22 Limited, Song Airlines, Spirit Airlines, Inc., TED Airlines, and Does 1-100.
23

24 4. At all times mentioned each defendant was a "[p]erson in the course of doing business"
25 within the meaning of Health and Safety Code section 25249.11, subdivision (b). Plaintiff is
26 informed, believes, and thereon alleges that at all times mentioned herein each defendant had ten
27 or more employees.
28

1 5. The Court has jurisdiction over this lawsuit pursuant California Constitution Article VI,
2 Section 10, which grants the Superior Court original jurisdiction in all causes except those given
3 by statute to other trial courts.
4

5 **CAUSE OF ACTION**

6 (BY ENVIRONMENTAL WORLD WATCH, INC. AGAINST DEFENDANTS SWISS
7 INTERNATIONAL AIR LINES, LTD., POLAR AIR CARGO, INC., ASTAR AIR CARGO,
8 INC., HAWAIIAN AIRLINES, INC. BAX GLOBAL, INC., AMERIJET INTERNATIONAL,
9 INC., DHL HOLDINGS (USA), INC., AER LINGUS, LIMITED, AIR INDIA, LTD., CHINA
10 AIRLINES, LTD., EVERGREEN INTERNATIONAL AIRLINES, CHINA EASTERN
11 AIRLINES CO., LTD., CHINA SOUTHERN AIRLINES CO, LTD., COMPAÑÍA
12 PANAMEÑA DE AVIACIÓN, S.A., (A.K.A.) COPA AIRLINES, EL AL ISRAEL AIRLINES,
13 LTD., EVA AIRWAYS CORP., KOREAN AIR LINES CO., LTD., LAN AIRLINES, S.A.,
14 LTU INTERNATIONAL AIRWAYS, INC., MALAYSIA AIRLINES, THAI AIRWAYS
INTERNATIONAL, LTD., MIDWEST EXPRESS AIRLINES, INC., PHILIPPINE AIRLINES,
INC., QANTAS AIRWAYS, LIMITED, SINGAPORE AIRLINES, LIMITED, SONG
AIRLINES, SPIRIT AIRLINES, INC., TED AIRLINES, AND DOES 1-100 FOR VIOLATION
OF PROPOSITION 65, THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT
ACT OF 1986 (HEALTH AND SAFETY CODE SECTIONS 25249.5, ET SEQ.)

15 6. Plaintiff ENVIRONMENTAL WORLD WATCH, INC. repeats and incorporates by
16 reference the previous paragraphs of this complaint as though fully set forth herein.

17 7. Defendants Swiss International Air Lines, Ltd., Hawaiian Airlines, Inc. Aer Lingus,
18 Limited, Air India, Ltd., China Airlines, Ltd., Evergreen International Airlines, China Eastern
19 Airlines Co., Ltd., China Southern Airlines Co., Ltd., Compañía Panameña de Aviación, S.A.,
20 (a.k.a.) Copa Airlines, El Al Israel Airlines, Ltd., EVA Airways Corp., Korean Air Lines Co.,
21 Ltd., Lan Airlines, S.A., LTU International Airways, Inc., Malaysia Airlines, Thai Airways
22 International, Ltd., Midwest Express Airlines, Inc., Philippine Airlines, Inc., Qantas Airways,
23 Limited, Singapore Airlines, Limited, Song Airlines, Spirit Airlines, Inc., TED Airlines and
24 Does 1-50 (collectively, the "Passenger Airline Defendants") are and at all times mentioned
25 herein were airlines that flew airplanes in and out of airports located in California. Between
26 January 4, 2001, and the filing date of this Complaint, the Passenger Airline Defendants exposed
27
28

