

**FILED**  
San Francisco County Superior Court

✓ MAY 18 2007

GORDON PARK-LI, Clerk  
BY: [Signature]  
Deputy Clerk

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**CASE MANAGEMENT CONFERENCE SET**

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OCT 19 2007 -9<sup>00</sup>AM

**DEPARTMENT 212**

**SUMMONS ISSUED**

10 Attorneys for Plaintiff,  
11 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 COUNTY OF SAN FRANCISCO  
14 (Unlimited Jurisdiction)

15 MATEEL ENVIRONMENTAL  
16 JUSTICE FOUNDATION,

CASE NO.

~~CGC-07-463536~~

*CORRECT  
CASE #*

CGC-07-463538

17 Plaintiff,

COMPLAINT FOR INJUNCTIVE RELIEF  
AND CIVIL PENALTIES

18 v.

19 PENNZOIL-QUAKER STATE COMPANY

TOXIC TORT/ENVIRONMENTAL

20 Defendant.

21  
22  
23 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:

24 INTRODUCTION

25 1. This Complaint seeks civil penalties and an injunction to remedy the continuing  
26 failure of defendant PENNZOIL-QUAKER STATE COMPANY, (hereinafter "Defendant"), to  
27 give clear and reasonable warnings to those residents of California, who handle and use products  
28

ORIGINAL

1 that are or that incorporate thermoset/thermoplastic coated wires and cables in which the coating  
2 material contains lead (hereinafter referred to as "Leaded Wire or Cable Products"), that  
3 handling and use of these products causes those residents to be exposed to lead and lead  
4 compounds, lead acetate, lead phosphate, and lead subacetate (hereinafter, collectively, "lead").  
5 The types of products to which this Complaint pertains are those types listed in the Product List  
6 appended to the Proposition 65 60-Day Notice Letter that is attached to and incorporated by  
7 reference into this Complaint. Lead is known to the State of California to cause cancer, birth  
8 defects and male and female reproductive toxicity. Defendant manufactures, distributes, and/or  
9 markets Leaded Wire or Cable Products. These products cause exposures to lead and lead  
10 compounds, which are chemicals known to the State of California to cause cancer, birth defects  
11 and other reproductive harm.

12         2. Defendant is a business that manufactures, markets, and/or distributes Leaded  
13 Wire or Cable Products. Defendant intends that residents of California handle and use Leaded  
14 Wire or Cable Products that Defendant manufactures, markets, and/or distributes. When these  
15 products are handled and used in their normally intended manner, they expose people to lead. In  
16 spite of knowing that residents of California were and are being exposed to these chemicals  
17 when they handle and use Leaded Wire or Cable Products, Defendant did not and does not  
18 provide clear and reasonable warnings that these products cause exposure to chemicals known to  
19 cause cancer, birth defects and other reproductive harm.

20         3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7  
21 to compel Defendant to bring its business practices into compliance with section 25249.5 et seq.  
22 by providing a clear and reasonable warning to each individual who has been and who in the  
23 future may be exposed to the above mentioned toxic chemicals from the use of Defendant's  
24 products. Plaintiff seeks an order that defendant identify and locate each individual person who  
25 in the past has purchased Leaded Wire or Cable Products and to provide to each such purchaser a  
26 clear and reasonable warning that the Leaded Wire or Cable Products will cause exposures to  
27 chemicals known to cause birth defects.

28         4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the failure

1 of Defendant to provide clear and reasonable warnings regarding exposure to chemicals known  
2 to cause cancer, birth defects and other reproductive harm.

3 PARTIES

4 5. Plaintiff MATEEL ENVIRONMENTAL JUSTICE FOUNDATION ("Mateel")  
5 is a non-profit organization dedicated to, among other causes, the protection of the environment,  
6 promotion of human health, environmental education, and consumer rights. Mateel is based in  
7 Eureka, California, and is incorporated under the laws of the State of California. Mateel is a  
8 "person" pursuant to Health & Safety Code Section 25118. Mateel brings this enforcement  
9 action in the public interest pursuant to Health & Safety Code §25249.7(d). Residents of  
10 California are regularly exposed to lead and lead compounds from Leaded Wire or Cable  
11 Products manufactured, distributed or marketed by Defendants and are so exposed without a  
12 clear and reasonable Proposition 65 warning.

