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13 CENTER FOR ENVIRONMENTAL HEALTH

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF SAN FRANCISCO

16 CENTER FOR ENVIRONMENTAL HEALTH, a
17 non-profit corporation,

18 Plaintiff,

19 v.

20 AESOP USA, INC.; AMAZON RETAIL LLC;
21 AMAZON.COM SERVICES LLC;
22 AMAZON.COM, INC.; AMERICAN MULTI-
23 CINEMA, INC.; AUTOZONE PARTS, INC.; BG
24 RETAIL, LLC; BRINKER INTERNATIONAL,
25 INC.; BRINKER RESTAURANT
26 CORPORATION; BURGER KING COMPANY
27 LLC; BURLINGTON COAT FACTORY
28 WAREHOUSE CORPORATION; BURLINGTON
STORES, INC.; CALERES, INC.; CAPITAL
ONE, N.A.; CARDENAS MARKETS LLC;
CARL'S JR. RESTAURANTS LLC; CHANEL,
INC.; CINNABON FRANCHISOR SPV LLC;
CINNABON LLC; CKE RESTAURANTS
HOLDINGS, INC.; COMPASS GROUP USA,
INC.; CONVERSE INC.; CRUMBL LLC; DAISO
USA LLC; DARDEN CORPORATION; DARDEN
RESTAURANTS, INC.; DEL TACO LLC;

ELECTRONICALLY
FILED

Superior Court of California,
County of San Francisco

05/18/2026
Clerk of the Court

BY: JUDITH NUNEZ
Deputy Clerk

Civil Case No. CGC-25-623997

**SECOND 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 DENNY'S (CA) CORPORATION; DENNY'S,
2 INC.; DFO, LLC; DICK'S SPORTING GOODS,
3 INC.; DOLGEN CALIFORNIA, LLC; DOLLAR
4 GENERAL CORPORATION; DOLLAR TREE
5 STORES, INC.; DOMINO'S PIZZA
6 FRANCHISING LLC; DOMINO'S PIZZA LLC;
7 DOMINO'S PIZZA, INC.; DUTCH BROS, INC.;
8 FEDEX OFFICE AND PRINT SERVICES, INC.;
9 FIVE GUYS ENTERPRISES, LLC; FIVE GUYS
10 OPERATIONS, LLC; FOOT LOCKER, INC.;
11 FOOT LOCKER RETAIL, INC.; GAMESTOP
12 CORP.; GAMESTOP, INC.; GROCERY OUTLET
13 INC.; HARBOR FREIGHT TOOLS USA, INC.;
14 HAT WORLD, INC.; JACK IN THE BOX, INC.;
15 JPMORGAN CHASE BANK, N.A.; KFC
16 CORPORATION; LOWE'S HOME CENTERS,
17 LLC; MCDONALD'S CORPORATION;
18 MCDONALD'S RESTAURANTS OF
19 CALIFORNIA, INC.; MCDONALD'S USA, LLC;
20 MOD SUPER FAST PIZZA (CALIFORNIA),
21 LLC; MOD SUPER FAST PIZZA, LLC; OFFICE
22 DEPOT, LLC; OLIVE GARDEN HOLDINGS,
23 LLC; P.F. CHANG'S CHINA BISTRO, INC.;
24 PAPA JOHN'S INTERNATIONAL, INC.; PEET'S
25 COFFEE, INC.; PENNEY OPCO LLC; PETCO
26 ANIMAL SUPPLIES, INC.; PETCO ANIMAL
27 SUPPLIES STORES, INC.; PETSMART LLC;
28 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 RESTAURANTS LLC; RED ROBIN
INTERNATIONAL, INC.; ROSS STORES, INC.;
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
INCORPORATED; THE CHEESECAKE
FACTORY RESTAURANTS, INC.; THE GAP,
INC.; THE HABIT RESTAURANTS, INC.; THE
HABIT RESTAURANTS, LLC; THE KROGER
CO.; TRACTOR SUPPLY COMPANY;
TST/IMPRESO, INC.; ULTA SALON,
COSMETICS & FRAGRANCE, INC.;
VICTORIA'S SECRET STORES, LLC;

1 WALMART INC.; WILLIAMS-SONOMA, INC.;
2 YARD HOUSE USA, INC.; NEW RECEIPTCO
3 OPCO, LLC, DBA DOMTAR; AJ & VJ, LLC;
4 ALLBIRDS INTERNATIONAL, INC.;
5 ALLBIRDS, INC.; ALTO PHARMACY LLC;
6 AMER SPORTS CANADA, INC.; AMERICAN
7 DAIRY QUEEN CORPORATION; APPLE, INC.;
8 ARBY'S FRANCHISOR, LLC; BBD OPCO LLC;
9 BBDI LLC; BEAR TRACKS HOLDINGS, LLC;
10 BEN & JERRY'S HOMEMADE, INC.;
11 BERKELEY BOWL PRODUCE, INC.; BJ'S
12 RESTAURANT OPERATIONS COMPANY; BJ'S
13 RESTAURANTS, INC.; BRISTOL FARMS;
14 BRITISH AIRWAYS PLC; BUCKLE BRANDS,
15 INC.; C. & J. CLARK AMERICA, INC.; C. & J.
16 CLARK RETAIL, INC.; CAFE POS LLC;
17 CALIFORNIA FUEL SUPPLY, INC.; CARTER'S
18 INC.; CAVA FOODS, LLC; CAVA GROUP,
19 INC.; CBOCS WEST, INC.; CHECKERS DRIVE-
20 IN RESTAURANTS, INC.; CLARINS U.S.A.
21 INC.; COLE HAAN COMPANY STORE, LLC;
22 COLE HAAN LLC; COMCAST CABLE
23 COMMUNICATIONS, LLC; COSTCO
24 WHOLESALE CORPORATION; CRACKER
25 BARREL OLD COUNTRY STORE, INC.; D&A
26 FOOD INC.; DAVE'S HOT CHICKEN
27 FRANCHISE CO., LLC; DR. MARTENS
28 AIRWAIR USA LLC; DTF ASSETS, LLC;
DUTCH MAFIA LLC; ECCO USA, INC.;
EIGHTEEN HUNDRED, INC.; EINSTEIN AND
NOAH CORP.; EINSTEIN NOAH
RESTAURANT GROUP, INC.; EUROMARKET
DESIGNS, INC.; FABLETICS, INC.;
FIREHOUSE OF AMERICA, LLC;
GHIRARDELLI CHOCOLATE COMPANY;
GLOBAL RESTAURANT HOSPITALITY
GROUP, LLC; GOLDEN CORRAL
CORPORATION; GOLDEN CORRAL
FRANCHISING SYSTEMS, INC.; GONG CHA
TEA, LLC; GOOD FOOD HOLDINGS, LLC;
GOSH ENTERPRISES, INC.; GUESS?, INC.; H
MART COMPANIES, INC.; H MART, INC.;
HAPPY LEMON WEST, INC.; INFINILUSH
COMPANY LIMITED; JIMMY JOHN'S
FRANCHISOR SPV, LLC; KAMDHENU LLC;
KF TEA FRANCHISING LLC; KF TEA USA
INC.; KHOU AND LIM INC.; KRISPY KREME
DOUGHNUT CORPORATION; LE CREUSET

1 OF AMERICA, INC.; MAURICES
2 INCORPORATED; MICHAEL KORS (USA)
3 INC.; MICHAEL KORS STORES (CALIFORNIA)
4 LLC; MINISO DEPOT CA, INC.; NEW
5 BALANCE ATHLETICS, INC.; NORCAL
6 NOODLES LLC; NUGGET MARKET, INC.;
7 OLD NAVY, LLC; PARIS BAGUETTE
8 AMERICA, INC.; PARIS BAGUETTE U.S.A.,
9 INC.; PERFECT 85 DEGREES C, INC.; PUMA
10 NORTH AMERICA, INC.; RACK ROOM SHOES
11 OF VIRGINIA LLC; RACK ROOM SHOES,
12 INC.; RALPHS GROCERY COMPANY; RARE
13 HOSPITALITY INTERNATIONAL, INC.;
14 SAMSONITE COMPANY STORES, LLC;
15 SAMSONITE, LLC; SAVE MART
16 SUPERMARKETS LLC; SEE'S CANDIES, INC.;
17 SEE'S CANDY SHOPS, INCORPORATED;
18 SIZZLER USA RESTAURANTS, INC.; SLT
19 LENDING SPV, INC.; SMCP USA, INC.;
20 SPORTSMAN'S WAREHOUSE SOUTHWEST,
21 INC.; SPORTSMAN'S WAREHOUSE, INC.;
22 SWEETGREEN, INC.; TAWA SUPERMARKET,
23 INC.; TEAM DRIVE IN AMERICAN CANYON,
24 LLC; TEASPOON FRANCHISING INC.;
25 TERRAMAR CAPITAL MANAGEMENT, INC.;
26 TERRAMAR CAPITAL, LLC; TEXAS
27 ROADHOUSE HOLDINGS LLC; TEXAS
28 ROADHOUSE INC.; THE BUCKLE, INC.; THE
CONTAINER STORE GROUP, INC.; THE
CONTAINER STORE, INC.; THE SAVE MART
COMPANIES, LLC; THREE VALLEY
INVESTMENTS, LLC; TRIO DONUT AND
COFFEE INC.; TUMI, INC.; TUMI STORES,
INC.; USA MINISO DEPOT INC.; VALLARTA
FOOD ENTERPRISES, INC.; VITALITY
BOWLS; VSI, INC.; VUORI, INC.; WELLS
FARGO BANK, N.A.; WINDSOR FASHIONS,
LLC; WKA ENTERPRISES, INC. DBA PARTEK
SOLUTIONS; WOLVERINE WORLD WIDE,
INC.; YUMMY-TOWN USA LLC; ZWILLING
J.A. HENCKELS LLC; BOOTBARN, INC.;
CALENDAR HOLDINGS LLC; GO TOYS &
GAMES LLC; GUITAR CENTER STORES, INC.;
GUITAR CENTER, INC.; P & A KNIGHT, INC.;
PA BAKE HOUSE LLC; QUICKQUACK CAR
WASH HOLDINGS, LLC; SPEEDWAY LLC;
THE REINALT-THOMAS CORPORATION DBA
AMERICA'S TIRE; A&W RESTAURANTS,

