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8 Counsel for Plaintiff  
9 ECOLOGICAL RIGHTS FOUNDATION

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

12 ECOLOGICAL RIGHTS FOUNDATION,

13 Plaintiff,

14 v.

15 3D PRINT OF NORTH AMERICA, INC.,  
AFINIA 3D, AMAZON.COM INC., BASF  
CORPORATION, DYNAMISM INC.,  
16 EASTMAN KODAK COMPANY, FRY'S  
ELECTRONICS, INC., KINPO GROUP, M3D  
17 LLC, MAKERBOT INDUSTRIES, LLC,  
MAKERGEAR, LLC, MEDIA SUPPLY, INC.,  
18 MICROBOARDS TECHNOLOGY LLC,  
MONOPRICE INC., OFFICE DEPOT, INC.,  
19 PROFOUND 3D, PRUSA RESEARCH S.R.O.,  
ROBO 3D INC., SHAXON INDUSTRIES, INC.,  
20 SHENZHEN ESUN INDUSTRIAL CO.,LTD,  
ULTIMAKER USA INC., ZORTRAX S.A.

21 Defendants.

Case No.

CGC-19-580009

COMPLAINT FOR INJUNCTIVE  
RELIEF AND CIVIL PENALTIES

Health & Safety Code § 25249.5 et seq.

(Other)

BY FAX  
ONE LEGAL LLC

22  
23 Plaintiff, Ecological Rights Foundation, in the public interest, based on information  
24 and belief, and knowledge and investigation of counsel allege as follows:

25 INTRODUCTION

26 1. This Complaint seeks civil penalties and an injunction against 3D PRINT OF NORTH  
27 AMERICA, INC., AFINIA 3D, AMAZON.COM INC., BASF CORPORATION, DYNAMISM  
28

ENDORSED  
FILED  
Superior Court of California  
County of San Francisco

OCT 15 2019

CLERK OF THE COURT  
BY: BOWMAN LIU  
Deputy Clerk

1 INC., EASTMAN KODAK COMPANY, FRY'S ELECTRONICS, INC., KINPO GROUP, M3D  
2 LLC, MAKERBOT INDUSTRIES, LLC, MAKERGEAR, LLC, MEDIA SUPPLY, INC.,  
3 MICROBOARDS TECHNOLOGY LLC, MONOPRICE INC., OFFICE DEPOT, INC.,  
4 PROFOUND 3D, PRUSA RESEARCH S.R.O., ROBO 3D INC., SHAXON INDUSTRIES, INC.,  
5 SHENZHEN ESUN INDUSTRIAL CO.,LTD, ULTIMAKER USA INC., and ZORTRAX S.A.  
6 (collectively “Defendants”) to remedy continuing failure to warn individuals in California about  
7 exposures to styrene, a chemical known to the State of California to cause cancer. Such exposures  
8 have occurred and continue to occur, through the use of filaments incorporating a styrene monomer  
9 including acrylonitrile-butadiene-styrene (ABS) filaments, polycarbonate ABS (PC-ABS) filaments,  
10 and high impact polystyrene (HIPS) filaments that Defendants manufacture, distribute, market  
11 and/or sell in the State (“Products”). These Products are intended to be used in the operation of 3D  
12 printers and 3D pens.

13 2. When people use filaments incorporating a styrene monomer with 3D printers or 3D pens,  
14 the filaments are heated by the 3D printers or 3D pens and thus release styrene into the air. People  
15 using the filaments incorporating a styrene monomer with 3D printers or 3D pens, and others  
16 standing in the same room, inhale styrene in the normal course of use.

17 3. Under California’s Proposition 65, California Health & Safety Code § 25249.5, *et seq.*, it is  
18 unlawful for businesses to knowingly and intentionally expose individuals in California to chemicals  
19 known to the State to cause cancer, birth defects, or other reproductive harm without providing clear  
20 and reasonable warnings to individuals prior to their exposure. Defendants introduce filaments  
21 incorporating a styrene monomer into the California marketplace, exposing users of the Products to  
22 styrene. Despite the fact that Defendants expose consumers and individuals to styrene, Defendants  
23 provide no warnings about the carcinogenic risks associated with such exposures. Defendants’  
24 conduct thus violates the warning provision of Proposition 65. Health & Safety Code § 25249.6.

25 4. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7 to compel  
26 Defendants to bring their business practices into compliance with Proposition 65 by providing a clear  
27 and reasonable warning to each individual who has been and who in the future may be exposed to  
28 styrene in the ways set forth above. Plaintiff seeks an order that Defendants identify and locate each

1 individual person to whom the Defendants conveyed Products during the past three years and to  
2 provide to each such individual, as well as new purchasers and Product users, a clear and reasonable  
3 warning that use of the Products causes exposures to a chemical known to cause cancer.

4 5. In addition to injunctive relief, Plaintiff seeks civil penalties to remedy Defendants' failure  
5 to provide clear and reasonable warnings regarding exposure to a chemical known to cause cancer.

#### 6 **PARTIES**

7 6. Plaintiff, Ecological Rights Foundation ("EcoRights") is a non-profit public benefit  
8 organization dedicated to, among other causes, protecting California residents from toxic exposures,  
9 environmental and human health education, and consumer rights. Ecological Rights Foundation is  
10 incorporated under the laws of the State of California and is a "person" pursuant to Health & Safety  
11 Code §25249.11(a). EcoRights brings this enforcement action in the public interest pursuant to  
12 Health & Safety Code §25249.7(d).

13 7. 3D PRINT OF NORTH AMERICA, INC. is a person in the course of doing business within  
14 the meaning of Health & Safety Code §25249.11(b). 3D PRINT OF NORTH AMERICA, INC.  
15 manufactures, markets, distributes, and/or sells the Products for sale and use in the State of  
16 California.

17 8. AFINIA 3D is a person in the course of doing business within the meaning of Health & Safety  
18 Code §25249.11(b). AFINIA 3D manufactures, markets, distributes, and/or sells the Products for  
19 sale and use in the State of California.

20 9. AMAZON.COM INC. is a person in the course of doing business within the meaning of  
21 Health & Safety Code §25249.11(b). AMAZON.COM INC. manufactures, markets, distributes,  
22 and/or sells the Products for sale and use in the State of California.