13 6. Defendant is a person doing business within the meaning of Health & Safety  
14 Code Section 25249.11. Defendant is a business that manufactures, distributes, and/or markets  
15 Leaded Wire or Cable Products in California, including the City and County of San Francisco.  
16 Manufacture, distribution and/or marketing of these products in the City and County of San  
17 Francisco and/or to people who live in San Francisco, causes people to be exposed to lead and  
18 lead compounds while they are physically present in the City and County of San Francisco.

19 7. Plaintiff brings this enforcement action against Defendant pursuant to Health &  
20 Safety Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of a  
21 60-day Notice letter dated October 19, 2006, which Mateel sent to California's Attorney  
22 General. Substantially identical letters were sent to every District Attorney in the state, and to the  
23 City Attorneys of every California city with a population greater than 750,000. On that same  
24 day, Mateel sent identical 60-Day Notice letters to the defendant. Attached to the 60-Day Notice  
25 Letters sent to each defendant was a summary of Proposition 65 that was prepared by  
26 California's Office of Environmental Health Hazard Assessment. In addition, each 60-Day  
27 Notice Letter plaintiff sent was accompanied by a Certificate of Service attesting to the service  
28 of the 60-Day Notice Letter on each entity which received it. Pursuant to California Health &

1 Safety Code Section 25249.7(d), a Certificate of Merit attesting to the reasonable and  
2 meritorious basis for the action was also sent with each 60-Day Notice Letter. Factual  
3 information sufficient to establish the basis of the Certificate of Merit was enclosed with the 60-  
4 Day Notice letter Mateel sent to the Attorney General.

5 8. Defendant is a business that employ more than ten people.

6 JURISDICTION

7 9. The Court has jurisdiction over this action pursuant to California Health & Safety  
8 Code Section 25249.7. California Constitution Article VI, Section 10 grants the Superior Court  
9 "original jurisdiction in all causes except those given by statute to other trial courts." Chapter  
10 6.6 of the Health & Safety Code, which contains the statutes under which this action is brought,  
11 does not grant jurisdiction to any other trial court.

12 10. This Court also has jurisdiction over Defendant because it is a business that has  
13 sufficient minimum contacts in California and within the City and County of San Francisco.  
14 Defendant intentionally availed itself of the California and San Francisco County markets for  
15 Leaded Wire or Cable Products. It is thus consistent with traditional notions of fair play and  
16 substantial justice for the San Francisco Superior Court to exercise jurisdiction over Defendant.

17 11. Venue is proper in this Court because Defendant markets its products in and  
18 around San Francisco and thus causes people to be exposed to lead and lead compounds while  
19 those people are physically present in San Francisco. Liability for Plaintiff's causes of action, or  
20 some parts thereof, has accordingly arisen in San Francisco during the times relevant to this  
21 Complaint and Plaintiff seeks civil penalties and forfeitures imposed by statutes.

22 FIRST CAUSE OF ACTION  
23 (Claim for Injunctive Relief)

24 12. Plaintiff realleges and incorporates by reference into this First Cause of Action, as  
25 if specifically set forth herein, paragraphs 1 through 12, inclusive.

26 13. The People of the State of California have declared by referendum under  
27 Proposition 65 (California Health & Safety Code § 25249.5 et seq.) their right "[t]o be informed  
28 about exposures to chemicals that cause cancer, birth defects, and reproductive harm."



