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17  
18 Attorneys for: Plaintiffs

19 UNITED STATES DISTRICT COURT  
20 EASTERN DISTRICT OF CALIFORNIA

21 ABARCA, RAUL VALENCIA  
22 ABARCA, MARTHA  
ADAME, YOLANDA  
23 ADAME, RICO ARIC  
ADAME, CHRISTOPHER PAUL  
24 ADAME, FRANK LEE, JR.  
ADAME, RAY ANTHONY  
25 AGUAS, JACQUELINE  
AGUAS, FERNANDO RODRIGO  
26 AGUAYO, MARIA ESTHER  
AGUAYO, MARIA GARCIA  
27 AGUAYO, CELESTE  
AGUAYO, EDGAR  
28 AGUAYO, KASANDRA

Case No. 1:07-CV-0388 OWW DLB

**THIRD AMENDED COMPLAINT FOR  
VIOLATIONS OF THE CLEAN  
WATER ACT, 33 U.S.C. § 1251 et seq.;  
VIOLATIONS OF THE RESOURCE  
CONSERVATION AND RECOVERY  
ACT, 42 U.S.C. § 6901, et seq.; INVERSE  
CONDEMNATION; NEGLIGENCE;  
NEGLIGENCE PER SE; NEGLIGENT  
FAILURE TO DISCLOSE;  
NEGLIGENT MAINTENANCE;  
DANGEROUS CONDITION OF  
PUBLIC PROPERTY;**

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AGUAYO, CHRISTIAN ABARCA )  
AGUAYO, ANDY ABARCA )  
AGUAYO, ROXANA )  
AGUAYO, AUSENCIO )  
AGUILAR, ROBERTO M. )  
AGUILAR, ZOE BETTY )  
AGUILAR, JONATHAN ROGELIO )  
AGUILAR, FLOR GUADALUPE )  
AGUIRRE, MARTHA VERONICA )  
AGUIRRE, JESICA )  
AGUIRRE, HUMBERTO, JR. )  
AGUIRRE, MARIA PERLA )  
AGUIRRE, MARIA DOLORES )  
AGUIRRE, ERNESTO, JR. )  
AGUIRRE, RAFAEL )  
AGUIRRE, ERNESTO, SR. )  
AGUIRRE, JOSE S. )  
AGUIRRE, ALEJANDRA )  
AGUIRRE, EMILY ALEXANDRA )  
AGUIRRE, ARIANA )  
AGUIRRE-YANEZ, ALISA REBECCA )  
AIKEN, MICHAEL JEROME, JR. )  
AIMONE, JACQUELINE LOUISE )  
ALAMILLO, AURORA )  
ALATORRE, DANIEL MIGUELL )  
ALATORRE, BENJAMIN JACK )  
ALCANTARA, HELEN MARQUEZ )  
ALCANTARA, JOSE PROTACIO )  
ALCARAZ, ANTONIA )  
ALCARAZ, ERNESTO )  
ALCARAZ, MARIA )  
ALCARAZ, LILIANA )  
ALCARAZ, ALONDRA )  
ALLEN, ARNOLD JOE )  
ALLEN, DRE SHAWN RONALD )  
ALLEN, LEANNE RENEE )  
ALLEN, ETHEL M. )  
ALLEN, RONALD DEEN )  
ALLEN, DERRICK )  
ALLEN, DONTÉ MARQUES )  
ALTOM, JIMMY HAROLD )  
ALVAREZ, NANCY GABRIELA )  
ALVAREZ, VIVIANNA MARIE )  
ALVAREZ, GLORIA ESTEFANI )  
ALVAREZ, DAISY YASMIN )  
ALVAREZ, JESSE NATHANIEL, JR. )  
ALVAREZ, CHRISTINA )  
ALVAREZ, PABLO ISMAEL )  
ALVAREZ, MARIBEL )  
ALVAREZ, NAYELI )  
ALVAREZ, DELSI )  
ALVAREZ, PEDRO, SR. )  
ALVAREZ, JACKELINE )  
ALVAREZ, JULIANA SARAI )  
ALVAREZ, JESUS ALBERTO )  
ALVAREZ, SANDRA )

**UNREASONABLE FLOOD BARRIER;  
NUISANCE AND TRESPASS**  
**DEMAND FOR JURY TRIAL**

- 1 ALVAREZ, LIZBETH )
- 2 ALVAREZ, PABLO )
- 3 ALVAREZ, PEDRO, JR. )
- 4 ALVAREZ, FERNANDO )
- 5 ALVAREZ, ANA KAREN )
- 6 ALVAREZ, ISIDRO )
- 7 ALVAREZ, JESSE, SR. )
- 8 ALVAREZ-CHAVEZ, MARIA GUADALUPE )
- 9 ALVAREZ-ZARAGOZA, JOEL GUILLERMO )
- 10 AMAYA, SALVINO JOHN )
- 11 AMEZCUA, IRENE )
- 12 ANACLETO, MARIA CASSIA )
- 13 ANDERSON CONCRETE, INC. )
- 14 ANDERSON, CHRISTOPHER OMAR )
- 15 ANDERSON, ANDY ANDREW )
- 16 ANDRES, LANNY ROSS )
- 17 ANDRES, MICHELE ELAIN )
- 18 ANDREWS, ANIYA DELPHINA )
- 19 ANDREWS, LAVELL LAMONT )
- 20 ANGE, EDWIN PAUL )
- 21 ANGE, SHEILA ANN )
- 22 APODACA, MATTHEW )
- 23 APODACA, DESIREE MARIE )
- 24 APODACA, MELISSA MARIA )
- 25 APODACA, ROBERT )
- 26 APODACA, JOSEPH ALEXANDER )
- 27 APODACA, ROSEMARY ELIZABETH )
- 28 APODACA, DANIEL )
- 29 AQUINO, NATALIE )
- 30 AQUINO, JAVIER )
- 31 AQUINO, GARDENIA )
- 32 AQUINO, MARIA )
- 33 AQUINO, JAIME )
- 34 AQUINO, CRYSTAL )
- 35 AQUINO, JESUS )
- 36 ARAICA, SUSAN ELIZABETH )
- 37 ARCE, SYLVIA PATRICIA )
- 38 ARCEO, STANLEY MARTIN )
- 39 ARCIGA, GABRIELA )
- 40 ARCINIEGA, LETICIA ARREDONDO )
- 41 ARMSTRONG, GEORGE A. )
- 42 ARMSTRONG, WILLIAM CURTIS )
- 43 ARMSTRONG, JIMMIE LOIS )
- 44 ARMSTRONG, LUCY L. )
- 45 ARMSTRONG, AUDIE L. )
- 46 ARROYO, ELIZABETH GARZA )
- 47 ARTEAGA, ROSA )
- 48 ARTEAGA, ESTHER )
- 49 ARUJO, VICTOR )
- 50 ARUJO, LUIS ANGEL )
- 51 ARUJO, RENE )

- 1 ARUJO, ALJANDRA )
- 2 ARUJO, VANESSA )
- 3 ARUJO, RODOLFO )
- 4 AVALOS, MERCEDES DOLORES )
- 5 AVILA, SERGIO, SR. )
- 6 AVILA, ROSEMARY )
- 7 AVILA, YOLANDA )
- 8 AVILA, HUMBERTO, JR. )
- 9 AVILA, BRYAN )
- 10 AVILA, LUIS JAVIER )
- 11 AVILA, LAURA )
- 12 AVILA, HUMBERO CORONA, SR. )
- 13 AVILA, ALJANDRO )
- 14 AVILA, SERGIO JESUS )
- 15 AVILES, JULISSA )
- 16 AVILES, JOSE INEZ )
- 17 AVILES, MELISSA )
- 18 AVILES, SONIA L. )
- 19 AYALA, MARIA )
- 20 AZAVEDO, WILLIAM VICTOR )
- 21 AZEVEDO, VICTOR J. )
- 22 AZEVEDO, VICTOR JOSEPH )
- 23 AZEVEDO, ZACHARY WAYNE )
- 24 AZEVEDO DAWNE KAY )
- 25 BAHENA, NICOLAS )
- 26 BAHENA, NEMESIA GUADALUPE )
- 27 BALLEZA, BRIAN ANDREW )
- 28 BARAHONA, NATALIA ACKLEY )
- BARAHONA, REYNALDO VINCENTE )
- BARAHONA, SEBASTIAN DELUGAN )
- BARCELLOS, KIMBERLY DIANE )
- BARCELLOS, MELANIE RICHAEAL )
- BARCENAS, THUY QUACH )
- BARCENAS, MARIA CARIDAD ALARKON )
- BARELA, THOMAS JOSEPH )
- BARELA, BEVERLY )
- BARKER, MICHAEL RYAN )
- BARNES, YVETTE DENISE )
- BARNES, LATONYA MARIE )
- BARRAGAN, RAMIRO GARICA )
- BARRAGAN, TANIA )
- BARRAGAN, MARIA ORALIA )
- BARRAGAN, ANGELA )
- BARRAGAN, JUAN JOSE )
- BARRAGAN, JORGE LUIS )
- BARRERA, ANN MARIE )
- BARRERA, ANORE MARIE )
- BARRERA, AMANDA REGINA )
- BARRERA, DAVID JOSEPH )
- BARRERA, ROSE MARIE )
- BARRERA, GILBERT ROLAND )

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- 1 BARRERA, JOE )
- 2 BARRERA, GABRIELLE MARIEA )
- 3 BASABE, MAXIMINO ABARCA )
- 4 BATCHELOR, JAMES MILTON )
- 5 BATES, ANGEL LAMAR )
- 6 BATES, DENAE LANICE )
- 7 BATES, DENISE LINDA )
- 8 BATES, DEMETRIUS LAMAR )
- 9 BATES, LINDA FAY )
- 10 BATES, KENNORIS DEMETRIUS )
- 11 BAUTISTA, MISTY ROSE )
- 12 BAUTISTA, JUAN MANUEL )
- 13 BEAM, JELANI IMAJINAE )
- 14 BEAM, BRYAN )
- 15 BEAM, JADA LORRAINE )
- 16 BEARD, SHAWN PAUL )
- 17 BEARD, CODY )
- 18 BEARD-OLGUIN, DEBORA LEE )
- 19 BECERRA, CONEY MANNING )
- 20 BECERRA, LUCIA )
- 21 BEJAR DE KOSE, MARIA )
- 22 BELCHER, RYAN DAMON )
- 23 BELCHER, RICHARD DALE, JR. )
- 24 BELCHER, JACKIE LINETTE )
- 25 BELCHER, PATRICIA LOUISE )
- 26 BELCHER, BRANDON SHANE )
- 27 BELDEN, STEPHANIE LORRAINE )
- 28 BELTON, JASON WILLIAM, SR. )
- 29 BELTON, CODIE RYAN )
- 30 BELTON, JASON WILLIAM, JR. )
- 31 BELTON, KABRENA ADAMA )
- 32 BENAVIDES, SARITA ESCOBEDO )
- 33 BENAVIDEZ, ELIODORA )
- 34 BENITEZ, JOSE JORGE )
- 35 BENITEZ, NATALIA ANGELITA )
- 36 BENITEZ, JORGE )
- 37 BENITEZ, KAROLINA )
- 38 BERNAL, MARA ALEXANDRA )
- 39 BERNAL, GINA ROSARIO )
- 40 BERNARD, VERA KATHERINE )
- 41 BERNARDO, CHRISTINE ANN )
- 42 BERNARDO, FILOMENA MELO )
- 43 BERNARDO, JOSE DINIS, SR. )
- 44 BERNARDO, JOSE DINIS, JR. )
- 45 BERRY, MICHAEL ROGER )
- 46 BERRY, JACQUELINE CAROL )
- 47 BIAGTAN, ANALIZA )
- 48 BIANCHI, JENNY LUCIA )
- 49 BISHOP, ARIELLE IONE )
- 50 BLACK, SELENA VIOLET )
- 51 BLACKBURN, KEITH ANTHONY )