1 their employees to jet engine exhaust. The exposures of employees to jet engine exhaust took
2 place when the Passenger Airline Defendants landed their airplanes, during the process of
3 refueling, while employees exited the airplanes, while employees performed maintenance on the
4 airplanes, while employees boarded the Passenger Airline Defendants' airplanes, while the
5 Passenger Airline Defendants' airplanes taxied upon landing, and during take-off, or any other
6 time while Passenger Airline Defendants operated their airplanes on or near the ground. The
7 exposed employees include baggage handlers, maintenance workers, pilots, flight attendants,
8 cleaning personnel, ticket agents and all other employees working at the gate, warehouse
9 workers, and all other airline crew and personnel working at the Passenger Airline Defendants'
10 respective gates or terminals where airplanes dock. Passenger Airline Defendants exposed these
11 employees to chemicals designated to cause cancer or reproductive toxicity, pursuant to
12 California Code of Regulations, title 22, section 12000 ("Covered Chemicals"), contained in jet
13 engine exhaust without first giving clear and reasonable warning of such pursuant to Health and
14 Safety Code sections 25249.5, et seq. ("Proposition 65"). The sources of exposures included
15 inhalation caused by the exposed employees inhaling and breathing the ambient air, which
16 contained jet engine exhaust, while the airplanes were on the runway, at the terminal, and while
17 the airplanes taxied at the airports listed in Exhibit A applicable to each respective defendant, as
18 specified therein. Exposures occurred at each of the airports listed in Exhibit A applicable to
19 each respective defendant, as specified therein.

24 8. Defendants Polar Air Cargo, Inc., ASTAR Air Cargo, Inc., Bax Global, Inc., Amerijet
25 International, Inc., DHL Holdings (USA), Inc., and Does 51-100 (collectively, the "Cargo
26 Airline Defendants") are and at all times mentioned herein were airlines that flew airplanes in
27 and out of airports located in California. Between January 4, 2001, and the filing date of this
28

1 Complaint, the Cargo Airline Defendants exposed their employees to jet engine exhaust. The
2 exposures of employees to jet engine exhaust took place when the Cargo Airline Defendants
3 landed their airplanes, during the process of refueling, while employees exited the airplanes,
4 while employees performed maintenance on the airplanes, while employees boarded the Cargo
5 Airline Defendants' airplanes, while the Cargo Airline Defendants' airplanes taxied upon
6 landing, and during take-off, or any other time while the Cargo Airline Defendants operated their
7 airplanes on or near the ground. The exposed employees include baggage handlers, maintenance
8 workers, pilots, cleaning personnel, warehouse workers, and all other airline crew and personnel
9 working at the airports where the Cargo Airline Defendants' airplanes dock. The Cargo Airline
10 Defendants exposed these employees to the Covered Chemicals contained in jet engine exhaust
11 without first giving clear and reasonable warning of such pursuant to Proposition 65. The
12 sources of exposures included inhalation caused by the exposed employees inhaling and
13 breathing the ambient air, which contained jet engine exhaust, while the airplanes were on the
14 runway, at the terminal, and while the airplanes taxied at the airports listed in Exhibit A
15 applicable to each respective defendant, as specified therein. Exposures occurred at each of the
16 airports listed in Exhibit A applicable to each respective defendant, as specified therein.
17
18
19

20 9. The Passenger Airline Defendants are and at all times mentioned herein were airlines that
21 flew airplanes in and out of airports located in California. Between January 4, 2001, and the
22 filing date of this Complaint, the Passenger Airline Defendants exposed persons to jet engine
23 exhaust. The Passenger Airline Defendants caused exposures when the Passenger Airline
24 Defendants landed their airplanes, during the process of refueling, while passengers exited and
25 boarded the Passenger Airline Defendants' airplanes, while the airplanes taxied, and during take-
26 off. Exposed persons included people visiting and working at the airports listed in Exhibit A,
27
28

1 including passengers, well-wishers, children, pregnant women, taxi and shuttle drivers, catering
2 and food service delivery personnel, police and security personnel, airport employees and ground
3 crews, neighborhood residents, and passersby. The Passenger Airline Defendants exposed these
4 persons to the Covered Chemicals contained in jet engine exhaust without first giving clear and
5 reasonable warning of such pursuant to Proposition 65. The sources of exposures included
6 inhalation caused by the exposed persons inhaling and breathing the ambient air containing jet
7 engine exhaust while traversing runway areas and jet bridges at the airports found in Exhibit A.
8 Some of the exposures for which a warning is required occurred near the gate or terminal where
9 the Passenger Airline Defendants dock their airplanes. Exposures occurred at each of the
10 airports listed in Exhibit A.
11
12