1 INC.; A GREAT AMERICAN BRAND LLC;
2 SPARROW OUTLETS HOLDCO, LLC; BASKIN
3 ROBBINS USA LLC; DUNKIN' BRANDS, INC.;
4 DUNKIN' DONUTS FRANCHISING LLC;
5 SONIC INDUSTRIES LLC; SONIC INDUSTRIES
6 SERVICES, LLC; SONIC FRANCHISING LLC;
7 MG RESTAURANTS, INC.; UNITED PARCEL
8 SERVICE, INC.; YNAP CORPORATION;
9 WHOLE FOODS MARKET CALIFORNIA, INC.;
10 QDOBA RESTAURANT CORPORATION;
11 QDOBA FRANCHISOR LLC; LUSH FRESH
12 HANDMADE COSMETICS LLC; RALEY'S;
13 HANSOL AMERICA, INC.; TCS PAPER INC.
14 DBA PACIFIC COAST SUPPLIES; BUNZL
15 DISTRIBUTION INC.; BUNZL DISTRIBUTION
16 USA, INC.; DADE PAPER & BAG, LLC;
17 IMPERIAL BAG & PAPER CO. LLC; SUPREME
18 SOURCE & SUPPLY CO.; HANSOL PAPER CO.,
19 LTD.; and DOES 53-200 and 352-850,
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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 (which is used to
10 generate transactional documents such as receipts from cash registers and credit card terminals, movie
11 theater tickets, service estimates, and airline flight documentation) (“Thermal Receipt Paper”) and/or
12 thermal labels (which includes thermal adhesive paper, sticky-back thermal paper, and thermal stickers)
13 (“Thermal Labels”) coated with BPS that are manufactured, distributed, purchased for use, sold, offered
14 for sale, provided, or offered to be provided by Defendants. Thermal Receipt Paper and Thermal Labels
15 are referred to collectively herein as “Thermal Paper.” Individuals, including women who are pregnant
16 or seeking to become pregnant, are exposed to BPS when they touch or handle the Thermal Paper.
17 Defendants’ violations arise due to the manufacture, distribution, and sale of Thermal Paper containing
18 BPS by several suppliers of such paper. These suppliers provide the Thermal Paper containing BPS to
19 their customers, who in turn provide receipts to individuals throughout California, thereby exposing
20 such individuals to BPS. This Complaint seeks to comprehensively address this industry-wide problem.

21 2. Beginning on January 14, 2025, Plaintiff served pre-suit 60-day notices alleging
22 Proposition 65 violations as to BPS in Thermal Receipt Paper. Beginning on June 9, 2025, Plaintiff
23 served pre-suit 60-day notices alleging Proposition 65 violations as to BPS in Thermal Labels. Some
24 Defendants are named in both notices, while others are named in only one. For each Defendant, this
25 Complaint covers only the claims in the 60-day notices regarding BPS that the Defendant received from
26 Plaintiff.

27 3. Under Proposition 65, it is unlawful for businesses to knowingly and intentionally expose
28 individuals in California to chemicals known to the State to cause birth defects or other reproductive

1 harm without first providing clear and reasonable warnings to exposed individuals. Defendants
2 manufacture, distribute, purchase for use, sell, offer to sell, provide, or offer to provide Thermal Paper
3 containing significant quantities of BPS to individuals in California, thereby exposing these individuals
4 to BPS.

5 4. Despite the fact that Defendants expose those who are pregnant, those who are seeking to
6 become pregnant, and others to BPS, Defendants provide no warnings whatsoever about the
7 reproductive hazards associated with BPS exposure. Defendants' conduct thus violates the warning
8 provision of Proposition 65. Health & Safety Code §25249.6.

9 PARTIES

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

20 6. Defendant AESOP USA, INC. is a person in the course of doing business within the
21 meaning of Health & Safety Code §25249.11. AESOP USA, INC. manufactures, distributes, purchases
22 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
23 individuals in California.

24 7. Defendant AMAZON RETAIL LLC is a person in the course of doing business within
25 the meaning of Health & Safety Code §25249.11. AMAZON RETAIL LLC 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.

1 8. Defendant AMAZON.COM SERVICES LLC is a person in the course of doing business
2 within the meaning of Health & Safety Code §25249.11. AMAZON.COM SERVICES LLC
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.

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

9 10. 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.

13 11. Defendant AUTOZONE PARTS, INC. is a person in the course of doing business within
14 the meaning of Health & Safety Code §25249.11. AUTOZONE PARTS, 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.

17 12. Defendant BG RETAIL, LLC is a person in the course of doing business within the
18 meaning of Health & Safety Code §25249.11. BG RETAIL, 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.

21 13. Defendant BRINKER INTERNATIONAL, INC. is a person in the course of doing
22 business within the meaning of Health & Safety Code §25249.11. BRINKER INTERNATIONAL,
23 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
24 Thermal Receipt Paper containing BPS to individuals in California.

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

1 15. Defendant BURGER KING COMPANY LLC is a person in the course of doing business
2 within the meaning of Health & Safety Code §25249.11. BURGER KING COMPANY LLC
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.

5 16. Defendant BURLINGTON COAT FACTORY WAREHOUSE CORPORATION is a
6 person in the course of doing business within the meaning of Health & Safety Code §25249.11.
7 BURLINGTON COAT FACTORY WAREHOUSE CORPORATION 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.

10 17. Defendant BURLINGTON STORES, INC. is a person in the course of doing business
11 within the meaning of Health & Safety Code §25249.11. BURLINGTON STORES, INC. manufactures,
12 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
13 containing BPS to individuals in California.

14 18. Defendant CALERES, INC. is a person in the course of doing business within the
15 meaning of Health & Safety Code §25249.11. CALERES, INC. manufactures, distributes, purchases for
16 use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
17 individuals in California.

18 19. Defendant CAPITAL ONE, N.A. is a person in the course of doing business within the
19 meaning of Health & Safety Code §25249.11. CAPITAL ONE, N.A. 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.

22 20. Defendant CARDENAS MARKETS LLC is a person in the course of doing business
23 within the meaning of Health & Safety Code §25249.11. CARDENAS MARKETS LLC manufactures,
24 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
25 and Thermal Labels containing BPS to individuals in California.

26 21. Defendant CARL'S JR. RESTAURANTS LLC is a person in the course of doing
27 business within the meaning of Health & Safety Code §25249.11. CARL'S JR. RESTAURANTS LLC
28

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.

3 22. Defendant CHANEL, INC. is a person in the course of doing business within the
4 meaning of Health & Safety Code §25249.11. CHANEL, INC. manufactures, distributes, purchases for
5 use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
6 individuals in California.

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

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

15 25. Defendant CKE RESTAURANTS HOLDINGS, INC. is a person in the course of doing
16 business within the meaning of Health & Safety Code §25249.11. CKE RESTAURANTS HOLDINGS,
17 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
18 Thermal Receipt Paper containing BPS to individuals in California.

19 26. Defendant COMPASS GROUP USA, INC. is a person in the course of doing business
20 within the meaning of Health & Safety Code §25249.11. COMPASS GROUP USA, INC.
21 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
22 Receipt Paper containing BPS to individuals in California.

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

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

1 offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in
2 California.

3 29. Defendant DAISO USA LLC is a person in the course of doing business within the
4 meaning of Health & Safety Code §25249.11. DAISO USA LLC manufactures, distributes, purchases
5 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
6 individuals in California.

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

11 31. Defendant DARDEN RESTAURANTS, INC. is a person in the course of doing business
12 within the meaning of Health & Safety Code §25249.11. DARDEN RESTAURANTS, INC.
13 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
14 Receipt Paper containing BPS to individuals in California.

15 32. Defendant DEL TACO LLC is a person in the course of doing business within the
16 meaning of Health & Safety Code §25249.11. DEL TACO LLC manufactures, distributes, purchases
17 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
18 individuals in California.

19 33. Defendant DENNY'S (CA) CORPORATION is a person in the course of doing business
20 within the meaning of Health & Safety Code §25249.11. DENNY'S (CA) CORPORATION
21 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
22 Receipt Paper containing BPS to individuals in California.

23 34. Defendant DENNY'S, INC. is a person in the course of doing business within the
24 meaning of Health & Safety Code §25249.11. DENNY'S, 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.

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

4 36. Defendant DICK'S SPORTING GOODS, INC. is a person in the course of doing
5 business within the meaning of Health & Safety Code §25249.11. DICK'S SPORTING GOODS, INC.
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.

8 37. Defendant DOLGEN CALIFORNIA, LLC is a person in the course of doing business
9 within the meaning of Health & Safety Code §25249.11. DOLGEN CALIFORNIA, LLC manufactures,
10 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
11 containing BPS to individuals in California.

12 38. Defendant DOLLAR GENERAL CORPORATION is a person in the course of doing
13 business within the meaning of Health & Safety Code §25249.11. DOLLAR GENERAL
14 CORPORATION manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to
15 provide Thermal Receipt Paper containing BPS to individuals in California.

16 39. Defendant DOLLAR TREE STORES, INC. is a person in the course of doing business
17 within the meaning of Health & Safety Code §25249.11. DOLLAR TREE STORES, INC.
18 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
19 Receipt Paper containing BPS to individuals in California.