- 1 BLAKEY, VERNON JOE )
- 2 BLANCO, MARY LOU )
- 3 BLUFORD, SHAVONA DA'NEA )
- 4 BONILLA, YENSY CAROLINA )
- 5 BOOTH, WILLIAM BRADLEY )
- 6 BORGES, CARRIE IRENE )
- 7 BORGES, TIPHANIE LEE )
- 8 BORGES, ROLAND LOUIS, SR. )
- 9 BORGES, ROLAND LOUIS, JR. )
- 10 BOSTROM, GARY MICHAEL )
- 11 BOSTROM, AMANDA LORRAINE )
- 12 BOSTROM, JOSEPH AAGE )
- 13 BOSTROM, BARBARA ANNETTE )
- 14 BOSTROM, AARON MICHAEL )
- 15 BOYD, PEARLIE ELIZABETH WOMACK )
- 16 BRAMMER-BATCHELOR, SANDRA LOUISE )
- 17 BRAUCHLER, JOHN THOMAS )
- 18 BRAUCHLER, ASHLEY RENAE )
- 19 BRAUCHLER, DIANA CAROL )
- 20 BRAUCHLER, AUDRA ANNE )
- 21 BRAUCHLER, KRISTEN NICOLE )
- 22 BREAZEALE, DALEN )
- 23 BRENNING, KEITH BENJAMIN )
- 24 BREWER, EARL MARCEL )
- 25 BREWTON, CLEVELAND )
- 26 BRIDGMAN, JANIE LEE )
- 27 BRIDGMAN, JAMES KENNITH )
- 28 BRIGGS, BENNIE LEE )
- 29 BRIGGS, ALAMEDA LAURENE )
- 30 BRIGGS, BENNIE BOYETTE )
- 31 BRIZENDINE, TIIMOTHY HARVEL )
- 32 BRIZENDINE, HARVEL )
- 33 BRIZENDINE, BERTHA MAE )
- 34 BROOKS, BEVERLY JUNE )
- 35 BROOKS, JOSEPH WILLIAM )
- 36 BROUSSARD, JOSLYN )
- 37 BROUSSARD-BROWN, AJA YORUBA )
- 38 BROWN, DAVID THOMAS )
- 39 BROWN, KODY ALAN )
- 40 BROWN, KATHLEEN LOUISE )
- 41 BROWN, JAMES DEBOLDER )
- 42 BROWN, ROBERT WADE )
- 43 BROWN, JUDITH ARLENE )
- 44 BROWN, BURNETTA ANN )
- 45 BROWN, KRISTAL PATRICIA )
- 46 BRYANT, JEANETTE ALICIA )
- 47 BRYANT, ANGELINA MARIE )
- 48 BRYANT, JAMIEE SHERRICE )
- 49 BRYANT, VIRGINIA GERADINE )
- 50 BRYANT, JAMES ARTHUR, III )
- 51 BRYANT, CHRISTIE NICOLE )

- 1 BUENROSTRO, JULIE )
- 2 BUENROSTROH, ARTURO )
- 3 BUGAY, MARGIE )
- 4 BUGAY, RONALDO )
- 5 BURGUETTE, ODIN BEJAR )
- 6 BURGUETTE, RAFAEL KOSE )
- 7 BURGUETTE, SELENA )
- 8 BURGUETTE, ZUES )
- 9 BURGUETTE, JESSICA )
- 10 BURGUETTE, ADRIANNA MACIAS )
- 11 BURNS, NAOMI FLORINS )
- 12 BURNS, PETER DAVID )
- 13 BURROWS, PATRICIA ANN )
- 14 BUTRYM, JOYCE ELLEN )
- 15 BYRD, DAVID MIGUEL )
- 16 CABELLO, MONICA L. )
- 17 CABELLO, BIANCA )
- 18 CABELLO, NOEMI )
- 19 CABRAL, BEATRIZ )
- 20 CABRAL, BEATRICE AGUILERA )
- 21 CAGLE, BABETTE )
- 22 CAIRNCROSS, PAMELA DAWN )
- 23 CALDERON, MARIA AGUSTINA )
- 24 CALDERON, MARLENE )
- 25 CALDERON, RAFAEL )
- 26 CALHOUN, MARIA GUADALUPE )
- 27 CALIFRO, MARIAH ADELE )
- 28 CALIFRO, JEFF MICHAEL )
- 29 CALIFRO, MARQUEZ MICHAEL )
- 30 CALLAHAN, JACK )
- 31 CALLAHAN, WILLIE MAE )
- 32 CAMACHO, WILLIAM ANDREW )
- 33 CAMACHO, MARIA MAGDALENA )
- 34 CAMPOS, ROBERTO, III )
- 35 CAMPOS, ROBERTO, JR. )
- 36 CANADAY, JOHN JOSHIE )
- 37 CAPERS, ETTA LORENE )
- 38 CARDENAS, IDANIA ALEXIS )
- 39 CARDENAS, ALEJANDRO )
- 40 CARDOSO, EULALIA MARIA )
- 41 CARDOZA, ALMA ELENES )
- 42 CARDOZA, ALFREDO ELENES, JR. )
- 43 CARDOZA, GISSELLA ELENES )
- 44 CARDOZA-SEPULVEDA, ALFREDO )
- 45 CARMONA, PATRICIA )
- 46 CARMONA, ROSA DELIA )
- 47 CARMONA, ANDRES, JR. )
- 48 CARMONA, EVELYN LIZETTE )
- 49 CARMONA, ANDRES, SR. )
- 50 CARMONA, JOCELYN GUADALUPE )
- 51 CARMONA, ISABEL NAIMA )
- 52 CARMONA, SARA )

- 1 CARMONA, BRENDA CRISTINA )
- 2 CASTANEDA, BERTHA )
- 3 CASTANEDA, ISIDRO )
- 4 CASTANEDA, RICARDO )
- 5 CASTANEDA, DAVID )
- 6 CASTILLO, TEOFILO )
- 7 CASTILLO, LOLITA )
- 8 CASTRO, RAFAEL R. )
- 9 CASTRO, RAMONA RUBALCAVA )
- 10 CASTRO, SIMON JAY )
- 11 CATANO, LUIS )
- 12 CATANO, LOUIS ANDREW, JR. )
- 13 CATANO, MARIA O. )
- 14 CATANO, MARISOL )
- 15 CATANO, MARIA LOURDES )
- 16 CATANO, LOUIS, SR. )
- 17 CELEDON, DAVID )
- 18 CERNA, OMAR )
- 19 CERVANTES, MARTIN MELCHOR )
- 20 CHA, SOUA )
- 21 CHACON, DANIEL III )
- 22 CHAFFIN, BETTY JANE )
- 23 CHANDLER, CHERYL JEAN )
- 24 CHANDLER, DENISE ANTOINETTE )
- 25 CHANDLER, HENRY LEE, JR. )
- 26 CHANDLER, CAROLYN LAVERNE )
- 27 CHANDLER, LUCY PEARL )
- 28 CHANTHAVONGSOR, CAYDYNCE NAUMTIP )
- 29 CHANTHAVONGSOR, JESSICA NATASHA- )
- 30 CATHERENE )
- 31 CHAVARRIA, DIANA MARIE )
- 32 CHAVEZ, MARIA RITA )
- 33 CHAVEZ, ALFRED JOSEPH, SR. )
- 34 CHAVEZ, JESSICA MARIE )
- 35 CHAVEZ, RITA MARIE )
- 36 CHAVEZ, CARMEN VARGAS )
- 37 CHAVEZ, BROOKE WILLETE )
- 38 CHAVEZ, ALFRED MANUEL, JR. )
- 39 CHAVEZ, BENJAMIN FORREST )
- 40 CHAVEZ-DIAZ, JOSE LUIS )
- 41 CHEN, LILAN )
- 42 CHEN, MARIA )
- 43 CHESSER, GLEN ALLEN )
- 44 CHEW, ROBERT LEE )
- 45 CLARK, JUDY CAROL )
- 46 CLARK, ERNEST BLAINE )
- 47 CLAYTON, PATSY JEAN )
- 48 CLEGG, SOFIA PANTIN )
- 49 CLOTMAN, LATREL MARCEL )
- 50 COBERLEY, CARRIE ANN )
- 51 COBERLEY, MILTON LEROY )
- 52 COBERLEY, CYNTHIA MARCIA )



- 1 CODD, MIKE EUGENE )
- 2 CODD, PATRICIA CLADIS )
- 3 CODD SUSAN )
- 4 COELHO, BEULAH MARIE )
- 5 COGGIN, LUCY FERNANDES )
- 6 COGGIN, AIDAN ANTHONY )
- 7 COGGIN, BRIAN PATRICK )
- 8 COGGIN, DANIEL HARRALSON )
- 9 COGGIN, MICHAEL DANIEL )
- 10 CONCEPCION, CYNTHIA LOUISE )
- 11 CONCEPCION, REYNALDO )
- 12 CONTRERAS, GERARDO )
- 13 CONTRERAS, NESTOR )
- 14 CONTRERAS-PINA, GERARDO, JR. )
- 15 CONTRERAS-PINA, ELIZABETH )
- 16 COOK, DEANZA METRECE )
- 17 COOK, QUANRYCE MALCOLM )
- 18 COOK, SHAQUELL BRIANNA-MARIE )
- 19 CORCHADO, MELISSA CHANTEL )
- 20 CORCHADO, ABEL QUEZADA )
- 21 CORCHADO, IRMA RAQUEL )
- 22 CORONADO, AMELIA SERNA )
- 23 CORONADO, ERIC )
- 24 CORONADO, CIPRIANO, JR. )
- 25 CORONADO, JUAN JOSE )
- 26 CORREA, JESUS SERRANO )
- 27 CORREA, FRANCISCA TAMAYO )
- 28 CORTES, OMAR )
- 29 CORTES, FRANCISCO, JR. )
- 30 CORTES, MARISOL )
- 31 CORTES, FRANCISCO, SR. )
- 32 CORTES, GISELLE )
- 33 CORTES, CHRISTIAN )
- 34 CORTES, OSVALDO )
- 35 CORTES, SONIA )
- 36 CORTES, MARISELA )
- 37 CORTES, ABUNDIO )
- 38 CORTES, JULIAN )
- 39 CORTES, ALEJANDRO )
- 40 CORTEZ, JALISSA ROSEMARY )
- 41 CORTEZ, CARISSA DESIREE )
- 42 CORTEZ, CRYSTAL DIANETTE )
- 43 CORTEZ, JORGE )
- 44 CORTEZ, SYLVIA )
- 45 COSBY, MARQUIS LADRAKE )
- 46 COSBY, DEANNA MARIE )
- 47 COUNTS, JEREMY MICHAEL )
- 48 COUNTS, KENNETH ALAN )
- 49 COUNTS, ANGELA RUTH )
- 50 COUNTS, CLARICE ANITA )
- 51 COUNTS, LEANNA MAY )
- 52 COUNTS, ERNEST JAMES )