23 10. BASF CORPORATION is a person in the course of doing business within the meaning of  
24 Health & Safety Code §25249.11(b). BASF CORPORATION manufactures, markets, distributes,  
25 and/or sells the Products for sale and use in the State of California.

26 11. DYNAMISM INC. is a person in the course of doing business within the meaning of Health  
27 & Safety Code §25249.11(b). DYNAMISM INC. manufactures, markets, distributes, and/or sells  
28 the Products for sale and use in the State of California.

1 12. EASTMAN KODAK COMPANY is a person in the course of doing business within the  
2 meaning of Health & Safety Code §25249.11(b). EASTMAN KODAK COMPANY manufactures,  
3 markets, distributes, and/or sells the Products for sale and use in the State of California.

4 13. FRY'S ELECTRONICS, INC. is a person in the course of doing business within the meaning  
5 of Health & Safety Code §25249.11(b). FRY'S ELECTRONICS, INC. manufactures, markets,  
6 distributes, and/or sells the Products for sale and use in the State of California.

7 14. KINPO GROUP is a person in the course of doing business within the meaning of Health &  
8 Safety Code §25249.11(b). KINPO GROUP manufactures, markets, distributes, and/or sells the  
9 Products for sale and use in the State of California.

10 15. M3D LLC is a person in the course of doing business within the meaning of Health & Safety  
11 Code §25249.11(b). M3D LLC manufactures, markets, distributes, and/or sells the Products for sale  
12 and use in the State of California.

13 16. MAKERBOT INDUSTRIES, LLC is a person in the course of doing business within the  
14 meaning of Health & Safety Code §25249.11(b). MAKERBOT INDUSTRIES, LLC manufactures,  
15 markets, distributes, and/or sells the Products for sale and use in the State of California.

16 17. MAKERGEAR, LLC is a person in the course of doing business within the meaning of  
17 Health & Safety Code §25249.11(b). MAKERGEAR, LLC manufactures, markets, distributes,  
18 and/or sells the Products for sale and use in the State of California.

19 18. MEDIA SUPPLY, INC. is a person in the course of doing business within the meaning of  
20 Health & Safety Code §25249.11(b). MEDIA SUPPLY, INC. manufactures, markets, distributes,  
21 and/or sells the Products for sale and use in the State of California.

22 19. MICROBOARDS TECHNOLOGY LLC is a person in the course of doing business within  
23 the meaning of Health & Safety Code §25249.11(b). MICROBOARDS TECHNOLOGY LLC  
24 manufactures, markets, distributes, and/or sells the Products for sale and use in the State of  
25 California.

26 20. MONOPRICE INC. is a person in the course of doing business within the meaning of Health  
27 & Safety Code §25249.11(b). MONOPRICE INC. manufactures, markets, distributes, and/or sells  
28 the Products for sale and use in the State of California.

1 21. OFFICE DEPOT, INC. is a person in the course of doing business within the meaning of  
2 Health & Safety Code §25249.11(b). OFFICE DEPOT, INC. manufactures, markets, distributes,  
3 and/or sells the Products for sale and use in the State of California.

4 22. PROFOUND 3D is a person in the course of doing business within the meaning of Health &  
5 Safety Code §25249.11(b). PROFOUND 3D manufactures, markets, distributes, and/or sells the  
6 Products for sale and use in the State of California.

7 23. PRUSA RESEARCH S.R.O. is a person in the course of doing business within the meaning  
8 of Health & Safety Code §25249.11(b). PRUSA RESEARCH S.R.O. manufactures, markets,  
9 distributes, and/or sells the Products for sale and use in the State of California.

10 24. ROBO 3D INC. is a person in the course of doing business within the meaning of Health &  
11 Safety Code §25249.11(b). ROBO 3D INC. manufactures, markets, distributes, and/or sells the  
12 Products for sale and use in the State of California.

13 25. SHAXON INDUSTRIES, INC. is a person in the course of doing business within the  
14 meaning of Health & Safety Code §25249.11(b). SHAXON INDUSTRIES, INC. manufactures,  
15 markets, distributes, and/or sells the Products for sale and use in the State of California.

16 26. SHENZHEN ESUN INDUSTRIAL CO.,LTD is a person in the course of doing business  
17 within the meaning of Health & Safety Code §25249.11(b). SHENZHEN ESUN INDUSTRIAL  
18 CO., LTD manufactures, markets, distributes, and/or sells the Products for sale and use in the State  
19 of California.

20 27. ULTIMAKER USA INC. is a person in the course of doing business within the meaning of  
21 Health & Safety Code §25249.11(b). ULTIMAKER USA INC. manufactures, markets, distributes,  
22 and/or sells the Products for sale and use in the State of California.

23 28. ZORTRAX S.A. is a person in the course of doing business within the meaning of Health &  
24 Safety Code §25249.11(b). ZORTRAX S.A. manufactures, markets, distributes, and/or sells the  
25 Products for sale and use in the State of California.

26 **JURISDICTION**

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

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

4 30. This Court also has jurisdiction over Defendants because each Defendant business has  
5 sufficient minimum contacts in California and within the County of San Francisco. Defendants  
6 intentionally availed themselves of the California and San Francisco County markets. It is thus  
7 consistent with traditional notions of fair play and substantial justice for the San Francisco County  
8 Superior Court to exercise jurisdiction over Defendants.

9 31. Venue is proper in San Francisco County Superior Court because one or more of the  
10 violations arise in the County of San Francisco.

11 **BACKGROUND**

12 32. The People of the State of California have declared by initiative under Proposition 65 their  
13 right "[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other  
14 reproductive harm." Proposition 65, § 1(b). To effectuate this goal, Proposition 65 prohibits exposing  
15 people to chemicals listed by the State of California as known to cause cancer, birth defects, or other  
16 reproductive harm without a "clear and reasonable warning" unless the business responsible for the  
17 exposure can prove that it fits within a statutory exemption. Health & Safety Code Section 25249.6  
18 states, in pertinent part:

19 No person in the course of doing business shall knowingly and intentionally  
20 expose any individual to a chemical known to the state to cause cancer or  
21 reproductive toxicity without first giving clear and reasonable warning to such  
individual ... .

