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MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

ENDORSED  
FILED  
San Francisco County Superior Court

OCT - 6 2006

GORDON PARK-LI, Clerk

BY: PARAM NATT  
Deputy Clerk

CASE MANAGEMENT CONFERENCE SET

MAR - 9 2007 - 9<sup>00</sup> AM

DEPARTMENT 212

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF SAN FRANCISCO  
12 (Unlimited Jurisdiction)

13 MATEEL ENVIRONMENTAL  
14 JUSTICE FOUNDATION,

CASE NO. CGC - 06 - 456750

15 Plaintiff,

COMPLAINT FOR INJUNCTIVE RELIEF  
AND CIVIL PENALTIES

16 v.

17 COST PLUS, INC.; SEARS ROEBUCK  
18 AND COMPANY; and DOES 1 through 100  
inclusive,

TOXIC TORT/ENVIRONMENTAL

19 Defendants.  
20 \_\_\_\_\_ /

21 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:

22 INTRODUCTION

23 1. This Complaint seeks civil penalties and an injunction to remedy the continuing  
24 failure of defendants COST PLUS, INC.; SEARS ROEBUCK AND COMPANY; and DOES 1  
25 through 100 inclusive (hereinafter "Defendants"), to give clear and reasonable warnings to those  
26 residents of California, who handle and cook with leaded aluminum cookware, that handling this  
27 cookware, and eating food that has been cooked in it, causes those residents to be exposed to lead  
28 and lead compounds, lead acetate, lead phosphate, and lead subacetate (hereinafter, collectively,

1 “lead”). The types of products to which this Complaint pertains are those types listed in the  
2 Product List appended to the Proposition 65 60-Day Notice Letter that is attached to and  
3 incorporated by reference into this Complaint. Lead is known to the State of California to cause  
4 cancer, birth defects and male and female reproductive toxicity. Defendants market leaded  
5 aluminum cookware. These products cause exposures to lead and lead compounds, which are  
6 chemicals known to the State of California to cause cancer, birth defects and other reproductive  
7 harm.

8 2. Defendants are businesses that market and/or distribute leaded aluminum  
9 cookware. Defendants intend that residents of California handle and eat food that has been  
10 cooked in leaded aluminum cookware that Defendants market and/or distribute. When these  
11 products are handled and used in their normally intended manner, they expose people to lead. In  
12 spite of knowing that residents of California were and are being exposed to these chemicals when  
13 they handle and use leaded aluminum cookware, Defendants did not and do not provide clear and  
14 reasonable warnings that these products cause exposure to chemicals known to cause cancer,  
15 birth defects and other reproductive harm.

16 3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7  
17 to compel Defendants to bring their business practices into compliance with section 25249.5 et  
18 seq. by providing a clear and reasonable warning to each individual who has been and who in the  
19 future may be exposed to the above mentioned toxic chemicals from the use of Defendants’  
20 products. Plaintiff seeks an order that defendants identify and locate each individual person who  
21 in the past has purchased leaded aluminum cookware and to provide to each such purchaser a  
22 clear and reasonable warning that the leaded aluminum cookware will cause exposures to  
23 chemicals known to cause birth defects.

24 4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the failure  
25 of Defendants to provide clear and reasonable warnings regarding exposure to chemicals known  
26 to cause cancer, birth defects and other reproductive harm.

27 PARTIES

28 5. Plaintiff MATEEL ENVIRONMENTAL JUSTICE FOUNDATION (“Mateel”)

1 is a non-profit organization dedicated to, among other causes, the protection of the environment,  
2 promotion of human health, environmental education, and consumer rights. Mateel is based in  
3 Eureka, California, and is incorporated under the laws of the State of California. Mateel is a  
4 "person" pursuant to Health & Safety Code Section 25118. Mateel brings this enforcement  
5 action in the public interest pursuant to Health & Safety Code §25249.7(d). Residents of  
6 California are regularly exposed to lead and lead compounds from leaded aluminum cookware  
7 marketed by Defendants and are so exposed without a clear and reasonable Proposition 65  
8 warning.

9         6. Defendants are each a person doing business within the meaning of Health &  
10 Safety Code Section 25249.11. Defendants are businesses that manufacture, distribute, and/or  
11 market leaded aluminum cookware in California, including the City and County of San  
12 Francisco. Manufacture, distribution and/or marketing of these products in the City and County  
13 of San Francisco and/or to people who live in San Francisco, causes people to be exposed to lead  
14 and lead compounds while they are physically present in the City and County of San Francisco.

15         7. Mateel is unaware of the true names or capacities of the Defendants sued herein  
16 under the fictitious names DOES 1 through 100, inclusive. Defendants DOES 1 through 100  
17 inclusive are therefore sued herein pursuant to Cal. Code Civ. Proc. §474. When Mateel learns  
18 their identities, it will amend the complaint.

19         8. Plaintiff brings this enforcement action against Defendants 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 June 27, 2006, which Mateel sent to California's Attorney General.  
22 Substantially identical letters were sent to every District Attorney in the state, and to the City  
23 Attorneys of every California city with a population greater than 750,000. On that same day,  
24 Mateel sent identical 60-Day Notice letters to each 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 of  
28 the 60-Day Notice Letter on each entity which received it. Pursuant to California Health & Safety

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

5 9. Defendants are all businesses that employ more than ten people.

