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CENTER FOR ENVIRONMENTAL HEALTH

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco
07/21/2025
Clerk of the Court
BY: AUSTIN LAM
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

CENTER FOR ENVIRONMENTAL HEALTH, a
non-profit corporation,

Plaintiff,

v.

AESOP USA, INC.; AMAZON RETAIL LLC;
AMAZON.COM SERVICES LLC;
AMAZON.COM, INC.; AMERICAN MULTI-
CINEMA, INC.; AUTOZONE PARTS, INC.;
AUTOZONE STORES INC.; AUTOZONE, INC.;
BG RETAIL, LLC; BRINKER
INTERNATIONAL, INC.; BRINKER
RESTAURANT CORPORATION; BURGER
KING COMPANY LLC; BURLINGTON COAT
FACTORY WAREHOUSE CORPORATION;
BURLINGTON STORES, INC.; CALERES, INC.;
CAPITAL ONE, N.A.; CARDENAS MARKETS
LLC; CARL'S JR. RESTAURANTS LLC; CBI
DISTRIBUTING CORP.; CHANEL, INC.;
CINNABON FRANCHISOR SPV LLC;
CINNABON LLC; CKE RESTAURANTS
HOLDINGS, INC.; CLAIRE'S STORES, INC.;
COMPASS GROUP USA, INC.; CONVERSE

Civil Case No. CGC-25-623997

**FIRST AMENDED COMPLAINT FOR
INJUNCTIVE RELIEF AND CIVIL
PENALTIES**

Health & Safety Code §25249.6 *et seq.*

Action Filed: April 3, 2025
Trial Date: None Set

Dept: 304

1 INC.; CRUMBL LLC; DAISO USA LLC;
2 DARDEN CORPORATION; DARDEN
3 RESTAURANTS, INC.; DEL TACO LLC;
4 DENNY'S (CA) CORPORATION; DENNY'S,
5 INC.; DFO, LLC; DICK'S SPORTING GOODS,
6 INC.; DOLGEN CALIFORNIA, LLC; DOLLAR
7 GENERAL CORPORATION; DOLLAR TREE
8 STORES, INC.; DOMINO'S PIZZA
9 FRANCHISING LLC; DOMINO'S PIZZA LLC;
10 DOMINO'S PIZZA, INC.; DUTCH BROS, INC.;
11 DUTCH MAFIA, INC.; FAT BRANDS INC.;
12 FEDEX OFFICE AND PRINT SERVICES, INC.;
13 FIVE GUYS ENTERPRISES, LLC; FIVE GUYS
14 OPERATIONS, LLC; FOOT LOCKER, INC.;
15 FOOT LOCKER RETAIL, INC.; GAMESTOP
16 CORP.; GAMESTOP, INC.; GROCERY OUTLET
17 INC.; HARBOR FREIGHT TOOLS USA, INC.;
18 HAT WORLD, INC.; ILITCH HOLDINGS, INC.;
19 JACK IN THE BOX, INC.; JPMORGAN CHASE
20 BANK, N.A.; KFC CORPORATION; LITTLE
21 CAESAR ENTERPRISES, INC.; LOWE'S HOME
22 CENTERS, LLC; MCDONALD'S
23 CORPORATION; MCDONALD'S
24 RESTAURANTS OF CALIFORNIA, INC.;
25 MCDONALD'S USA, LLC; MOD SUPER FAST
26 PIZZA (CALIFORNIA), LLC; MOD SUPER
27 FAST PIZZA, LLC; OFFICE DEPOT, LLC;
28 OLIVE GARDEN HOLDINGS, LLC; P.F.
CHANG'S CHINA BISTRO, INC.; PAPA JOHN'S
INTERNATIONAL, INC.; PEET'S COFFEE,
INC.; PENNEY OPCO LLC; PETCO ANIMAL
SUPPLIES, INC.; PETCO ANIMAL SUPPLIES
STORES, INC.; PETSMART LLC; PHILLIPS 66
COMPANY; PIZZA HUT OF AMERICA, LLC;
PIZZA HUT, LLC; PRESSED JUICERY, INC.;
RAISING CANE'S RESTAURANTS, LLC;
RAISING CANE'S USA, LLC; RED LOBSTER
HOSPITALITY LLC; RED LOBSTER
MANAGEMENT LLC; RED LOBSTER
RESTAURANTS LLC; RED ROBIN
INTERNATIONAL, INC.; ROSS STORES, INC.;
SAKS & COMPANY LLC; SAKS OFF 5TH LLC;
SHAKE SHACK CALIFORNIA, LLC; SHAKE
SHACK ENTERPRISES, LLC; SMART & FINAL
LLC; SMART & FINAL STORES LLC;
SPENCER GIFTS LLC; STAPLES, INC.; TACO
BELL CORP; TACO BELL OF AMERICA, LLC;
THE CHEESECAKE FACTORY

1 INCORPORATED; THE CHEESECAKE
2 FACTORY RESTAURANTS, INC.; THE GAP,
3 INC.; THE HABIT RESTAURANTS, INC.; THE
4 HABIT RESTAURANTS, LLC; THE KROGER
5 CO.; TRACTOR SUPPLY COMPANY;
6 TST/IMPRESO, INC.; ULTA BEAUTY, INC.;
7 ULTA SALON, COSMETICS & FRAGRANCE,
8 INC.; VICTORIA'S SECRET STORES, LLC;
9 WALMART INC.; WELLS FARGO &
10 COMPANY; WILLIAMS-SONOMA, INC.;
11 YARD HOUSE USA, INC.; NEW RECEIPTCO
12 OPCO, LLC, DBA DOMTAR.; and DOES 45-400

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Defendants.

1 Plaintiff Center for Environmental Health, in the public interest, based on information and belief
2 and investigation of counsel, except for information based on knowledge, hereby makes the following
3 allegations:

4 **INTRODUCTION**

5 1. This Complaint seeks to remedy Defendants' ongoing violations of California's
6 Proposition 65, Health & Safety Code §25249.5, *et seq.* Defendants violate Proposition 65 by
7 knowingly and intentionally exposing individuals in California to Bisphenol S ("BPS"), a chemical
8 known to the State of California to cause birth defects and other reproductive harm. Such exposures
9 have occurred, and continue to occur, when individuals handle thermal receipt paper coated with BPS
10 ("Thermal Receipt Paper") that is manufactured, distributed, purchased for use, sold, offered for sale,
11 provided, or offered to be provided by Defendants. Individuals, including women who are pregnant or
12 seeking to become pregnant, are exposed to BPS when they touch or handle the Thermal Receipt Paper.
13 Defendants' violations arise due to the manufacture, distribution, and sale of Thermal Receipt Paper
14 containing BPS by several suppliers of such paper. These suppliers provide the Thermal Receipt Paper
15 containing BPS to their customers, who in turn provide receipts to individuals throughout California,
16 thereby exposing such individuals to BPS. This Complaint seeks to comprehensively address this
17 industry-wide problem.

18 2. Under Proposition 65, it is unlawful for businesses to knowingly and intentionally expose
19 individuals in California to chemicals known to the State to cause birth defects or other reproductive
20 harm without first providing clear and reasonable warnings to exposed individuals. Defendants
21 manufacture, distribute, purchase for use, sell, offer to sell, provide, or offer to provide Thermal Receipt
22 Paper containing significant quantities of BPS to individuals in California, thereby exposing these
23 individuals to BPS.

