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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,

17 Plaintiff,

18 v.

19 HICKORY HARDWARE, INC.

20 Defendant.

CASE NO. **CGC-07-463543**

COMPLAINT FOR INJUNCTIVE RELIEF
AND CIVIL PENALTIES

21 / TOXIC TORT/ENVIRONMENTAL

22 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:

23 INTRODUCTION

24 1. This Complaint seeks civil penalties and an injunction to remedy the continuing
25 failure of defendant HICKORY HARDWARE, INC., to give clear and reasonable warnings to
26 those residents of California, who handle and use brass padlock products (Leaded Brass
27 Padlocks). The bodies of these Leaded Brass Padlocks are made from leaded brass, which
28 contains lead and lead compounds ("lead"), which are chemicals known to cause cancer, birth

ENDORSED
FILED
San Francisco County Superior Court

MAY 18 2007

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

CASE MANAGEMENT CONFERENCE SET

OCT 19 2007 - 9⁰⁰ AM

DEPARTMENT 212

1 defects and other reproductive harm. California residents are exposed to lead when they handle
2 these Leaded Brass Padlocks.

3 2. Defendant is a business that manufactures, markets, and/or distributes Leaded
4 Brass Padlocks. Defendant intends that residents of California handle and use Leaded Brass
5 Padlocks that Defendant manufactures, markets, and/or distributes. When these products are
6 handled and used in their normally intended manner, they expose people to lead. In spite of
7 knowing that residents of California were and are being exposed to these chemicals when they
8 handle and use Leaded Brass Padlocks, Defendant did not and does not provide clear and
9 reasonable warnings that these products cause exposure to chemicals known to cause cancer,
10 birth defects and other reproductive harm.

11 3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7
12 to compel Defendant to bring its business practices into compliance with section 25249.5 et seq.
13 by providing a clear and reasonable warning to each individual who has been and who in the
14 future may be exposed to the above mentioned toxic chemicals from the use of Defendant's
15 products. Plaintiff seeks an order that Defendant identify and locate each individual person who
16 in the past has purchased Leaded Brass Padlocks and to provide to each such purchaser a clear
17 and reasonable warning that the Leaded Brass Padlocks will cause exposures to chemicals
18 known to cause birth defects.

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

22 PARTIES

23 5. Plaintiff MATEEL ENVIRONMENTAL JUSTICE FOUNDATION ("Mateel")
24 is a non-profit organization dedicated to, among other causes, the protection of the environment,
25 promotion of human health, environmental education, and consumer rights. Mateel is based in
26 Eureka, California, and is incorporated under the laws of the State of California. Mateel is a
27 "person" pursuant to Health & Safety Code Section 25118. Mateel brings this enforcement
28 action in the public interest pursuant to Health & Safety Code §25249.7(d). Residents of

1 California are regularly exposed to lead and lead compounds from Leaded Brass Padlock
2 Products manufactured, distributed or marketed by Defendants and are so exposed without a
3 clear and reasonable Proposition 65 warning.

4 6. Defendant is a person doing business within the meaning of Health & Safety
5 Code Section 25249.11. Defendant is a business that manufactures, distributes, and/or markets
6 Leaded Brass Padlocks in California, including the City and County of San Francisco.
7 Manufacture, distribution and/or marketing of these products in the City and County of San
8 Francisco and/or to people who live in San Francisco, causes people to be exposed to lead and
9 lead compounds while they are physically present in the City and County of San Francisco.