20 40. Defendant DOMINO'S PIZZA FRANCHISING LLC is a person in the course of doing
21 business within the meaning of Health & Safety Code §25249.11. DOMINO'S PIZZA FRANCHISING
22 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
23 Thermal Receipt Paper containing BPS to individuals in California.

24 41. Defendant DOMINO'S PIZZA LLC is a person in the course of doing business within
25 the meaning of Health & Safety Code §25249.11. DOMINO'S PIZZA LLC 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.

28

1 42. Defendant DOMINO’S PIZZA, INC. is a person in the course of doing business within
2 the meaning of Health & Safety Code §25249.11. DOMINO’S PIZZA, 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.

5 43. Defendant DUTCH BROS, INC. is a person in the course of doing business within the
6 meaning of Health & Safety Code §25249.11. DUTCH BROS, INC. manufactures, distributes,
7 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
8 BPS to individuals in California.

9 44. Defendant FEDEX OFFICE AND PRINT SERVICES, INC. is a person in the course of
10 doing business within the meaning of Health & Safety Code §25249.11. FEDEX OFFICE AND PRINT
11 SERVICES, INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to
12 provide Thermal Receipt Paper and Thermal Labels containing BPS to individuals in California.

13 45. Defendant FIVE GUYS ENTERPRISES, LLC is a person in the course of doing business
14 within the meaning of Health & Safety Code §25249.11. FIVE GUYS ENTERPRISES, LLC
15 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
16 Receipt Paper containing BPS to individuals in California.

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

21 47. Defendant FOOT LOCKER, INC. is a person in the course of doing business within the
22 meaning of Health & Safety Code §25249.11. FOOT LOCKER, 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.

25 48. Defendant FOOT LOCKER RETAIL, INC. is a person in the course of doing business
26 within the meaning of Health & Safety Code §25249.11. FOOT LOCKER RETAIL, 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.

1 49. Defendant GAMESTOP CORP. is a person in the course of doing business within the
2 meaning of Health & Safety Code §25249.11. GAMESTOP CORP. 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.

5 50. Defendant GAMESTOP, INC. is a person in the course of doing business within the
6 meaning of Health & Safety Code §25249.11. GAMESTOP, 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.

9 51. Defendant GROCERY OUTLET INC. is a person in the course of doing business within
10 the meaning of Health & Safety Code §25249.11. GROCERY OUTLET INC. manufactures,
11 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
12 containing BPS to individuals in California.

13 52. Defendant HARBOR FREIGHT TOOLS USA, INC. is a person in the course of doing
14 business within the meaning of Health & Safety Code §25249.11. HARBOR FREIGHT TOOLS USA,
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.

17 53. Defendant HAT WORLD, INC. is a person in the course of doing business within the
18 meaning of Health & Safety Code §25249.11. HAT WORLD, INC. manufactures, distributes,
19 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
20 BPS to individuals in California.

21 54. Defendant JACK IN THE BOX, INC. is a person in the course of doing business within
22 the meaning of Health & Safety Code §25249.11. JACK IN THE BOX, 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.

25 55. Defendant JPMORGAN CHASE BANK, N.A. is a person in the course of doing business
26 within the meaning of Health & Safety Code §25249.11. JPMORGAN CHASE BANK, N.A.
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.

1 56. Defendant KFC CORPORATION is a person in the course of doing business within the
2 meaning of Health & Safety Code §25249.11. KFC CORPORATION 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.

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

9 58. Defendant MCDONALD'S CORPORATION is a person in the course of doing business
10 within the meaning of Health & Safety Code §25249.11. MCDONALD'S CORPORATION
11 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
12 Receipt Paper containing BPS to individuals in California.

13 59. Defendant MCDONALD'S RESTAURANTS OF CALIFORNIA, INC. is a person in the
14 course of doing business within the meaning of Health & Safety Code §25249.11. MCDONALD'S
15 RESTAURANTS OF CALIFORNIA, INC. manufactures, distributes, purchases for use, sells, offers to
16 sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California.

17 60. Defendant MCDONALD'S USA, LLC is a person in the course of doing business within
18 the meaning of Health & Safety Code §25249.11. MCDONALD'S USA, LLC 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.

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

25 62. Defendant MOD SUPER FAST PIZZA, LLC is a person in the course of doing business
26 within the meaning of Health & Safety Code §25249.11. MOD SUPER FAST PIZZA, LLC
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.

1 63. Defendant OFFICE DEPOT, LLC is a person in the course of doing business within the
2 meaning of Health & Safety Code §25249.11. OFFICE DEPOT, 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.

5 64. Defendant OLIVE GARDEN HOLDINGS, LLC is a person in the course of doing
6 business within the meaning of Health & Safety Code §25249.11. OLIVE GARDEN HOLDINGS, LLC
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.

9 65. Defendant P.F. CHANG'S CHINA BISTRO, INC. is a person in the course of doing
10 business within the meaning of Health & Safety Code §25249.11. P.F. CHANG'S CHINA BISTRO,
11 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
12 Thermal Receipt Paper and Thermal Labels containing BPS to individuals in California.

13 66. Defendant PAPA JOHN'S INTERNATIONAL, INC. is a person in the course of doing
14 business within the meaning of Health & Safety Code §25249.11. PAPA JOHN'S 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.

17 67. Defendant PEET'S COFFEE, INC. is a person in the course of doing business within the
18 meaning of Health & Safety Code §25249.11. PEET'S COFFEE, INC. manufactures, distributes,
19 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
20 BPS to individuals in California.

21 68. Defendant PENNEY OPCO LLC is a person in the course of doing business within the
22 meaning of Health & Safety Code §25249.11. PENNEY OPCO LLC 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.

25 69. Defendant PETCO ANIMAL SUPPLIES, INC. is a person in the course of doing
26 business within the meaning of Health & Safety Code §25249.11. PETCO ANIMAL SUPPLIES, 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.

1 70. 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.

5 71. Defendant PETSMART LLC is a person in the course of doing business within the
6 meaning of Health & Safety Code §25249.11. PETSMART LLC 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.

9 72. Defendant PHILLIPS 66 COMPANY is a person in the course of doing business within
10 the meaning of Health & Safety Code §25249.11. PHILLIPS 66 COMPANY 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.

13 73. Defendant PIZZA HUT OF AMERICA, LLC is a person in the course of doing business
14 within the meaning of Health & Safety Code §25249.11. PIZZA HUT OF AMERICA, LLC
15 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
16 Receipt Paper containing BPS to individuals in California.

17 74. Defendant PIZZA HUT, LLC is a person in the course of doing business within the
18 meaning of Health & Safety Code §25249.11. PIZZA HUT, 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.

21 75. Defendant PRESSED JUICERY, INC. is a person in the course of doing business within
22 the meaning of Health & Safety Code §25249.11. PRESSED JUICERY, INC. manufactures,
23 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
24 containing BPS to individuals in California.

25 76. Defendant RAISING CANE'S RESTAURANTS, LLC is a person in the course of doing
26 business within the meaning of Health & Safety Code §25249.11. RAISING CANE'S
27 RESTAURANTS, 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.

1 77. Defendant RAISING CANE’S USA, LLC is a person in the course of doing business
2 within the meaning of Health & Safety Code §25249.11. RAISING CANE’S USA, LLC manufactures,
3 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
4 containing BPS to individuals in California.

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

9 79. Defendant RED LOBSTER RESTAURANTS LLC is a person in the course of doing
10 business within the meaning of Health & Safety Code §25249.11. RED LOBSTER RESTAURANTS
11 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
12 Thermal Receipt Paper containing BPS to individuals in California.

13 80. Defendant RED ROBIN INTERNATIONAL, INC. is a person in the course of doing
14 business within the meaning of Health & Safety Code §25249.11. RED ROBIN INTERNATIONAL,
15 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
16 Thermal Receipt Paper and Thermal Labels containing BPS to individuals in California.

17 81. Defendant ROSS STORES, INC. is a person in the course of doing business within the
18 meaning of Health & Safety Code §25249.11. ROSS STORES, INC. manufactures, distributes,
19 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
20 BPS to individuals in California.

21 82. Defendant SHAKE SHACK CALIFORNIA, LLC is a person in the course of doing
22 business within the meaning of Health & Safety Code §25249.11. SHAKE SHACK CALIFORNIA,
23 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
24 Thermal Receipt Paper containing BPS to individuals in California.

25 83. Defendant SHAKE SHACK ENTERPRISES, LLC is a person in the course of doing
26 business within the meaning of Health & Safety Code §25249.11. SHAKE SHACK ENTERPRISES,
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.

1 84. 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.

5 85. Defendant SMART & FINAL STORES LLC is a person in the course of doing business
6 within the meaning of Health & Safety Code §25249.11. SMART & FINAL STORES LLC
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.

9 86. Defendant SPENCER GIFTS LLC is a person in the course of doing business within the
10 meaning of Health & Safety Code §25249.11. SPENCER GIFTS 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.

13 87. Defendant STAPLES, INC. is a person in the course of doing business within the
14 meaning of Health & Safety Code §25249.11. STAPLES, INC. manufactures, distributes, purchases for
15 use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
16 individuals in California.

17 88. Defendant TACO BELL CORP is a person in the course of doing business within the
18 meaning of Health & Safety Code §25249.11. TACO BELL CORP 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.

21 89. Defendant TACO BELL OF AMERICA, LLC is a person in the course of doing business
22 within the meaning of Health & Safety Code §25249.11. TACO BELL OF AMERICA, LLC
23 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
24 Receipt Paper containing BPS to individuals in California.

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

1 91. Defendant THE CHEESECAKE FACTORY RESTAURANTS, INC. is a person in the
2 course of doing business within the meaning of Health & Safety Code §25249.11. THE CHEESECAKE
3 FACTORY RESTAURANTS, INC. manufactures, distributes, purchases for use, sells, offers to sell,
4 provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California.