22 33. On April 22, 2016, the State of California officially listed styrene as a chemical known to  
23 cause cancer. On April 22, 2017, styrene exposures became subject to the clear and reasonable  
24 warning requirements under Proposition 65. 27 C.C.R. § 27001(b); Health & Safety Code Section  
25 25249.10(b).

26 34. Plaintiff brings this enforcement action against Defendants pursuant to Health & Safety  
27 Code Section 25249.7(d). Attached hereto and incorporated by reference are copies of the Notice of  
28 Violation dated April 24, 2019, the date on which EcoRights sent to California's Attorney General,

1 every county District Attorney in California, and to the City Attorneys of every California City with  
2 a population greater than 750,000. On the same day, Plaintiff sent a substantively identical letter to  
3 Defendants. In compliance with Health & Safety Code § 25249.7(d) and 27 C.C.R. § 25903(b), each  
4 of the Notices included the following information: (1) the name and address of each violator; (2) the  
5 statute violated; (3) the time period during which violations occurred; (4) specific descriptions of the  
6 violations, including (a) the routes of exposure to styrene from the Products, and (b) specific  
7 examples of Products sold and used in violation of Proposition 65; and (5) the name of the specific  
8 Proposition 65-listed chemical that is the subject of the violations described in each Notice.

9 35. Accompanying each of the Notices of Violation sent to the Defendants was a summary of  
10 Proposition 65 that was prepared by California’s Office of Environmental Health Hazard  
11 Assessment. In addition, the Notices of Violation were accompanied by a Certificate of Service  
12 attesting to the service of the Notice of Violation on each entity which received it. Pursuant to Health  
13 & Safety Code Section 25249.7(d) and 11 C.C.R. § 3101, Plaintiff also sent a Certificate of Merit  
14 with the Notices of Violation attesting to the reasonable and meritorious basis for the action. Plaintiff  
15 enclosed factual information sufficient to establish the basis of the Certificate of Merit with the  
16 Notice of Violation letters sent to the Attorney General.

17 36. None of the public prosecutors with the authority to prosecute violations of Proposition 65  
18 has commenced and/or is diligently prosecuting a cause of action against Defendants under Health  
19 & Safety Code Section 25249.5 *et seq.*, based on the claims asserted in EcoRights’ Notices.

20 37. Defendants know and intend that individuals will use the Products in the operation of 3D  
21 printers and 3D pens, thus exposing them to styrene. Under Proposition 65, an exposure is “knowing”  
22 where the party responsible for such exposure has “knowledge of the fact that a[n] . . . exposure to a  
23 chemical listed pursuant to [Health & Safety Code § 25249.8(a)] is occurring. No knowledge that . .  
24 . exposure is unlawful is required.” 27 C.C.R. § 25102(n). This knowledge may be either actual or  
25 constructive. *See, e.g.*, Final Statement of Reasons Revised (November 4, 1988) (pursuant to former  
26 22 C.C.R. Division 2, § 12201). Defendants have been informed of the styrene exposures caused by  
27 the use of Products by the 60-Day Notice of Violation, and the accompanying Certificate of Merit  
28 served on them by EcoRights. Defendants also have constructive knowledge of the styrene exposures

1 caused by Products. As a company that manufactures, markets, distributes and/or sells the Products  
2 for use in the State of California, Defendants know or should know that styrene exposures to users  
3 of the Products are a natural and foreseeable consequence of Defendants' placing the Products into  
4 the stream of commerce.

5 38. Any person "violating or threatening to violate" Proposition 65 may be enjoined in any court  
6 of competent jurisdiction. Health & Safety Code § 25249.7. "Threaten to violate" is defined to mean  
7 "to create a condition in which there is a substantial probability that a violation will occur." Health  
8 & Safety Code § 25249.11(e). Proposition 65 provides for civil penalties not to exceed \$2,500 per  
9 day for each violation of the statute.

10 39. EcoRights has engaged in good faith efforts to resolve the claims alleged herein prior to  
11 filing this complaint.

### 12 **FIRST CAUSE OF ACTION**

#### 13 **(Violations of Health & Safety Code §25249.6)**

14 40. EcoRights realleges and incorporates the facts and allegations contained in the above  
15 paragraphs as though specifically set forth herein.

16 41. That each Defendant is a person in the course of doing business within the meaning of Health  
17 & Safety Code § 25249.11(b) who, by manufacturing, marketing, distribution, sale or otherwise  
18 placing the Products into the stream of commerce, violated, violates or threatens to violate  
19 Proposition 65.

20 42. Styrene is a chemical listed by the State of California as known to cause cancer.

21 43. Defendants know that the average use of the Products will expose users of the Products to  
22 styrene. Defendants intend that the Products be used in a manner that results in exposures to styrene.

23  
24 44. Defendants have failed and continue to fail, to provide clear and reasonable warnings  
25 regarding the carcinogenicity of styrene to users of the Products.

26 45. Since at least three years prior to the Notice of Violation Letters, Defendants have violated  
27 Proposition 65 by knowingly and intentionally exposing individuals to styrene without first giving  
28 clear and reasonable warnings to such individuals regarding the carcinogenicity of styrene.



1 **PRAYER FOR RELIEF**

2 Wherefore, Plaintiff prays for judgment against Defendants as follows:

- 3 1. Pursuant to the First Cause of Action, that Defendants be enjoined, restrained, and  
4 ordered to comply with the provisions of Section 25249.6 of the California Health &  
5 Safety Code;
- 6 2. That Defendants be ordered to make best efforts to identify and locate each individual  
7 in California to whom it, or its customers or agents, distributed or sold Products  
8 during the past three years, and to provide a warning to each such person that use of  
9 the Product will expose that person to a chemical known to cause cancer;
- 10 3. That Defendants be assessed a civil penalty in an amount equal to \$2,500.00 per day  
11 per individual exposed to styrene in violation of Section 25249.6 of the California  
12 Health & Safety Code, as the result of Defendants' marketing, distributing, and/or  
13 selling the Products for use in California.
- 14 4. That, pursuant to Civil Procedure Code § 1021.5, Defendants be ordered to pay to  
15 Plaintiff the attorneys' fees and costs it incurred in bringing this enforcement action;  
16 and,
- 17 5. For such other relief as this court deems just and proper.
- 18