13 10. The Cargo Airline Defendants are and at all times mentioned herein were airlines that
14 flew airplanes in and out of airports located in California. Between January 4, 2001, and the
15 filing date of this Complaint, the Cargo Airline Defendants exposed persons to jet engine
16 exhaust. The Cargo Airline Defendants caused exposures when the Passenger Airline
17 Defendants landed their airplanes, during the process of refueling, while passengers exited and
18 boarded the Cargo Airline Defendants' airplanes, while the airplanes taxied, and during take-off.
19 Exposed persons included people visiting and working at the airports listed in Exhibit A, police
20 and security personnel, airport employees and ground crews, neighborhood residents, and
21 passersby. The Cargo Airline Defendants exposed these persons to the Covered Chemicals
22 contained in jet engine exhaust without first giving clear and reasonable warning of such
23 pursuant to Proposition 65. The sources of exposures included inhalation caused by the exposed
24 persons inhaling and breathing the ambient air containing jet engine exhaust while traversing
25
26
27
28

1 runway areas and jet bridges at the airports found in Exhibit A. Exposures occurred at each of
2 the airports listed in Exhibit A.

3
4 11. Jet engine exhaust contains the following Covered Chemicals.

Benz[a]anthracene	Chrysene	Benzo[a]pyrene	Indeno[1,2,3-cd]pyrene
Formaldehyde (gas)	Acetaldehyde	Naphthalene	Benzene
1,3-Butadiene	Benzo[b]fluoranthene	Benzo[k]fluoranthene	Dibenz[a,h]anthracene
Toluene	Carbon Monoxide		

8
9 12. On July 1, 1987, Benz[a]anthracene first appeared on the Governor's Proposition 65 list
10 ("Proposition 65 List") of Chemicals known to cause developmental toxicity. (Cal. Code Regs.,
11 tit 22, §12000, subd. (b)) ("§12000".) Pursuant to Health and Safety Code section 25249.9
12 ("§25249.9"), twenty months after first appearing on the Governor's Proposition 65 list,
13 Benz[a]anthracene became subject to Proposition 65 warning requirements.
14

15 13. On January 1, 1990, Chrysene first appeared on the Proposition 65 List of Chemicals
16 known to cause cancer. (§12000.) Pursuant to §25249.9, twenty months after first appearing on
17 the Proposition 65 List, Chrysene became subject to Proposition 65 warning requirements.
18

19 14. On July 1, 1987, Benzo[a]pyrene first appeared on the Proposition 65 List of Chemicals
20 known to cause cancer. (§12000.) Pursuant to §25249.9, twenty months after first appearing on
21 the Proposition 65 List, Benzo[a]pyrene became subject to Proposition 65 warning requirements.
22

23 15. On January 1, 1988, Indeno[1,2,3-cd]pyrene first appeared on the Proposition 65 List of
24 Chemicals known to cause cancer. (§12000.) Pursuant to §25249.9, twenty months after first
25 appearing on the Proposition 65 List, Indeno[1,2,3-cd]pyrene became subject to Proposition 65
26 warning requirements.

27 16. On January 1, 1988, Formaldehyde (gas) first appeared on the Proposition 65 List of
28 Chemicals known to cause cancer. (§12000.) Pursuant to §25249.9, twenty months after first

1 appearing on the Proposition 65 List, Formaldehyde (gas) became subject to Proposition 65
2 warning requirements.