5 92. Defendant THE GAP, INC. is a person in the course of doing business within the
6 meaning of Health & Safety Code §25249.11. THE GAP, INC. manufactures, distributes, purchases for
7 use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
8 individuals in California.

9 93. Defendant THE HABIT RESTAURANTS, INC. is a person in the course of doing
10 business within the meaning of Health & Safety Code §25249.11. THE HABIT RESTAURANTS, INC.
11 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
12 Receipt Paper containing BPS to individuals in California.

13 94. Defendant THE HABIT RESTAURANTS, LLC is a person in the course of doing
14 business within the meaning of Health & Safety Code §25249.11. THE HABIT RESTAURANTS, LLC
15 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
16 Receipt Paper containing BPS to individuals in California.

17 95. 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.

21 96. Defendant TRACTOR SUPPLY COMPANY is a person in the course of doing business
22 within the meaning of Health & Safety Code §25249.11. TRACTOR SUPPLY COMPANY
23 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
24 Receipt Paper containing BPS to individuals in California.

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

1 98. Defendant ULTA SALON, COSMETICS & FRAGRANCE, INC. is a person in the
2 course of doing business within the meaning of Health & Safety Code §25249.11. ULTA SALON,
3 COSMETICS & FRAGRANCE, INC. manufactures, distributes, purchases for use, sells, offers to sell,
4 provides, or offers to provide Thermal Receipt Paper and Thermal Labels containing BPS to individuals
5 in California.

6 99. Defendant VICTORIA'S SECRET STORES, LLC is a person in the course of doing
7 business within the meaning of Health & Safety Code §25249.11. VICTORIA'S SECRET STORES,
8 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
9 Thermal Receipt Paper containing BPS to individuals in California.

10 100. Defendant WALMART INC. is a person in the course of doing business within the
11 meaning of Health & Safety Code §25249.11. WALMART INC. manufactures, distributes, purchases
12 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
13 individuals in California.

14 101. Defendant WILLIAMS-SONOMA, INC. is a person in the course of doing business
15 within the meaning of Health & Safety Code §25249.11. WILLIAMS-SONOMA, 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.

18 102. Defendant YARD HOUSE USA, INC. is a person in the course of doing business within
19 the meaning of Health & Safety Code §25249.11. YARD HOUSE USA, INC. 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.

22 103. Defendant AJ & VJ, LLC is a person in the course of doing business within the meaning
23 of Health & Safety Code §25249.11. AJ & VJ, LLC manufactures, distributes, purchases for use, sells,
24 offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in
25 California.

26 104. Defendant ALLBIRDS INTERNATIONAL, INC. is a person in the course of doing
27 business within the meaning of Health & Safety Code §25249.11. ALLBIRDS INTERNATIONAL,
28

1 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
2 Thermal Receipt Paper containing BPS to individuals in California.

3 105. Defendant ALLBIRDS, INC. is a person in the course of doing business within the
4 meaning of Health & Safety Code §25249.11. ALLBIRDS, INC. manufactures, distributes, purchases
5 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
6 individuals in California.

7 106. Defendant ALTO PHARMACY LLC is a person in the course of doing business within
8 the meaning of Health & Safety Code §25249.11. ALTO PHARMACY LLC 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.

11 107. Defendant AMER SPORTS CANADA, INC. is a person in the course of doing business
12 within the meaning of Health & Safety Code §25249.11. AMER SPORTS CANADA, INC.
13 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
14 Receipt Paper containing BPS to individuals in California.

15 108. Defendant AMERICAN DAIRY QUEEN CORPORATION is a person in the course of
16 doing business within the meaning of Health & Safety Code §25249.11. AMERICAN DAIRY QUEEN
17 CORPORATION manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to
18 provide Thermal Receipt Paper containing BPS to individuals in California.

19 109. Defendant APPLE, INC. is a person in the course of doing business within the meaning
20 of Health & Safety Code §25249.11. APPLE, INC. manufactures, distributes, purchases for use, sells,
21 offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in
22 California.

23 110. Defendant ARBY'S FRANCHISOR, LLC is a person in the course of doing business
24 within the meaning of Health & Safety Code §25249.11. ARBY'S FRANCHISOR, LLC 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.

27 111. Defendant BBD OPCO LLC is a person in the course of doing business within the
28 meaning of Health & Safety Code §25249.11. BBD OPCO 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.

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

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

10 114. Defendant BEN & JERRY'S HOMEMADE, INC. is a person in the course of doing
11 business within the meaning of Health & Safety Code §25249.11. BEN & JERRY'S HOMEMADE,
12 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
13 Thermal Receipt Paper containing BPS to individuals in California.

14 115. Defendant BERKELEY BOWL PRODUCE, INC. is a person in the course of doing
15 business within the meaning of Health & Safety Code §25249.11. BERKELEY BOWL PRODUCE,
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.

18 116. Defendant BJ'S RESTAURANT OPERATIONS COMPANY is a person in the course of
19 doing business within the meaning of Health & Safety Code §25249.11. BJ'S RESTAURANT
20 OPERATIONS COMPANY manufactures, distributes, purchases for use, sells, offers to sell, provides,
21 or offers to provide Thermal Receipt Paper containing BPS to individuals in California.

22 117. Defendant BJ'S RESTAURANTS, INC. is a person in the course of doing business
23 within the meaning of Health & Safety Code §25249.11. BJ'S RESTAURANTS, 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.

26 118. Defendant BRISTOL FARMS is a person in the course of doing business within the
27 meaning of Health & Safety Code §25249.11. BRISTOL FARMS manufactures, distributes, purchases
28

1 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
2 individuals in California.

3 119. Defendant BRITISH AIRWAYS PLC is a person in the course of doing business within
4 the meaning of Health & Safety Code §25249.11. BRITISH AIRWAYS PLC manufactures, distributes,
5 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper and Thermal
6 Labels containing BPS to individuals in California.

7 120. Defendant BUCKLE BRANDS, INC. is a person in the course of doing business within
8 the meaning of Health & Safety Code §25249.11. BUCKLE 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.

11 121. Defendant C. & J. CLARK AMERICA, INC. is a person in the course of doing business
12 within the meaning of Health & Safety Code §25249.11. C. & J. CLARK AMERICA, INC.
13 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
14 Receipt Paper containing BPS to individuals in California.

15 122. Defendant C. & J. CLARK RETAIL, INC. is a person in the course of doing business
16 within the meaning of Health & Safety Code §25249.11. C. & J. CLARK RETAIL, INC. manufactures,
17 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
18 containing BPS to individuals in California.

19 123. Defendant CAFE POS LLC is a person in the course of doing business within the
20 meaning of Health & Safety Code §25249.11. CAFE POS LLC manufactures, distributes, purchases for
21 use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper and Thermal Labels
22 containing BPS to individuals in California.

23 124. Defendant CALIFORNIA FUEL SUPPLY, INC. is a person in the course of doing
24 business within the meaning of Health & Safety Code §25249.11. CALIFORNIA FUEL SUPPLY,
25 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
26 Thermal Receipt Paper containing BPS to individuals in California.

27 125. Defendant CARTER'S INC. is a person in the course of doing business within the
28 meaning of Health & Safety Code §25249.11. CARTER'S INC. 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.

3 126. Defendant CAVA FOODS, LLC is a person in the course of doing business within the
4 meaning of Health & Safety Code §25249.11. CAVA FOODS, 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.

7 127. Defendant CAVA GROUP, INC. is a person in the course of doing business within the
8 meaning of Health & Safety Code §25249.11. CAVA GROUP, 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.

11 128. Defendant CBOCS WEST, INC. is a person in the course of doing business within the
12 meaning of Health & Safety Code §25249.11. CBOCS WEST, INC. 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.

15 129. Defendant CHECKERS DRIVE-IN RESTAURANTS, INC. is a person in the course of
16 doing business within the meaning of Health & Safety Code §25249.11. CHECKERS DRIVE-IN
17 RESTAURANTS, INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or
18 offers to provide Thermal Receipt Paper containing BPS to individuals in California.

19 130. Defendant CLARINS U.S.A. INC. is a person in the course of doing business within the
20 meaning of Health & Safety Code §25249.11. CLARINS U.S.A. INC. manufactures, distributes,
21 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
22 BPS to individuals in California.

23 131. Defendant COLE HAAN COMPANY STORE, LLC is a person in the course of doing
24 business within the meaning of Health & Safety Code §25249.11. COLE HAAN COMPANY STORE,
25 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
26 Thermal Receipt Paper containing BPS to individuals in California.

27 132. Defendant COLE HAAN LLC is a person in the course of doing business within the
28 meaning of Health & Safety Code §25249.11. COLE HAAN 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.

3 133. Defendant COMCAST CABLE COMMUNICATIONS, LLC (erroneously sued as
4 COMCAST CORP.) is a person in the course of doing business within the meaning of Health & Safety
5 Code §25249.11. COMCAST CABLE COMMUNICATIONS, LLC (erroneously sued as COMCAST
6 CORP.) manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
7 Thermal Receipt Paper containing BPS to individuals in California.

8 134. Defendant COSTCO WHOLESALE CORPORATION is a person in the course of doing
9 business within the meaning of Health & Safety Code §25249.11. COSTCO WHOLESALE
10 CORPORATION manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to
11 provide Thermal Receipt Paper containing BPS to individuals in California.

12 135. Defendant CRACKER BARREL OLD COUNTRY STORE, INC. is a person in the
13 course of doing business within the meaning of Health & Safety Code §25249.11. CRACKER
14 BARREL OLD COUNTRY STORE, 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.

