

September 4, 2019

Member/Manager Pilot #1019 4444 Commerce Ln Orland, CA 95963	Member/Manager Gina Group LLC LIMITED LIABILITY COMPANY NEW YORK 10 West 33rd Street, Suite 312 NEW YORK, NY 10001
Member/Manager Pilot Travel Centers LLC CT Corporation System 818 West Seventh Street Suite 930 Los Angeles, CA 90017	Member/Manager Pilot Corporation 5508 Lenas Road Knoxville, TN 37909

AND THE PUBLIC PROSECUTORS LISTED ON THE DISTRIBUTION LIST ACCOMPANYING THE ATTACHED CERTIFICATE OF SERVICE

Re: Notice of Violation of California Health & Safety Code 825249.5, et seq.

To Whom It May Concern:

Tianyu Law Group, Inc("Tianyu Law") represents Zhifeng Xu ("Our client"), a citizen of the State of California acting in the interest of the general public to promote awareness of exposures to toxic chemicals in products sold in California and to improve human health by reducing hazardous substances contained in such items.

With respect to the product identified below, our client has identified a violation of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65"), which is codified at Cal. Health & Safety Code 825249.5, et seq. This violation has occurred and continues to occur because the alleged Violator(s) identified below failed to provide required clear and reasonable warnings with this product. Section 25249.6 of the statute provides that "[n]o person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the State to cause cancer or reproductive toxicity without first providing a clear and reasonable warning to such individual ...". Without proper warnings regarding the toxic effects of exposures to this listed chemical that results from contact with this product, California citizens lack the information necessary to make an informed decision on whether and/or how to eliminate (or reduce) their risk of exposure to the listed chemical from the reasonably foreseeable use of the product.

Please allow this letter to serve as notice of this violation to the alleged Violators and the appropriate public enforcement agencies. Pursuant to Section 25249.7(d) of the statute, Tianyu Law intends to file a private enforcement action on behalf of our client sixty (60) days after effective service of this notice unless the public enforcement agencies' have commenced and are earnestly prosecuting an action to redress these violations.

Alleged Violator(s): The name of the company's covered by this notice that Violated Proposition 65 (hereinafter "the Violators") are:

Pilot #1019
Pilot Travel Centers LLC
Pilot Corporation
Gina Group LLC LIMITED LIABILITY COMPANY

Product Category/Type: The specific type of product causing this violation are slippers.

Product	Retailer	Manufacturer/Distributor
Shocked Slippers Style# ZTM-2001/C UPC# 7 31351 63594 7	Pilot #1019	Gina Group LLC

Listed Chemicals: This violation involves exposure to the chemical DBP(Dibutyl Phthalate). On 12/02/2005, the State of California listed DBP as a chemical known to the State to cause cancer. The addition took place more than twenty (20) months before this Notice was served.

Violations: The alleged Violators knowingly and intentionally have exposed and continue to knowingly and intentionally expose consumers within the State of California to DBP(Dibutyl Phthalate) at levels that, upon reasonable use of the product, exceed the No Significant Risk Level and the Maximum Allowable Dose Level without providing clear and reasonable warning of this exposure. In particular, the product does not warn that it contains chemicals known to the State of California to cause Developmental Toxicity, Male Reproductive Toxicity and Female Reproductive Toxicity.

Route of Exposure – Slippers - Clear Plastic: The exposures that are the subject of this notice result from the purchase, acquisition, handling and recommended use of the product. Consequently, the primary route of exposure to these chemicals is through dermal absorption. Dermal absorption of DBP can occur through direct skin contact with the clear plastic during routine use when the backpack is grasped, opened, or manipulated with bare hands. If the plastic becomes wet due to contact with water and is handled or held in contact permeation. If the slippers are stored or transported in a carrier, DBP that leaches from the clear plastic may contaminate other articles contained within the storage area or carrier that are subsequently handled, worn, mouthed, or ingested by the user. Finally, while mouthing of the product does not seem likely, some amount of exposure through ingestion can occur by touching the clear plastic with subsequent touching of the user's hand to mouth.

Duration of the Violations: Each of these ongoing violations has occurred on every day since at least July 3, 2019 as well as every day since the product was introduced to the California marketplace; and will continue every day until clear and reasonable warnings are provided to product purchasers and users or until this known toxic chemical is removed from the product.

Pursuant to Title 11, C.C.R. 53100, a certificate of merit is attached hereto. Pursuant to Title 27, C.C.R. §25903(b), a copy of "The Safe Drinking Water and Toxic Enforcement Action of 1986 (Proposition 65): A Summary" is also enclosed.

Consistent with the public interest goals of Proposition 65 and desire to have these ongoing violations of California law quickly rectified, our client is interested in seeking a constructive resolution of this matter without engaging in costly and protracted litigation.

Our client has retained me as legal counsel in connection with this matter. Please direct all communications regarding this Notice of Violations to my attention at the law office address and telephone number indicated on the letterhead.

Sincerely,

Tianyu Ju

Attachments

Certificate of Merit Certificate of Service

The Safe Drinking Water and Toxic Enforcement Action of 1986 (Proposition 65): A Summary

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am a citizen of the United States, over the age of 18 years of age, and am not a party to the within action. My business address is 388 E Valley Blvd, Suite 206, Alhambra CA 91801. I am employed in Los Angeles County where the mailing occurred.

On September 4, 2019, I served the following documents: Notice of Violation of California Health & Safety Code 825249.5, et seq.; Certificate of Merit; The Safe Drinking Water and Toxic Enforcement Action of 1986 (Proposition 65): A Summary on the following entities and individuals listed below by placing a true and correct copy thereof in a sealed envelope, addressed to the person or entity listed below and depositing it in a US Postal Service Office with postage fully prepaid for delivery by Certified Mail:

Member/Manager Pilot #1019 4444 Commerce Ln Orland, CA 95963	Member/Manager Gina Group LLC LIMITED LIABILITY COMPANY NEW YORK 10 West 33rd Street, Suite 312 NEW YORK, NY 10001
Member/Manager Pilot Travel Centers LLC CT Corporation System 818 West Seventh Street Suite 930 Los Angeles, CA 90017	Member/Manager Pilot Corporation 5508 Lenas Road Knoxville, TN 37909

On September 4, 2019, I served the following documents: Notice of Violation of California Health & Safety Code 825249.5, et seq.; Certificate of Merit; The Safe Drinking Water and Toxic Enforcement Action of 1986 (Proposition 65): A Summary on each of the individuals on the service list attached hereto as Appendix B by placing a true and correct copy thereof in a sealed envelope, addressed to the person or entity listed below and depositing it in a US Postal Service Office with postage fully prepaid for delivery by Priority Mail.

Executed on September 4, 2019, in Alhambra, California.

Tianyu Ju

CERTIFICATE OF MERIT Health & Safety Code Section 25249.7(d)

I, Tianyu Ju, hereby declare:

(1) This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the parties identified in the notice have violated Health & Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.

(2) I am the attorney for the noticing party, Zhifeng Xu.

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

(4) Based on the information obtained through these consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator(s) will be able to establish any of the affirmative defenses set forth in the statute.

The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including information identified in Health & Safety Code Section 25249.7(h)(2), i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: September 4, 2019

Tianyu Ju
Attorney for Zhifeng Xu