3 17. On April 1, 1988, Acetaldehyde first appeared on the Proposition 65 List of Chemicals
4 known to cause cancer. (§12000.) Pursuant to §25249.9, twenty months after first appearing on
5 the Proposition 65 List, Acetaldehyde became subject to Proposition 65 warning requirements.
6

7 18. On April 19, 2002, Naphthalene first appeared on the Proposition 65 List of Chemicals
8 known to cause cancer. (§12000.) Pursuant to §25249.9, twenty months after first appearing on
9 the Governor's Proposition 65 list, Naphthalene became subject to Proposition 65 warning
10 requirements.
11

12 19. On February 27, 1987, Benzene first appeared on the Proposition 65 List of Chemicals
13 known to cause cancer, and on December 26, 1997, for male reproductive toxicity. (§12000.)
14 Pursuant to §25249.9, twenty months after first appearing on the Proposition 65 List, Benzene
15 became subject to Proposition 65 warning requirements.
16

17 20. On April 1, 1988, 1,3-Butadiene first appeared on the Proposition 65 List of Chemicals
18 known to cause cancer. (§12000.) Pursuant to §25249.9, twenty months after first appearing on
19 the Proposition 65 List, 1,3-Butadiene became subject to Proposition 65 warning requirements.
20

21 21. On July 1, 1987, Benzo[b]fluoranthene first appeared on the Proposition 65 List of
22 Chemicals known to cause cancer. (§12000.) Pursuant to §25249.9, twenty months after first
23 appearing on the Proposition 65 List, Benzo[b]fluoranthene became subject to Proposition 65
24 warning requirements.

25 22. On July 1, 1987, Benzo[k]fluoranthene first appeared on the Proposition 65 List of
26 Chemicals known to cause cancer. (§12000.) Pursuant to §25249.9, twenty months after first
27
28

1 appearing on the Proposition 65 List, Benzo[k]fluoranthene became subject to Proposition 65
2 warning requirements.

3 23. On January 1, 1988, Dibenz[a,h]anthracene first appeared on the Proposition 65 List of
4 Chemicals known to cause cancer. (§12000.) Pursuant to §25249.9, twenty months after first
5 appearing on the Proposition 65 List, Dibenz[a,h]anthracene became subject to Proposition 65
6 warning requirements.
7

8 24. On January 1, 1991, Toluene first appeared on the Proposition 65 List of Chemicals
9 known to cause reproductive toxicity. (§12000.) Pursuant to §25249.9, twenty months after first
10 appearing on the Proposition 65 List, Toluene became subject to Proposition 65 warning
11 requirements.
12

13 25. On January 1, 1989, Carbon Monoxide first appeared on the Proposition 65 List of
14 Chemicals known to cause reproductive toxicity. (§12000.) Pursuant to §25249.9, twenty
15 months after first appearing on the Proposition 65 List, Carbon Monoxide became subject to
16 Proposition 65 warning requirements.
17

18 26. At least sixty days prior to commencing this action by the filing of this complaint,
19 Plaintiff gave notices of alleged violations of Proposition 65 subject to a private action to the
20 Attorney General and applicable district attorneys and city attorneys in whose jurisdictions the
21 violations allegedly occurred, and to each named defendant.
22

23 27. Plaintiff gave these notices and filed this action more than twenty months after each of
24 the chemicals listed in Paragraph 11 of this Complaint first appeared on the Proposition 65 List,
25 and after such chemicals became subject to Proposition 65 warning requirements.
26

27 28. Each of Plaintiff's respective notices of the alleged violations included a certificate of
28 merit executed by the attorney for the noticing party, Plaintiff. The certificate of merit stated that

1 the attorney for Plaintiff who executed the certificate had consulted with at least one person with
2 relevant and appropriate expertise who had reviewed data regarding the exposure to the
3 chemicals listed in Paragraph 11 of this Complaint that are subjects of this action. Based on that
4 information, the attorney for Plaintiff who executed the certificate believed there was a
5 reasonable and meritorious case for this private action. The attorney for Plaintiff attached to the
6 certificate of merit served on the Attorney General information sufficient to establish the basis of
7 the certificate of merit.
8

9
10 29. Plaintiff is informed, believes, and thereon alleges that neither the Attorney General, nor
11 any applicable district attorney or city attorney, has commenced and is diligently prosecuting an
12 action against the alleged violations.