24 3. Despite the fact that Defendants expose those who are pregnant, those who are seeking to
25 become pregnant, and others to BPS, Defendants provide no warnings whatsoever about the
26 reproductive hazards associated with BPS exposure. Defendants' conduct thus violates the warning
27 provision of Proposition 65. Health & Safety Code §25249.6.
28

PARTIES

4. Plaintiff CENTER FOR ENVIRONMENTAL HEALTH (“CEH”) is a non-profit corporation dedicated to protecting the public from environmental health hazards and toxic exposures. CEH is based in Oakland, California and incorporated under the laws of the State of California. CEH is a “person” within the meaning of Health & Safety Code §25249.11(a) and brings this enforcement action in the public interest pursuant to Health & Safety Code §25249.7(d). CEH is a nationally recognized not-for-profit environmental advocacy group that has prosecuted numerous Proposition 65 cases in the public interest. Through its work, CEH has created substantial public benefit, including the reformulation or removal from the market of millions of products harming consumers and the environment. CEH also provides information to Californians about the health risks associated with exposure to hazardous substances when manufacturers and other responsible parties fail to do so.

5. Defendant AESOP USA, INC. is a person in the course of doing business within the meaning of Health & Safety Code §25249.11. AESOP USA, INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California. AESOP USA, INC. purchased Thermal Receipt Paper containing BPS from a SUPPLIER DOE and used and/or provided such Thermal Receipt Paper containing BPS to individuals in California.

6. Defendant AMAZON RETAIL LLC is a person in the course of doing business within the meaning of Health & Safety Code §25249.11. AMAZON RETAIL LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California. AMAZON RETAIL LLC purchased Thermal Receipt Paper containing BPS from a SUPPLIER DOE and used and/or provided such Thermal Receipt Paper containing BPS to individuals in California.

7. Defendant AMAZON.COM SERVICES LLC is a person in the course of doing business within the meaning of Health & Safety Code §25249.11. AMAZON.COM SERVICES LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California. AMAZON.COM SERVICES LLC

1 purchased Thermal Receipt Paper containing BPS from a SUPPLIER DOE and used and/or provided
2 such Thermal Receipt Paper containing BPS to individuals in California.

3 8. Defendant AMAZON.COM, INC. is a person in the course of doing business within the
4 meaning of Health & Safety Code §25249.11. AMAZON.COM, INC. manufactures, distributes,
5 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
6 BPS to individuals in California. AMAZON.COM, INC. purchased Thermal Receipt Paper containing
7 BPS from a SUPPLIER DOE and used and/or provided such Thermal Receipt Paper containing BPS to
8 individuals in California.

9 9. Defendant AMERICAN MULTI-CINEMA, INC. is a person in the course of doing
10 business within the meaning of Health & Safety Code §25249.11. AMERICAN MULTI-CINEMA,
11 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
12 Thermal Receipt Paper containing BPS to individuals in California. AMERICAN MULTI-CINEMA,
13 INC. purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
14 SUPPLIER DOE and used and/or provided such Thermal Receipt Paper containing BPS to individuals
15 in California.

16 10. Defendant AUTOZONE PARTS, INC. is a person in the course of doing business within
17 the meaning of Health & Safety Code §25249.11. AUTOZONE PARTS, INC. manufactures,
18 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
19 containing BPS to individuals in California. AUTOZONE PARTS, INC. purchased Thermal Receipt
20 Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and/or
21 provided such Thermal Receipt Paper containing BPS to individuals in California.

22 11. Defendant AUTOZONE STORES INC. is a person in the course of doing business within
23 the meaning of Health & Safety Code §25249.11. AUTOZONE STORES INC. manufactures,
24 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
25 containing BPS to individuals in California. AUTOZONE STORES INC. purchased Thermal Receipt
26 Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and/or
27 provided such Thermal Receipt Paper containing BPS to individuals in California.
28

1 12. Defendant AUTOZONE, INC. is a person in the course of doing business within the
2 meaning of Health & Safety Code §25249.11. AUTOZONE, INC. manufactures, distributes, purchases
3 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
4 individuals in California. AUTOZONE, INC. purchased Thermal Receipt Paper containing BPS from
5 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and/or provided such Thermal
6 Receipt Paper containing BPS to individuals in California.

7 13. Defendant BG RETAIL, LLC is a person in the course of doing business within the
8 meaning of Health & Safety Code §25249.11. BG RETAIL, LLC manufactures, distributes, purchases
9 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
10 individuals in California. BG RETAIL, LLC purchased Thermal Receipt Paper containing BPS from
11 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
12 Receipt Paper containing BPS to individuals in California.

13 14. Defendant BRINKER INTERNATIONAL, INC. is a person in the course of doing
14 business within the meaning of Health & Safety Code §25249.11. BRINKER INTERNATIONAL,
15 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
16 Thermal Receipt Paper containing BPS to individuals in California. BRINKER INTERNATIONAL,
17 INC. purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
18 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
19 California.

20 15. Defendant BRINKER RESTAURANT CORPORATION is a person in the course of
21 doing business within the meaning of Health & Safety Code §25249.11. BRINKER RESTAURANT
22 CORPORATION manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to
23 provide Thermal Receipt Paper containing BPS to individuals in California. BRINKER
24 RESTAURANT CORPORATION purchased Thermal Receipt Paper containing BPS from NEW
25 RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal Receipt
26 Paper containing BPS to individuals in California.

27 16. Defendant BURGER KING COMPANY LLC is a person in the course of doing business
28 within the meaning of Health & Safety Code §25249.11. BURGER KING COMPANY LLC

1 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
2 Receipt Paper containing BPS to individuals in California. BURGER KING COMPANY LLC
3 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
4 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
5 California.

6 17. Defendant BURLINGTON COAT FACTORY WAREHOUSE CORPORATION is a
7 person in the course of doing business within the meaning of Health & Safety Code §25249.11.
8 BURLINGTON COAT FACTORY WAREHOUSE CORPORATION manufactures, distributes,
9 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
10 BPS to individuals in California. BURLINGTON COAT FACTORY WAREHOUSE CORPORATION
11 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
12 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
13 California.

14 18. Defendant BURLINGTON STORES, INC. is a person in the course of doing business
15 within the meaning of Health & Safety Code §25249.11. BURLINGTON STORES, INC. manufactures,
16 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
17 containing BPS to individuals in California. BURLINGTON STORES, INC. purchased Thermal
18 Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and
19 used and provided such Thermal Receipt Paper containing BPS to individuals in California.

20 19. Defendant CALERES, INC. is a person in the course of doing business within the
21 meaning of Health & Safety Code §25249.11. CALERES, INC. manufactures, distributes, purchases for
22 use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
23 individuals in California. CALERES, INC. purchased Thermal Receipt Paper containing BPS from
24 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
25 Receipt Paper containing BPS to individuals in California.

26 20. Defendant CAPITAL ONE, N.A. is a person in the course of doing business within the
27 meaning of Health & Safety Code §25249.11. CAPITAL ONE, N.A. manufactures, distributes,
28 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing

1 BPS to individuals in California. CAPITAL ONE, N.A. purchased Thermal Receipt Paper containing
2 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
3 Thermal Receipt Paper containing BPS to individuals in California.

4 21. Defendant CARDENAS MARKETS LLC is a person in the course of doing business
5 within the meaning of Health & Safety Code §25249.11. CARDENAS MARKETS LLC manufactures,
6 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
7 containing BPS to individuals in California. CARDENAS MARKETS LLC purchased Thermal Receipt
8 Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and
9 provided such Thermal Receipt Paper containing BPS to individuals in California.

10 22. Defendant CARL'S JR. RESTAURANTS LLC is a person in the course of doing
11 business within the meaning of Health & Safety Code §25249.11. CARL'S JR. RESTAURANTS LLC
12 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
13 Receipt Paper containing BPS to individuals in California. CARL'S JR. RESTAURANTS LLC
14 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
15 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
16 California.

17 23. Defendant CBI DISTRIBUTING CORP. is a person in the course of doing business
18 within the meaning of Health & Safety Code §25249.11. CBI DISTRIBUTING CORP. manufactures,
19 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
20 containing BPS to individuals in California. CBI DISTRIBUTING CORP. purchased Thermal Receipt
21 Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and
22 provided such Thermal Receipt Paper containing BPS to individuals in California.