10 7. Plaintiff brings this enforcement action against Defendants pursuant to Health &
11 Safety Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of a
12 60-day Notice letter, dated June 29, 2006 which Mateel sent to California's Attorney General.
13 Substantially identical letters were sent to every District Attorney in the state, and to the City
14 Attorneys of every California city with a population greater than 750,000. On the same date,
15 Mateel sent to each Defendant a letter substantively identical to the Notice letter it sent on that
16 date to the Attorney General. Attached to the 60-Day Notice Letters sent to each defendant was
17 a summary of Proposition 65 that was prepared by California's Office of Environmental Health
18 Hazard Assessment. In addition, each 60-Day Notice Letter plaintiff sent was accompanied by a
19 Certificate of Service attesting to the service of the 60-Day Notice Letter on each entity which
20 received it. Pursuant to California Health & Safety Code Section 25249.7(d), a Certificate of
21 Merit attesting to the reasonable and meritorious basis for the action was also sent with each 60-
22 Day Notice Letter. Factual information sufficient to establish the basis of the Certificate of Merit
23 was enclosed with the 60-Day Notice letters Mateel sent to the Attorney General on the two
24 dates.

25 8. Defendants are all businesses that employ more than ten people.

26 JURISDICTION

27 9. The Court has jurisdiction over this action pursuant to California Health & Safety
28 Code Section 25249.7. California Constitution Article VI, Section 10 grants the Superior Court

1 "original jurisdiction in all causes except those given by statute to other trial courts." Chapter
2 6.6 of the Health & Safety Code, which contains the statutes under which this action is brought,
3 does not grant jurisdiction to any other trial court.

4 10. This Court also has jurisdiction over Defendant because it is a business that has
5 sufficient minimum contacts in California and within the City and County of San Francisco.
6 Defendant intentionally availed itself of the California and San Francisco County markets for
7 Leaded Brass Padlocks Products. It is thus consistent with traditional notions of fair play and
8 substantial justice for the San Francisco Superior Court to exercise jurisdiction over Defendant..

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

14 FIRST CAUSE OF ACTION
15 (Claim for Injunctive Relief)

16 12. Plaintiff realleges and incorporates by reference into this First Cause of Action, as
17 if specifically set forth herein, paragraphs 1 through 11, inclusive.

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

21 14. To effectuate this goal, Section 25249.6 of the Health and Safety Code mandates
22 that persons who, in the course of doing business, knowingly and intentionally expose any
23 individual to a chemical known to the State of California to cause cancer or birth defects must
24 first provide a clear and reasonable warning to such individual prior to the exposure.

25 15. Since at least three (3) years prior to the filing of this complaint Defendant has
26 engaged in conduct that violates Health and Safety Code Section 25249.6 et seq. This conduct
27 includes knowingly and intentionally exposing to the above mentioned toxic chemicals, those
28 California residents who handle and use Leaded Brass Padlocks. The normally intended use of

1 Leaded Brass Padlocks causes exposure to lead and lead compounds, which are chemicals
2 known to the State of California to cause cancer, birth defects and other reproductive harm.
3 Defendant has not provided clear and reasonable warnings, within the meaning of Health &
4 Safety Code Sections 25249.6 and 25249.11.

5 16. At all times relevant to this action, Defendant knew that the Leaded Brass
6 Padlocks they manufactured, distributed or marketed were causing exposures to lead and lead
7 compounds. Defendant intended that residents of California handle and use Leaded Brass
8 Padlocks in such ways as would lead to significant exposures to these chemicals.

9 17. By the above described acts, Defendant has violated Cal. Health & Safety Code
10 § 25249.6 and is therefore subject to an injunction ordering it to stop violating Proposition 65, to
11 provide warnings to all present and future customers, and to provide warnings to their past
12 customers who purchased defendant's products without receiving a clear and reasonable
13 warning.

14 SECOND CAUSE OF ACTION
15 (Claim for Civil Penalties)

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

18 19. By the above described acts, Defendant is liable and should be liable pursuant to
19 Health & Safety Code § 25249.7(b), for a civil penalty of \$2,500.00 per day for each individual
20 exposed without proper warning to lead and lead compounds from the handling or use of
21 Defendant's Leaded Brass Padlocks.