19 Dated: October 11, 2019

20   
21 \_\_\_\_\_  
22 Fredric Evenson  
23 Attorney for Plaintiff  
24 ECOLOGICAL RIGHTS FOUNDATION  
25  
26  
27  
28

**LAW OFFICES OF BRIAN GAFFNEY, A Professional Corporation**  
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April 24, 2019

Notice of Violations  
Safe Drinking Water and Toxic Enforcement Act

By Certified Mail, Return Receipt Requested to Violators in U.S.A.  
By Registered Mail to Violators Located Outside U.S.A.  
By First Class U.S. Mail to Public Enforcement Agencies

Dear Public Enforcement Agencies / Violators:

This office and Ecological Rights Foundation (“ERF”) gives you notice that, since at least April 24, 2016 the businesses listed on Attachment A have been, and continue to be, in violation of California Health & Safety Code §25249.6. ERF is a California non-profit corporation dedicated to protecting human and environmental health, including raising awareness of, and reducing exposures to, toxic chemicals.

ERF intends to bring an enforcement action 60 days after effective service of this notice unless the public enforcement agencies have commenced and are diligently prosecuting an action to rectify the violations discussed in this notice letter. The public enforcement agencies that have been served with copies of this notice of violations are identified on the attached Certificate of Service.

The above referenced violations occur when California residents use filaments incorporating a styrene monomer, including acrylonitrile-butadiene-styrene (ABS) filaments, polycarbonate ABS (PC-ABS) filaments, and high impact polystyrene (HIPS) filaments in the operation of 3d printers or 3d pens. These filaments, used in the operation of 3d printers or 3d pens, expose people to styrene, a chemical known to the State of California to cause cancer. Filaments sold by the businesses listed on Attachment A expose consumers and workers to styrene via inhalation.

Examples of particular products manufactured, sold, distributed and/or marketed by the violators are attached as Attachment B. All of the filaments at issue in this notice can be used with of 3d printers or 3d pens. When people use filaments incorporating a styrene monomer with 3d printers or 3d pens, the filaments are heated by the 3D printers or 3d pens and thus release styrene into

the air. People using the filaments incorporating a styrene monomer with 3d printers or 3d pens, and others in the same room where such filaments are being used, inhale styrene in the normal course of use.

In addition, exposures in the environmental context occur in the homes, businesses, schools and public locations where the people use filaments incorporating a styrene monomer with 3d printers or 3d pens. Exposures to styrene occur within the consumer and environmental contexts.

The businesses listed on Attachment A did not and do not provide clear and reasonable warnings to people who use filaments incorporating a styrene monomer, that use of these products in 3d printers or 3d pens will expose them to chemicals known to cause cancer. The above violations have occurred every day since at least April 24, 2016 and will continue every day until clear and reasonable warnings are given.

Attachment B is a non-exclusive list of examples of these types of products. Though specific models or product numbers are given as examples, this Notice also pertains to all models and all variations of filaments incorporating a styrene monomer sold in California. Attachment B is for the recipient's benefit and is not meant to be an exhaustive or comprehensive identification of each specific offending product. It is ERF's position that the alleged Violators are obligated to conduct a good faith investigation into other specific products within the identified category or type that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the notice recipient's custody or control) during the past three years, to ensure that clear and reasonable warnings are provided to California citizens prior to purchase, or retroactively if necessary.

These violations and threatened violations will continue to occur everyday until these businesses either provide clear and reasonable warnings, reformulate their filaments so as not to contain styrene, or stop selling these filaments in California. These violations occur in all of California's 58 counties, both on and off of these businesses' properties.

In keeping with its public interest mission and to expeditiously rectify these ongoing violations of California law, ERF is interested in seeking a constructive resolution of this matter without engaging in costly and protracted litigation.

The following individual is the responsible individual within ERF for purposes of this Notice:

Fredric Evenson  
Ecological Rights Foundation  
P.O. Box 1000  
Santa Cruz, California 95061  
Telephone: (831) 454-8216  
Email: [evenson@ecologylaw.com](mailto:evenson@ecologylaw.com)

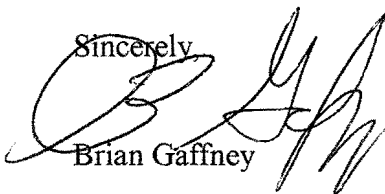
ERF has retained the following counsel to represent it in this matter. **Please direct communications to counsel.**

Brian Gaffney  
LAW OFFICES OF BRIAN GAFFNEY APC  
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[brian@gaffneylegal.com](mailto:brian@gaffneylegal.com)

Resolution of Noticed Claims:

ERF is interested in seeking a constructive resolution of this matter that advances the public interest without engaging in costly and protracted litigation. ERF is willing to settle this matter to the extent legally possible prior to the commencement of any enforcement action. Settlement terms would require that the unwarned exposures described in this Notice of Violation be stopped. That would require at least the following: 1) a potential recall of products already sold; 2) that either warnings be given to all future purchasers in California of the products subject to this Notice, that the products be reformulated to eliminate the exposures described in the Notice, or that you stop marketing, distributing or selling the products in California; 3) that you locate and provide a warning compliant with 27 Cal. Code Regs Section 25601 to each person who has been subject to the unwarned exposures described in the Notice to the extent those exposures are caused by products that were sold in California during the past three years; and 4) that you pay an appropriate civil penalty based on the factors enumerated in California Health and Safety Code Section 25249(b). It should be noted that ERF cannot finalize any settlement of this matter until 70 days have elapsed since the sending of the Notice and unless no public enforcer has begun an enforcement action concerning the violations described in the Notice. Any settlement on behalf of the public interest must be approved by the California Superior Court on noticed motion with 45 days' notice to the California Attorney General. The Attorney General may appear at any approval hearing and oppose a settlement if he or she believes the proposed settlement is not in the public interest. If you wish to discuss settlement of this matter before ERF files suit, please promptly contact ERF's counsel.

Sincerely



Brian Gaffney

Enclosure to Violators "The Safe Drinking Water and Toxic Enforcement Act of 1986: A Summary." A Certificate of Merit is also attached.

**Certificate of Merit - Health & Safety Code Section 25249.7(d)**

I, Brian Gaffney, hereby declare:

(1) 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.