23 24. Defendant CHANEL, INC. is a person in the course of doing business within the
24 meaning of Health & Safety Code §25249.11. CHANEL, INC. manufactures, distributes, purchases for
25 use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
26 individuals in California. CHANEL, INC. purchased Thermal Receipt Paper containing BPS from
27 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
28 Receipt Paper containing BPS to individuals in California.

1 25. Defendant CINNABON FRANCHISOR SPV LLC is a person in the course of doing
2 business within the meaning of Health & Safety Code §25249.11. CINNABON FRANCHISOR SPV
3 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
4 Thermal Receipt Paper containing BPS to individuals in California. CINNABON FRANCHISOR SPV
5 LLC purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
6 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
7 California.

8 26. Defendant CINNABON LLC is a person in the course of doing business within the
9 meaning of Health & Safety Code §25249.11. CINNABON LLC manufactures, distributes, purchases
10 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
11 individuals in California. CINNABON LLC purchased Thermal Receipt Paper containing BPS from
12 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
13 Receipt Paper containing BPS to individuals in California.

14 27. Defendant CKE RESTAURANTS HOLDINGS, INC. is a person in the course of doing
15 business within the meaning of Health & Safety Code §25249.11. CKE RESTAURANTS HOLDINGS,
16 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
17 Thermal Receipt Paper containing BPS to individuals in California. CKE RESTAURANTS
18 HOLDINGS, INC. purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO,
19 LLC and/or a SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to
20 individuals in California.

21 28. Defendant CLAIRE'S STORES, INC. is a person in the course of doing business within
22 the meaning of Health & Safety Code §25249.11. CLAIRE'S STORES, INC. manufactures, distributes,
23 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
24 BPS to individuals in California. CLAIRE'S STORES, INC. purchased Thermal Receipt Paper
25 containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided
26 such Thermal Receipt Paper containing BPS to individuals in California.

27 29. Defendant COMPASS GROUP USA, INC. is a person in the course of doing business
28 within the meaning of Health & Safety Code §25249.11. COMPASS GROUP USA, INC.

1 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
2 Receipt Paper containing BPS to individuals in California. COMPASS GROUP USA, INC. purchased
3 Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER
4 DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in California.

5 30. Defendant CONVERSE INC. is a person in the course of doing business within the
6 meaning of Health & Safety Code §25249.11. CONVERSE INC. manufactures, distributes, purchases
7 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
8 individuals in California. CONVERSE INC. purchased Thermal Receipt Paper containing BPS from
9 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
10 Receipt Paper containing BPS to individuals in California.

11 31. Defendant CRUMBL LLC is a person in the course of doing business within the meaning
12 of Health & Safety Code §25249.11. CRUMBL LLC manufactures, distributes, purchases for use, sells,
13 offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in
14 California. CRUMBL LLC purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO
15 OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal Receipt Paper containing
16 BPS to individuals in California.

17 32. Defendant DAISO USA LLC is a person in the course of doing business within the
18 meaning of Health & Safety Code §25249.11. DAISO USA LLC manufactures, distributes, purchases
19 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
20 individuals in California. DAISO USA LLC purchased Thermal Receipt Paper containing BPS from
21 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
22 Receipt Paper containing BPS to individuals in California.

23 33. Defendant DARDEN CORPORATION is a person in the course of doing business within
24 the meaning of Health & Safety Code §25249.11. DARDEN CORPORATION manufactures,
25 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
26 containing BPS to individuals in California. DARDEN CORPORATION purchased Thermal Receipt
27 Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and
28 provided such Thermal Receipt Paper containing BPS to individuals in California.

1 34. Defendant DARDEN RESTAURANTS, INC. is a person in the course of doing business
2 within the meaning of Health & Safety Code §25249.11. DARDEN RESTAURANTS, INC.
3 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
4 Receipt Paper containing BPS to individuals in California. DARDEN RESTAURANTS, INC.
5 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
6 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
7 California.

8 35. Defendant DEL TACO LLC is a person in the course of doing business within the
9 meaning of Health & Safety Code §25249.11. DEL TACO LLC manufactures, distributes, purchases
10 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
11 individuals in California. DEL TACO LLC purchased Thermal Receipt Paper containing BPS from
12 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
13 Receipt Paper containing BPS to individuals in California.

14 36. Defendant DENNY'S (CA) CORPORATION is a person in the course of doing business
15 within the meaning of Health & Safety Code §25249.11. DENNY'S (CA) CORPORATION
16 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
17 Receipt Paper containing BPS to individuals in California. DENNY'S (CA) CORPORATION
18 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
19 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
20 California.

21 37. Defendant DENNY'S, INC. is a person in the course of doing business within the
22 meaning of Health & Safety Code §25249.11. DENNY'S, INC. manufactures, distributes, purchases for
23 use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
24 individuals in California. DENNY'S, INC. purchased Thermal Receipt Paper containing BPS from
25 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
26 Receipt Paper containing BPS to individuals in California.

27 38. Defendant DFO, LLC is a person in the course of doing business within the meaning of
28 Health & Safety Code §25249.11. DFO, LLC manufactures, distributes, purchases for use, sells, offers

1 to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California.
2 DFO, LLC purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC
3 and/or a SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to
4 individuals in California.

5 39. Defendant DICK'S SPORTING GOODS, INC. is a person in the course of doing
6 business within the meaning of Health & Safety Code §25249.11. DICK'S SPORTING GOODS, INC.
7 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
8 Receipt Paper containing BPS to individuals in California. DICK'S SPORTING GOODS, INC.
9 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
10 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
11 California.

12 40. Defendant DOLGEN CALIFORNIA, LLC is a person in the course of doing business
13 within the meaning of Health & Safety Code §25249.11. DOLGEN CALIFORNIA, LLC manufactures,
14 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
15 containing BPS to individuals in California. DOLGEN CALIFORNIA, LLC purchased Thermal
16 Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and
17 used and provided such Thermal Receipt Paper containing BPS to individuals in California.

18 41. Defendant DOLLAR GENERAL CORPORATION is a person in the course of doing
19 business within the meaning of Health & Safety Code §25249.11. DOLLAR GENERAL
20 CORPORATION manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to
21 provide Thermal Receipt Paper containing BPS to individuals in California. DOLLAR GENERAL
22 CORPORATION purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO,
23 LLC and/or a SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to
24 individuals in California.

25 42. Defendant DOLLAR TREE STORES, INC. is a person in the course of doing business
26 within the meaning of Health & Safety Code §25249.11. DOLLAR TREE STORES, INC.
27 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
28 Receipt Paper containing BPS to individuals in California. DOLLAR TREE STORES, INC. purchased

1 Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER
2 DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in California.

3 43. Defendant DOMINO'S PIZZA FRANCHISING LLC is a person in the course of doing
4 business within the meaning of Health & Safety Code §25249.11. DOMINO'S PIZZA FRANCHISING
5 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
6 Thermal Receipt Paper containing BPS to individuals in California. DOMINO'S PIZZA
7 FRANCHISING LLC purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO
8 OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal Receipt Paper containing
9 BPS to individuals in California.

10 44. Defendant DOMINO'S PIZZA LLC is a person in the course of doing business within
11 the meaning of Health & Safety Code §25249.11. DOMINO'S PIZZA LLC manufactures, distributes,
12 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
13 BPS to individuals in California. DOMINO'S PIZZA LLC purchased Thermal Receipt Paper
14 containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided
15 such Thermal Receipt Paper containing BPS to individuals in California.

16 45. Defendant DOMINO'S PIZZA, INC. is a person in the course of doing business within
17 the meaning of Health & Safety Code §25249.11. DOMINO'S PIZZA, INC. manufactures, distributes,
18 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
19 BPS to individuals in California. DOMINO'S PIZZA, INC. purchased Thermal Receipt Paper
20 containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided
21 such Thermal Receipt Paper containing BPS to individuals in California.