22 PRAYER FOR RELIEF

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

24 1. Pursuant to the First Cause of Action, that all Defendants be enjoined, restrained,
25 and ordered to comply with the provisions of Section 25249.6 of the California Health & Safety
26 Code;

27 2. Pursuant to the Second Cause of Action, that Defendants be assessed a civil
28 penalty in an amount equal to \$2,500.00 per day per individual exposed, in violation of Section

1 25249.6 of the California Health & Safety Code, to lead and lead compounds as the result of
2 Defendant's manufacturing, distributing or marketing of Leaded Brass Padlocks;


3 3. That Defendant be ordered to identify and locate each individual who purchased
4 Leaded Brass Padlock Products and provide a warning to each such person that the Leaded Brass
5 Padlocks the person purchased will expose that person to chemicals known to cause birth
6 defects.

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


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

10 Dated: May 16, 2007

KLAMATH ENVIRONMENTAL LAW CENTER

11
12
13 By 

14 William Verick
15 Attorney for Plaintiff
16 Mateel Environmental Justice Foundation
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Klamath

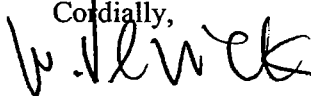
June 29, 2006

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") give you notice that the private businesses on the attached service list have been, are, will be and threaten to be in violation of Cal. Health & Safety Code § 25249.6. Both this office and Mateel are private enforcers of Proposition 65, both may be contacted at the below listed address and telephone number, and I am a responsible individual at both Mateel and this office. The above referenced violations occur when California residents come into contact with brass padlocks. A list of specific examples of the specific types of products at issue is attached. The bodies of these brass locks are made from leaded brass, which contains lead and lead compounds ("lead"), which are chemicals known to cause cancer, birth defects and other reproductive harm. California residents are exposed to lead when they handle these locks while using them to secure their property, or when they are unlocking them to gain access to their property. Lead is transferred from the brass locks to their hands and to other parts of their skin. This lead is then absorbed through the skin, taken into cuts and abrasions, absorbed through mucous membranes, and transferred from the skin to the mouth via oral contact either directly with the brass, from oral contact with the lead-contaminated skin, and when lead is transferred from contaminated skin to cigarettes and food and the contaminated cigarettes and food are smoked and/or eaten. These lead exposures thus occur via the dermal absorption, subcutaneous, mucus membrane, ingestion and inhalation routes. The listed businesses did not and do not provide people with clear and reasonable warnings before they expose them to lead. These violations have occurred every day since at least June 29, 2003, and will continue every day until the lead is removed from the brass locks, or until clear and reasonable warnings are given. The above-referenced 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 brass locks made outside of California, except as to workplaces these companies themselves maintain in California. Exposures constituting Proposition 65 environmental exposure violations occur both on and off these private businesses and in each of California's 58 counties.

Cordially,

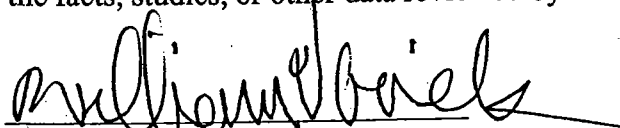


William Verick

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: June 29, 2006

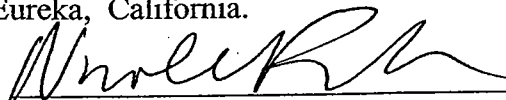

William Verick

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.

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. On June 29, 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 June 29, 2006, at Eureka, California.


Nicole Frank

PRODUCT LIST

AMERICAN LOCK COMPANY/MASTER LOCK COMPANY

AMERICAN LOCK SOLID BRASS PADLOCK #42CC UPC: 037325 090119: This product description pertains not only to the specific model of the product listed, but also for all units of all models of similar types of products.

EZ-FLO INTERNATIONAL, INC.

EZ-FLO 1-1/2" BRASS PADLOCK PART NO. 57158 UPC: 091712 571582: This product description pertains not only to the specific model of the product listed, but also for all units of all models of similar types of products.