16 136. Defendant D&A FOOD INC. is a person in the course of doing business within the
17 meaning of Health & Safety Code §25249.11. D&A FOOD INC. manufactures, distributes, purchases
18 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
19 individuals in California.

20 137. Defendant DAVE'S HOT CHICKEN FRANCHISE CO., LLC is a person in the course
21 of doing business within the meaning of Health & Safety Code §25249.11. DAVE'S HOT CHICKEN
22 FRANCHISE CO., LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or
23 offers to provide Thermal Receipt Paper containing BPS to individuals in California.

24 138. Defendant DR. MARTENS AIRWAIR USA LLC is a person in the course of doing
25 business within the meaning of Health & Safety Code §25249.11. DR. MARTENS AIRWAIR USA
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.

1 139. Defendant DTF ASSETS, LLC is a person in the course of doing business within the
2 meaning of Health & Safety Code §25249.11. DTF ASSETS, LLC 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.

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

9 141. Defendant ECCO USA, INC. is a person in the course of doing business within the
10 meaning of Health & Safety Code §25249.11. ECCO USA, INC. manufactures, distributes, purchases
11 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
12 individuals in California.

13 142. Defendant EIGHTEEN HUNDRED, INC. is a person in the course of doing business
14 within the meaning of Health & Safety Code §25249.11. EIGHTEEN HUNDRED, 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.

17 143. Defendant EINSTEIN AND NOAH CORP. is a person in the course of doing business
18 within the meaning of Health & Safety Code §25249.11. EINSTEIN AND NOAH CORP.
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.

21 144. Defendant EINSTEIN NOAH RESTAURANT GROUP, INC. is a person in the course of
22 doing business within the meaning of Health & Safety Code §25249.11. EINSTEIN NOAH
23 RESTAURANT GROUP, INC. manufactures, distributes, purchases for use, sells, offers to sell,
24 provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California.

25 145. Defendant EUROMARKET DESIGNS, INC. is a person in the course of doing business
26 within the meaning of Health & Safety Code §25249.11. EUROMARKET DESIGNS, 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.

1 146. Defendant FABLETICS, INC. is a person in the course of doing business within the
2 meaning of Health & Safety Code §25249.11. FABLETICS, 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.

5 147. Defendant FIREHOUSE OF AMERICA, LLC is a person in the course of doing business
6 within the meaning of Health & Safety Code §25249.11. FIREHOUSE OF AMERICA, LLC
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.

9 148. Defendant GHIRARDELLI CHOCOLATE COMPANY is a person in the course of
10 doing business within the meaning of Health & Safety Code §25249.11. GHIRARDELLI
11 CHOCOLATE COMPANY manufactures, distributes, purchases for use, sells, offers to sell, provides,
12 or offers to provide Thermal Receipt Paper containing BPS to individuals in California.

13 149. Defendant GLOBAL RESTAURANT HOSPITALITY GROUP, LLC is a person in the
14 course of doing business within the meaning of Health & Safety Code §25249.11. GLOBAL
15 RESTAURANT HOSPITALITY GROUP, LLC manufactures, distributes, purchases for use, sells,
16 offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in
17 California.

18 150. Defendant GOLDEN CORRAL CORPORATION is a person in the course of doing
19 business within the meaning of Health & Safety Code §25249.11. GOLDEN CORRAL
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.

22 151. Defendant GOLDEN CORRAL FRANCHISING SYSTEMS, INC. is a person in the
23 course of doing business within the meaning of Health & Safety Code §25249.11. GOLDEN CORRAL
24 FRANCHISING SYSTEMS, INC. manufactures, distributes, purchases for use, sells, offers to sell,
25 provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California.

26 152. Defendant GONG CHA TEA, LLC is a person in the course of doing business within the
27 meaning of Health & Safety Code §25249.11. GONG CHA TEA, LLC manufactures, distributes,
28

1 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper and Thermal
2 Labels containing BPS to individuals in California.

3 153. Defendant GOOD FOOD HOLDINGS, LLC is a person in the course of doing business
4 within the meaning of Health & Safety Code §25249.11. GOOD FOOD HOLDINGS, 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.

7 154. Defendant GOSH ENTERPRISES, INC. is a person in the course of doing business
8 within the meaning of Health & Safety Code §25249.11. GOSH ENTERPRISES, INC. manufactures,
9 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
10 containing BPS to individuals in California.

11 155. Defendant GUESS?, INC. is a person in the course of doing business within the meaning
12 of Health & Safety Code §25249.11. GUESS?, INC. 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.

15 156. Defendant H MART COMPANIES, INC. is a person in the course of doing business
16 within the meaning of Health & Safety Code §25249.11. H MART COMPANIES, INC. manufactures,
17 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
18 containing BPS to individuals in California.

19 157. Defendant H MART, INC. is a person in the course of doing business within the meaning
20 of Health & Safety Code §25249.11. H MART, INC. manufactures, distributes, purchases for use, sells,
21 offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in
22 California.

23 158. Defendant HAPPY LEMON WEST, INC. is a person in the course of doing business
24 within the meaning of Health & Safety Code §25249.11. HAPPY LEMON WEST, INC. 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.

27 159. Defendant INFINILUSH COMPANY LIMITED is a person in the course of doing
28 business within the meaning of Health & Safety Code §25249.11. INFINILUSH COMPANY

1 LIMITED manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
2 Thermal Receipt Paper containing BPS to individuals in California.

3 160. Defendant JIMMY JOHN'S FRANCHISOR SPV, LLC (erroneously sued as JIMMY
4 JOHN'S LLC, JIMMY JOHN'S ENTERPRISES, LLC, and JIMMY JOHN'S FRANCHISE, LLC) is a
5 person in the course of doing business within the meaning of Health & Safety Code §25249.11. JIMMY
6 JOHN'S FRANCHISOR SPV, LLC (erroneously sued as JIMMY JOHN'S LLC, JIMMY JOHN'S
7 ENTERPRISES, LLC, and JIMMY JOHN'S FRANCHISE, LLC) manufactures, distributes, purchases
8 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
9 individuals in California.

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

14 162. Defendant KF TEA FRANCHISING LLC is a person in the course of doing business
15 within the meaning of Health & Safety Code §25249.11. KF TEA FRANCHISING LLC 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.

18 163. Defendant KF TEA USA INC. is a person in the course of doing business within the
19 meaning of Health & Safety Code §25249.11. KF TEA USA INC. manufactures, distributes, purchases
20 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
21 individuals in California.

22 164. Defendant KHOU AND LIM INC. is a person in the course of doing business within the
23 meaning of Health & Safety Code §25249.11. KHOU AND LIM 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.

26 165. Defendant KRISPY KREME DOUGHNUT CORPORATION is a person in the course of
27 doing business within the meaning of Health & Safety Code §25249.11. KRISPY KREME
28 DOUGHNUT CORPORATION manufactures, distributes, purchases for use, sells, offers to sell,

1 provides, or offers to provide Thermal Receipt Paper and Thermal Labels containing BPS to individuals
2 in California.

3 166. Defendant LE CREUSET OF AMERICA, INC. is a person in the course of doing
4 business within the meaning of Health & Safety Code §25249.11. LE CREUSET OF AMERICA, 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.

7 167. Defendant MAURICES INCORPORATED is a person in the course of doing business
8 within the meaning of Health & Safety Code §25249.11. MAURICES INCORPORATED
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.

11 168. Defendant MICHAEL KORS (USA) INC. is a person in the course of doing business
12 within the meaning of Health & Safety Code §25249.11. MICHAEL KORS (USA) INC. manufactures,
13 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
14 containing BPS to individuals in California.

15 169. Defendant MICHAEL KORS STORES (CALIFORNIA) LLC is a person in the course of
16 doing business within the meaning of Health & Safety Code §25249.11. MICHAEL KORS STORES
17 (CALIFORNIA) LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or
18 offers to provide Thermal Receipt Paper containing BPS to individuals in California.

19 170. Defendant MINISO DEPOT CA, INC. is a person in the course of doing business within
20 the meaning of Health & Safety Code §25249.11. MINISO DEPOT CA, 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.

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

27 172. Defendant NORCAL NOODLES LLC is a person in the course of doing business within
28 the meaning of Health & Safety Code §25249.11. NORCAL NOODLES LLC manufactures,

1 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
2 containing BPS to individuals in California.

3 173. Defendant NUGGET MARKET, INC. is a person in the course of doing business within
4 the meaning of Health & Safety Code §25249.11. NUGGET MARKET, 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.

7 174. Defendant OLD NAVY, LLC is a person in the course of doing business within the
8 meaning of Health & Safety Code §25249.11. OLD NAVY, 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.

11 175. Defendant PARIS BAGUETTE AMERICA, INC. is a person in the course of doing
12 business within the meaning of Health & Safety Code §25249.11. PARIS BAGUETTE AMERICA,
13 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
14 Thermal Receipt Paper containing BPS to individuals in California.

15 176. Defendant PARIS BAGUETTE U.S.A., INC. is a person in the course of doing business
16 within the meaning of Health & Safety Code §25249.11. PARIS BAGUETTE U.S.A., INC.
17 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
18 Receipt Paper containing BPS to individuals in California.

19 177. Defendant PERFECT 85 DEGREES C, INC. is a person in the course of doing business
20 within the meaning of Health & Safety Code §25249.11. PERFECT 85 DEGREES C, INC.
21 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
22 Receipt Paper containing BPS to individuals in California.

23 178. Defendant PUMA NORTH AMERICA, INC. is a person in the course of doing business
24 within the meaning of Health & Safety Code §25249.11. PUMA NORTH AMERICA, INC.
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.

27 179. Defendant RACK ROOM SHOES OF VIRGINIA LLC is a person in the course of doing
28 business within the meaning of Health & Safety Code §25249.11. RACK ROOM SHOES OF

1 VIRGINIA LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to
2 provide Thermal Receipt Paper containing BPS to individuals in California.