22 46. Defendant DUTCH BROS, INC. is a person in the course of doing business within the
23 meaning of Health & Safety Code §25249.11. DUTCH BROS, INC. manufactures, distributes,
24 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
25 BPS to individuals in California. DUTCH BROS, INC. purchased Thermal Receipt Paper containing
26 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
27 Thermal Receipt Paper containing BPS to individuals in California.
28

1 47. Defendant DUTCH MAFIA, INC. is a person in the course of doing business within the
2 meaning of Health & Safety Code §25249.11. DUTCH MAFIA, INC. manufactures, distributes,
3 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
4 BPS to individuals in California. DUTCH MAFIA, INC. purchased Thermal Receipt Paper containing
5 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
6 Thermal Receipt Paper containing BPS to individuals in California.

7 48. Defendant FAT BRANDS INC. is a person in the course of doing business within the
8 meaning of Health & Safety Code §25249.11. FAT BRANDS INC. manufactures, distributes,
9 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
10 BPS to individuals in California. FAT BRANDS INC. purchased Thermal Receipt Paper containing
11 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
12 Thermal Receipt Paper containing BPS to individuals in California.

13 49. Defendant FEDEX OFFICE AND PRINT SERVICES, INC. is a person in the course of
14 doing business within the meaning of Health & Safety Code §25249.11. FEDEX OFFICE AND PRINT
15 SERVICES, INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to
16 provide Thermal Receipt Paper containing BPS to individuals in California. FEDEX OFFICE AND
17 PRINT SERVICES, INC. purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO
18 OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal Receipt Paper containing
19 BPS to individuals in California.

20 50. Defendant FIVE GUYS ENTERPRISES, LLC is a person in the course of doing business
21 within the meaning of Health & Safety Code §25249.11. FIVE GUYS ENTERPRISES, LLC
22 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
23 Receipt Paper containing BPS to individuals in California. FIVE GUYS ENTERPRISES, LLC
24 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
25 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
26 California.

27 51. Defendant FIVE GUYS OPERATIONS, LLC is a person in the course of doing business
28 within the meaning of Health & Safety Code §25249.11. FIVE GUYS OPERATIONS, LLC

1 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
2 Receipt Paper containing BPS to individuals in California. FIVE GUYS OPERATIONS, LLC
3 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
4 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
5 California.

6 52. Defendant FOOT LOCKER, INC. is a person in the course of doing business within the
7 meaning of Health & Safety Code §25249.11. FOOT LOCKER, INC. manufactures, distributes,
8 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
9 BPS to individuals in California. FOOT LOCKER, INC. purchased Thermal Receipt Paper containing
10 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
11 Thermal Receipt Paper containing BPS to individuals in California.

12 53. Defendant FOOT LOCKER RETAIL, INC. is a person in the course of doing business
13 within the meaning of Health & Safety Code §25249.11. FOOT LOCKER RETAIL, INC.
14 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
15 Receipt Paper containing BPS to individuals in California. FOOT LOCKER RETAIL, INC. purchased
16 Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER
17 DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in California.

18 54. Defendant GAMESTOP CORP. is a person in the course of doing business within the
19 meaning of Health & Safety Code §25249.11. GAMESTOP CORP. manufactures, distributes,
20 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
21 BPS to individuals in California. GAMESTOP CORP. purchased Thermal Receipt Paper containing
22 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
23 Thermal Receipt Paper containing BPS to individuals in California.

24 55. Defendant GAMESTOP, INC. is a person in the course of doing business within the
25 meaning of Health & Safety Code §25249.11. GAMESTOP, INC. manufactures, distributes, purchases
26 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
27 individuals in California. GAMESTOP, INC. purchased Thermal Receipt Paper containing BPS from
28

1 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
2 Receipt Paper containing BPS to individuals in California.

3 56. Defendant GROCERY OUTLET INC. is a person in the course of doing business within
4 the meaning of Health & Safety Code §25249.11. GROCERY OUTLET INC. manufactures,
5 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
6 containing BPS to individuals in California. GROCERY OUTLET INC. purchased Thermal Receipt
7 Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and
8 provided such Thermal Receipt Paper containing BPS to individuals in California.

9 57. Defendant HARBOR FREIGHT TOOLS USA, INC. is a person in the course of doing
10 business within the meaning of Health & Safety Code §25249.11. HARBOR FREIGHT TOOLS USA,
11 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
12 Thermal Receipt Paper containing BPS to individuals in California. HARBOR FREIGHT TOOLS
13 USA, INC. purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC
14 and/or a SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to
15 individuals in California.

16 58. Defendant HAT WORLD, INC. is a person in the course of doing business within the
17 meaning of Health & Safety Code §25249.11. HAT WORLD, INC. manufactures, distributes,
18 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
19 BPS to individuals in California. HAT WORLD, INC. purchased Thermal Receipt Paper containing
20 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
21 Thermal Receipt Paper containing BPS to individuals in California.

22 59. Defendant ILITCH HOLDINGS, INC. is a person in the course of doing business within
23 the meaning of Health & Safety Code §25249.11. ILITCH HOLDINGS, INC. manufactures,
24 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
25 containing BPS to individuals in California. ILITCH HOLDINGS, INC. purchased Thermal Receipt
26 Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and
27 provided such Thermal Receipt Paper containing BPS to individuals in California.
28

1 60. Defendant JACK IN THE BOX, INC. is a person in the course of doing business within
2 the meaning of Health & Safety Code §25249.11. JACK IN THE BOX, INC. manufactures, distributes,
3 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
4 BPS to individuals in California. JACK IN THE BOX, INC. purchased Thermal Receipt Paper
5 containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided
6 such Thermal Receipt Paper containing BPS to individuals in California.

7 61. Defendant JPMORGAN CHASE BANK, N.A. is a person in the course of doing business
8 within the meaning of Health & Safety Code §25249.11. JPMORGAN CHASE BANK, N.A.
9 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
10 Receipt Paper containing BPS to individuals in California. JPMORGAN CHASE BANK, N.A.
11 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
12 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
13 California.

14 62. Defendant KFC CORPORATION is a person in the course of doing business within the
15 meaning of Health & Safety Code §25249.11. KFC CORPORATION manufactures, distributes,
16 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
17 BPS to individuals in California. KFC CORPORATION purchased Thermal Receipt Paper containing
18 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
19 Thermal Receipt Paper containing BPS to individuals in California.

20 63. Defendant LITTLE CAESAR ENTERPRISES, INC. is a person in the course of doing
21 business within the meaning of Health & Safety Code §25249.11. LITTLE CAESAR ENTERPRISES,
22 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
23 Thermal Receipt Paper containing BPS to individuals in California. LITTLE CAESAR
24 ENTERPRISES, INC. purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO
25 OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal Receipt Paper containing
26 BPS to individuals in California.

27 64. Defendant LOWE'S HOME CENTERS, LLC is a person in the course of doing business
28 within the meaning of Health & Safety Code §25249.11. LOWE'S HOME CENTERS, LLC

1 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
2 Receipt Paper containing BPS to individuals in California. LOWE'S HOME CENTERS, LLC purchased
3 Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER
4 DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in California.

5 65. Defendant MCDONALD'S CORPORATION is a person in the course of doing business
6 within the meaning of Health & Safety Code §25249.11. MCDONALD'S CORPORATION
7 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
8 Receipt Paper containing BPS to individuals in California. MCDONALD'S CORPORATION
9 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
10 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
11 California.

12 66. Defendant MCDONALD'S RESTAURANTS OF CALIFORNIA, INC is a person in the
13 course of doing business within the meaning of Health & Safety Code §25249.11. MCDONALD'S
14 RESTAURANTS OF CALIFORNIA, INC manufactures, distributes, purchases for use, sells, offers to
15 sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California.
16 MCDONALD'S RESTAURANTS OF CALIFORNIA, INC purchased Thermal Receipt Paper
17 containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided
18 such Thermal Receipt Paper containing BPS to individuals in California.