1 PRAYER FOR RELIEF

2 Wherefore, plaintiff prays for judgment against DEFENDANT, as follows:

3 1. Pursuant to the First Cause of Action, that Defendant be enjoined, restrained, and  
4 ordered to comply with the provisions of Section 25249.6 of the California Health & Safety  
5 Code;

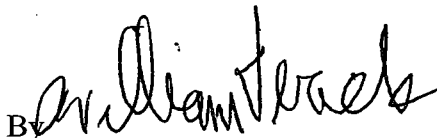
6 2. Pursuant to the Second Cause of Action, that Defendant be assessed a civil  
7 penalty in an amount equal to \$2,500.00 per day per individual exposed, in violation of Section  
8 25249.6 of the California Health & Safety Code, to lead and lead compounds as the result of  
9 Defendants' manufacturing, distributing or marketing of Leaded Wire or Cable Products;

10 3. That Defendant be ordered to identify and locate each individual who purchased  
11 Leaded Wire or Cable Products and provide a warning to each such person that the Leaded Wire  
12 or Cable Products the person purchased will expose that person to chemicals known to cause  
13 birth defects.

14 4. That, pursuant to Civil Procedure Code § 1021.5, Defendant be ordered to pay to  
15 Plaintiff the attorneys' fees and costs Plaintiff incurred in bringing this enforcement action.

16 5. For such other relief as this court deems just and proper.

17 Dated: May 16, 2007

18  
19 

20 William Verick  
21 Attorney for Plaintiff  
22 Mateel Environmental Justice Foundation  
23  
24  
25  
26  
27  
28



# Klamath

October 19, 2006

EDWARD G. WEIL  
DEPUTY ATTORNEY GENERAL  
OFFICE OF THE ATTORNEY GENERAL  
P.O. BOX 70550  
OAKLAND CA 94612-0550

Greetings:

This office and the Mateel Environmental Justice Foundation ("Mateel") hereby give you notice that the companies on the attached service list have been, are and threaten to be in violation of Cal. Health & Safety Code § 25249.6. This office and Mateel are both private enforcers of Proposition 65, both organizations may be reached at the below listed address and telephone number, I may be considered a "responsible individual" at both organizations, and I may be contacted at the same address and telephone number. The above referenced violations occur when California residents come into contact with thermoset/thermoplastic-coated wires, cables, and/or cords/cord sets, including PVC-coated wires, cords/cord sets, plugs and connectors, and both SPT and HPN cords/cord sets (hereinafter collectively "Cords"). The listed companies market products with, or that are themselves, Cords. Some examples of the products that incorporate Cords are those listed in the attached Product List. Though a specific model or SKU or product number is given as an example, this notice pertains to all variations of the specific type of product of which the named model is an example. Handling of, and contact with, these Cords exposes people to acrylonitrile, antimony trioxide, arsenic, 1,3 butadiene, carbon tetrachloride, carbon black extracts, chlorinated paraffins, chloroform, ethyl acrylate, ethylene thiourea, nickel, toluene, cadmium, hexavalent chromium, vinyl chloride, lead and lead compounds, lead acetate, lead phosphate, lead subacetate, and di(2ethylhexyl) phthalate. Handling Cords causes these chemicals to come off the coating of the Cords and to be transferred to the skin of the person handling the Cords. These chemicals are then ingested through hand-to-mouth contact and hand-to-food-to-mouth and hand-to-cigarette-to-mouth behavior. These chemicals are also absorbed through the skin, through mucous membranes and enter the body through cuts, punctures and abrasions. Smokers also inhale those chemicals transferred from hands to cigarettes when they smoke the cigarettes. People are thus exposed to these chemicals via the ingestion, inhalation, dermal absorption, mucous membrane absorption and subcutaneous routes. These companies did not and do not provide people with clear and reasonable warnings before they expose them to lead. The above referenced violations have occurred every day since at least October 19, 2003 and will continue every day until the lead is taken out of these products or until warnings are given. These violations are alleged for occupational exposures as well as for consumer and environmental exposures. We do not, however, allege occupational exposure violations as to any of these products the companies make outside of California, except as to workplaces the companies' themselves maintain in California. Exposures constituting Proposition 65 environmental exposure violations occur both on and off the property of the companies and in each of California's 58 counties.