1	COUNTS, HEATHER ANITA	)
2	COUNTS, ALFRED JAMES	)
	COX, DAVID WILLIAM	)
3	COX, MARIE T.	)
	COX, MATTOX COLE	)
4	COX, APRIL DIANE	)
	CRAFT, JO ANN	)
5	CRAFT, DOUG ALLEN	)
	CRAFT, KATELYN PAIGE	)
6	CRESPO, MONICA	)
	CRESPO, VANESSA	)
7	CRIDER, MICHELLE RENEE	)
	CROPPER, ISAAC	)
8	CRUEDAD, ROMEO CATABIJAN	)
	CRUELDAD, TERESITA VELO	)
9	CRUZ, GUS FLORES	)
	CRUZ, RUBEN ARTURO	)
10	CURRIN, CHRISTINA MICHELLE	)
	DALMASO, ZACHARY LYLE	)
11	DALMASO, JEFFREY PAUL	)
	DALMASO, ANTHONY JOSEPH	)
12	DALMASO, SYDNEY GAY	)
	DANGTRAN, QUANG	)
13	DANIEL KAITLYN JANE	)
	DANIEL, BRAD MARTIN	)
14	DANIEL, BRIAN MICHAEL	)
	DANIEL, JENNIFER ROSE	)
15	DANIEL, BRADLEY MICHAEL	)
	DANIELS, ROSETTA	)
16	DART, BEATRICE	)
	DART, DALTON JAY	)
17	DAVIDSON, JAHLEEL ANTHONY-KADESH	)
	DAVIS, KATELYN MARIE	)
18	DAVIS, RITA JEAN	)
	DAVIS, BOBBY LEE, JR.	)
19	DAVIS, LORI LEE	)
	DAVIS, KATHY MACHELLE	)
20	DAVIS, SHEILA MARIE	)
	DAVIS, SHELLIE LOREE	)
21	DAVIS, EDWARD RAY	)
	DAVIS, JARRELL	)
22	DAVIS, DARRELL EARL	)
	DAVIS, DIONTE	)
23	DAVIS, STEVE EARL	)
	DAVIS, BOB LEE	)
24	DAVIS, MICHAEL SCOTT, JR.	)
	DAVIS, MICHAEL SCOTT, SR.	)
25	DAVIS-LEAL, LEILA MARIE	)
	DAY, EMMA LOU	)
26	DAY, DALE ERVIN	)
	DAY, GEORGE ERVIN	)
27	DAY, WILLIAM LESTER, SR.	)

28

1	DE LEON, EVANGELINE RIVERA	)
2	DE LEON, MANUEL	)
	DE LEON, ESTELITA RIVERA	)
3	DE LA ROSA, ROBERT	)
	DE LA CRUZ, VIRGINIA	)
4	DE LA ROSA, PAULINA ESTHER	)
	DE LEON, JOSEPH LORENZO	)
5	DE LEON, LUCIA GABRIELA	)
	DE LEON, LORENZO	)
6	DE LEON, ROSARIO B.	)
	DE LEON, GRISEL OLGA	)
7	DE LA ROSA, JESSENYA BEATRIS	)
	DE LA CRUZ, GUADALUPE, JR.	)
8	DE LA CUEVA, ANTONIA	)
	DE LEON, CARMEN RIVERA	)
9	DEAN, RONALD REED	)
	DEAN, REBECCA ANN	)
10	DEL RIO, SOPHIA ALEXANDRA	)
	DEL RIO, BENJAMIN ALEXANDER	)
11	DEL RIO, OLIVIA JO	)
	DELUGAN, ROBIN MARIA	)
12	DEMARTINI, KYLE EDWARD	)
	DEMATTEO, AMANDA MICHELLE	)
13	DEPINA, CHRISTOPHER ROY WILLIAM	)
	MARSHALL	)
14	DEVAURS, LOUIS ROGER	)
	DEVAURS, MARY JOAN	)
15	DHANJU, NADINE MACIAS PADILLA	)
	DIAZ, JOSE ALBERTO	)
16	DIAZ, NORMA ALIZIA	)
	DIAZ, RICARDO C.	)
17	DIAZ, ARTURO LOMAS	)
	DIAZ, RICHARD C.	)
18	DIAZ, ERNIE CHAVEZ	)
	DIAZ, GISELA	)
19	DIAZ, AURORA	)
	DIAZ, CARLOS, SR.	)
20	DIAZ, MARIA ELENA	)
	DIAZ, RICHARD C.	)
21	DIAZ, ELISA A.	)
	DIAZ, MARTHA	)
22	DIAZ, SOFIA	)
	DIAZ, OSCAR	)
23	DIAZ, CARLOS, JR.	)
	DIAZ, RICHARD REYES, JR.	)
24	DIAZ, NANCY	)
	DIAZ, PEDRO	)
25	DIAZ, RENE PAUL	)
	DIAZ, BELINDA REYES	)
26	DIAZ, MARISSA LEANNE	)
	DIAZ, EUGENIO DANIEL	)
27	DIAZ, MARIA DOLORES	)

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- 1 DIAZ, ARTURO ANTONIO )
- 2 DIAZ, MANUEL )
- 3 DIAZ, SANDY )
- 4 DIAZ, MARICELA CHAVEZ )
- 5 DIAZ-SUAREZ, ANGEL RAFAEL )
- 6 DICKEY, ELIZABETH ASHLEY )
- 7 DICKEY, STEPHANIE FRANCES )
- 8 DISCOUNT AUTO FINANCE LLC )
- 9 DO, JONA HUONG )
- 10 DOBBINS, TALCIA LATISHA )
- 11 DOBBINS-STOREY, DEBORAH JOYCE )
- 12 DONALDON, MARILYN JOAN )
- 13 DORIGHI, MICHAEL PAUL )
- 14 DORIGHI, CAROLYN LAVERN )
- 15 DOUTHIT, SAMUEL JONATHAN )
- 16 DOUTHIT, SUSAN CAROL )
- 17 DOWNEY, DAVID JOHN )
- 18 DOWNEY, BARBARA ANN )
- 19 DUGGER, DAVID JAY )
- 20 DUNN, LUTHER )
- 21 DUNN, ESTELLA RUTH )
- 22 DURAN, PETER R. )
- 23 DUTRA, BONNIE SUE )
- 24 DUTRA, JOSEPH GABRIEL )
- 25 DUTRA, JOSEPH DANIEL )
- 26 EDDINGS, GEORGE III )
- 27 EDDINGS, KERMAN ALEXANDER )
- 28 EDWARDS, WALTER JAMES, SR. )
- EDWARDS, KISSY LASHETTA )
- EDWARDS, JAVONNE WAYNITA )
- EDWARDS, ROOSEVELT, JR. )
- EDWARDS, KAMONA ESHANEE )
- EDWARDS, SHIRLEY KAY )
- EDWARDS, ROOSEVELT KENYATA III )
- EDWARDS, D'ANGELO O'MOND )
- EDWARDS, WALTER, JR. )
- EDWARDS, ROOSEVELT KENYATA, IV )
- ELIAS, ROBERT AUGUSTINE ENRIQUE )
- ELIAS, JOSHUA AARON )
- ELIAS, ROBERT CHARLES, JR. )
- ELLISON, KAYDENCE MARIE )
- ELLISON, BRANDON A. )
- ENCHILL, DIANE )
- ENCISO, JESSICA )
- ENCISO, JULIAN )
- ENCIZO, CARMEN )
- ENSOR, DONALD LLOYD )
- ENSOR, CAROLYN ANN )
- ESPINOSA, JESSEE JOSEF )
- ESPINOSA, WILLIAM JOSEPH, SR. )
- ESPINOSA, WILLIAM JOSEPH, JR. )
- ESPINOSA, JONATHAN ABLE )

- 1 ESPINOSA, IRMA MARGARET )
- 2 ESPINOSA, MELINDA JO )
- 3 ESPINOZA, KARINA )
- 4 ESPINOZA, ZULEMA )
- 5 ESPINOZA, YULIANNA )
- 6 ESPINOZA, JUAN EDUARDO )
- 7 ESPINOZA, MANUEL DE LA CUEVA )
- 8 ESQUIVEL, SABAS )
- 9 ESQUIVEL, MARTIN )
- 10 ESTRELLAS, MELCHOR AQUINO )
- 11 EVANS, NICOLE PETRICE )
- 12 FAGUNDES, ISABEL )
- 13 FAIL, SUSAN )
- 14 FAIRBANK, KANDACE ROXANNE )
- 15 FAIRBANK, DEVIN EUGENE )
- 16 FARIAS, JAIME II )
- 17 FARIAS, JAIME )
- 18 FAUSONE, ANGELO EUGENE )
- 19 FELIX, RUDOLPH JOHN )
- 20 FELIX, ISABEL CHRISTINA )
- 21 FELLING, GENE LLOYD )
- 22 FELLING, BOBBIE )
- 23 FERLING, KRISTIN ANN )
- 24 FERLING, KENNETH )
- 25 FERNANDEZ, JONATHAN )
- 26 FERNANDEZ, EDITH ADRIANA )
- 27 FERNANDEZ, ANGEL )
- 28 FERNANDEZ, ULYSSES )
- 29 FERRARIO, JULIE ANNA )
- 30 FERRER, ROSELLE )
- 31 FIERROS, JULIA ROSAURA )
- 32 FIERROS, DIANA VANESSA )
- 33 FIERROS, ANGEL )
- 34 FIERROS, ALONDRA )
- 35 FIERROS, MIGUEL ANGEL )
- 36 FIGUEROA, SERGIO IVAN )
- 37 FIGUEROA, ABRAHAM HUGO )
- 38 FIGUEROA, ANA ITZEL )
- 39 FIGUEROA, ARIANA ANAIS )
- 40 FITZGERALD, BREANNE RACHAL )
- 41 FLAGG, JAMES MERRITT, JR. )
- 42 FLAGG, MARY LOU )
- 43 FLORES, ZANDRA ARROYO )
- 44 FLORES, MARIA ARROYO )
- 45 FLORES, JEANNIE BERNADETTE )
- 46 FLORES, ANGELICA MICHELLE )
- 47 FLORES, JOE )
- 48 FLORES, JEANETTE MARIE )
- 49 FLORES, CARLOS NEPOMOCENO )
- 50 FLORES, RODOLFO GONZALEZ )
- 51 FLORES, JESSE RAY )
- 52 FLORES, MYRNA PATRICIA )

- 1 FLORES, HEATHER LEE )
- 2 FLORES, JESUS )
- 3 FLORES, JOSE ANTONIO )
- 4 FLORES, CASANDRA MARIE )
- 5 FLORES, PAUL ANTHONY )
- 6 FLOREZ, GABRIELA ARROYO )
- 7 FONTENETTE, GILBERT )
- 8 FONTENETTE, DENISE ROCHELLE )
- 9 FONTENETTE, LOUVENIA )
- 10 FONTES, TONY FLORES )
- 11 FOOTE, LOUISE )
- 12 FORD, KIRK DOUGLAS III )
- 13 FORD, HELEN OLATHA )
- 14 FORD, GRANT FREDERICK )
- 15 FORDON, HILDEGARD OTTELIE )
- 16 FOX, MARY JANE )
- 17 FOX, STEVEN WILLIAM )
- 18 FOX, JOSHUA EUGENE )
- 19 FOX, WILLIAM ERNEST )
- 20 FRANCO, ADRIANA )
- 21 FRANCO, MARIA DE LOS ANGELES )
- 22 FRANCO, OMAR RAFAEL )
- 23 FRANCO, RAFAEL )
- 24 FRANCO, ROGELIO )
- 25 FRANK, BRENDA KAY )
- 26 FRANK, DENNIS JAMES )
- 27 FRANKLIN, ELIJAH IMMANUEL )
- 28 FRANKLIN, ISHMAEL )
- 29 FRANKS, HEATHER SARAH )
- 30 FRANKS, SHIRLEY ANN )
- 31 FRANKS, KENNY ALAN )
- 32 FRANKS, WYATT DANNY )
- 33 FRANKS, DANNY RAY )
- 34 FRANKS, RANDY KYLE )
- 35 FRANKS, STEVEN CHRISTOPHER )
- 36 FRAZIER, DANIEL )
- 37 FREGOSO, KRISTA CATHRIE )
- 38 FREGOSO, DEANNA LAURA )
- 39 FREGOSO, HECTOR MANUEL )
- 40 FREITAS, DANNY DENNIS )
- 41 FRIESEN, KIMBERLY ANN )
- 42 FUENTES, ALEJANDRO )
- 43 FUENTES, JOSE )
- 44 GALLARDO, ALEX )
- 45 GALLARDO, ALEX, JR. )
- 46 GALLARDO, AUDRA MARIE )
- 47 GALLARDO, ALLISON MICHELLE )
- 48 GALLARDO, ALAN )
- 49 GALLARDO, ANGELINA SOCORRO )
- 50 GALLASHAW, TIARRA LENISHA )
- 51 GALLASHAW, TIMOTHY LEE )
- 52 GALLASHAW, LUTHER KING )