(2) I am the attorney for the noticing party.

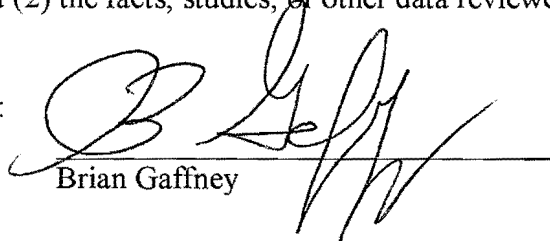
(3) I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the alleged exposure to the listed chemical that is the subject of the action.

(4) 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 plaintiff's 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.

(5) 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 persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Date: April 24, 2019

By:

  
Brian Gaffney

## **Attachment A – Violators – FILAMENTS**

Afinia 3D  
Microboards Technology LLC  
Amazon.com Inc.  
3D Print of North America, Inc.  
BASF Corporation  
Shenzhen Esun Industrial Co.,Ltd  
Keene Village Plastics, Ltd.  
Eastman Kodak Company  
M3D LLC  
Office Depot, Inc.  
Makerbot Industries, LLC  
Makergear, LLC  
Media Supply, Inc.  
Profound 3D  
Monoprice Inc.  
Print-Rite N.A., Inc.  
Prusa Research S.R.O.  
Robo 3d Inc.  
SHAXON INDUSTRIES, Inc.  
FRY'S ELECTRONICS, Inc.  
DYNAMISM.COM  
Ultimaker USA Inc.  
XYZPRINTING, INC.  
Kinpo Group  
Zortrax S.A.

**ATTACHMENT B****FILAMENTS**

<b>Violator</b>	<b>Product</b>
Afinia 3D	Afinia 3D ABS PREMIUM FILAMENT YELLOW PREM500-ABS-YELLOW P/N: 25232 UPC: 678621 120409
Microboards Technology LLC	Afinia 3D ABS PREMIUM FILAMENT YELLOW PREM500-ABS-YELLOW P/N: 25232 UPC: 678621 120409
Afinia 3D	Afinia 3D ABS PLUS PREMIUM FILAMENT WHITE PLUS1K-ABS-WHITE P/N: 27948 UPC: 678621 120904
Microboards Technology LLC	Afinia 3D ABS PLUS PREMIUM FILAMENT WHITE PLUS1K-ABS-WHITE P/N: 27948 UPC: 678621 120904
Amazon.com Inc.	AMAZON BASICS ABS 3D PRINTING FILAMENT RED 1.75MM BATCH NO. 180801809 ASIN B07D6BG8FR

**ATTACHMENT B****FILAMENTS**

<b>Violator</b>	<b>Product</b>
3D Print of North America, Inc.	INNOFIL 3D ABS GREEN 1.75MM 750 GRAM UPC: 8718969 921190
BASF Corporation	INNOFIL 3D ABS GREEN 1.75MM 750 GRAM UPC: 8718969 921190

Amazon.com Inc.	eSUN 1.75mm BLACK ABS 3D PRINTING FILAMENT 1KG SPOOL X000N82SBJ UPC: 840249 121018 EAN: 6922572 221017
Shenzhen Esun Industrial Co.,Ltd	eSUN 1.75mm BLACK ABS 3D PRINTING FILAMENT 1KG SPOOL X000N82SBJ UPC: 840249 121018 EAN: 6922572 221017

Amazon.com Inc.	eSUN 1.75mm ABS+ 3D FILAMENT X000WM75ZZ UPC: 840249 129021 EAN: 6922572 229020
Shenzhen Esun Industrial Co.,Ltd	eSUN 1.75mm ABS+ 3D FILAMENT X000WM75ZZ UPC: 840249 129021 EAN: 6922572 229020



**ATTACHMENT B****FILAMENTS**

<b>Violator</b>	<b>Product</b>
Amazon.com Inc.	eSUN 1.75mm eABS-MAX 3D FILAMENT 0.5KG X001QMNJNKF UPC: 840249 189025 EAN: 6922572 289024
Shenzhen Esun Industrial Co.,Ltd	eSUN 1.75mm eABS-MAX 3D FILAMENT 0.5KG X001QMNJNKF UPC: 840249 189025 EAN: 6922572 289024

Amazon.com Inc.	eSUN 3mm BLACK HIPS 3D PRINTING FILAMENT 1KG SPOOL X0013DV0SZ UPC: 840249 133011 EAN: 6922572 233010
Shenzhen Esun Industrial Co.,Ltd	eSUN 3mm BLACK HIPS 3D PRINTING FILAMENT 1KG SPOOL X0013DV0SZ UPC: 840249 133011 EAN: 6922572 233010

Keene Village Plastics, Ltd.	KVP ABS FILAMENT 01-1.75MM-BU- 605.11-1KG-R ITEM # FG0174
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Keene Village Plastics, Ltd.	KVP HIPS 44.1-1.75MM-BK-511-1KG-R ITEM # FG0688
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**ATTACHMENT B****FILAMENTS**

<u>Violator</u>	<u>Product</u>
Keene Village Plastics, Ltd.	KVP N-VIRE BIO ABS 01-B-1.75MM-GGN 544.1-1KG-R ITEM # FG0411
Eastman Kodak Company	KODAK 3D PRINTING FILAMENT ABS (WHITE, 1.75MM) B079NZYJFQ ABS1WHT 606110283762
Eastman Kodak Company	KODAK 3D PRINTING FILAMENT HIPS (RED, 1.75MM) B01LRPA68C HIPS1RED 614143320699
M3D LLC	M3D 250FT/250G ABS-R 3D INK® GREY SKU: 84-#6b6b6 UPC: 851492-006984
M3D LLC	M3D 250FT/250G ABS-R3 3D INK® GREEN SKU: 1103-#01990b UPC: 851492 006359
M3D LLC	M3D 250FT/250G HIPS 3D INK® WHITE SKU: 9020-#F4F3E9 UPC: 611191 046342
M3D LLC	M3D ABS-R3 INK® BLACK (250FT) UPC: 851492 006380
Amazon.com Inc.	M3D ABS-R3 INK® BLACK (250FT) UPC: 851492 006380