HAMPTON PRODUCTS INTERNATIONAL CORPORATION/MOUNTAIN SECURITY

MOUNTAIN SECURITY 2" SOLID BRASS PADLOCK #201-50001 UPC: 039208 955409: This product description pertains not only to the specific model of the product listed, but also for all units of all models of similar types of products.

HICKORY HARDWARE, INC.

FIRST WATCH 2" PADLOCK #4140: This product description pertains not only to the specific model of the product listed, but also for all units of all models of similar types of products.

ORCHARD SUPPLY HARDWARE CORPORATION

BRASS PADLOCK Item#73301 SKU#6690580 MODEL#25B3040 UPC:732799 823200: This product description pertains not only to the specific model of the product listed, but also for all units of all models of similar types of products.

RITE-HITE CORPORATION

RITE-HITE SECURITY TOP SECURITY SOLID BRASS PADLOCK MODEL NO: FJL01-250L UPC: 758309 433745: This product description pertains not only to the specific model of the product listed, but also for all units of all models of similar types of products.

SEARS ROEBUCK AND CO.

CRAFTSMAN HIGH SECURITY 2 IN. BRASS COMPINATION LOCK #958707 NO UPC and CRAFTSMAN 2-3/8 IN. BRASS PADLOCK #958706 UPC: 078217 587065: This product description pertains not only to the specific models of the products listed, but also for all units of all models of similar types of products.

SERVICE LIST

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DEPUTY ATTORNEY GENERAL
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CITY OF SAN FRANCISCO
CITY HALL ROOM 206
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SAN FRANCISCO, CA 94102

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CITY OF SACRAMENTO
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CITY OF SAN JOSE
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SAN JOSE, CA 95110

OFFICE OF THE CITY ATTORNEY
CITY OF LOS ANGELES
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LOS ANGELES, CA 90012

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CITY OF SAN DIEGO
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SAN DIEGO, CA 92101

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

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ATTORNEY
COUNTY OF AMADOR
108 COURT ST. SUITE 202
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

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ATTORNEY
COUNTY OF COLUSA
547 MARKET ST.
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

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COUNTY OF GLENN
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EL CENTRO, CA 92243

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INDEPENDENCE, CA 93526

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HANFORD, CA 93230

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255 N. FORBES ST # 424
LAKEPORT, CA 95453

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ATTORNEY
COUNTY OF LASSEN
COUNTY ADMINISTRATION
BUILDING
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SUSANVILLE, CA 96130

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ATTORNEY
COUNTY OF LOS ANGELES
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HALL OF JUSTICE #183
SAN RAFAEL, CA 94903

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MARIPOSA, CA 95338

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UKIAH, CA 95482

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SAN BERNARDINO, CA 92415-0004

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SANTA BARBARA, CA 93101-2008

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701 OCEAN ST. #200
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1525 COURT ST.
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YREKA, CA 96097

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600 UNION AVE
FAIRFIELD, CA 94533

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600 ADMINISTRATION DR. #212J
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COUNTY OF STANISLAUS
1100 I ST. #200
MODESTO, CA 95354

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COUNTY OF TRINITY
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WEAVERVILLE, CA 96093

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COUNTY OF TULARE
COURTHOUSE #224
VISALIA, CA 93291

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COUNTY OF TUOLUMNE
2 S. GREEN ST.
SONORA, CA 95370

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ATTORNEY'S OFFICE
c/o GREGORY BROSE D.D.A.
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VENTURA, CA 93003

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204 4TH ST
P.O. BOX 1247
WOODLAND, CA 95695

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215 5TH ST.
MARYSVILLE, CA 95901

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137 W. FOREST HILL AVE.
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ONTARIO, CA 91761

HAYWARD K KELLEY III, PRESIDENT
HAMPTON PRODUCTS
INTERNATIONAL CORPORATION
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FOOTHILL RANCH, CA 92610

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PORTLAND, TN 37148

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HOFFMAN ESTATES, IL 60179

MICHAEL WHITE, CEO
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