19 67. Defendant MCDONALD'S USA, LLC is a person in the course of doing business within
20 the meaning of Health & Safety Code §25249.11. MCDONALD'S USA, LLC manufactures,
21 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
22 containing BPS to individuals in California. MCDONALD'S USA, LLC purchased Thermal Receipt
23 Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and
24 provided such Thermal Receipt Paper containing BPS to individuals in California.

25 68. Defendant MOD SUPER FAST PIZZA (CALIFORNIA), LLC is a person in the course
26 of doing business within the meaning of Health & Safety Code §25249.11. MOD SUPER FAST PIZZA
27 (CALIFORNIA), LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or
28 offers to provide Thermal Receipt Paper containing BPS to individuals in California. MOD SUPER

1 FAST PIZZA (CALIFORNIA), LLC purchased Thermal Receipt Paper containing BPS from NEW
2 RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal Receipt
3 Paper containing BPS to individuals in California.

4 69. Defendant MOD SUPER FAST PIZZA, LLC is a person in the course of doing business
5 within the meaning of Health & Safety Code §25249.11. MOD SUPER FAST PIZZA, LLC
6 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
7 Receipt Paper containing BPS to individuals in California. MOD SUPER FAST PIZZA, LLC
8 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
9 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
10 California.

11 70. Defendant OFFICE DEPOT, LLC is a person in the course of doing business within the
12 meaning of Health & Safety Code §25249.11. OFFICE DEPOT, LLC manufactures, distributes,
13 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
14 BPS to individuals in California. OFFICE DEPOT, LLC purchased Thermal Receipt Paper containing
15 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
16 Thermal Receipt Paper containing BPS to individuals in California.

17 71. Defendant OLIVE GARDEN HOLDINGS, LLC is a person in the course of doing
18 business within the meaning of Health & Safety Code §25249.11. OLIVE GARDEN HOLDINGS, LLC
19 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
20 Receipt Paper containing BPS to individuals in California. OLIVE GARDEN HOLDINGS, LLC
21 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
22 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
23 California.

24 72. Defendant P.F. CHANG'S CHINA BISTRO, INC. is a person in the course of doing
25 business within the meaning of Health & Safety Code §25249.11. P.F. CHANG'S CHINA BISTRO,
26 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
27 Thermal Receipt Paper containing BPS to individuals in California. P.F. CHANG'S CHINA BISTRO,
28 INC. purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a

1 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
2 California.

3 73. Defendant PAPA JOHN'S INTERNATIONAL, INC. is a person in the course of doing
4 business within the meaning of Health & Safety Code §25249.11. PAPA JOHN'S INTERNATIONAL,
5 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
6 Thermal Receipt Paper containing BPS to individuals in California. PAPA JOHN'S
7 INTERNATIONAL, INC. purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO
8 OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal Receipt Paper containing
9 BPS to individuals in California.

10 74. Defendant PEET'S COFFEE, INC. is a person in the course of doing business within the
11 meaning of Health & Safety Code §25249.11. PEET'S COFFEE, INC. manufactures, distributes,
12 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
13 BPS to individuals in California. PEET'S COFFEE, INC. purchased Thermal Receipt Paper containing
14 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
15 Thermal Receipt Paper containing BPS to individuals in California.

16 75. Defendant PENNEY OPCO LLC is a person in the course of doing business within the
17 meaning of Health & Safety Code §25249.11. PENNEY OPCO LLC manufactures, distributes,
18 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
19 BPS to individuals in California. PENNEY OPCO LLC purchased Thermal Receipt Paper containing
20 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
21 Thermal Receipt Paper containing BPS to individuals in California.

22 76. Defendant PETCO ANIMAL SUPPLIES, INC. is a person in the course of doing
23 business within the meaning of Health & Safety Code §25249.11. PETCO ANIMAL SUPPLIES, INC.
24 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
25 Receipt Paper containing BPS to individuals in California. PETCO ANIMAL SUPPLIES, INC.
26 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
27 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
28 California.

1 77. Defendant PETCO ANIMAL SUPPLIES STORES, INC. is a person in the course of
2 doing business within the meaning of Health & Safety Code §25249.11. PETCO ANIMAL SUPPLIES
3 STORES, INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to
4 provide Thermal Receipt Paper containing BPS to individuals in California. PETCO ANIMAL
5 SUPPLIES STORES, INC. purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO
6 OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal Receipt Paper containing
7 BPS to individuals in California.

8 78. Defendant PETSMART LLC is a person in the course of doing business within the
9 meaning of Health & Safety Code §25249.11. PETSMART LLC manufactures, distributes, purchases
10 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
11 individuals in California. PETSMART LLC purchased Thermal Receipt Paper containing BPS from
12 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
13 Receipt Paper containing BPS to individuals in California.

14 79. Defendant PHILLIPS 66 COMPANY is a person in the course of doing business within
15 the meaning of Health & Safety Code §25249.11. PHILLIPS 66 COMPANY manufactures, distributes,
16 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
17 BPS to individuals in California. PHILLIPS 66 COMPANY purchased Thermal Receipt Paper
18 containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided
19 such Thermal Receipt Paper containing BPS to individuals in California.

20 80. Defendant PIZZA HUT OF AMERICA, LLC is a person in the course of doing business
21 within the meaning of Health & Safety Code §25249.11. PIZZA HUT OF AMERICA, LLC
22 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
23 Receipt Paper containing BPS to individuals in California. PIZZA HUT OF AMERICA, LLC
24 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
25 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
26 California.

27 81. Defendant PIZZA HUT, LLC is a person in the course of doing business within the
28 meaning of Health & Safety Code §25249.11. PIZZA HUT, LLC manufactures, distributes, purchases

1 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
2 individuals in California. PIZZA HUT, LLC purchased Thermal Receipt Paper containing BPS from
3 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
4 Receipt Paper containing BPS to individuals in California.

5 82. Defendant PRESSED JUICERY, INC. is a person in the course of doing business within
6 the meaning of Health & Safety Code §25249.11. PRESSED JUICERY, INC. manufactures,
7 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
8 containing BPS to individuals in California. PRESSED JUICERY, INC. purchased Thermal Receipt
9 Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and
10 provided such Thermal Receipt Paper containing BPS to individuals in California.

11 83. Defendant RAISING CANE'S RESTAURANTS, LLC is a person in the course of doing
12 business within the meaning of Health & Safety Code §25249.11. RAISING CANE'S
13 RESTAURANTS, LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or
14 offers to provide Thermal Receipt Paper containing BPS to individuals in California. RAISING
15 CANE'S RESTAURANTS, LLC purchased Thermal Receipt Paper containing BPS from NEW
16 RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal Receipt
17 Paper containing BPS to individuals in California.

18 84. Defendant RAISING CANE'S USA, LLC is a person in the course of doing business
19 within the meaning of Health & Safety Code §25249.11. RAISING CANE'S USA, LLC manufactures,
20 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
21 containing BPS to individuals in California. RAISING CANE'S USA, LLC purchased Thermal Receipt
22 Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and
23 provided such Thermal Receipt Paper containing BPS to individuals in California.

24 85. Defendant RED LOBSTER HOSPITALITY LLC is a person in the course of doing
25 business within the meaning of Health & Safety Code §25249.11. RED LOBSTER HOSPITALITY
26 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
27 Thermal Receipt Paper containing BPS to individuals in California. RED LOBSTER HOSPITALITY
28 LLC purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a

1 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
2 California.

3 86. Defendant RED LOBSTER MANAGEMENT LLC is a person in the course of doing
4 business within the meaning of Health & Safety Code §25249.11. RED LOBSTER MANAGEMENT
5 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
6 Thermal Receipt Paper containing BPS to individuals in California. RED LOBSTER MANAGEMENT
7 LLC purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
8 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
9 California.