- 1 GARCES, MICHAEL CRUZ
- 2 GARCES, DANIEL MARTIN JESUS
- 3 GARCIA, JOSE PULIDO
- 4 GARCIA, DOLORES
- 5 GARCIA, MICHELLE
- 6 GARCIA, ALFREDO
- 7 GARCIA, LETICIA
- 8 GARCIA, ADRIAN ENRIQUE
- 9 GARCIA, JONATHAN EDUARDO
- 10 GARCIA, ALMA
- 11 GARCIA, DIANETTE CRISTINA
- 12 GARCIA, PETRA
- 13 GARCIA, VICKIE LYNN
- 14 GARCIA, MEDELIA MANZO
- 15 GARCIA, KAYTIE DYANNE
- 16 GARCIA, MONICA
- 17 GARCIA, ANA LILIA
- 18 GARCIA, ARCELI
- 19 GARCIA, RAFAEL MANZO
- 20 GARCIA, ERNESTO ARTURO
- 21 GARCIA, VICTALINA
- 22 GARCIA, DOCINDA
- 23 GARCIA, DAVID
- 24 GARCIA, GABRIEL FRANCISCO
- 25 GARCIA, JOHN SIMON
- 26 GARCIA, RAUL
- 27 GARCIA, ENRIQUE
- 28 GARCIA, ARACELI
- 29 GARCIA, CONNIE
- 30 GARCIA, DAMARIS CELESTE
- 31 GARCIA, MARIA SOLEDAD
- 32 GARCIA, VANESSA
- 33 GARCIA, JESSE PRUNEDA
- 34 GARCIA, ADRIANA MARIE
- 35 GARCIA, OSCAR, SR.
- 36 GARCIA, SERGIO
- 37 GARCIA, JESUS
- 38 GARCIA, JONATHON
- 39 GARCIA, JOSE MANUEL
- 40 GARCIA, DIEGO ESAE
- 41 GARCIA, ESTEFANIE
- 42 GARCIA, MARIA ROSARIO
- 43 GARCIA, MARIA CONCEPTION
- 44 GARCIA, OSCAR DANIEL, JR.
- 45 GARCIA, JESSE FRANCO
- 46 GARCIA, SHANNON ELOISE
- 47 GARCIA, LUZ MARIA
- 48 GARCIA, YOLANDA
- 49 GARCIA, JUAN ALBERTO
- 50 GARCIA, ALEXA DANYELLE
- 51 GARCIA, SERGIO
- 52 GARCIA, HENRY

1	GARCIA, NATHAN GABRIEL FRANCO	)
2	GARCIA, JOSEPH ALAN	)
	GARCIA-MYERS, DORA ALICIA	)
3	GARIBAY, DAMIEN ISAIAH	)
	GARIBAY, BIANCA CELESTE	)
4	GARIBAY, LEXI DELANEY	)
	GARICA, JAIME	)
5	GAUTHIER, PHILIP ANDREW	)
	GENTRY, WILLIE MAE	)
6	GOLDFOOS, MARK JAY	)
	GOMES, CYNTHIA ELAINE	)
7	GOMEZ, ROSEMARIE	)
	GOMEZ, ERNESTO MARTIN	)
8	GOMEZ, MARCO JULIO	)
	GONZALES, MARY ELVIA	)
9	GONZALES, BENITO RAFAEL	)
	GONZALES, ALEX	)
10	GONZALES, MANUEL FLORES	)
	GONZALES, LINDA LOUISE	)
11	GONZALES, ALLYS MARIE	)
	GONZALEZ, BRIANA DANIELLE	)
12	GONZALEZ, MARGARITA JARAMILLO	)
	GONZALEZ, ANTONIA MARIE	)
13	GONZALEZ, DANIEL ELIJAH	)
	GONZALEZ, DANIEL	)
14	GONZALEZ, ZENAIDA	)
	GONZALEZ, MARIA DEL ROSARIO	)
15	GONZALEZ, JULIAN JARAMILLO, JR.	)
	GONZALEZ, ARTEMIO	)
16	GONZALEZ, JUAN PABLO	)
	GONZALEZ, EMMANUEL	)
17	GONZALEZ, SALVADOR	)
	GONZALEZ, RODRIGO	)
18	GONZALEZ, JOVANY	)
	GONZALEZ, JESSICA G.	)
19	GONZALEZ, DAVID, SR.	)
	GONZALEZ, CHRISTOPHER	)
20	GONZALEZ, AMALIA	)
	GONZALEZ, VANESSA	)
21	GONZALEZ, ERICA OLIVIA	)
	GONZALEZ, ELIJAH RAY	)
22	GONZALEZ, JUAN PABLO	)
	GONZALEZ, NELBA	)
23	GONZALEZ, RAMONA GOMEZ DE	)
	GONZALEZ, RESTITUTO R.	)
24	GONZALEZ, JULIAN, SR.	)
	GONZALEZ, GERARDO D.	)
25	GONZALEZ, JOSE RODRIGO	)
	GONZALEZ, GABRIELA A.	)
26	GONZALEZ, VIRIDIANA	)
	GONZALEZ, FRANCISCO	)
27	GONZALEZ, JESUS	)

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- 1 GONZALEZ, GABRIELA )
- 2 GONZALEZ, FRANCISCO )
- 3 GONZALEZ, REINALDO, JR. )
- 4 GONZALEZ, VIRGINIA )
- 5 GONZALEZ, OMAR )
- 6 GONZALEZ, TERESA )
- 7 GONZALEZ, ERIC SALVADOR )
- 8 GONZALEZ, MARY JARAMILLO )
- 9 GONZALEZ, GUILLERMO, JR. )
- 10 GONZALEZ-AMAYA, KRYSTAL RAYLIN )
- 11 GONZALEZ-AMAYA, ZECHARIAH JOHN )
- 12 GONZALEZ-FLORES, LILIANA )
- 13 GONZALEZ-FLORES, DOLORES )
- 14 GONZALEZ-FLORES, MARITZA )
- 15 GORRELL, ROXIE ADELINE )
- 16 GORTON, ROBERT HUGH )
- 17 GOSE, CONNIE GAY )
- 18 GOSE, CINDY RAE )
- 19 GOZA, JULIE ANN )
- 20 GOZA, KEVIN MICHAEL )
- 21 GOZA, KARSON JAY )
- 22 GRACIA, TERESA MARIE )
- 23 GRACIA, JOSE ANTONIO )
- 24 GRACIA, SYLVIA JO )
- 25 GRACIANO, MARIA DEL CARMEN )
- 26 GRAY, LANDEN JOSEPH )
- 27 GRAY, RON JOSEPH )
- 28 GRIFFIN, MARKELL MAURICE )
- 29 GRIFFIN, GARY MAURICE )
- 30 GRIFFIN, MARCELLE ODELL )
- 31 GRIFFIN, MARJAAN DEMONTE )
- 32 GRIGGS, JAMIE LYNN )
- 33 GRISSOM, THOMAS PERRY, JR. )
- 34 GRISSOM, SEAN EMORY )
- 35 GRISSOM, THOMAS PERRY, SR. )
- 36 GUERRA, JOEL ANGEL )
- 37 GUEVARA, EVELYN DENISE )
- 38 GUEVARA, GERARDO )
- 39 GUNNIN, SHANE BRADLEY )
- 40 GUNNIN, KYLE DAVID )
- 41 GUNNIN, ERIKA FAY )
- 42 GUTH, HEINZ HERBERT )
- 43 GUTH, BARBARA JEANNE )
- 44 GUTIERREZ, OMAR )
- 45 GUTIERREZ, LIZETTE )
- 46 GUZMAN, RAUL )
- 47 GUZMAN, SALVADOR ARIAS, SR. )
- 48 GUZMAN, STEPHEN )
- 49 GUZMAN, SANTIAGO )
- 50 GUZMAN, MARLEN )
- 51 GUZMAN, ALBINO GALLEGOS )
- 52 GUZMAN, MARINA )

1 HAARMEYER, MICHAEL LEE )  
2 HALFORD, ARCHIE LEE )  
HALFORD, EVANGELINE )  
3 HALFORD, CARIE LEEANNE )  
HALL, MARIE AMANDA )  
4 HALL, EVA VERNELL )  
HAMILTON, SEAN PATRICK )  
5 HAMILTON, RILEY SUSAN )  
HAMILTON, CHRISTOPHER LEE )  
6 HAMMOND, DUSTIN ALLEN )  
HAMMOND, STEVE ALLEN )  
7 HAMMOND, CHRIS ALLEN )  
HAMMOND, JOSH JAMES )  
8 HAMMOND, VIRGINIA MARIE )  
HAMPTON, MICHAEL RAY )  
9 HAMPTON, DAVID WAYNE )  
HANSEW, GREGORY KEITH )  
10 HARRIS, CRISTAL MICHELLE )  
HARRIS, MARQUEZ JAYMES )  
11 HARRIS, BRANDY REYLYNN )  
HARRIS, JAMES ALBERT )  
12 HARRIS, JAMIE DIANE )  
HARRIS, CAROLYN DIANE )  
13 HART, JOSEPH WAYNE )  
HART, JOSEPH GREGORY )  
14 HART, DAVID JOSEPH )  
HART, KAREN REGINA )  
15 HARTMAN, JEREMY JAMES )  
HARTMAN, TONI )  
16 HARTMAN, LOVEY MARIE )  
HAYWARD, MARK ANTHONY )  
17 HAZELTINE, KAREN LEE )  
HAZELTINE, CLIFFORD STANLEY )  
18 HENDERSON, MANDY MARIE )  
HENLINE, TAMMY LYNN )  
19 HENRY, PALENTE, IAN )  
HER, YOUA )  
20 HERKERT, JOHN )  
HERKERT, RAMONA )  
21 HERN, DONAVEN MACLEE MARKUS )  
HERN-MOSS, MARKA RENEE KASEY )  
22 HERNANDEZ, RAFAEL )  
HERNANDEZ, OTILIA )  
23 HERNANDEZ, SYLVIA )  
HERNANDEZ, LEAH ANN BAILEE )  
24 HERNANDEZ, MARGARITA STEPHANIE )  
HERNANDEZ, FRANCISCO JAVIER )  
25 HERNANDEZ, LUIS )  
HERNANDEZ, LUIS ALBERTO )  
26 HERNANDEZ, LUIS JAVIER )  
HERNANDEZ, DANIEL )  
27 HERNANDEZ, NICHOLAS, JR. )  