3 180. Defendant RACK ROOM SHOES, INC. is a person in the course of doing business
4 within the meaning of Health & Safety Code §25249.11. RACK ROOM SHOES, 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.

7 181. Defendant RALPHS GROCERY COMPANY is a person in the course of doing business
8 within the meaning of Health & Safety Code §25249.11. RALPHS GROCERY 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.

11 182. Defendant RARE HOSPITALITY INTERNATIONAL, INC. is a person in the course of
12 doing business within the meaning of Health & Safety Code §25249.11. RARE HOSPITALITY
13 INTERNATIONAL, INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or
14 offers to provide Thermal Receipt Paper containing BPS to individuals in California.

15 183. Defendant SAMSONITE COMPANY STORES, LLC is a person in the course of doing
16 business within the meaning of Health & Safety Code §25249.11. SAMSONITE COMPANY STORES,
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.

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

23 185. Defendant SAVE MART SUPERMARKETS LLC is a person in the course of doing
24 business within the meaning of Health & Safety Code §25249.11. SAVE MART SUPERMARKETS
25 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
26 Thermal Receipt Paper and Thermal Labels containing BPS to individuals in California.

27 186. Defendant SEE'S CANDIES, INC. is a person in the course of doing business within the
28 meaning of Health & Safety Code §25249.11. SEE'S CANDIES, INC. manufactures, distributes,

1 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
2 BPS to individuals in California.

3 187. Defendant SEE'S CANDY SHOPS, INCORPORATED is a person in the course of doing
4 business within the meaning of Health & Safety Code §25249.11. SEE'S CANDY SHOPS,
5 INCORPORATED manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers
6 to provide Thermal Receipt Paper containing BPS to individuals in California.

7 188. Defendant SIZZLER USA RESTAURANTS, INC. is a person in the course of doing
8 business within the meaning of Health & Safety Code §25249.11. SIZZLER USA RESTAURANTS,
9 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
10 Thermal Receipt Paper containing BPS to individuals in California.

11 189. Defendant SLT LENDING SPV, INC. is a person in the course of doing business within
12 the meaning of Health & Safety Code §25249.11. SLT LENDING SPV, INC. 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.

15 190. Defendant SMCP USA, INC. is a person in the course of doing business within the
16 meaning of Health & Safety Code §25249.11. SMCP USA, INC. manufactures, distributes, purchases
17 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
18 individuals in California.

19 191. Defendant SPORTSMAN'S WAREHOUSE SOUTHWEST, INC. is a person in the
20 course of doing business within the meaning of Health & Safety Code §25249.11. SPORTSMAN'S
21 WAREHOUSE SOUTHWEST, INC. manufactures, distributes, purchases for use, sells, offers to sell,
22 provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California.

23 192. Defendant SPORTSMAN'S WAREHOUSE, INC. is a person in the course of doing
24 business within the meaning of Health & Safety Code §25249.11. SPORTSMAN'S WAREHOUSE,
25 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
26 Thermal Receipt Paper containing BPS to individuals in California.

27 193. Defendant SWEETGREEN, INC. is a person in the course of doing business within the
28 meaning of Health & Safety Code §25249.11. SWEETGREEN, INC. manufactures, distributes,

1 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
2 BPS to individuals in California.

3 194. Defendant TAWA SUPERMARKET, INC. is a person in the course of doing business
4 within the meaning of Health & Safety Code §25249.11. TAWA SUPERMARKET, 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.

7 195. Defendant TEAM DRIVE IN AMERICAN CANYON, LLC is a person in the course of
8 doing business within the meaning of Health & Safety Code §25249.11. TEAM DRIVE IN
9 AMERICAN CANYON, LLC manufactures, distributes, purchases for use, sells, offers to sell, provides,
10 or offers to provide Thermal Receipt Paper containing BPS to individuals in California.

11 196. Defendant TEASPOON FRANCHISING INC. is a person in the course of doing business
12 within the meaning of Health & Safety Code §25249.11. TEASPOON FRANCHISING INC.
13 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
14 Receipt Paper containing BPS to individuals in California.

15 197. Defendant TERRAMAR CAPITAL MANAGEMENT, INC. is a person in the course of
16 doing business within the meaning of Health & Safety Code §25249.11. TERRAMAR CAPITAL
17 MANAGEMENT, INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or
18 offers to provide Thermal Receipt Paper containing BPS to individuals in California.

19 198. Defendant TERRAMAR CAPITAL, LLC is a person in the course of doing business
20 within the meaning of Health & Safety Code §25249.11. TERRAMAR CAPITAL, 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.

23 199. Defendant TEXAS ROADHOUSE HOLDINGS LLC is a person in the course of doing
24 business within the meaning of Health & Safety Code §25249.11. TEXAS ROADHOUSE HOLDINGS
25 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
26 Thermal Receipt Paper containing BPS to individuals in California.

27 200. Defendant TEXAS ROADHOUSE INC. is a person in the course of doing business
28 within the meaning of Health & Safety Code §25249.11. TEXAS ROADHOUSE INC. manufactures,

1 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
2 containing BPS to individuals in California.

3 201. Defendant THE BUCKLE, INC. is a person in the course of doing business within the
4 meaning of Health & Safety Code §25249.11. THE BUCKLE, 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.

7 202. Defendant THE CONTAINER STORE GROUP, INC. is a person in the course of doing
8 business within the meaning of Health & Safety Code §25249.11. THE CONTAINER STORE
9 GROUP, INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to
10 provide Thermal Receipt Paper containing BPS to individuals in California.

11 203. Defendant THE CONTAINER STORE, INC. is a person in the course of doing business
12 within the meaning of Health & Safety Code §25249.11. THE CONTAINER STORE, INC.
13 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
14 Receipt Paper containing BPS to individuals in California.

15 204. Defendant THE SAVE MART COMPANIES, LLC is a person in the course of doing
16 business within the meaning of Health & Safety Code §25249.11. THE SAVE MART COMPANIES,
17 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
18 Thermal Receipt Paper and Thermal Labels containing BPS to individuals in California.

19 205. Defendant THREE VALLEY INVESTMENTS, LLC is a person in the course of doing
20 business within the meaning of Health & Safety Code §25249.11. THREE VALLEY INVESTMENTS,
21 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
22 Thermal Receipt Paper containing BPS to individuals in California.

23 206. Defendant TRIO DONUT AND COFFEE INC. is a person in the course of doing
24 business within the meaning of Health & Safety Code §25249.11. TRIO DONUT AND COFFEE INC.
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.

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1 207. Defendant TUMI, INC. is a person in the course of doing business within the meaning of
2 Health & Safety Code §25249.11. TUMI, INC. manufactures, distributes, purchases for use, sells, offers
3 to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California.

4 208. Defendant TUMI STORES, INC. is a person in the course of doing business within the
5 meaning of Health & Safety Code §25249.11. TUMI STORES, INC. manufactures, distributes,
6 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
7 BPS to individuals in California.

8 209. Defendant USA MINISO DEPOT INC. is a person in the course of doing business within
9 the meaning of Health & Safety Code §25249.11. USA MINISO DEPOT INC. manufactures,
10 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
11 containing BPS to individuals in California.

12 210. Defendant VALLARTA FOOD ENTERPRISES, INC. is a person in the course of doing
13 business within the meaning of Health & Safety Code §25249.11. VALLARTA FOOD
14 ENTERPRISES, INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or
15 offers to provide Thermal Receipt Paper containing BPS to individuals in California.

16 211. Defendant VITALITY BOWLS is a person in the course of doing business within the
17 meaning of Health & Safety Code §25249.11. VITALITY BOWLS 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.

20 212. Defendant VSI, INC. is a person in the course of doing business within the meaning of
21 Health & Safety Code §25249.11. VSI, INC. manufactures, distributes, purchases for use, sells, offers
22 to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in California.

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

27 214. Defendant WELLS FARGO BANK, N.A. is a person in the course of doing business
28 within the meaning of Health & Safety Code §25249.11. WELLS FARGO BANK, N.A. manufactures,

1 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
2 containing BPS to individuals in California.

3 215. Defendant WINDSOR FASHIONS, LLC is a person in the course of doing business
4 within the meaning of Health & Safety Code §25249.11. WINDSOR FASHIONS, LLC 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.

7 216. Defendant WKA ENTERPRISES, INC. DBA PARTEK SOLUTIONS is a person in the
8 course of doing business within the meaning of Health & Safety Code §25249.11. WKA
9 ENTERPRISES, INC. DBA PARTEK SOLUTIONS manufactures, distributes, purchases for use, sells,
10 offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to individuals in
11 California.

12 217. Defendant WOLVERINE WORLD WIDE, INC. is a person in the course of doing
13 business within the meaning of Health & Safety Code §25249.11. WOLVERINE WORLD WIDE, 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.

16 218. Defendant YUMMY-TOWN USA LLC is a person in the course of doing business
17 within the meaning of Health & Safety Code §25249.11. YUMMY-TOWN USA LLC 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.

20 219. Defendant ZWILLING J.A. HENCKELS LLC is a person in the course of doing business
21 within the meaning of Health & Safety Code §25249.11. ZWILLING J.A. HENCKELS 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.

24 220. Defendant BOOTBARN, INC. is a person in the course of doing business within the
25 meaning of Health & Safety Code §25249.11. BOOTBARN, 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.

1 221. Defendant CALENDAR HOLDINGS LLC is a person in the course of doing business
2 within the meaning of Health & Safety Code §25249.11. CALENDAR HOLDINGS LLC manufactures,
3 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
4 containing BPS to individuals in California.

5 222. Defendant GO TOYS & GAMES LLC is a person in the course of doing business within
6 the meaning of Health & Safety Code §25249.11. GO TOYS & GAMES LLC 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.