Cordially,




William Verick

### CERTIFICATE OF MERIT

I, William Verick, hereby declare: This Certificate of Merit accompanies the attached sixty-day notice(s) in which it is alleged the parties identified in the notices have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings. I am the attorney for the noticing party. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the action. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the person(s) consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: October 19, 2006



William Verick

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This notice alleges the violation of Proposition 65 with respect to occupational exposures governed by the California State Plan for Occupational Safety and Health. The State Plan incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed certain conditions on Proposition 65, including that it does not apply to the conduct of manufacturers occurring outside the State of California. The approval also provides that an employer may use the means of compliances in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement is subject to the supervision of the California Occupational Safety and Health Administration. Accordingly, any settlement, civil complaint, or substantive court orders in this matter must be submitted to the Attorney General.

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### CERTIFICATE OF SERVICE

I, Nicole Frank, declare:

If called, I could and would testify as follows: I am over eighteen. My business address is 424 First Street, Eureka, California, 95501. October 19, 2006 I caused the attached 60-DAY NOTICE LETTER, or a letter identical in substance, to be served by U.S. Mail on those public enforcement agencies listed on the attached SERVICE LIST; in addition on the same date and by U.S. Mail I caused the attached 60-DAY NOTICE LETTER and PROPOSITION 65: A SUMMARY to be sent by Certified U.S. Mail to the private business entities also listed on the attached SERVICE LIST. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on October 19, 2006, at Eureka, California.



Nicole Frank



## PRODUCTS LIST

### **SHIN FU COMPANY OF AMERICA, INC.**

MVP RECHARGEABLE SPOTLIGHT 1.5M CANDLEPOWER #WL-316 UPC: 652597 193315 This product description pertains not only to the specific model of the product listed, but also for all units of all models of the same types of products.

### **PENZOIL-QUAKER STATE COMPANY**

AXIUS AUTO EXPRESSIONS CLIP-ON FAN #83106 UPC: 019912 518886 This product description pertains not only to the specific model of the product listed, but also for all units of all models of the same types of products.

### **RICCAR AMERICA/TACONY CORPORATION**

RICCAR MINI VACUUM #"GEM-R" UPC: 098612 500704 This product description pertains not only to the specific model of the product listed, but also for all units of all models of the same types of products.

### **HARLEY DAVIDSON**

HARLEY DAVIDSON SUPERSMART BATTERY TENDER JUNIOR #94654-98 NO UPC This product description pertains not only to the specific model of the product listed, but also for all units of all models of the same types of products.

2/2/01

# SERVICE LIST

EDWARD G. WEIL  
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CITY OF OAKLAND  
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OAKLAND, CA 94612

OFFICE OF THE CITY ATTORNEY  
CITY OF SAN FRANCISCO  
CITY HALL ROOM 206  
400 VAN NESS  
SAN FRANCISCO, CA 94102

OFFICE OF THE CITY ATTORNEY  
CITY OF SACRAMENTO  
980 9<sup>th</sup> Street, 10<sup>th</sup> Floor  
SACRAMENTO, CA 95814

OFFICE OF THE CITY ATTORNEY  
CITY OF SAN JOSE  
151 W. MISSION ST.  
SAN JOSE, CA 95110

OFFICE OF THE CITY ATTORNEY  
CITY OF LOS ANGELES  
200 N. MAIN ST.  
LOS ANGELES, CA 90012

OFFICE OF THE CITY ATTORNEY  
CITY OF SAN DIEGO CONSUMER &  
ENVIRONMENTAL PROTECTION  
1200 THIRD AVENUE, SUITE 700  
SAN DIEGO, CA 92101

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF ALAMEDA  
1225 FALLON STREET ROOM 900  
OAKLAND, CA 94612

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF ALPINE  
P.O. BOX 248  
MARKLEEVILLE, CA 96120

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF AMADOR  
708 COURT STREET  
JACKSON, CA 95642

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF BUTTE  
25 COUNTY CENTER DR.  
OROVILLE, CA 95965

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF CALAVERAS  
GOVERNMENT CENTER  
891 MOUNTAIN RANCH ROAD  
SAN ANDREAS, CA 95249