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- 1 HERNANDEZ, CASSANDRA JEANETTE )
- 2 HERNANDEZ, ARACELI JASMIN )
- 3 HERNANDEZ, JUAN A., JR. )
- 4 HERNANDEZ, MARIA BIBIANNA )
- 5 HERNANDEZ, HUMBERTO )
- 6 HERNANDEZ, ROSEMARY )
- 7 HERNANDEZ, NICOLAS, SR. )
- 8 HERNANDEZ, KARINA SUSET )
- 9 HERNANDEZ, TANIA CELESTE )
- 10 HERNANDEZ, MARIA ANTONIA )
- 11 HERNANDEZ, GONZALO )
- 12 HERNANDEZ, EDWARD GEOVANNI )
- 13 HERRING, SHERYL DENISE )
- 14 HICKMAN, PAULINE FAYE )
- 15 HIGAREDA, ROSARIO )
- 16 HIGAREDA, MARIA GUADALUPE )
- 17 HIGAREDA, MARTHA ELBA )
- 18 HIGAREDA, ARTURO, SR. )
- 19 HIGAREDA, GERARDO )
- 20 HIGAREDA, NANCY )
- 21 HIGAREDA, ARTURO, JR. )
- 22 HIGGINBOTHAM, MARKECE DION )
- 23 HIGGINS, LINDA KAY )
- 24 HIGGINS, RODNEY SAMUEL )
- 25 HIGGINS, SHELLY RAY )
- 26 HIGGINS, CARRIE )
- 27 HOFFMAN, ELEANOR REBECCA )
- 28 HOLT, DIANA LEE )
- 29 HOPE, CHRISTOPHER TERRENCE )
- 30 HOPE, SALLY MARIE )
- 31 HOPKINS, CAMERON TRE'VONN )
- 32 HOPPER, JOHNNY LEE )
- 33 HUERTA, GILBERT JOSEPH )
- 34 HUERTA, TAMMY LEE )
- 35 HUERTA, RICHARD LUCIO )
- 36 HUERTA, RITA )
- 37 HUERTA, ALBERTO RAMIREZ )
- 38 HUERTA, ALICIA BETTANCOURT )
- 39 HUERTA, JOSEPH )
- 40 HUERTA, ALBERT BETTANCOURT, JR. )
- 41 HUERTA, JOHNNY RAY )
- 42 HUERTA, NANCY )
- 43 HUFF, KATHI ANN )
- 44 HUFF, JACK HERMAN, JR. )
- 45 HUFF, SHELLEY LORRAINE )
- 46 HUFF, JACK HERMAN, SR. )
- 47 HUFF, RICHARD LEROY )
- 48 HUGGINS, DENICE WAGNER )
- 49 HUGGINS, DOUG EDWARD )
- 50 HUNT, RUBY ANN )
- 51 HUNT, REGINA LEE )
- 52 HUNTER, AIMEE ELLEN )

1	HUNWARDSSEN, SUMMER INELL	)
2	HUNWARDSSEN, REMUS RAY	)
3	HUNWARDSSEN, REMUS RAY, JR.	)
4	HUNWARDSSEN, JOYCE INELL	)
5	HURTADO, ERLINDA	)
6	HUYNH, NEIL	)
7	HUYNH, GWEN	)
8	INGRAM, JUDY ANN	)
9	INGRAM, THOMAS M., JR.	)
10	JAMES, ANTHONY JOHN	)
11	JANZ, ROGER STEVEN	)
12	JANZ, ROGER LEE	)
13	JARAMILLO, GUADALUPE	)
14	JENSEN, WALTER FRANKLIN, JR.	)
15	JENSEN, NERIE LOBUSTA	)
16	JEWELL, CHRISTOPHER LEE	)
17	JIMENEZ, GRACIELA	)
18	JIMENEZ, MARIA JUANA	)
19	JIMENEZ, CRISTIAN	)
20	JIMENEZ, GERARDO, SR.	)
21	JIMENEZ, JAIRO	)
22	JIMENEZ, RAPHAEL	)
23	JIMENEZ, GERARDO A., JR.	)
24	JOE, TAMMY YVETTE	)
25	JOHNSON, MARJAHNE D'NEJAH	)
26	JOHNSON, EDWARD WAYNE, III	)
27	JONES, COLTON JORDON	)
28	JONES, METTE LE	)
29	JONES, DENAE MARIA	)
30	JONES, GREGORY ROBERT	)
31	JONES, RILEY JOSEPH	)
32	JONES, CHARLES WINGFIELD	)
33	JONES, JUANITA JOYCE	)
34	JONES, ANNA MAE	)
35	JONES, BOBBY JEAN	)
36	JUE, VICTOR	)
37	KAPPIA, MARIAN OLETHA	)
38	KARSNER, DERICK JOSEPH	)
39	KARSNER, ERIC JOSEPH	)
40	KARSNER, JESSICA MARIE	)
41	KARSNER, MAKAYLA LYNN	)
42	KATELEY, LYNN ANN	)
43	KATELEY, LESLI ANN	)
44	KEEL, TIMOTHY RICHARD	)
45	KEENEY, RITCHY BRANDON	)
46	KELLEY, DEBRA MARIE	)
47	KELLEY, JOSHUA KENNETH	)
48	KELLEY, SEAN MICHAEL	)
49	KETCHUM, LILY DEE DEE	)
50	KETCHUM, JAMES DONALD	)
51	KETCHUM, JAIME ROSE	)
52	KING, WILLIAM RAY	)

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1	KING, CHERYL ANN	)
2	KING, REGINALD JAMES	)
	KING, ANTWON JAMES	)
3	KING-TATRO, SHANEA FRANCES JEAN	)
	KLEINERT, BRIAN GEORGE	)
4	KLEINERT, LYNDA MICOLE	)
	KNIESS, ROBERT WILLIAM	)
5	KNIGHT, CHRISTIAN	)
	KRIS, MADHU KUMAR	)
6	KRIS-TANGELLA, VIJAYA	)
	KYSER, DEMETRIA	)
7	LACOUNT, KATHRYN ELLEN	)
	LAM, HANG	)
8	LAMBERT, BREANNA LYNN	)
	LANDRUM, VERLIN DALE	)
9	LANDRUM, SANDRA LEE	)
	LANE, WENDY RAE	)
10	LARA, PATRICK M.	)
	LARA, TITO RAYMOND	)
11	LARA, LIZET	)
	LARA, FRANK M.	)
12	LARA, ANGEL MONIQUE	)
	LARA, DIANA	)
13	LARA, ROBERT ANTHONY	)
	LARA, STANLEY	)
14	LARA, DEYANA MARIA	)
	LARA, CLARA RUTH	)
15	LARA, MARIA	)
	LARA, STANLEY III	)
16	LARIOS, JAQUELIN	)
	LARIOS, ENRIQUE M.	)
17	LARIOS, BRYANT	)
	LAW, RANDALL LEE, JR.	)
18	LAZARO, LETICIA	)
	LAZARO, MONICA	)
19	LAZARO, JOSEFINA	)
	LAZARO, MARTHA	)
20	LAZARO, MARIA	)
	LAZARO, JESUS	)
21	LAZARO, ROXANNA CECRIA	)
	LAZARO, ANTHONY JOSEPH	)
22	LAZARO, AGUSTINE LOMELI	)
	LAZARO-TORRES, MADISON LILLY	)
23	LEACH, WILLIAM DONALD	)
	LEE, BELINDA	)
24	LEE, TAWANA YVETTE	)
	LEE, JOHN MARTIN	)
25	LEE, NORMA ADAME	)
	LEE, CHA MEE	)
26	LEE-GRIFFIN, TTYRESE ALI	)
	LEE-GRIFFIN, LIYAH MYRESE	)
27	LEMUS, ORLANDO M. (ORELLANA)	)

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1 LEWIS, KEVIN ALPHONSO )  
2 LEYVA, ROSIE MEZA )  
3 LEYVA, BLAS DOMINGUEZ )  
4 LICEA, ANA MARIA )  
5 LILLARD, VALERIE JO )  
6 LILLARD, DEAN LEROY )  
7 LILLARD, ROSHELL MONET )  
8 LILLARD, JOSHUA DEAN )  
9 LIM, JOSEPHINE )  
10 LIM, RONALD )  
11 LINDO, PAULA JEAN )  
12 LIRA, BEATRIZ )  
13 LIU, HOLDEN MICHAEL ELIJAH )  
14 LIU, LIAM HUDSON )  
15 LIU, JONATHAN PAUL MIN-EN )  
16 LIU, LIAM HUDSON )  
17 LIU, ANGELA DAWN )  
18 LLOYD, CRYSTAL VANICCA )  
19 LOEFFERS, STEVEN AUGUST )  
20 LOEFFERS, GERALD )  
21 LOEFFERS, DIANNA )  
22 LOGAN, GARY A. )  
23 LOMELI, MANUEL BRIAN LUIS )  
24 LOMELI, JOSEPH BRIAN )  
25 LOMELI, JOSEPH LUIS )  
26 LOMELI, ALLYNAH MARIE )  
27 LOMELI, WENDY JULIANA )  
28 LOMELI, MARY ELLEN )  
LOPEZ, JUAN CARLOS )  
LOPEZ, JESUS ALBERTO )  
LOPEZ, GREGORY PAUL )  
LOPEZ, MARIA DEL ROSARIO )  
LOPEZ, EULALIO GONZALEZ )  
LOPEZ, DONNA ALEJO )  
LOPEZ, ANGELICA )  
LOPEZ, STEPHANIE )  
LOPEZ, JARED ADAM )  
LOPEZ, GUADALUPE ALEJO )  
LOPEZ, JOAN ARMINDA )  
LOPEZ, JUANA )  
LOPEZ, OLAF )  
LOPEZ, JULIAN PAUL )  
LOPEZ, EDWARD )  
LOPEZ, SONIA )  
LOPEZ, BECKY VIOLA )  
LOPEZ, JUAN VASQUEZ )  
LOPEZ, JULIETA )  
LOPEZ, DEBORAH SUZELLE )  
LOPEZ, MARIA PETRA )  
LOPEZ, LISA )  
LOPEZ, VIONNY CAROLINA )  
LOPEZ, ADRIAN ANDRES )

