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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF ORANGE**
11 **UNLIMITED JURISDICTION**

12 MARIA ELIZABETH ROMERO,
13
14 Plaintiff,

15 vs.

16 LGC STANDARDS, INC., a Massachusetts
17 corporation, LGC NORTH AMERICA,
18 INC., a Delaware corporation, VHG LABS,
19 INCORPORATED, a New Hampshire
20 corporation, and DOES 1 to 10,
21 Defendants.

Case No.: 30-2020-01132973-CU-BT-CJC

Judge John C. Gastelum

**COMPLAINT FOR INJUNCTIVE
RELIEF AND CIVIL PENALTIES**

(Health & Safety Code §25249.5 *et seq.*)

DEMAND FOR JURY TRIAL

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24 Plaintiff Maria Elizabeth Romero (“Plaintiff”), by and through her
25 attorneys, alleges the following cause of action in the public interest of the citizens of
26 the State of California.

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1 **FIRST CAUSE OF ACTION**

2 (Violation of Health & Safety Code §25249.6 against all Defendants)

3 26. Plaintiff hereby repeats and incorporates by reference paragraphs 1
4 through 25 of this Complaint as though fully set forth herein.

5 27. In the course of doing business and at all relevant times, each Defendant
6 has acted as manufacturer, importer, distributor, supplier, and retail seller of products
7 containing high-purity samples of Acrylamide (collectively referenced as the
8 “Products”), including products identified by the codes PT-AQ-37, DRE-C10045300,
9 DRE-GA09011066ME, DRE-GS900038DI, ERM-BD515, ERM-BD514, ERM-BD513,
10 ERM-BD272, ERM-BD272-274, and PT-FC-788.

11 28. Acrylamide is a chemical listed by the State of California as causing
12 cancer and reproductive harm.

13 29. In the course of doing business and at all relevant times, each Defendant
14 marketed and sold the Products to colleges, universities, high schools, and academic
15 laboratories located in California.

16 30. Defendants’ sales of the Products to colleges, universities, high schools,
17 and academic laboratories located in California have resulted in the exposure of
18 students and members of the public to Acrylamide. Such exposures result from regular
19 uses of the Products in research and from spills, accidents, splashing, vaporization,
20 combustion, improper cleaning procedures, improper use of protective equipment,
21 defective or damaged equipment, and from proper and improper disposal of waste
22 materials after research use of the Products, *inter alia*.

23 31. The exposures described herein are reasonably foreseeable and
24 substantially certain to result from the use of the Products in research. At all relevant
25 times, Defendants have acted with actual knowledge of the occurrence of such
26 exposures.

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4. That the court grant any further relief as may be just and proper.

Respectfully submitted on this 18th day of February, 2020.

AGENCY D&L

By: 

BENJAMIN D. WESTON
Attorney for Plaintiff
MARIA ELIZABETH ROMERO