10 87. Defendant RED LOBSTER RESTAURANTS LLC is a person in the course of doing
11 business within the meaning of Health & Safety Code §25249.11. RED LOBSTER RESTAURANTS
12 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
13 Thermal Receipt Paper containing BPS to individuals in California. RED LOBSTER RESTAURANTS
14 LLC purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
15 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
16 California.

17 88. Defendant RED ROBIN INTERNATIONAL, INC. is a person in the course of doing
18 business within the meaning of Health & Safety Code §25249.11. RED ROBIN INTERNATIONAL,
19 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
20 Thermal Receipt Paper containing BPS to individuals in California. RED ROBIN INTERNATIONAL,
21 INC. purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
22 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
23 California.

24 89. Defendant ROSS STORES, INC. is a person in the course of doing business within the
25 meaning of Health & Safety Code §25249.11. ROSS STORES, INC. manufactures, distributes,
26 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
27 BPS to individuals in California. ROSS STORES, INC. purchased Thermal Receipt Paper containing
28

1 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
2 Thermal Receipt Paper containing BPS to individuals in California.

3 90. Defendant SAKS & COMPANY LLC is a person in the course of doing business within
4 the meaning of Health & Safety Code §25249.11. SAKS & COMPANY LLC manufactures, distributes,
5 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
6 BPS to individuals in California. SAKS & COMPANY LLC purchased Thermal Receipt Paper
7 containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided
8 such Thermal Receipt Paper containing BPS to individuals in California.

9 91. Defendant SAKS OFF 5TH LLC is a person in the course of doing business within the
10 meaning of Health & Safety Code §25249.11. SAKS OFF 5TH LLC manufactures, distributes,
11 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
12 BPS to individuals in California. SAKS OFF 5TH LLC purchased Thermal Receipt Paper containing
13 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
14 Thermal Receipt Paper containing BPS to individuals in California.

15 92. Defendant SHAKE SHACK CALIFORNIA, LLC is a person in the course of doing
16 business within the meaning of Health & Safety Code §25249.11. SHAKE SHACK CALIFORNIA,
17 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
18 Thermal Receipt Paper containing BPS to individuals in California. SHAKE SHACK CALIFORNIA,
19 LLC purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
20 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
21 California.

22 93. Defendant SHAKE SHACK ENTERPRISES, LLC is a person in the course of doing
23 business within the meaning of Health & Safety Code §25249.11. SHAKE SHACK ENTERPRISES,
24 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
25 Thermal Receipt Paper containing BPS to individuals in California. SHAKE SHACK ENTERPRISES,
26 LLC purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
27 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
28 California.

1 94. Defendant SMART & FINAL LLC is a person in the course of doing business within the
2 meaning of Health & Safety Code §25249.11. SMART & FINAL LLC manufactures, distributes,
3 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
4 BPS to individuals in California. SMART & FINAL LLC purchased Thermal Receipt Paper containing
5 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
6 Thermal Receipt Paper containing BPS to individuals in California.

7 95. Defendant SMART & FINAL STORES LLC is a person in the course of doing business
8 within the meaning of Health & Safety Code §25249.11. SMART & FINAL STORES LLC
9 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
10 Receipt Paper containing BPS to individuals in California. SMART & FINAL STORES LLC purchased
11 Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER
12 DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in California.

13 96. Defendant SPENCER GIFTS LLC is a person in the course of doing business within the
14 meaning of Health & Safety Code §25249.11. SPENCER GIFTS LLC manufactures, distributes,
15 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
16 BPS to individuals in California. SPENCER GIFTS LLC purchased Thermal Receipt Paper containing
17 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
18 Thermal Receipt Paper containing BPS to individuals in California.

19 97. Defendant STAPLES, INC. is a person in the course of doing business within the
20 meaning of Health & Safety Code §25249.11. STAPLES, INC. manufactures, distributes, purchases for
21 use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
22 individuals in California. STAPLES, INC. purchased Thermal Receipt Paper containing BPS from
23 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
24 Receipt Paper containing BPS to individuals in California.

25 98. Defendant TACO BELL CORP is a person in the course of doing business within the
26 meaning of Health & Safety Code §25249.11. TACO BELL CORP manufactures, distributes, purchases
27 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
28 individuals in California. TACO BELL CORP purchased Thermal Receipt Paper containing BPS from

1 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
2 Receipt Paper containing BPS to individuals in California.

3 99. Defendant TACO BELL OF AMERICA, LLC is a person in the course of doing business
4 within the meaning of Health & Safety Code §25249.11. TACO BELL OF AMERICA, LLC
5 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
6 Receipt Paper containing BPS to individuals in California. TACO BELL OF AMERICA, LLC
7 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
8 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
9 California.

10 100. Defendant THE CHEESECAKE FACTORY INCORPORATED is a person in the course
11 of doing business within the meaning of Health & Safety Code §25249.11. THE CHEESECAKE
12 FACTORY INCORPORATED manufactures, distributes, purchases for use, sells, offers to sell,
13 provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California. THE
14 CHEESECAKE FACTORY INCORPORATED purchased Thermal Receipt Paper containing BPS from
15 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
16 Receipt Paper containing BPS to individuals in California.

17 101. Defendant THE CHEESECAKE FACTORY RESTAURANTS, INC. is a person in the
18 course of doing business within the meaning of Health & Safety Code §25249.11. THE CHEESECAKE
19 FACTORY RESTAURANTS, INC. manufactures, distributes, purchases for use, sells, offers to sell,
20 provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California. THE
21 CHEESECAKE FACTORY RESTAURANTS, INC. purchased Thermal Receipt Paper containing BPS
22 from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
23 Receipt Paper containing BPS to individuals in California.

24 102. Defendant THE GAP, INC. is a person in the course of doing business within the
25 meaning of Health & Safety Code §25249.11. THE GAP, INC. manufactures, distributes, purchases for
26 use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
27 individuals in California. THE GAP, INC. purchased Thermal Receipt Paper containing BPS from NEW
28

1 RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal Receipt
2 Paper containing BPS to individuals in California.

3 103. Defendant THE HABIT RESTAURANTS, INC. is a person in the course of doing
4 business within the meaning of Health & Safety Code §25249.11. THE HABIT RESTAURANTS, INC.
5 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
6 Receipt Paper containing BPS to individuals in California. THE HABIT RESTAURANTS, INC.
7 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
8 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
9 California.

10 104. Defendant THE HABIT RESTAURANTS, LLC is a person in the course of doing
11 business within the meaning of Health & Safety Code §25249.11. THE HABIT RESTAURANTS, LLC
12 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
13 Receipt Paper containing BPS to individuals in California. THE HABIT RESTAURANTS, LLC
14 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
15 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
16 California.

17 105. Defendant THE KROGER CO. is a person in the course of doing business within the
18 meaning of Health & Safety Code §25249.11. THE KROGER CO. manufactures, distributes, purchases
19 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
20 individuals in California. THE KROGER CO. purchased Thermal Receipt Paper containing BPS from
21 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
22 Receipt Paper containing BPS to individuals in California.

23 106. Defendant TRACTOR SUPPLY COMPANY is a person in the course of doing business
24 within the meaning of Health & Safety Code §25249.11. TRACTOR SUPPLY COMPANY
25 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
26 Receipt Paper containing BPS to individuals in California. TRACTOR SUPPLY COMPANY
27 purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
28

1 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
2 California.

3 107. Defendant TST/IMPRESO, INC. is a person in the course of doing business within the
4 meaning of Health & Safety Code §25249.11. TST/IMPRESO, INC. manufactures, distributes,
5 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
6 BPS to individuals in California. TST/IMPRESO, INC. purchased Thermal Receipt Paper containing
7 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
8 Thermal Receipt Paper containing BPS to individuals in California.