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- 1 LOUGHTON, JASON ORION )
- 2 LOUGHTON, JENI MARIE )
- 3 LOUGHTON, ALEXI MARIE )
- 4 LOYA, ROSA MARIA )
- 5 LOZANO, ALEJANDRO )
- 6 LOZANO, CARLOS )
- 7 LOZANO, GUADALUPE )
- 8 LOZANO, BIANCA )
- 9 LOZANO, ISMAEL )
- 10 LUCKETT, QUATISHA DEFRIECE )
- 11 LUJAN,, NICK ISSAC )
- 12 LUMLEY, SHARON LOUISE )
- 13 LUMLEY, EUFRACIA )
- 14 LUMLEY, BOBBY EUGENE )
- 15 LUNA, MELISSA CARMEN )
- 16 LUNA, SANTIAGO ISAAC )
- 17 LUND, KNUD JENSEN )
- 18 LUNDA, MARC ANTHONY )
- 19 LUNDA, RICKY FRANK )
- 20 LUPIAN, LUIS HERNANDEZ )
- 21 LUPIAN, LAURA CRISTINA )
- 22 LUPIAN, LUIS, JR. )
- 23 LUPIAN, TERESA )
- 24 MABREY, JASONEE )
- 25 MACIAS, RICHARD LEO )
- 26 MACIAS, LUIS ALBERTO, SR. )
- 27 MACIAS, DAISY ADYLENE )
- 28 MACIAS, ALBERTO BEN )
- 29 MACIAS, AMY )
- 30 MACIAS, LEONOR ANETTE )
- 31 MACIAS, MELODY AYANNA )
- 32 MACIAS, JEANETTE VICTORIA )
- 33 MACIAS, LUIS ALBERTO, JR. )
- 34 MACIAS, CLAUDIA MARIE )
- 35 MACIAS, FRANCES )
- 36 MACIAS, CARMEN MARIA )
- 37 MACIAS, MARIA MUNOZ )
- 38 MACKIE, KENNETH ROBERT )
- 39 MADRID, ISIDRO NATHANIEL )
- 40 MADRIGAL, MONICA MIREYA )
- 41 MADRIGAL, RAMONA )
- 42 MAGANA, FLOR ICELA )
- 43 MALDONADO, MAXIMILLIANO BUGARIN )
- 44 MALLARI, DOMINICK DOMINGUEZ )
- 45 MALLARI, ALYSSA RENEE )
- 46 MALLARI, LAURA RENEE )
- 47 MANN, JAMES DARREN, JR. )
- 48 MANN, JAMIEANNA AISSIA )
- 49 MAPLE, IAN THOMAS )
- 50 MARQUEZ, ROXANNA )
- 51 MARQUEZ, SYLVIONNE RENEE )
- 52 MARQUEZ, ROGELIO )

28

1	MARQUEZ, MARIA DOLORES	)
2	MARQUEZ, RIGOBERTO	)
	MARQUEZ, RICARDO	)
3	MARQUEZ, RIGOBERTO, JR.	)
	MARQUEZ, RAMIRO	)
4	MARROQUIN, WILLIAM YOVANNI	)
	MARROQUIN, CARMEN CARDENAS	)
5	MARTIN, FRANK ALBERT	)
	MARTIN, SARA	)
6	MARTIN, SCOTT ALBERT	)
	MARTIN, KASEY RAILEE	)
7	MARTINEZ, TAMARA LYNN	)
	MARTINEZ, RALPH	)
8	MARTINEZ, ROSENDO JESUS	)
	MARTINEZ, MANUEL LUPE	)
9	MARTINEZ, MARCOS ANTHONY	)
	MARTINEZ, SIERRA ADRIANNA	)
10	MARTINEZ, MARC ANTHONY	)
	MARTINEZ, LORENA PATRICIA	)
11	MARTINEZ, MARTHA	)
	MARTINEZ, MARY R.	)
12	MARTINEZ, LETICIA	)
	MARTINEZ, RAUL, JR.	)
13	MARTINEZ, ISABELLA SOPHIA	)
	MARTINEZ, RAUL	)
14	MARTINEZ, ERNIE	)
	MARTINEZ, MARIANA VANESSA	)
15	MARTINEZ, PABLO, JR.	)
	MASASSO, IMOGENE	)
16	MASASSO, FELIX JOHN	)
	MASASSO, KENNETH JOHN	)
17	MATER DEI DAIRY	)
	MATTOX, ISAIHA GREGORY	)
18	MATTOX, DAISHA	)
	MATTOX, PAIGE MARIE	)
19	MATTOX, STEVEN GREGORY	)
	MAYO, ELIZABETH	)
20	MAYS, SANDRA MARIE	)
	MAYS, LINDA SUE	)
21	MAYS, BESSIE ROBINSON	)
	MAYS, JAMES BENJAMIN, SR.	)
22	MAYS, DONNELL	)
	MAYS, DANIEL, JR.	)
23	MAYS, DION ANTHONY, SR.	)
	MAYS, RAYMOND BRADLEY	)
24	MAYS, JAMES BENJIMEN, JR.	)
	MAYS-JOHNSON, DANA LATRICE	)
25	MCAFEE, ANTHONY PATRICK	)
	MCAFEE, ANTHONY PATRICK, SR.	)
26	MCAFEE, MARISSA MARIE	)
	MCAFEE, LARISSA ANDREA	)
27	MCCRADY, RUBY JEAN	)

28



1 MCCRADY, GEORGE WILLIAM )  
2 MCDONALD, TINA MICHELLE )  
3 MCGARRY PROPERTY MANAGEMENT )  
4 MCGARRY, RUSSELL CHARLES )  
5 MCGINTY, LINDA SUE )  
6 MCGINTY, KAYLA MARIE )  
7 MCHENRY, PERLENA GLORIA )  
8 MCKNIGHT, ROBERT THOMAS )  
9 MCKNIGHT, TRACY JANE )  
10 MEARS, VICKIE JEAN )  
11 MEDRANO, MARIA GUADALUPE )  
12 MEE, HER )  
13 MEEUSEN, JONATHAN JOSEPH )  
14 MEEUSEN, JOSEPH WALTER )  
15 MEEUSEN, ANDREW SCOTT )  
16 MEIDLINGER, VICKIE LEE )  
17 MEISSONNIER, VICTOR ARTHUR )  
18 MEISSONNIER, CHRISTINE JEANETTE )  
19 MEJIA, LORENCE EDWARD )  
20 MEJIA, LORENZO )  
21 MEJIA, ADRIANA )  
22 MEJIA, VALERIE LYNN )  
23 MEJIA, MARCELLA MARIE )  
24 MELCHOR, RAMON )  
25 MELCHOR, RAMONA )  
26 MELCHOR, MARTIN CERVANTES )  
27 MELCHOR, JOSE ANTONIO )  
28 MELCHOR, NATALIE )  
MELCHOR, MARTIN )  
MELCHOR, GUADALUPE )  
MELGOZA, JESUS BARRAGAN )  
MELGOZA, ELISA )  
MENDEZ, RACHELLE LEE )  
MENDOZA, ALMA )  
MENDOZA, LESLIE )  
MENDOZA, RAMIRO GUERRA )  
MENDOZA, ADALIZ )  
MENDOZA, KAMILA )  
MENDOZA, THOMAS JOSEPH, JR. )  
MENDOZA, RUD )  
MENDOZA, MARCELINO )  
MENDOZA, LIZET )  
MENDOZA, TAYLOR NICOLE )  
MENDOZA, ADELINA )  
MENDOZA, MIGUEL, SR. )  
MENDOZA, IVAN )  
MENDOZA, MARIA ANITA )  
MENDOZA, THOMAS JOSEPH )  
MENDOZA, DAYGORO )  
MENDOZA, MARIA CONSUELO )  
MENDOZA, JEREMY MARTIN )  
MENDOZA, VICTOR MANUEL )

1	MENDOZA, LAURA ANTONIA	)
2	MENDOZA, DEYCI	)
	MENDOZA, DAISY LIZETTE	)
3	MENDOZA, MIGUEL, JR.	)
	MENDOZA, MARIA CHRISTINA	)
4	MENDOZA, GUADALUPE MARTIN	)
	MENOR, FLORITA GLORIANE	)
5	MENSSEN, MICHAEL RAYMOND	)
	MERAZ, FRANK	)
6	MERAZ, ARMANDO	)
	MERAZ, MARIA	)
7	MERAZ, TERESA MARIA	)
	MERAZ, MARISSA	)
8	MERCADO, FRANCISCA	)
	MERCADO, APOLINAR	)
9	MERCADO, HUMBERTO, SR.	)
	MERCADO, HUMBERTO DIEGO	)
10	MERCADO, BRENDA	)
	MERCADO, FERNANDO	)
11	MERCADO, ABRAHAM	)
	MERCADO, ALFONSO ALVAREZ	)
12	MEZA, SOCORRO	)
	MIAO, YONG HAN	)
13	MIESOWITZ III, WILLIAM RICHARD	)
	MIESOWITZ, CATHY LOUISE	)
14	MIGUEL, DIANE MAY	)
	MILBOURN, SUSAN GAYLE	)
15	MILBOURN, MARIE NICOLE	)
	MILEUR, RUSTY LYN	)
16	MILEUR, MAGGEN MARIE	)
	MILEUR, LORI ANN	)
17	MILLAN, BLANCA STEPHANIE	)
	MILLAN, BLANCA ALONZO	)
18	MILLER, VICTORIA JEANNE	)
	MILLER, MICHAEL DEAN	)
19	MILNIK, DANNY AARON	)
	MILNIK, KIMBERLY NICOLE	)
20	MILNIK, ERIN MICHELLE	)
	MINOR, VIRGINIA CAMPOS	)
21	MINOR, CORNELIO ACEVEDO	)
	MIRANDA, RANDI MICHELLE	)
22	MIRANDA, LOUIS LEONARDO	)
	MISSOURI, JEFFREY, JR.	)
23	MISSOURI, JAQUISHA	)
	MISSOURI, CHARLANDER LAVERNE	)
24	MITCHELL, DIANE SUE	)
	MITCHELL, GEORGE WILLIAM	)
25	MIXON, KHORE LAVUN	)
	MIXON, JUSTICE TIYEZ	)
26	MOBLEY, JOHN J., III	)
	MOISA, ANDREA ABERI	)
27	MOLES, KRISTINA ANN	)

28

- 1 MOLES, BRIAN ANTHONY, JR. )
- 2 MOLES, BRIAN ANTHONY, SR. )
- 3 MOLINA, YVETTE LYA )
- 4 MOLINA, LUIS C. )
- 5 MONROE, KEVIN MARLIN )
- 6 MONROE, KRISTIPHER DALE )
- 7 MONTANO, MIGUEL ANGEL CANDO )
- 8 MONTES, PABLO TORRES )
- 9 MONTES, ANDREA SANDOVAL )
- 10 MONTES, ELVIRA SANDOVAL )
- 11 MONTES, ROSARITO SANDOVAL )
- 12 MONTES, EVELYN SANDOVAL )
- 13 MORA, STEPHANIE ANN )
- 14 MORALES, MIGUEL AGUILAR )
- 15 MORENO, GABRIEL )
- 16 MORENO, JAIME )
- 17 MORENO, MANUEL JOHNNY )
- 18 MORENO, JANET GUADALUPE )
- 19 MORENO, ANNETTE )
- 20 MORENO, JAIME RAMON, JR. )
- 21 MORENO, GANDY EDWIN )
- 22 MORENO, MARIA ELENA )
- 23 MORENO, MARIA YANETTE CUEVAS )
- 24 MORENO, JORGE MENDEZ )
- 25 MORENO, JORGE )
- 26 MORENO, PATRICIA )
- 27 MORENO, OSCAR )
- 28 MORGAN, LEROY, II )
- MORGAN, PATRICIA THOMAS )
- MORREIRA, TIFFANY MARIE )
- MORROW, LISA DIANE )
- MOSS, BRANDON SCOTT )
- MOUA, STEVEN )
- MOUA, KA )
- MOUA, NARRY )
- MOUA, KOU )
- MOUA, TONY )
- MOUA, PANG )
- MOUA, AMY )
- MOULTRIE, TREVAN HASHEEN )
- MOULTRIE, TAMAR LEE )
- MUA, KU )
- MUNIZ, SILVIA E. )
- MUNIZ, VICTOR )
- MUNIZ-GUTIERREZ, RIGOBERTO )
- MUNOZ, BLANCA ESTHELA )
- MUNOZ, LINDA )
- MUNOZ, ELVIS, ANDRES )
- MUNOZ, ANDRES )
- MUNOZ, SELENA )
- MUNOZ, JASON PATRICK )
- MUNOZ, GUILLERMINA )