**ATTACHMENT B****FILAMENTS**

<u>Violator</u>	<u>Product</u>
Office Depot, Inc.	MAKERBOT ABS TRUE BLUE 1.75MM 1KG LOT#008683 ITEM# MP01973
Makerbot Industries, LLC	MAKERBOT ABS TRUE BLUE 1.75MM 1KG LOT#008683 ITEM# MP01973
Makerbot Industries, LLC	MAKERBOT ABS TRUE RED 1 KG UPC: 0817913010039 ITEM# MP01971 SKU: 20000175341
Makergear, LLC	MAKERGEAR ABS 3D PRINTING FILAMENT BLUE 1.75MM 1 KG LOT#1827201 UPC: 175220 100431
Media Supply, Inc.	OCTAVE ABD FILAMENT FOR 3D PRINTERS - BLACK SKU: OCT3DP-JC-ABK17-10 UPC: 762182 110013
Profound 3D	OCTAVE ABD FILAMENT FOR 3D PRINTERS - BLACK SKU: OCT3DP-JC-ABK17-10 UPC: 762182 110013
Monoprice Inc.	MONOPRICE 3D PRINTER FILAMENT ABS 1.75MM 1KG RED ITEM# 10547 UPC: 757901 803802

**ATTACHMENT B****FILAMENTS**

<b>Violator</b>	<b>Product</b>
Monoprice Inc.	MONOPRICE PREMIUM 3D PRINTER FILAMENT ABS 1.75MM, 1KG WHITE ITEM# 10546 UPC: 757901 803796
Print-Rite N.A., Inc.	COLIDO 3D FILAMENT ABS 1KG BLUE FILAMENT X001U7MESJ LCD001U-ABS-1KG 695553093960
Print-Rite N.A., Inc.	COLIDO 3D UNIVERSAL 3D PRINTING FILAMENT GOLD ABS BLUE 1.75MM UPC: 6955530 941184
Amazon.com Inc.	COLIDO 3D UNIVERSAL 3D PRINTING FILAMENT GOLD ABS BLUE 1.75MM UPC: 6955530 941184
Prusa Research S.R.O.	PRUSA ABS-T FILAMENT 1.75MM 1KG SILVER
Robo 3d Inc.	ROBO 3D ABS FILAMENT 1.75MM 500G BLACK UPC: 857061 007017
SHAXON INDUSTRIES, Inc.	SHAXON SHX-ABS175-1-OR-B 3D ABS FILAMENT 1.75MM 1KG ORANGE UPC: 813020 016438
FRY'S ELECTRONICS, Inc.	SHAXON SHX-ABS175-1-OR-B 3D ABS FILAMENT 1.75MM 1KG ORANGE UPC: 813020 016438

**ATTACHMENT B****FILAMENTS**

<b>Violator</b>	<b>Product</b>
DYNAMISM Inc.	ULTIMAKER MATERIAL 1624 ABS MATERIAL BLUE UPC: 817146 020348 EAN: 8718836 374715
Ultimaker USA Inc.	ULTIMAKER MATERIAL 1624 ABS MATERIAL BLUE UPC: 817146 020348 EAN: 8718836 374715
XYZPRINTING, INC.	XYZ PRINTING ABS FILAMENT 600G SNOW WHITE RF10B-FPM-A6I-A6I-TH-ZZW-0649 UPC: 840710 101655
Kinpo Group	XYZ PRINTING ABS FILAMENT 600G SNOW WHITE RF10B-FPM-A6I-A6I-TH-ZZW-0649 UPC: 840710 101655
Amazon.com Inc.	XYZ PRINTING ABS FILAMENT 1.75MM 600G BLACK B00SYG03BS UPC: 840710 101570
XYZPRINTING, INC.	XYZ PRINTING ABS FILAMENT 1.75MM 600G BLACK B00SYG03BS UPC: 840710 101570
Kinpo Group	XYZ PRINTING ABS FILAMENT 1.75MM 600G BLACK B00SYG03BS UPC: 840710 101570
Amazon.com Inc.	ZORTRAX Z-ABS FILAMENT PURE BLACK 1.75MM 800G X000UKQV1N
Zortrax S.A.	ZORTRAX Z-ABS FILAMENT PURE BLACK 1.75MM 800G X000UKQV1N

**ATTACHMENT B****FILAMENTS**

<u>Violator</u>	<u>Product</u>
Amazon.com Inc.	ZORTRAX ZHIPSGRY ZHIPS 800G 1.75MM GREY X001FCH59R
Zortrax S.A.	ZORTRAX ZHIPSGRY ZHIPS 800G 1.75MM GREY X001FCH59R
Monoprice Inc.	MONOPRICE MP SELECT ABS PLUS+ PREMIUM 3D FILAMENT 1.75MM, 0.5KG NATURAL ITEM# 15843 UPC: 889028 039536

## CERTIFICATE OF SERVICE

I, Brian Gaffney, declare:

If so called, I could and would testify as follows: I am over eighteen. My business address is 446 Old County Road, Suite 100-310, Pacifica, CA 94044.

On April 24, 2019, I caused the attached

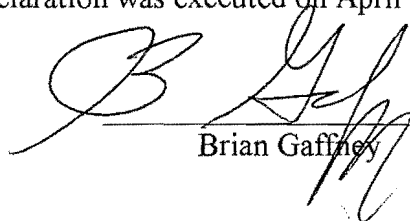
(1) Notice of Violations: California Safe Drinking Water and Toxic Enforcement Act, (2) Certificate of Merit: Health and Safety Code Section 25249.7(d), (3) Appendix A: The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary, (4) Certificate of Service to be served by CERTIFIED MAIL to each private business entity listed on the attached SERVICE LIST-Noticed Parties, except for each private business located outside of the U.S.A. which are served by REGISTERED MAIL. 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.

In addition, on the same date and I caused the attached

(1) Notice of Violations: California Safe Drinking Water and Toxic Enforcement Act, (2) Certificate of Merit: Health and Safety Code Section 25249.7(d), (3) Certificate of Merit (Attorney General Copy): Factual information sufficient to establish the basis of the Certificate of Merit (only sent to the Attorney General), (4) Certificate of Service by FIRST CLASS U.S. MAIL on those public enforcement agencies listed on the attached SERVICE LIST-Public Enforcers. 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, and

by sending portable document format (PDF) files of the same to the electronic mail addresses to each of the public prosecutors identified by the California Attorney General as having authorized electronic service of notices. These public enforcement agencies appear on the attached Service List with their electronic mail addresses.