9 223. Defendant GUITAR CENTER STORES, INC. is a person in the course of doing business
10 within the meaning of Health & Safety Code §25249.11. GUITAR CENTER STORES, INC.
11 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
12 Receipt Paper containing BPS to individuals in California.

13 224. Defendant GUITAR CENTER, INC. is a person in the course of doing business within
14 the meaning of Health & Safety Code §25249.11. GUITAR CENTER, INC. 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.

17 225. Defendant P & A KNIGHT, INC. is a person in the course of doing business within the
18 meaning of Health & Safety Code §25249.11. P & A KNIGHT, INC. manufactures, distributes,
19 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing
20 BPS to individuals in California.

21 226. Defendant PA BAKE HOUSE LLC is a person in the course of doing business within the
22 meaning of Health & Safety Code §25249.11. PA BAKE HOUSE LLC 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.

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

1 228. Defendant SPEEDWAY LLC is a person in the course of doing business within the
2 meaning of Health & Safety Code §25249.11. SPEEDWAY LLC 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.

5 229. Defendant THE REINALT-THOMAS CORPORATION DBA AMERICA'S TIRE is a
6 person in the course of doing business within the meaning of Health & Safety Code §25249.11. THE
7 REINALT-THOMAS CORPORATION DBA AMERICA'S TIRE manufactures, distributes, purchases
8 for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper containing BPS to
9 individuals in California.

10 230. Defendant A&W RESTAURANTS, INC. is a person in the course of doing business
11 within the meaning of Health & Safety Code §25249.11. A&W RESTAURANTS, INC. manufactures,
12 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
13 containing BPS to individuals in California.

14 231. Defendant A GREAT AMERICAN BRAND LLC is a person in the course of doing
15 business within the meaning of Health & Safety Code §25249.11. A GREAT AMERICAN BRAND
16 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
17 Thermal Receipt Paper containing BPS to individuals in California.

18 232. Defendant SPARROW OUTLETS HOLDCO, LLC is a person in the course of doing
19 business within the meaning of Health & Safety Code §25249.11. SPARROW OUTLETS HOLDCO,
20 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
21 Thermal Receipt Paper containing BPS to individuals in California.

22 233. Defendant BASKIN ROBBINS USA LLC is a person in the course of doing business
23 within the meaning of Health & Safety Code §25249.11. BASKIN ROBBINS USA LLC 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.

26 234. Defendant DUNKIN' BRANDS, INC. is a person in the course of doing business within
27 the meaning of Health & Safety Code §25249.11. DUNKIN' BRANDS, INC. manufactures, distributes,
28

1 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper and Thermal
2 Labels containing BPS to individuals in California.

3 235. Defendant DUNKIN' DONUTS FRANCHISING LLC is a person in the course of doing
4 business within the meaning of Health & Safety Code §25249.11. DUNKIN' DONUTS
5 FRANCHISING LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or
6 offers to provide Thermal Receipt Paper and Thermal Labels containing BPS to individuals in
7 California.

8 236. Defendant SONIC INDUSTRIES LLC is a person in the course of doing business within
9 the meaning of Health & Safety Code §25249.11. SONIC INDUSTRIES LLC manufactures,
10 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
11 containing BPS to individuals in California.

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

16 238. Defendant SONIC FRANCHISING LLC is a person in the course of doing business
17 within the meaning of Health & Safety Code §25249.11. SONIC FRANCHISING LLC 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.

20 239. Defendant MG RESTAURANTS, INC. is a person in the course of doing business within
21 the meaning of Health & Safety Code §25249.11. MG RESTAURANTS, INC. manufactures,
22 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
23 and Thermal Labels containing BPS to individuals in California.

24 240. Defendant UNITED PARCEL SERVICE, INC. is a person in the course of doing
25 business within the meaning of Health & Safety Code §25249.11. UNITED PARCEL SERVICE, INC.
26 manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal
27 Labels containing BPS to individuals in California.

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1 241. Defendant YNAP CORPORATION is a person in the course of doing business within the
2 meaning of Health & Safety Code §25249.11. YNAP CORPORATION manufactures, distributes,
3 purchases for use, sells, offers to sell, provides, or offers to provide Thermal Labels containing BPS to
4 individuals in California.

5 242. Defendant WHOLE FOODS MARKET CALIFORNIA, INC. is a person in the course of
6 doing business within the meaning of Health & Safety Code §25249.11. WHOLE FOODS MARKET
7 CALIFORNIA, INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers
8 to provide Thermal Labels containing BPS to individuals in California.

9 243. Defendant QDOBA RESTAURANT CORPORATION is a person in the course of doing
10 business within the meaning of Health & Safety Code §25249.11. QDOBA RESTAURANT
11 CORPORATION manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to
12 provide Thermal Labels containing BPS to individuals in California.

13 244. Defendant QDOBA FRANCHISOR LLC is a person in the course of doing business
14 within the meaning of Health & Safety Code §25249.11. QDOBA FRANCHISOR LLC manufactures,
15 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Labels
16 containing BPS to individuals in California.

17 245. Defendant LUSH FRESH HANDMADE COSMETICS LLC is a person in the course of
18 doing business within the meaning of Health & Safety Code §25249.11. LUSH FRESH HANDMADE
19 COSMETICS LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers
20 to provide Thermal Labels containing BPS to individuals in California.

21 246. Defendant RALEY'S is a person in the course of doing business within the meaning of
22 Health & Safety Code §25249.11. RALEY'S manufactures, distributes, purchases for use, sells, offers
23 to sell, provides, or offers to provide Thermal Labels containing BPS to individuals in California.

24 247. Defendant NEW RECEIPTCO OPCO, LLC, DBA DOMTAR is a person in the course of
25 doing business within the meaning of Health & Safety Code §25249.11. NEW RECEIPTCO OPCO,
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. NEW RECEIPTCO OPCO, LLC is
28 one of the largest suppliers of Thermal Receipt Paper to California and provides and/or has provided

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

8 248. Defendant HANSOL AMERICA, INC. is a person in the course of doing business within
9 the meaning of Health & Safety Code §25249.11. HANSOL AMERICA, INC. manufactures,
10 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
11 containing BPS to businesses and retail customers in California that in turn provide Thermal Receipt
12 Paper to individuals in California. HANSOL AMERICA, INC. provides and/or has provided Thermal
13 Receipt Paper to a number of the other Defendants named herein as well as to numerous other entities
14 not yet named herein.

15 249. Defendant TCS PAPER INC. DBA PACIFIC COAST SUPPLIES is a person in the
16 course of doing business within the meaning of Health & Safety Code §25249.11. TCS PAPER INC.
17 DBA PACIFIC COAST SUPPLIES manufactures, distributes, purchases for use, sells, offers to sell,
18 provides, or offers to provide Thermal Receipt Paper containing BPS to businesses and retail customers
19 in California that in turn provide Thermal Receipt Paper to individuals in California. TCS PAPER INC.
20 DBA PACIFIC COAST SUPPLIES provides and/or has provided Thermal Receipt Paper to a number of
21 the other Defendants named herein as well as to numerous other entities not yet named herein.

22 250. Defendant BUNZL DISTRIBUTION INC. is a person in the course of doing business
23 within the meaning of Health & Safety Code §25249.11. BUNZL DISTRIBUTION INC. manufactures,
24 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
25 containing BPS to businesses and retail customers in California that in turn provide Thermal Receipt
26 Paper to individuals in California. BUNZL DISTRIBUTION INC. provides and/or has provided
27 Thermal Receipt Paper to a number of the other Defendants named herein as well as to numerous other
28 entities not yet named herein.

1 251. Defendant BUNZL DISTRIBUTION USA, INC. is a person in the course of doing
2 business within the meaning of Health & Safety Code §25249.11. BUNZL DISTRIBUTION USA,
3 INC. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
4 Thermal Receipt Paper containing BPS to businesses and retail customers in California that in turn
5 provide Thermal Receipt Paper to individuals in California. BUNZL DISTRIBUTION USA, INC.
6 provides and/or has provided Thermal Receipt Paper to a number of the other Defendants named herein
7 as well as to numerous other entities not yet named herein.

8 252. Defendant DADE PAPER & BAG, LLC is a person in the course of doing business
9 within the meaning of Health & Safety Code §25249.11. DADE PAPER & BAG, LLC manufactures,
10 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
11 containing BPS to businesses and retail customers in California that in turn provide Thermal Receipt
12 Paper to individuals in California. DADE PAPER & BAG, LLC provides and/or has provided Thermal
13 Receipt Paper to a number of the other Defendants named herein as well as to numerous other entities
14 not yet named herein.

15 253. Defendant IMPERIAL BAG & PAPER CO. LLC is a person in the course of doing
16 business within the meaning of Health & Safety Code §25249.11. IMPERIAL BAG & PAPER CO.
17 LLC manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
18 Thermal Receipt Paper containing BPS to businesses and retail customers in California that in turn
19 provide Thermal Receipt Paper to individuals in California. IMPERIAL BAG & PAPER CO. LLC
20 provides and/or has provided Thermal Receipt Paper to a number of the other Defendants named herein
21 as well as to numerous other entities not yet named herein.

22 254. Defendant SUPREME SOURCE & SUPPLY CO. is a person in the course of doing
23 business within the meaning of Health & Safety Code §25249.11. SUPREME SOURCE & SUPPLY
24 CO. manufactures, distributes, purchases for use, sells, offers to sell, provides, or offers to provide
25 Thermal Receipt Paper containing BPS to businesses and retail customers in California that in turn
26 provide Thermal Receipt Paper to individuals in California. SUPREME SOURCE & SUPPLY CO.
27 provides and/or has provided Thermal Receipt Paper to a number of the other Defendants named herein
28 as well as to numerous other entities not yet named herein.