1 MUNOZ, VIRGINIA )  
2 MUNOZ, IGNACIA )  
3 MUNOZ, JESUS ANTONIO )  
4 MURAIRA, JUSTIN SCOTT )  
5 MURAIRA, JEFFREY SCOTT )  
6 MURAIRA, AMY CAROLINE )  
7 MURAIRA, LIANE MICHELLE )  
8 MURAKAMI, KJORI RUDI )  
9 MURAKAMI, SAGE MIKIO )  
10 MURATALLA, ANA M.J )  
11 MURATALLA, JUAN C. )  
12 MURATALLA, JOSE HECTOR, SR. )  
13 MURATALLA, JOSE HECTOR, JR. )  
14 MURILLO, MONICA )  
15 MURRIETA, ROSWITA MARGARET )  
16 MURRIETA, HENRY LOPEZ )  
17 MYERS, SANDRA ALICIA )  
18 MYERS, NICHOLAS SCOTT )  
19 NAVA, ALEJANDRO, JR. )  
20 NAVA, GRACIELA CRUZ )  
21 NAVA, ALEJANDRO ESPINOZA, SR. )  
22 NAVARRO, JENNIFER )  
23 NAVARRO, TRINIDAD )  
24 NAVARRO, SERGIO )  
25 NAVARRO, ROSALVA )  
26 NAVARRO, JASMINE )  
27 NAVARRO, MIGUEL )  
28 NAVARRO, FRANCISCO )  
29 NAVARRO, VICTOR )  
30 NEGRETE, JUANA )  
31 NEGRETE, MARIA GUADALUPE )  
32 NEGRETE, CELESTE )  
33 NEGRETE, MARIEU )  
34 NEGRETE, ANGEL )  
35 NEGRETE, JUANA )  
36 NEWMAN, AUDREY CHRISTINE )  
37 NEY, KENNETH MICHAEL )  
38 NGUYEN, HANH NGOU )  
39 NGUYEN, MAI THANH )  
40 NGUYEN, LIEM THANH )  
41 NGUYEN, LAN THANH )  
42 NICHOLS, DENNIS EUGENE )  
43 NICKEL, LINDA GAIL )  
44 NICKEL, THOMAS EUGENE )  
45 NISHIHAMA, LORRAINE )  
46 O'CONNELL, BRUCE EDWARD )  
47 O'CONNELL, WILLIAM HARVEY )  
48 O'DELL, MARK DAVIS )  
49 O'REILLY, TIMOTHY LAWRENCE )  
50 OCHOA, FRANCISCO O. )  
51 OCHOA, CATALINA REYNAGA )  
52 OCHOA, JOSE GODINEZ )

- 1 OCHOA, FRANCISCO REYNAGA )
- 2 OCHOA, FRANCISCO JAVIER )
- 3 OCHOA, MARGARITA REYNAGA )
- 4 OCHOA, HOPE S. )
- 5 OCHOA, LUCIA REYNAGA )
- 6 OCHOA, XIMENA )
- 7 OCHOA, NARCISO R. )
- 8 OCHOA, GABRIELA SANDOVAL )
- 9 OCHOA, MARIA ISABEL )
- 10 OLGUIN, GILBERT DANIEL )
- 11 OLIVARES, JOSLYN NATHALY )
- 12 OLIVARES, JORGE ALBERTO )
- 13 OLIVO, SANDRA J. )
- 14 ORELLANA, JOSE OSMIN )
- 15 ORELLANA-GARCIA, ASHLEY CRUZ )
- 16 ORELLANA-GARICA, OSMIN EDUARDO )
- 17 ORNELAS, RAYMOND VICTOR, III )
- 18 ORNELAS, CLAUDIA )
- 19 ORNELAS, LINDA DANNY )
- 20 ORNELAS, DESTINEE LARAE )
- 21 ORNELAS, ASHLEY JOSEPHINE )
- 22 ORNELAS, RAYMOND VICTOR, JR. )
- 23 ORNELAS, LAZARO )
- 24 ORNELAS, ISAIAS LAZARO )
- 25 ORNELAS, AIKO )
- 26 ORNELAS, ANITA ABIGAIL )
- 27 ORNELAS, MARIA )
- 28 ORNELAS, KATHY )
- 29 ORNELAS, ADRIAN ISAIAH )
- 30 OROZCO, ISABELLE )
- 31 OROZCO, ERICA )
- 32 OROZCO, JUANITA )
- 33 OROZCO, JOSE C. )
- 34 OROZCO, BRIANNA MARIE )
- 35 OROZCO, GRACIELA )
- 36 OROZCO, MANUEL SANDOVAL )
- 37 OROZCO, RAFAEL C. )
- 38 OROZCO, ANDRES )
- 39 OROZCO, JESUS MANUEL )
- 40 OROZCO, TEREZA )
- 41 OROZCO, DELFIA GONZALES )
- 42 OROZCO, RIGOBERTO GONZALES )
- 43 OROZCO, JACQUELINE )
- 44 OROZCO, RIGOBERTO A. )
- 45 ORTEGA, SARA )
- 46 ORTEGA, ANTONIO LUIS )
- 47 ORTEGA, CANDELARIA HELEN )
- 48 ORTEGA, JUDY K. )
- 49 ORTEGA, ANA ISABEL )
- 50 ORTEGA, SARAITA EMILY )
- 51 ORTEGA, STEVEN JAVIER )
- 52 ORTEGA, MIGUEL ANGEL )

- 1 ORTEGA, JAIME DANIEL )
- 2 ORTEGA, JAVIER )
- 3 ORTIZ, VANESSA YOLANDA )
- 4 ORTIZ, VERA MERAZ )
- 5 ORTIZ, ABIGAIL )
- 6 OSBORN, BARBARA GAIL )
- 7 OTTEND-PENROD, DONNA LOU )
- 8 PACHECO, CONNIE )
- 9 PACHECO, RODOLFO VARGAS )
- 10 PACHECO-BUSKO, VERONICA )
- 11 PADDACK, BOBBY LEON )
- 12 PADDACK, MARY FRANCES )
- 13 PANTOJA, SALVADOR )
- 14 PANTOJA, DEZIREY SURINDER )
- 15 PARGA, PHILLIP ANTONE )
- 16 PARGA, SHEILA MARIE )
- 17 PARKER, TA TANESHIA S. )
- 18 PARKER, DESHA EMON )
- 19 PARKER, DANTE TAWON-KENNETH, JR. )
- 20 PARKER, DANTE DAMION )
- 21 PARKER, HEAVEN ZENYA-LYNN )
- 22 PARRISH, CARNELL )
- 23 PARRISH, SANDRA KAY )
- 24 PATTERSON, ELVIRA )
- 25 PATTERSON, WILLIE FREAD )
- 26 PEDRELLI, MORGAN )
- 27 PEDRELLI, DOMINIC )
- 28 PEDRELLI, AUSTINE JANEAN )
- 29 PENA, GABRIELLA )
- 30 PENA, MARILYN LINDA )
- 31 PENAS, MARK MALONDA )
- 32 PENFOLD, EVERETT J. )
- 33 PENFOLD, LENORA ANN )
- 34 PENFOLD, LAVERNE )
- 35 PENNER, EVELYN MAXINE )
- 36 PENROD, JOAN FRANKLYNN )
- 37 PENROD, ROBERT LEE )
- 38 PENROD, ANNETTE MARIE )
- 39 PEREIRA, MARY FATIMA )
- 40 PEREIRA, DANIEL VIRGINIO )
- 41 PEREIRA, GABRIELLE MARIE )
- 42 PEREIRA, JOHN AUGUSTO )
- 43 PEREZ, JEANNETT )
- 44 PEREZ, ARMANDO )
- 45 PEREZ, KRISTY LEANNE )
- 46 PEREZ, MARIA GUADALUPE )
- 47 PEREZ, ADAN RODRIGUEZ, SR. )
- 48 PEREZ, ERICK ARMANDO )
- 49 PEREZ, ANTONIA GUERRERO )
- 50 PEREZ, ADRIANA )
- 51 PEREZ, ADAN, JR. )
- 52 PEREZ, MARICELA )

1 PEREZ, CECILIA )  
2 PEREZ-FREITAS, CHRISTINA )  
3 PERRY, MONICA SERNA )  
4 PETERS, DAVID MARCELL )  
5 PETERS, KYRIE MARQUEZ )  
6 PETERS, KAYTON TYLER )  
7 PETERSON, ALICE LUCILLE )  
8 PETERSON, MORRIS KENT )  
9 PHILLIPS, EDWARD MARSHALL, III )  
10 PICART, LEONIDA BALOT )  
11 PIMENTEL, MANUEL JOSEPH )  
12 PIMENTEL, STACI RENEE )  
13 PIMENTEL, NOVA L. )  
14 PINA, LEONOR )  
15 PLANTZ, JOJI MARIE )  
16 PLANTZ, JOHN ARLINGTON )  
17 PLEASANT, IESHIA LEISHIA )  
18 PLEASANT, AUGUSTA YVONNE )  
19 POLLARD, RAISHAWNA FAYE )  
20 POMPA, MAYRA )  
21 POMPA, CYNTHIA )  
22 PONCE, JUAN MANUEL, JR. )  
23 PONCE, DIANA LAURA )  
24 PONCE, JUAN MANUEL, SR. )  
25 PONCE, DIEGO EDUARDO )  
26 POSADA, CHRISTY ARLENE )  
27 PRADO, MARICELA )  
28 PRADO, OSCAR NOE )  
PRADO, AMELIA )  
PRADO, RIGOBERTO )  
PRADO, VIVIANA )  
PRADO, LUIS LORENZO )  
PRADO, MARTIN, SR. )  
PRADO, SOPHIA )  
PRADO, BRENDA MARIELA )  
PRADO, LUIS, SR. )  
PRADO, FAVIOLA YADID )  
PRADO, VERONICA YASMIN )  
PRADO-DIAZ, MARTIN, JR. )  
PRECIADO, HAYDEE )  
PRECIADO, LUISA JANETTE )  
PRECIADO, AARON EDUARDO )  
QUACH, PHOUC (FRANK) )  
QUACH, LOAN KIM )  
QUEZADA, MIGUEL A. CANDO )  
QUILON, MARIA ANTONIA )  
QUINTERO, DEMETRIO III )  
QUINTERO, DEMETRIO )  
RAILEY, CHARLES S. )  
RAMIREZ, TERESA CHAVEZ DE )  
RAMIREZ, MICHAEL VASQUEZ )  
RAMIREZ, LOURDES VEGA )