6 JURISDICTION

7 10. 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 6.6  
10 of the Health & Safety Code, which contains the statutes under which this action is brought, does  
11 not grant jurisdiction to any other trial court.

12 11. This Court also has jurisdiction over Defendants because they are businesses that  
13 have sufficient minimum contacts in California and within the City and County of San Francisco.  
14 Defendants intentionally availed themselves of the California and San Francisco County markets  
15 for leaded aluminum cookware. It is thus consistent with traditional notions of fair play and  
16 substantial justice for the San Francisco Superior Court to exercise jurisdiction over them.

17 12. Venue is proper in this Court because Defendants market their products in and  
18 around San Francisco and thus cause 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 13. 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 14. 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           15. To effectuate this goal, Section 25249.6 of the Health and Safety Code mandates  
2 that persons who, in the course of doing business, knowingly and intentionally expose any  
3 individual to a chemical known to the State of California to cause cancer or birth defects must  
4 first provide a clear and reasonable warning to such individual prior to the exposure.

5           16. Since at least July 27, 2003, Defendants have engaged in conduct that violates  
6 Health and Safety Code Section 25249.6 *et seq.* This conduct includes knowingly and  
7 intentionally exposing to the above mentioned toxic chemicals, those California residents who  
8 handle and eat food cooked in leaded aluminum cookware. The normally intended use of leaded  
9 aluminum cookware causes exposure to lead and lead compounds, which are chemicals known to  
10 the State of California to cause cancer, birth defects and other reproductive harm. Defendants  
11 have not provided clear and reasonable warnings, within the meaning of Health & Safety Code  
12 Sections 25249.6 and 25249.11.

13           17. At all times relevant to this action, Defendants knew that the leaded aluminum  
14 cookware they marketed was causing exposures to lead and lead compounds. Defendants  
15 intended that residents of California handle and use leaded aluminum cookware in such ways as  
16 would lead to significant exposures to these chemicals.

17           18. By the above described acts, Defendants have violated Cal. Health & Safety Code  
18 § 25249.6 and are therefore subject to an injunction ordering them to stop violating Proposition  
19 65 and requiring them to provide warnings to their past customers who purchased defendants'  
20 products without receiving a clear and reasonable warning.

21   SECOND CAUSE OF ACTION  
22   (Claim for Civil Penalties)

23           19. Plaintiff realleges and incorporates by reference into this Second Cause of Action,  
24 as if specifically set forth herein, paragraphs 1 through 18, inclusive.

25           20. By the above described acts, Defendants are liable and should be liable pursuant  
26 to Health & Safety Code § 25249.7(b), for a civil penalty of \$2,500.00 per day for each  
27 individual exposed without proper warning to lead and lead compounds from the handling or use  
28 of Defendants' leaded aluminum cookware.

1 PRAYER FOR RELIEF

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

3 1. Pursuant to the First Cause of Action, that all Defendants be enjoined, restrained,  
4 and 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 Defendants 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' marketing of leaded aluminum cookware;

10 3. That Defendants be ordered to identify and locate each individual who purchased  
11 leaded aluminum cookware and provide a warning to each such person that the leaded aluminum  
12 cookware the person purchased will expose that person to chemicals known to cause birth  
13 defects.

14 4. For such other relief as this court deems just and proper.

15 Dated: October 4, 2006

16 KLAMATH ENVIRONMENTAL LAW  
17 CENTER

18 By 

19 William Verick  
20 Attorney for Plaintiff  
21 Mateel Environmental Justice Foundation  
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27  
28



# Klamath

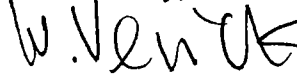
July 27, 2006

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 private businesses listed in 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 these businesses market aluminum cookware, such as pots and pans, the food contact surfaces of which contain lead. (hereinafter "leaded aluminum pots and pans"). Some examples of the products to which this notice pertains 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, contact with, eating from, and eating food stored or cooked in leaded aluminum pots and pans exposes people to lead and lead compounds (hereinafter, collectively, "lead"). Lead leaches from the leaded aluminum pots and pans into the food stored or cooked in, or served from, the leaded aluminum pots and pans. The food is then consumed and the accompanying lead ingested. These exposures (and resulting violations) occur occupationally, environmentally, and as the result of the sale of consumer products and/or services. In occupational settings, the type of work that is done during which the above-referenced exposures occur is handling the leaded aluminum pots and pans, and eating food cooked in it, such as at catered office parties. These exposures occur via the dermal absorption, inhalation, ingestion, and subcutaneous routes. These violations have occurred every day since at least July 27, 2003, and will continue every day until reasonable warnings are given to those people exposed or until these businesses stop selling leaded aluminum pots and pans. 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 listed businesses make outside of California, except as to workplaces the business itself maintains in California. Environmental exposure violations occur in every county of the State and occur both on and off the property of the aforementioned private businesses.

Cordially,



William Verick

## **PRODUCT LIST**

### **COST PLUS, INC.**

IMUSA 24 CM CALDERO CAST ALUMINUM COOKWARE, ITEM # 370854

This product description pertains not only to the specific model of the products listed, but also for all units of all models of leaded aluminum cookware.

### **SEARS ROEBUCK AND COMPANY**

IMUSA 14 QT. CAST ALUMINUM ROASTER, ITEM #00807698000

This product description pertains not only to the specific model of the products listed, but also for all units of all models of leaded aluminum cookware.



## SERVICE LIST

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