13 30. At all times relevant to this action, Defendants knew they were exposing their employees
14 and people visiting and working at the airports, including passengers, police and security
15 personnel, catering personnel, and food service delivery personnel to the chemicals listed in
16 Paragraph 11 of this Complaint without first giving clear and reasonable warning of such to the
17 persons exposed. The State of California has designated that these chemicals cause cancer
18 and/or developmental toxicity. Therefore, between January 4, 2001, and the filing date of this
19 complaint, Defendants, without first giving clear and reasonable warning, knowingly and
20 intentionally exposed the aforementioned persons to the chemicals listed in Paragraph 11 of this
21 Complaint and known to the State of California to cause cancer and/or developmental toxicity.
22

23
24 31. The route of exposure for the chemicals listed in Paragraph 11 of this Complaint included
25 inhalation caused by the exposed persons inhaling and breathing the ambient air containing jet
26 engine exhaust while traversing runway areas, terminals, jet bridges, and other areas at the
27 airports found in Exhibit A.
28

1 32. Individuals exposed to the chemicals listed in Paragraph 11 of this Complaint suffered
2 and continue to suffer irreparable harm due to exposure to such chemicals without prior clear and
3 reasonable warning.
4

5
6 **PRAYER FOR RELIEF**

7 Plaintiff demands against each defendant as follows:

- 8 1. A permanent injunction;
9
10 2. Penalties pursuant to Health and Safety Code section 25249.7, subdivision (b) of
11 \$2,500.00 per day per violation;
12
13 3. Costs of suit;
14
15 4. Reasonable attorney's fees and costs; and
16
17 5. Any further relief that the court may deem just and equitable.

18 Dated: Monday, May 15, 2006

YEROUSHALMI & ASSOCIATES

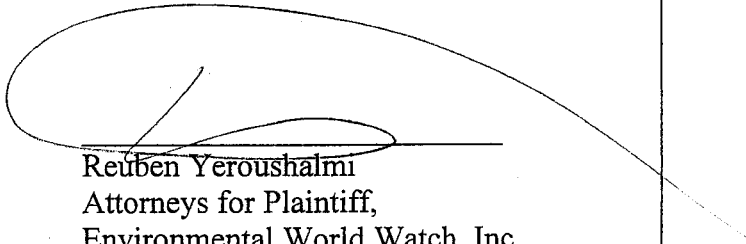
19
20
21 
22 Reuben Yeroushalmi
23 Attorneys for Plaintiff,
24 Environmental World Watch, Inc.
25
26
27
28

EXHIBIT A

EXHIBIT A

The alleged violations by Defendant Swiss International Air Lines Ltd., took place at:
Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED; Airport Longitude: 122-22-29.6000W

The alleged violations by Defendant Polar Air Cargo, Inc., took place at:
Los Angeles International Airport (for location see above)

The alleged violations by Defendant ASTAR Air Cargo, Inc., took place at:
Los Angeles International Airport (for location see above)

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED; Airport Longitude: 122-22-29.6000W

Sacramento International Airport
6900 Airport Blvd.
Sacramento, CA 95837
Airport Latitude: 38-41-43.5000N ESTIMATED; Airport Longitude: 121-35-26.8000W

San Diego International Airport-Lindbergh Field
3225 N. Harbor Drive
San Diego, CA 92101-1022
Airport Latitude: 32-44-00.8000N ESTIMATED; Airport Longitude: 117-11-22.8000W

Ontario International Airport
2900 East Airport Dr
Ontario, CA 91761
Airport Latitude: 34-03-21.6000N ESTIMATED; Airport Longitude: 117-36-04.3000W

The alleged violations by Defendant Hawaiian Airlines, Inc. took place at:
Los Angeles International Airport (for location see above)

San Francisco International Airport (for location see above)

Sacramento International Airport (for location see above)

San Diego International Airport-Lindbergh Field (for location see above)

Ontario International Airport (for location see above)

The alleged violations by Defendant Bax Global Inc. took place at:
Los Angeles International Airport (for location see above)