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 April 24, 2019, at Pacifica, California.

  
\_\_\_\_\_  
Brian Gaffney

**SERVICE LIST-Noticed Parties  
STYRENE FILAMENTS**

**Afinia 3D**  
ATTN: President/CEO  
8150 Mallory Ct  
Chanhassen, MN 55317

**Microboards Technology LLC**  
ATTN: President/CEO  
8150 Mallory Ct, PO Bx 846  
Chanhassen, MN 55317

**Jeffrey P. Bezos or**  
Current President or CEO,  
Amazon.Com Inc.  
410 Terry Avenue  
North Seattle WA 98109-5210

**Amazon.Com Inc.**  
c/o CSC - LAWYERS INCORPORATING  
SERVICE  
2710 Gateway Oaks Dr., Ste. 150N  
Sacramento CA 95833

**3D Print of North America, Inc.,**  
c/o Corporation Service Company  
80 State Street  
Albany, New York 12207

**3D Print of North America, Inc.**  
ATTN: President/CEO  
333 Henderson Ave.  
Kenmore NY 14217

**BASF Corporation**  
c/o CT Corporation System  
818 West Seventh Street, Suite 930  
Los Angeles, CA 90017

**BASF Corporation**  
ATTN: President/CEO  
100 Park Avenue  
Florham Park, NJ 07932

**Keene Village Plastics Ltd.**  
ATTN: President/CEO  
100 16th St. SW  
Barberton, OH 44203

**Keene Village Plastics, Ltd.**  
c/o TAFT SERVICE SOLUTIONS CORP.  
425 Walnut Street, Suite 1800  
Cincinnati OH 45202

**Eastman Kodak Company**  
c/o CSC- Lawyers Incorporating Service  
2710 Gateway Oaks Drive, Suite 150N  
Sacramento, CA 95833

**Eastman Kodak Company**  
ATTN: President/CEO  
343 STATE STREET  
ROCHESTER NY 14650

**M3D LLC**  
Attn: Michael Armani  
11850 West Market Place, STE M  
Fulton, MD 20759-2671

**Office Depot, Inc.**  
c/o Corporate Creations California Inc.  
11380 Prosperity Farms Rd. #221E  
Palm Beach Gardens, FL 33410

**OFFICE DEPOT, INC.**  
ATTN: President/CEO  
6600 North Military Trail  
Boca Raton, FL 33496

**Makerbot Industries, LLC.**  
c/o National Registered Agents, Inc.  
818 West Seventh Street, Suite 930  
Los Angeles, CA 90017

**Makerbot Industries, LLC,**  
ATTN: President/CEO  
ONE METRO TECH CENTER, 21ST FL  
BROOKLYN NY 11201

**MakerGear, LLC.**  
ATTN: President/CEO  
23632 Mercantile Rd. Unit G  
Beachwood, OH 44122

**MakerGear, LLC.**  
c/o Richard Pollack  
24139 Wimledon Road,  
Shaker Heights, OH 44122

**Media Supply, Inc.**  
ATTN: President/CEO  
208 Philips Road, Exton PA 19341

**Media Supply Inc.**  
ATTN: President/CEO, 611 Jeffers Circle  
Exton PA 19341

**Profound 3D**  
ATTN: President/CEO  
208 Philips Rd  
Exton PA 19341

**Monoprice, Inc.**  
c/o BERNARD LUTHI  
ONE POINTE DR., SUITE# 400  
BREA CA 92821

**Monoprice, Inc.**  
ATTN: President/CEO  
ONE POINTE DR., 4th Floor  
BREA CA 92821

**Print-Rite N.A., Inc.**  
c/o JEMMA JANG  
1077 TIMBER CREST DR  
SAN JOSE CA 95120

**Print-Rite, N.A., Inc.**  
ATTN: President/CEO  
201 SPEAR STREET, STE 1100 # 3204  
SAN FRANCISCO CA 94105

**Robo 3d Inc.**  
c/o TAILORED LEGAL, A  
PROFESSIONAL CORPORATION,  
3555 4th Avenue  
San Diego, CA 92103



**Robo 3D Inc.**  
ATTN: President/CEO  
5070 SANTA FE Street, STE C  
SAN DIEGO CA 92109

**Shaxon Industries, Inc.**  
c/o BENJAMIN SHIR-KWEI WANG  
4852 E. LA PALMA AVE.  
ANAHEIM CA 92807

**Shaxon Industries, Inc.**  
ATTN: President/CEO  
4852 E. LA PALMA AVE..  
ANAHEIM CA 92807

**Fry's Electronics, Inc.**  
c/o Kathryn Jean Kolder  
600 E. Brokaw Road  
San Jose, CA 95112

**Fry's Electronics, Inc.**  
ATTN: President/CEO  
600 E. Brokaw Road  
San Jose, CA 95112

**Dynamism Inc.**  
ATTN Douglas Krone  
207 East Ohio Street, Suite 200  
Chicago, IL 60611-3238

**Dynamism Inc.**  
ATTN: President/CEO  
207 East Ohio Street, Suite 200  
Chicago, IL 60611-3238

**Ultimaker USA Inc.**  
c/o Northwest Registered Agent, Inc.  
1267 Willis Street, STE 200  
Redding, CA 96001

**Ultimaker USA Inc.**  
ATTN: President/CEO  
228 EAST 45TH STREET, SUITE 9  
NEW YORK NY 10017

**XYZPrinting, Inc.**  
c/o TIM T CHANG  
One Wilshire Blvd., Suite 2000,  
LA CA 90017

**XYZ Printing**  
ATTN: President/CEO  
20191 Windrow Drive, Suite B  
Lake Forest CA 92630

**Zortrax S.A.**  
ATTN:CEO, Lubelska 34  
10-409 Olsztyn  
Poland

**Shenzhen Esun Industrial Co.,Ltd,**  
ATTN: President/CEO  
Wuhan University Building A403-I,  
No.6 Yuexing 2 Road, Nanshan  
District, Shenshen, Guangdong  
Province, China 518057

