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**FILED**

AUG 22 2018

JAMES M. KIM, Court Executive Officer  
MARIN COUNTY SUPERIOR COURT  
By: E. Chais, Deputy

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA

8 FOR THE COUNTY OF MARIN

9 UNLIMITED CIVIL JURISDICTION

10  
11 SUSAN DAVIA,

12 Plaintiff,

13 v.

14 WILLIAMS SONOMA, INC. AND DOES 1-  
15 150,

16 Defendants.

Case No. CIV 1802994

**COMPLAINT FOR CIVIL PENALTIES AND  
INJUNCTIVE RELIEF**

*(Cal. Health & Safety Code § 25249.6 et seq.)*

1 DEFENDANTS without a "clear and reasonable warning", have suffered, and continue to suffer,  
2 irreparable harm, for which harm they have no other plain, speedy or adequate remedy at law.

3 36. As a consequence of the above-described acts, DEFENDANTS are liable for a  
4 maximum civil penalty of \$2,500 per day for each violation of Proposition 65 pursuant to California  
5 Health & Safety Code Section 25249.7(b).

6 37. As a consequence of the above-described acts, California Health & Safety Code  
7 Section 25249.7(a) also specifically authorizes the Court to grant injunctive relief against  
8 DEFENDANTS.

9 **PRAYER FOR RELIEF**

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

11 1. That the Court, pursuant to California Health & Safety Code Section 25249.7(b), assess  
12 civil penalties against DEFENDANTS in the amount of \$2,500 per day for each alleged violation;

13 2. That the Court, pursuant to California Health & Safety Code Section 25249.7(a),  
14 preliminarily and permanently enjoin DEFENDANTS from manufacturing, distributing, or offering  
15 the PRODUCTS for sale or use in California, without providing "clear and reasonable warnings" as  
16 defined by 27 CCR Section 25601, as to the harms associated with exposures to the LISTED  
17 CHEMICAL;


18 3. That the Court grant plaintiff his reasonable attorneys' fees and costs of suit; and

19 4. That the Court grant such other and further relief as may be just and proper.

20 Dated: August 22, 2018

Respectfully submitted,

21 SHEFFER LAW FIRM

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23 By:   
24 Gregory M. Sheffer  
25 Attorneys for Plaintiff  
26 SUSAN DAVIA  
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