9 108. Defendant ULTA BEAUTY, INC. is a person in the course of doing business within the
10 meaning of Health & Safety Code §25249.11. ULTA BEAUTY, INC. manufactures, distributes,
11 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
12 BPS to individuals in California. ULTA BEAUTY, INC. purchased Thermal Receipt Paper containing
13 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
14 Thermal Receipt Paper containing BPS to individuals in California.

15 109. Defendant ULTA SALON, COSMETICS & FRAGRANCE, INC. is a person in the
16 course of doing business within the meaning of Health & Safety Code §25249.11. ULTA SALON,
17 COSMETICS & FRAGRANCE, INC. manufactures, distributes, purchases for use, sells, offers to sell,
18 provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California.
19 ULTA SALON, COSMETICS & FRAGRANCE, INC. purchased Thermal Receipt Paper containing
20 BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such
21 Thermal Receipt Paper containing BPS to individuals in California.

22 110. Defendant VICTORIA'S SECRET STORES, LLC is a person in the course of doing
23 business within the meaning of Health & Safety Code §25249.11. VICTORIA'S SECRET STORES,
24 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
25 Thermal Receipt Paper containing BPS to individuals in California. VICTORIA'S SECRET STORES,
26 LLC purchased Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a
27 SUPPLIER DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in
28 California.

1 111. Defendant WALMART INC. is a person in the course of doing business within the
2 meaning of Health & Safety Code §25249.11. WALMART INC. manufactures, distributes, purchases
3 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
4 individuals in California. WALMART INC. purchased Thermal Receipt Paper containing BPS from
5 NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and provided such Thermal
6 Receipt Paper containing BPS to individuals in California.

7 112. Defendant WELLS FARGO & COMPANY is a person in the course of doing business
8 within the meaning of Health & Safety Code §25249.11. WELLS FARGO & COMPANY
9 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
10 Receipt Paper containing BPS to individuals in California. WELLS FARGO & COMPANY purchased
11 Thermal Receipt Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER
12 DOE and used and provided such Thermal Receipt Paper containing BPS to individuals in California.

13 113. Defendant WILLIAMS-SONOMA, INC. is a person in the course of doing business
14 within the meaning of Health & Safety Code §25249.11. WILLIAMS-SONOMA, INC. manufactures,
15 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
16 containing BPS to individuals in California. WILLIAMS-SONOMA, INC. purchased Thermal Receipt
17 Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and
18 provided such Thermal Receipt Paper containing BPS to individuals in California.

19 114. Defendant YARD HOUSE USA, INC. is a person in the course of doing business within
20 the meaning of Health & Safety Code §25249.11. YARD HOUSE USA, INC. manufactures,
21 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
22 containing BPS to individuals in California. YARD HOUSE USA, INC. purchased Thermal Receipt
23 Paper containing BPS from NEW RECEIPTCO OPCO, LLC and/or a SUPPLIER DOE and used and
24 provided such Thermal Receipt Paper containing BPS to individuals in California.

25 115. Defendant NEW RECEIPTCO OPCO, LLC, DBA DOMTAR is a person in the course of
26 doing business within the meaning of Health & Safety Code §25249.11. NEW RECEIPTCO OPCO,
27 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
28 Thermal Receipt Paper containing BPS to individuals in California. NEW RECEIPTCO OPCO, LLC is

1 one of the largest suppliers of Thermal Receipt Paper to California and provides and/or has provided
2 Thermal Receipt Paper to a number of the other Defendants named herein as well as to numerous other
3 entities not yet named herein (“NEW RECEIPTCO DOES”). On information and belief, NEW
4 RECEIPTCO OPCO, LLC provided some notice to its customers prior to the effective date of the BPS
5 warning requirement informing them that BPS would soon be a listed chemical pursuant to Proposition
6 65 and informing them of ways in which they could comply with the warning requirement for Thermal
7 Receipt Paper purchased from it. Whether and to what extent this notice was reasonable and adequate
8 are questions of fact to be addressed in this case.

9 116. DOES 45 through 70 (“SUPPLIER DOES”) are each a person in the course of doing
10 business within the meaning of Health & Safety Code §25249.11. SUPPLIER DOES each manufacture,
11 distribute, purchase for use, sell, offer to sell, provide, or offer to provide Thermal Receipt Paper
12 containing BPS to businesses and retail customers in California that in turn provide Thermal Receipt
13 Paper to individuals in California. SUPPLIER DOES provide and/or have provided Thermal Receipt
14 Paper to a number of the other Defendants named herein as well as to numerous other entities not yet
15 named herein.

16 117. DOES 71-200 (“NEW RECEIPTCO DOES”) are each a person in the course of doing
17 business within the meaning of Health & Safety Code §25249.11. NEW RECEIPTCO DOES each
18 purchased Thermal Receipt Paper from NEW RECEIPTCO OPCO, LLC and use, sell, offer to sell,
19 provide, or offer to provide Thermal Receipt Paper containing BPS to individuals in California.

20 118. DOES 201-400 are each a person in the course of doing business within the meaning of
21 Health & Safety Code §25249.11. DOES 201 through 400 each purchased Thermal Receipt Paper from
22 one or more SUPPLIER DOES and use, sell, offer to sell, provide, or offer to provide Thermal Receipt
23 Paper containing BPS to individuals in California.

24 119. The true names of DOES 45 through 400 are either unknown to CEH at this time or the
25 applicable time period before which CEH may file a Proposition 65 action has not run. When CEH
26 ascertains the identifies of the DOE Defendants and/or the applicable time period before which CEH
27 may file a Proposition 65 action has run, CEH will amend the Complaint to reflect the true names and
28 identities of the DOE Defendants.

120. The defendants identified in paragraphs 5 through 115 and DOES 45 through 400 are collectively referred to herein as “Defendants.”

JURISDICTION AND VENUE

121. The Court has jurisdiction over this action pursuant to Health & Safety Code §25249.7, which allows enforcement in any court of competent jurisdiction, and pursuant to California Constitution Article VI, Section 10, because this case is a cause not given by statute to other trial courts.

122. This Court has jurisdiction over Defendants because each is a business entity that either (i) has its principal place of business in California or is headquartered in California; or (ii) does sufficient business, has sufficient minimum contacts in California, or otherwise avails itself of the California market through its manufacture, distribution, purchasing for use, selling, offering to sell, providing, or offering to provide Thermal Receipt Paper in California and such business and contacts gave rise to the claims at issue. Such contacts with California also render the exercise of jurisdiction over Defendants by California courts consistent with traditional notions of fair play and substantial justice.

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

BACKGROUND FACTS

124. The People of the State of California have declared by initiative under Proposition 65 their right “[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other reproductive harm.” Proposition 65, §1(b).

125. To effectuate this goal, Proposition 65 prohibits exposing people to chemicals listed by the State of California as known to cause cancer, birth defects, or other reproductive harm above certain levels without a “clear and reasonable warning” unless the business responsible for the exposure can prove that it fits within a statutory exemption. Health & Safety Code §25249.6 states, in pertinent part:

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

126. In 2016, CEH filed an action against several retail entities alleging that such entities were exposing their customers to bisphenol A (“BPA”) through their use of Thermal Receipt Paper containing BPA without first providing clear and reasonable warnings pursuant to Proposition 65. CEH later added similar claims against a host of entities that supplied Thermal Receipt Paper containing BPA to these retailers and others. CEH was able to resolve its claims in that action, *CEH v. Del Taco Restaurants, Inc., et al.*, by means of Consent Judgments that required the settling defendants to stop using Thermal Receipt Paper containing BPA. At that time, BPS was not yet included on the Proposition 65 list of toxic chemicals. Nevertheless, CEH included provisions in its Consent Judgments with the settling defendants encouraging them to take steps to reduce and/or eliminate the use of BPS and other phenols in Thermal Receipt Paper. Unfortunately, the industry did not accede to CEH’s suggestion regarding using BPS and/or phenol-free Thermal Receipt Paper.