Norman Y. Mineta San Jose International Airport
2077 Airport Blvd.
San Jose, CA 95110
Airport Latitude: 37-21-45.4500N ESTIMATED; Airport Longitude: 121-55-44.4300W

The alleged violations by Defendant Amerijet International Inc., took place at:
Los Angeles International Airport (for location see above)

The alleged violations by Defendant DHL Holdings (USA), Inc., took place at:
Los Angeles International Airport (for location see above)

San Francisco International Airport (for location see above)

Metropolitan Oakland International Airport
1 Airport Drive
Oakland, CA 94621
Airport Latitude: 37-43-16.6470N ESTIMATED; Airport Longitude: 122-13-14.5800W

San Diego International Airport-Lindbergh Field (for location see above)

The alleged violations by Defendant Aer Lingus Limited, took place at:
Los Angeles International Airport (for location see above)

San Francisco International Airport (for location see above)

The alleged violations by Defendant Air India Ltd., took place at:
Los Angeles International Airport (for location see above)

The alleged violations by Defendant China Airlines, Ltd., took place at:
Los Angeles International Airport (for location see above)

San Francisco International Airport (for location see above)

The alleged violations by Defendant Evergreen International Airlines, took place at:
San Francisco International Airport (for location see above)

The alleged violations by Defendant China Eastern Airlines Co, Ltd., took place at:
Los Angeles International Airport (for location see above)

San Francisco International Airport (for location see above)

The alleged violations by Defendant China Southern Airlines Co, Ltd., took place at:
Los Angeles International Airport (for location see above)

The alleged violations by Defendant Compañía Panameña de Aviación, S.A., (a.k.a.)
Copa Airlines, took place at:
Los Angeles International Airport (for location see above)

San Francisco International Airport (for location see above)

The alleged violations by Defendant El Al Israel Airlines, Ltd., took place at:
Los Angeles International Airport (for location see above)

The alleged violations by Defendant EVA Airways Corp., took place at:
Los Angeles International Airport (for location see above)

San Francisco International Airport (for location see above)

The alleged violations by Defendant Korean Air Lines Co., Ltd., took place at:
Los Angeles International Airport (for location see above)

San Francisco International Airport (for location see above)

The alleged violations by Defendant Lan Airlines, S.A., took place at:
Los Angeles International Airport (for location see above)

The alleged violations by Defendant LTU International Airways, Inc., took place at:
Los Angeles International Airport (for location see above)

The alleged violations by Defendant Malaysia Airlines, took place at:
Los Angeles International Airport (for location see above)

San Francisco International Airport (for location see above)

The alleged violations by Defendant Thai Airways International, Ltd., took place at:
Los Angeles International Airport (for location see above)

The alleged violations by Defendant Midwest Express Airlines, Inc., took place at:
San Francisco International Airport (for location see above)

Los Angeles International Airport (for location see above)

John Wayne-Orange County Airport
3160 Airway Ave
Costa Mesa, CA 92626
Airport Latitude: 33-40-32.4000N ESTIMATED
Airport Longitude: 117-52-05.6000W

The alleged violations by Defendant Philippine Airlines, Inc., took place at:
San Francisco International Airport (for location see above)

Los Angeles International Airport (for location see above)

The alleged violations by Defendant Qantas Airways Limited, took place at:
San Francisco International Airport (for location see above)

Los Angeles International Airport (for location see above)

San Diego International Airport-Lindbergh Field (for location see above)

Norman Y. Mineta San Jose International Airport (for location see above)

The alleged violations by Defendant Singapore Airlines Limited, took place at:
San Francisco International Airport (for location see above)

Los Angeles International Airport (for location see above)

The alleged violations by Defendant Song Airlines took place at:
Los Angeles International Airport (for location see above)

San Francisco International Airport (for location see above)

The alleged violations by Defendant Spirit Airlines, Inc., took place at:
Los Angeles International Airport (for location see above)

The alleged violations by Defendant TED Airlines took place at:
Los Angeles International Airport (for location see above)

San Francisco International Airport (for location see above)

Ontario International Airport (for location see above)