**Prusa Resarch S.R.O.**  
ATTN: President/CEO  
Partyzanshka 188/7a Holesovice  
17000 Praha 7  
Prague, Czech Republic

**XYZPrinting, Inc.**  
147, Beishen Rd., Sec. 3  
New Taipei City 22201  
Taiwan

**Kinpo Group**  
10th Fl., 99 NanKing East Road  
Sec 5, Taipei 105  
Taiwan

## Service List - Public Enforcers

Office of the District Attorney Alameda County CEPDProp65@acgov.org	Office of the District Attorney Lassen County mlatimer@co.lassen.ca.us	Office of the District Attorney San Benito County 419 4th Street Hollister, CA 95023	Office of the District Attorney Tehama County P.O. Box 519 Red Bluff, CA 96080
Office of the District Attorney Alpine County P.O. Box 248 Markleeville, CA 96120	Office of the District Attorney Los Angeles County 211 W. Temple Street, Suite 1200 Los Angeles, CA 90012	Office of the District Attorney San Bernardino County 303 W. Third Street San Bernardino, CA 92415	Office of the District Attorney Trinity County P.O. Box 310 Weaverville, CA 96093
Office of the District Attorney Amador County 708 Court Street, #202 Jackson, CA 95642	Office of the District Attorney Madera County 209 West Yosemite Avenue Madera, CA 93637	Office of the District Attorney San Diego County CityAttyProp65@sandiego.gov	Office of the District Attorney Tulare County Prop65@co.tulare.ca.us
Office of the District Attorney Butte County 25 County Center Drive Oroville, CA 95965	Office of the District Attorney Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903	Office of the District Attorney San Francisco County gregory.alker@sfgov.org	Office of the District Attorney Tuolumne County 423 N. Washington Street Sonora, CA 95370
Office of the District Attorney Calaveras County Prop65Env@co.calaveras.ca.us	Office of the District Attorney Mariposa County P.O. Box 730 Mariposa, CA 95338	Office of the District Attorney San Joaquin County DAConsumer.Environmental@sjcda.org	Office of the District Attorney Ventura County daspecialops@ventura.org
Office of the District Attorney Colusa County 346 5th Street, Suite 101 Colusa, CA 95932	Office of the District Attorney Mendocino County P.O. Box 1000 Ukiah, CA 95482	Office of the District Attorney San Luis Obispo County edobroth@co.slo.ca.us	Office of the District Attorney Yolo County cfepe@yolocounty.org
Office of the District Attorney Contra Costa County sgrassini@contracostada.org	Office of the District Attorney Merced County 550 West Main Street Merced, CA 95340	Office of the District Attorney San Mateo County 400 County Center, Third Floor Redwood City, CA 94063	Office of the District Attorney Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901
Office of the District Attorney Del Norte County 450 H Street, Room 171 Crescent City, CA 95531	Office of the District Attorney Modoc County 204 S. Court Street Room 202 Alturas, CA 96101	Office of the District Attorney Santa Barbara County DAProp65@co.santa-barbara.ca.us	Oakland City Attorney City Hall, 6th Floor 1 Frank Ogawa Plaza Oakland, California 94612
Office of the District Attorney El Dorado County 515 Main Street Placerville, CA 95667	Office of the District Attorney Mono County P.O. Box 617 Bridgeport, CA 93517	Office of the District Attorney Santa Clara County EPU@da.sccgov.org	Office of the City Attorney City of San Francisco City Hall, Room 234 1 Dr. Carlton B. Goodlett Pl. San Francisco, CA 94102
Office of the District Attorney Fresno County 2220 Tulare Street, Suite 1000 Fresno, CA 93721	Office of the District Attorney Monterey County Prop65DA@co.monterey.ca.us	Office of the District Attorney Santa Cruz County Prop65DA@santacruzcounty.us	Office of the City Attorney City of Sacramento 915 I Street, 4th Floor Sacramento, CA 95814
Office of the District Attorney Glenn County P.O. Box 430 Willows, CA 95988	Office of the District Attorney Napa County CEPD@countyofnapa.org	Office of the District Attorney Shasta County 1355 West Street Redding, CA 96001	Office of the City Attorney City of San Jose 200 E. Santa Clara St. San Jose, CA 95113
Office of the District Attorney Humboldt County 825 5th Street, 4th Floor Eureka, CA 95501	Office of the District Attorney Nevada County 201 Commercial Street Nevada City, CA 95959	Office of the District Attorney Sierra County P.O. Box 457 Downieville, CA 95936	Office of the City Attorney City of Los Angeles 200 N. Main Street, Suite 800 Los Angeles, CA 90012
Office of the District Attorney Imperial County 940 West Main Street, Suite 102 El Centro, CA 92243	Office of the District Attorney Orange County 401 Civic Center Drive West Santa Ana, CA 92701	Office of the District Attorney Siskiyou County P.O. Box 986 Yreka, CA 96097	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620 San Diego, CA 92101
Office of the District Attorney Inyo County inyoda@inyocounty.us	Office of the District Attorney Placer County 10810 Justice Center Drive Roseville, CA 95678	Office of the District Attorney Solano County 675 Texas Street, Suite 4500 Fairfield, CA 94533	Proposition 65 Enforcement Reporting Attn: Prop 65 Coordinator 1515 Clay Street, Suite 2000 P.O. Box 70550 Oakland, CA 94612
Office of the District Attorney Kern County 1215 Truxtun Avenue Bakersfield, CA 93301	Office of the District Attorney Plumas County 520 Main Street, Room 404 Quincy, CA 95971	Office of the District Attorney Sonoma County jbarnes@sonoma-county.org	
Office of the District Attorney Kings County 1400 West Lacey Blvd. Hanford, CA 93230	Office of the District Attorney Riverside County Prop65@rivcoda.org	Office of the District Attorney Stanislaus County 832 12th Street, Suite 300 Modesto, CA 95354	
Office of the District Attorney Lake County 255 N. Forbes Street Lakeport, CA 95453	Office of the District Attorney Sacramento County Prop65@sacda.org	Office of the District Attorney Sutter County 446 Second Street, Suite 102 Yuba City, CA 95991	