127. On December 29, 2023, the State of California officially listed BPS as a female reproductive toxicant. 27 California Code of Regulations (“C.C.R.”) §27001(c). On December 29, 2024, BPS became subject to the clear and reasonable warning requirement regarding reproductive toxicity under Proposition 65. Health & Safety Code §25249.10(b).

128. BPS is intentionally added to the surface of the Thermal Receipt Paper as a functional component of the paper. People who touch, handle, or otherwise come into contact with the surface of Thermal Receipt Paper are thus exposed to BPS.

129. Defendants’ Thermal Receipt Paper contains sufficient quantities of BPS such that individuals, including women who are pregnant or seeking to become pregnant, who touch or handle the Thermal Receipt Paper are exposed to significant amounts of BPS. The primary routes of exposure for the violations are dermal absorption directly through the skin when individuals touch or handle Thermal Receipt Paper and ingestion via hand-to-mouth contact after individuals touch or handle Thermal Receipt Paper. These exposures occur in homes, workplaces, retail establishments, and everywhere else throughout California where the Thermal Receipt Paper is touched or handled.

130. The addition of BPS in the Thermal Receipt Paper is not necessary, as receipt paper can be produced, processed, packaged, purchased, and provided without BPS.

1 131. Defendants fail to provide any warning, let alone the required clear and reasonable
2 warning, with their Thermal Receipt Paper regarding the reproductive toxicity of BPS.

3 132. Any person acting in the public interest has standing to enforce violations of Proposition
4 65 provided that such person supplied the requisite public enforcers with a valid 60-Day Notice of
5 Violation and such public enforcers are not diligently prosecuting the action within such time. Health &
6 Safety Code §25249.7(d).

7 133. More than sixty days prior to naming each Defendant in this lawsuit, CEH provided a 60-
8 Day “Notice of Violation” of Proposition 65 to the California Attorney General, to the District Attorneys
9 of every county in California, to the City Attorneys of every California city with a population greater
10 than 750,000, and to each of the named Defendants. In compliance with Health & Safety Code
11 §25249.7(d) and 27 C.C.R. §25903(b), each Notice included the following information: (1) the name
12 and address of each violator; (2) the statute violated; (3) the time period during which violations
13 occurred; (4) specific descriptions of the violations, including (a) the routes of exposures to BPS from
14 Defendants’ Thermal Receipt Paper; and (b) the specific type of products sold or provided in violation
15 of Proposition 65; and (5) the name of the specific Proposition 65-listed chemical that is the subject of
16 the violations described in each Notice. Each Notice also included a proposal for resolution of the
17 noticed claims and a demand that Defendants preserve all evidence relevant to the noticed claims.

18 134. CEH also sent a Certificate of Merit for each Notice to the California Attorney General,
19 to the District Attorneys of every county in California, to the City Attorneys of every California city
20 with a population greater than 750,000, and to each of the named Defendants. In compliance with
21 Health & Safety Code §25249.7(d) and 11 C.C.R. §3101, each Certificate certified that CEH’s counsel:
22 (1) has consulted with one or more persons with relevant and appropriate experience or expertise who
23 reviewed facts, studies, or other data regarding the exposures to BPS alleged in each Notice; and (2)
24 based on the information obtained through such consultations, believes that there is a reasonable and
25 meritorious case for a citizen enforcement action based on the facts alleged in each Notice. In
26 compliance with Health & Safety Code §25249.7(d) and 11 C.C.R. §3102, each Certificate served on the
27 Attorney General included factual information – provided on a confidential basis – sufficient to establish
28

1 the basis for the Certificate, including the identity of the person(s) consulted by CEH's counsel and the
2 facts, studies, or other data reviewed by such persons.

3 135. None of the public prosecutors with the authority to prosecute violations of Proposition
4 65 have commenced or is diligently prosecuting a cause of action against Defendants under Health &
5 Safety Code §25249.5, *et seq.*, based on the claims asserted in any of CEH's Notices regarding BPS in
6 Thermal Receipt Paper.

7 136. Defendants both know and intend that individuals – including those who are pregnant and
8 seeking to become pregnant – touch or handle their Thermal Receipt Paper, thus exposing them to BPS.

9 137. Under Proposition 65, an exposure is “knowing” where the party responsible for such
10 exposure has: “knowledge of the fact that a[n] ... exposure to a chemical listed pursuant to [Health &
11 Safety Code §25249.8(a)] is occurring. No knowledge that the ... exposure is unlawful is required.”
12 27 C.C.R. §25102(n). This knowledge may be either actual or constructive. *See, e.g.*, Final Statement
13 of Reasons Revised (November 4, 1988) (pursuant to former 22 C.C.R. Division 2, §12601).

14 138. Defendants continue to expose individuals to BPS without prior clear and reasonable
15 warnings regarding the reproductive toxicity of BPS.

16 139. CEH has engaged in good-faith efforts to resolve the claims alleged herein prior to filing
17 this Complaint.

18 140. Any person “violating or threatening to violate” Proposition 65 may be enjoined in any
19 court of competent jurisdiction. Health & Safety Code §25249.7. “Threaten to violate” is defined to
20 mean “to create a condition in which there is a substantial probability that a violation will occur.”
21 Health & Safety Code §25249.11(e). Proposition 65 provides for civil penalties not to exceed \$2,500
22 per day for each violation of Proposition 65.

23 **FIRST CAUSE OF ACTION**

24 (Violations of Health & Safety Code §25249.6)

25 141. CEH realleges and incorporates by reference as if specifically set forth herein the
26 paragraphs of this Complaint.

142. By placing the Thermal Receipt Paper into the stream of commerce or providing Thermal Receipt Paper to California consumers, each Defendant is a person in the course of doing business within the meaning of Health & Safety Code §25249.11.

143. BPS is a chemical listed by the State of California as a known female reproductive toxicant.

144. Each Defendant knows that average use of the Thermal Receipt Paper will expose individuals who touch or handle the Thermal Receipt Paper to BPS.

145. Each Defendant intends that the Thermal Receipt Paper be used in a manner that results in exposures to BPS from these products.

146. Each Defendant has failed, and continues to fail, to provide clear and reasonable warnings regarding the reproductive toxicity of BPS to individuals who touch or handle its Thermal Receipt Paper.

147. By committing the acts alleged above, each Defendant has at all times relevant to this Complaint violated Proposition 65 by knowingly and intentionally exposing individuals to BPS without first giving clear and reasonable warnings to such individuals regarding the reproductive toxicity of BPS.

PRAYER FOR RELIEF

CEH prays for judgment against Defendants as follows:

1. That the Court, pursuant to Health & Safety Code §25249.7(a), preliminarily and permanently enjoin Defendants from either offering the Thermal Receipt Paper that will be sold in California or providing the Thermal Receipt Paper to California consumers without either reducing the BPS levels in their Thermal Receipt Paper such that no Proposition 65 warnings are required or providing prior clear and reasonable warnings, as CEH shall specify in further application to the Court;

2. That the Court, pursuant to Health & Safety Code §25249.7(b), assess civil penalties against each Defendant in the amount of \$2,500 per day for each violation of Proposition 65 according to proof;

1 3. That the Court, pursuant to Health & Safety Code §25249.7(a), order Defendants to take
2 action to stop ongoing unwarned exposures to BPS resulting from the use of Thermal Receipt Paper sold
3 or provided to consumers by Defendants, as CEH shall specify in further application to the Court;

4 4. That the Court, pursuant to Code of Civil Procedure §1021.5 or any other applicable
5 theory, grant CEH its reasonable attorneys' fees and costs of suit; and

6 5. That the Court grant such other and further relief as may be just and proper.

7
8 Dated: July 21, 2025

Respectfully submitted,

9 LEXINGTON LAW GROUP, LLP

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11 _____
12 Mark Todzo
13 Patrick Carey
14 Joseph Mann
15 Attorneys for Plaintiff
16 Center for Environmental Health
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