1 255. Defendant HANSOL PAPER CO., LTD. is a person in the course of doing business
2 within the meaning of Health & Safety Code §25249.11. HANSOL PAPER CO., LTD. manufactures,
3 distributes, purchases for use, sells, offers to sell, provides, or offers to provide Thermal Receipt Paper
4 containing BPS to businesses and retail customers in California that in turn provide Thermal Receipt
5 Paper to individuals in California. HANSOL PAPER CO., LTD. provides and/or has provided Thermal
6 Receipt Paper to a number of the other Defendants named herein as well as to numerous other entities
7 not yet named herein.

8 256. DOES 53 through 70 (“RECEIPT SUPPLIER DOES”) are each a person in the course of
9 doing business within the meaning of Health & Safety Code §25249.11. RECEIPT SUPPLIER DOES
10 each manufacture, distribute, purchase for use, sell, offer to sell, provide, or offer to provide Thermal
11 Receipt Paper containing BPS to businesses and retail customers in California that in turn provide
12 Thermal Receipt Paper to individuals in California. RECEIPT SUPPLIER DOES provide and/or have
13 provided Thermal Receipt Paper to a number of the other Defendants named herein as well as to
14 numerous other entities not yet named herein.

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

19 258. DOES 352 through 500 (“RECEIPT DOES”) are each a person in the course of doing
20 business within the meaning of Health & Safety Code §25249.11. DOES 352 through 500 each
21 purchased Thermal Receipt Paper from NEW RECEIPTCO OPCO, LLC, HANSOL AMERICA, INC.,
22 TCS PAPER INC., BUNZL DISTRIBUTION INC., BUNZL DISTRIBUTION USA, INC., DADE
23 PAPER & BAG, LLC, IMPERIAL BAG & PAPER CO. LLC, SUPREME SOURCE & SUPPLY CO.,
24 HANSOL PAPER CO., LTD., and/or one or more RECEIPT SUPPLIER DOES and use, sell, offer to
25 sell, provide, or offer to provide Thermal Receipt Paper containing BPS to individuals in California.

26 259. DOES 501 through 525 (“LABEL SUPPLIER DOES”) are each a person in the course of
27 doing business within the meaning of Health & Safety Code §25249.11. LABEL SUPPLIER DOES
28 each manufacture, distribute, purchase for use, sell, offer to sell, provide, or offer to provide Thermal

1 Labels containing BPS to businesses and retail customers in California that in turn provide Thermal
2 Labels to individuals in California. LABEL SUPPLIER DOES provide and/or have provided Thermal
3 Labels to a number of the other Defendants named herein as well as to numerous other entities not yet
4 named herein.

5 260. DOES 526-625 (“LABEL DOES”) are each a person in the course of doing business
6 within the meaning of Health & Safety Code §25249.11. LABEL DOES each purchased Thermal
7 Labels from NEW RECEIPTCO OPCO, LLC, HANSOL AMERICA, INC., TCS PAPER INC.,
8 BUNZL DISTRIBUTION INC., BUNZL DISTRIBUTION USA, INC., DADE PAPER & BAG, LLC,
9 IMPERIAL BAG & PAPER CO. LLC, SUPREME SOURCE & SUPPLY CO., HANSOL PAPER CO.,
10 LTD., and/or one or more LABEL SUPPLIER DOES and use, sell, offer to sell, provide, or offer to
11 provide Thermal Labels containing BPS to individuals in California.

12 261. DOES 626-750 (“RECEIPT/LABEL SUPPLIER DOES”) are each a person in the course
13 of doing business within the meaning of Health & Safety Code §25249.11. RECEIPT/LABEL
14 SUPPLIER DOES each manufacture, distribute, purchase for use, sell, offer to sell, provide, or offer to
15 provide Thermal Receipt Paper and Thermal Labels containing BPS to businesses and retail customers
16 in California that in turn provide Thermal Receipt Paper and Thermal Labels to individuals in
17 California. RECEIPT/LABEL SUPPLIER DOES provide and/or have provided Thermal Receipt Paper
18 and Thermal Labels to a number of the other Defendants named herein as well as to numerous other
19 entities not yet named herein.

20 262. DOES 751-850 (“RECEIPT/LABEL DOES”) are each a person in the course of doing
21 business within the meaning of Health & Safety Code §25249.11. RECEIPT/LABEL DOES each
22 purchased Thermal Receipt Paper and Thermal Labels from NEW RECEIPTCO OPCO, LLC,
23 HANSOL AMERICA, INC., TCS PAPER INC., BUNZL DISTRIBUTION INC., BUNZL
24 DISTRIBUTION USA, INC., DADE PAPER & BAG, LLC, IMPERIAL BAG & PAPER CO. LLC,
25 SUPREME SOURCE & SUPPLY CO., HANSOL PAPER CO., LTD., and/or one or more
26 RECEIPT/LABEL SUPPLIER DOES and use, sell, offer to sell, provide, or offer to provide Thermal
27 Receipt Paper and Thermal Labels containing BPS to individuals in California.

1 levels without a “clear and reasonable warning” unless the business responsible for the exposure can
2 prove that it fits within a statutory exemption. Health & Safety Code §25249.6 states, in pertinent part:

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

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

17 271. On December 29, 2023, the State of California officially listed BPS as a female
18 reproductive toxicant, which means it is known to cause harm to the female reproductive system. 27
19 California Code of Regulations (“C.C.R.”) §27001(c). On December 29, 2024, BPS became subject to
20 the clear and reasonable warning requirement regarding reproductive toxicity under Proposition 65.
21 Health & Safety Code §25249.10(b).

22 272. On January 3, 2025, the State of California officially listed BPS as a male reproductive
23 toxicant, which means it is known to cause harm to the male reproductive system. 27 C.C.R. §27001(c).
24 On December 8, 2025, the State of California officially listed BPS as a developmental toxicant, which
25 means it is known to cause harm to the developing fetus. *Id.*
26
27
28

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

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

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

13 276. Defendants fail to provide any warning, let alone the required clear and reasonable
14 warning, with their Thermal Paper regarding the reproductive toxicity of BPS.

15 277. Any person acting in the public interest has standing to enforce violations of Proposition
16 65 provided that such person supplied the requisite public enforcers with a valid 60-Day Notice of
17 Violation and such public enforcers are not diligently prosecuting the action within such time. Health &
18 Safety Code §25249.7(d).

19 278. More than sixty days prior to naming each Defendant in this lawsuit, CEH provided a 60-
20 Day "Notice of Violation" of Proposition 65 to the California Attorney General, to the District Attorneys
21 of every county in California, to the City Attorneys of every California city with a population greater
22 than 750,000, and to each of the named Defendants. In compliance with Health & Safety Code
23 §25249.7(d) and 27 C.C.R. §25903(b), each Notice included the following information: (1) the name
24 and address of each violator; (2) the statute violated; (3) the time period during which violations
25 occurred; (4) specific descriptions of the violations, including (a) the routes of exposures to BPS from
26 Defendants' Thermal Paper; and (b) the specific type of products sold or provided in violation of
27 Proposition 65; and (5) the name of the specific Proposition 65-listed chemical that is the subject of the
28

1 violations described in each Notice. Each Notice also included a proposal for resolution of the noticed
2 claims and a demand that Defendants preserve all evidence relevant to the noticed claims.

3 279. CEH also sent a Certificate of Merit for each Notice to the California Attorney General,
4 to the District Attorneys of every county in California, to the City Attorneys of every California city
5 with a population greater than 750,000, and to each of the named Defendants. In compliance with
6 Health & Safety Code §25249.7(d) and 11 C.C.R. §3101, each Certificate certified that CEH's counsel:
7 (1) has consulted with one or more persons with relevant and appropriate experience or expertise who
8 reviewed facts, studies, or other data regarding the exposures to BPS alleged in each Notice; and (2)
9 based on the information obtained through such consultations, believes that there is a reasonable and
10 meritorious case for a citizen enforcement action based on the facts alleged in each Notice. In
11 compliance with Health & Safety Code §25249.7(d) and 11 C.C.R. §3102, each Certificate served on the
12 Attorney General included factual information – provided on a confidential basis – sufficient to establish
13 the basis for the Certificate, including the identity of the person(s) consulted by CEH's counsel and the
14 facts, studies, or other data reviewed by such persons.

15 280. None of the public prosecutors with the authority to prosecute violations of Proposition
16 65 have commenced or is diligently prosecuting a cause of action against Defendants under Health &
17 Safety Code §25249.5, *et seq.*, based on the claims asserted in any of CEH's Notices regarding BPS in
18 Thermal Paper.

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

21 282. Under Proposition 65, an exposure is “knowing” where the party responsible for such
22 exposure has: “knowledge of the fact that a[n] ... exposure to a chemical listed pursuant to [Health &
23 Safety Code §25249.8(a)] is occurring. No knowledge that the ... exposure is unlawful is required.”
24 27 C.C.R. §25102(n). This knowledge may be either actual or constructive. *See, e.g.*, Final Statement
25 of Reasons Revised (November 4, 1988) (pursuant to former 22 C.C.R. Division 2, §12601).

26 283. Defendants continue to expose individuals to BPS without prior clear and reasonable
27 warnings regarding the reproductive toxicity of BPS.

28

1 first giving clear and reasonable warnings to such individuals regarding the reproductive toxicity of
2 BPS.

3 **PRAYER FOR RELIEF**

4 CEH prays for judgment against Defendants as follows:

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

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

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

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

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

19
20 Dated: May 18, 2026

Respectfully submitted,

21 LEXINGTON LAW GROUP, LLP

22 

23 _____
24 Mark Todzo
25 Patrick Carey
26 Joseph Mann
27 Attorneys for Plaintiff
28 Center for Environmental Health