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF COLUSA  
547 MARKET STREET  
COLUSA, CA 95932

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF CONTRA COSTA  
P.O. BOX 670  
MARTINEZ, CA 94553

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF DEL NORTE  
450 H ST #171  
CRESCENT CITY, CA 95531

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF EL DORADO  
515 MAIN ST.  
PLACERVILLE, CA 95667

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF FRESNO  
2220 TULARE ST #1000  
FRESNO, CA 93721

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF GLENN  
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WILLOWS, CA 95988

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825 5TH ST.  
EUREKA, CA 95501

COUNTY OF IMPERIAL  
COURTHOUSE, FLOOR 2  
939 W. MAIN ST  
EL CENTRO, CA 92243

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF INYO  
P.O. DRAWER D  
INDEPENDENCE, CA 93526

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF KERN  
1215 TRUXTUN AVE. FLOOR 4  
BAKERSFIELD, CA 93301

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF KINGS  
1400 W. LACEY BLVD.  
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ATTORNEY  
COUNTY OF LASSEN  
220 SOUTH LASSEN ST. STE 8  
SUSANVILLE, CA 96130

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210 W. TEMPLE ST.  
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209 W. YOSEMITE AVE.  
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ATTORNEY  
COUNTY OF MARIN  
HALL OF JUSTICE #183  
SAN RAFAEL, CA 94903

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ATTORNEY  
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MARIPOSA, CA 95338

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ATTORNEY  
COUNTY OF MENDOCINO  
PO BOX 1000  
UKIAH, CA 95482

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ATTORNEY  
COUNTY OF MERCED  
2222 M ST.  
MERCED, CA 95340

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ATTORNEY  
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COUNTY OF MONO  
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COUNTY OF PLUMAS  
520 MAIN STREET #404  
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RIVERSIDE, CA 92501

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COUNTY GOVERNMENT CENTER #450  
SAN LUIS OBISPO, CA 93408

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REDWOOD CITY, CA 94063

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OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SANTA CLARA  
70 W. HEDDING ST.  
SAN JOSE, CA 95110

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SANTA CRUZ  
701 OCEAN ST. #200  
SANTA CRUZ, CA 95060

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REDDING, CA 96001

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DOWNIEVILLE, CA 95936

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SISKIYOU  
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YREKA, CA 96097

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FAIRFIELD, CA 94533

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SONOMA  
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OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF STANISLAUS  
1100 I ST. #200  
MODESTO, CA 95354

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COUNTY OF SUTTER  
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YUBA CITY, CA 95993

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF TEHAMA  
P.O. BOX 519  
REDBLUFF, CA 96080

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF TRINITY  
P.O. BOX 310  
WEAVERVILLE, CA 96093

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF TULARE  
COURTHOUSE #224  
VISALIA, CA 93291

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF TUOLUMNE  
2 S. GREEN ST.  
SONORA, CA 95370

VENTURA COUNTY DISTRICT  
ATTORNEY'S OFFICE  
800 SOUTH VICTORIA AVE  
VENTURA, CA 93009

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COUNTY OF YOLO  
301 SECOND STREET  
WOODLAND, CA 95695

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF YUBA  
215 5TH ST.  
MARYSVILLE, CA 95901

HARLEY-DAVIDSON, INC.  
JAMES L ZIEMER, PRESIDENT  
3700 WEST JUNEAU AVENUE  
MILWAUKEE, WI 53208

PENNZOIL-QUAKER STATE COMPANY  
DOUGLAS S BOYLE, CEO  
910 LOUISIANA ST  
HOUSTON, TX 77002

RICCAR AMERICA  
CRAIG NEAL, PRESIDENT  
1800 E WALNUT AVE  
FULLERTON, CA 92831-4844

SHINN FU COMPANY OF AMERICA,  
INC.  
STEVEN HUANG, PRESIDENT  
10939 N. POMONA AVE.  
KANSAS CITY, MO 64153

TACONY CORPORATION  
KENNETH J. TACONY, CEO  
1760 GILSINN LN  
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