1	RAMIREZ, ARTURO, JR.	)
2	RAMIREZ, MARIA LUISA	)
	RAMIREZ, CARLOS E.	)
3	RAMIREZ, ROBERTO	)
	RAMIREZ, MARIA LINDA	)
4	RAMIREZ, SANDRA NOEMI	)
	RAMIREZ, RIGOBERTO	)
5	RAMIREZ, ARTURO S., SR.	)
	RAMIREZ, MARIA HERLINDA	)
6	RAMIREZ, MARIA DE JESUS	)
	RAMIREZ, MARISSA ADELENA	)
7	RAMIREZ, ARTURO MANUEL	)
	RAMIREZ, LIZBETH	)
8	RAMOS, BRENDA MARIE	)
	RAMOS, KATHY ROSEMARY	)
9	RAMOS, JOHN, JR.	)
	RAMOS, MARIA CONSUELO	)
10	RAMSDEN, DOTTI LUCILLE-KEYE	)
	RAMSEY, VENUS PICART	)
11	RATZLAFF, TAYLOR LEE	)
	RATZLAFF, ELISA JOANNE	)
12	RATZLAFF, ANDREA NICOLE	)
	RAY, LARRY CURTIS	)
13	RAY, GERALD LEE	)
	RAY, RAHEL LOUISE	)
14	REAL, CASSIE MAY	)
	REAL, MEAGEN LENORE	)
15	REAL, JOSHUA ROBERT	)
	REED, ZADA DELANA	)
16	REED, ISAIAH WALIJAH	)
	REED, ALLAN LEROY	)
17	REGLA, ENRIQUE	)
	REGLA, NICANOR	)
18	REINERO, RENEE SUZANNE	)
	REINERO, ELEANOR	)
19	REINERO, SANDRA NOREEN	)
	RENERIA, CHRISTIAN MICHAEL	)
20	RENERIA, JOSE ANTONIO	)
	RENERIA, ANDREW CAIN	)
21	RENERIA, AMELIA	)
	RENERIA, JUAN MANUEL	)
22	RESENDES, ANDRES, JR.	)
	RESENDES, RAFAELA	)
23	RESENDES, LUCIA	)
	RESENDES, BENJAMIN ALEJANDRO	)
24	RESENDES, MARCOS ANDRES	)
	REYES, ERIC GLEN	)
25	REYES, LARRY ANTHONY	)
	REYES, NORMA IVONNE	)
26	REYES, VALENTIN	)
	REYES, LOUIS THOMAS	)
27	REYES, CAROLINE NADINE	)

28



- 1 REYES, ABIGAIL )
- 2 REYES, CRISTINA RAMOS )
- 3 REYES, MELISSA GENE )
- 4 REYES, ANGELA MARIE )
- 5 REYES, MICHAEL LEE )
- 6 REYES, JOSE GUADIANA )
- 7 REYES, TERI LYNN )
- 8 REYES, YUBANI (ZARAGOZA) )
- 9 REYES, JUAN ESTRADA )
- 10 REYES-PETTY, JOSEPH JAVIS )
- 11 REYES-PETTY, LEILANI FAITH )
- 12 REYNAGA, JOSE GUADALUPE )
- 13 REYNAGA, ADAM JARAMILLO )
- 14 REYNAGA, JOSEPH JARAMILLO )
- 15 REYNAGA, SALUD JARAMILLO )
- 16 RILEY, PAUL HOWARD )
- 17 RILEY, ROSEANNA LEE )
- 18 RILEY, MARIA ALARCON )
- 19 RILEY, MELISSA )
- 20 ROACH, STACY LYNN )
- 21 ROBBINS, JOHN ALONZO )
- 22 ROBBINS, FRANCES CAROL )
- 23 ROCHA, ALEJANDRO, JR. )
- 24 ROCHA, ALEJANDRO HERNANDEZ )
- 25 ROCHA, ALLEN NATHANIEL )
- 26 ROCHA, PENELOPE EMILY )
- 27 RODARTE, JUAN LOPEZ )
- 28 RODGERS, STEPHANIE JEANNE )
- RODRIGUEZ, VERONICA )
- RODRIGUEZ, NORMA C. )
- RODRIGUEZ, ALMA ELENES )
- RODRIGUEZ, JANNA )
- RODRIGUEZ, MERCEDES CRUZ )
- RODRIGUEZ, LUZ MARIA )
- RODRIGUEZ, ANDRAMEDA ATHENCILLIA )
- RODRIGUEZ, JESSICA )
- RODRIGUEZ, MATEO SALINAS, JR. )
- RODRIGUEZ, MATTHEW SALINAS, SR. )
- RODRIGUEZ, MARY HELEN )
- RODRIGUEZ, YESENIA )
- RODRIGUEZ, MODESTO )
- RODRIGUEZ, ADRIANO ERIC ANDREW )
- RODRIGUEZ, LUIS )
- RODRIGUEZ, MIGUEL ANGEL )
- RODRIGUEZ, JOSE )
- RODRIGUEZ, MARIA )
- ROJAS, MARIA DEL CARMEN )
- ROJAS, ESTHER )
- ROJAS, MANUEL )
- ROJAS, SABINO )
- ROJAS, NORMAN ENRIQUE )
- ROMERO, ISAAK )

- 1 ROMO, JOEL GABRIEL )
- 2 ROMO, HOSANNA JENNIE JOHNAE )
- 3 ROMO, SARAH ANN CELESTE )
- 4 ROMO, GABRIEL DANIEL )
- 5 ROMO-MEDINA, MARY JESSIE )
- 6 ROSALES, LUPE ORTEGA )
- 7 ROSALES, ABRAHAM O. )
- 8 ROSALES, ANASTACIO FLORES )
- 9 ROSALES, MARIA GUADALUPE )
- 10 ROSALES, ARMANDO XAVIER )
- 11 ROSALES, ANGEL )
- 12 ROSALES, MARIA )
- 13 RUBIO-MACIAS, LEONOR )
- 14 RUELAN, ASELA NACUA )
- 15 RUELAN, JULIUS BORBAJO )
- 16 RUIZ, HOLEGARIO )
- 17 RUIZ, ELIA )
- 18 RUIZ, JIMMY )
- 19 RUIZ, MARY LOU )
- 20 RUIZ, JASMINE )
- 21 SAELEE, CHIO FOW )
- 22 SAELEE, SHELLY )
- 23 SAELEE, PHILLIP LOCHOY )
- 24 SALAS, ANGEL ADRIAN )
- 25 SALAS, JUAN )
- 26 SALAS, JAILENE BRYANA )
- 27 SALAZAR, GUADALUPE BEJAR )
- 28 SALAZAR, EDUARDO YANEZ, III )
- 29 SALAZAR, GUADALUPE )
- 30 SALAZAR, EDUARDO )
- 31 SALAZAR, LUCIA CARMEN YANEZ )
- 32 SALAZAR, ARTURO GONZALEZ )
- 33 SALAZAR, CRISSELVA YANEZ )
- 34 SALAZAR, CRISSELVA VICTORIA YANEZ )
- 35 SALAZAR-JIMINEZ, MARIA )
- 36 SALCEDO DE PRADO, ROSA CELIA )
- 37 SALDIVAR, ERNESTO DANIEL )
- 38 SALDIVAR, ROBERT FERNANDEZ )
- 39 SALDIVAR, JUAN FERNANDEZ )
- 40 SALDIVAR, TAI LEI )
- 41 SALDIVAR, RAUL MEJIA )
- 42 SALDIVAR, RAUL FERNANDEZ, JR. )
- 43 SALDIVAR, MARIA DE ROSARIO )
- 44 FERNANDEZ )
- 45 SALES, ANNA IDA )
- 46 SANCHEZ, ELLERY MENESES )
- 47 SANCHEZ, LILLY MARIE )
- 48 SANCHEZ, ISAAC SANTIAGO )
- 49 SANCHEZ, JIMMY SANTIAGO )
- 50 SANCHEZ, ROWAN PRESLEY )
- 51 SANCHEZ, DAVID LEONARDO )
- 52 SANCHEZ, JIMMY FRANCISCO, JR. )

1	SANCHEZ, LUCAS BENJAMIN	)
2	SANCHEZ, CARLOS R.	)
	SANCHEZ, GUSTAVO	)
3	SANCHEZ, AMANDA MARIE	)
	SANCHEZ, ADAM	)
4	SANCHEZ, CARMELITA MELANIE	)
	SANCHEZ, KAREN PRISCILLA	)
5	SANCHEZ, JESUS, SR.	)
	SANCHEZ, JESUS, JR.	)
6	SANCHEZ, ANGEL GABRIEL	)
	SANCHEZ, KEVIN YUREN	)
7	SANCHEZ, ALEXIS	)
	SANCHEZ, MARIA DEL CARMEN	)
8	SANCHEZ, JIMMY FRANCISCO	)
	SANCHEZ, CARLOS FRED	)
9	SANCHEZ-BARKER, LETICIA ESTELLA	)
	SANCHEZ-VISCARRA, IMELDA	)
10	SANDERS, SHARMAINE	)
	SANDOVAL, ANDRES ESPARZA	)
11	SANDOVAL, JUAN CARLOS, SR.	)
	SANDOVAL, JOSIE	)
12	SANDOVAL, JUAN CARLOS, JR.	)
	SANDOVAL, MIGUEL ANGEL	)
13	SANDOVAL, SELENE	)
	SANDOVAL, ROSARIO	)
14	SANDOVAL, JACQUELYN MONIQUE	)
	SANDOVAL, ISMAEL LOPEZ	)
15	SANDOVAL, RAFAEL	)
	SANDOVAL, ARI JOEL	)
16	SANDOVAL, JUAN JOSE	)
	SANDOVAL, NICOLE KRISTEN	)
17	SANSONI AGRI-ENTERPRISES	)
	SANSONI, ELEANOR CALVIN	)
18	SANSONI, HENRY JACOB	)
	SANSONI, EZIO ANTHONY	)
19	SANSONI, JOSEPH BENJAMIN	)
	SANSONI, ALDO JULIAN	)
20	SANTOS, JERALD LOUIE	)
	SCACCO, BETTY JEAN	)
21	SCHINDLER, FRANCIS LAVERN	)
	SCHINDLER, PAUL HERMAN	)
22	SEGOVIANO, CONCEPCION FRANCES	)
	SEGURA, MARIA DELGADILLO	)
23	SEIBERT, MICHELLE LEE	)
	SEIBERT, JESSICA RENEE	)
24	SEIBERT-LARA, SANDY RENEE	)
	SENTIERI, RODGER	)
25	SEPTIEN, MATTHEW MICHAEL	)
	SEPTIEN, WILLIAM MICHAEL, JR.	)
26	SEQUEIRA, ANDREW	)
	SEQUEIRA, AMANDA MARIE	)
27	SEQUEIRA, LIZABETE FATIMA	)

28

1	SEQUEIRA, BRANDON	)
2	SEQUEIRA, JERRY	)
	SEQUEIRA, MATTHEW	)
3	SEQUEIRA UNLIMITED, INC.	)
	SERILLA, VICTOR D.	)
4	SERNA, JESUS MARIO	)
	SERNA, DOLORES	)
5	SERNA, MARIA GONZALEZ	)
	SERNA, REYNOL	)
6	SERNA, JUAN	)
	SERNA, JUDY MONIQUE	)
7	SERNA, JESUS MARIA	)
	SERNA, JUAN GABRIEL, JR.	)
8	SERNA, ARLENE AMERICA	)
	SERNA, JUAN GABRIEL	)
9	SERNA, JODY MONIQUE	)
	SERNA, DIANA	)
10	SERNA, PEDRO	)
	SERNA, FELIPA	)
11	SERNA RAMIRO	)
	SERNA, OLGA LYDIA	)
12	SERNA, JOSE LUIS	)
	SHELTON, CIERRA LEE ANN	)
13	SHEPHERD, KENNETH GENE	)
	SHEPHERD, MARIE	)
14	SHUE, LEANNA JANE	)
	SIERRA, CLAUDIA	)
15	SIERRA, JESSICA	)
	SILVA, MICHAEL	)
16	SILVA, JOSE ARTURO	)
	SILVA, MARTHA LIDIA PORTILLO	)
17	SILVA, RAFAEL LOPES	)
	SILVA, NELIDA	)
18	SILVA, MARTHA ALEJANDRA	)
	SILVA, FRANCISCA	)
19	SILVA, MARTHA ELENA	)
	SILVA, ESPIRIDIOU	)
20	SILVA, MIGUEL	)
	SILVA, STEPHANIE ANGELINA	)
21	SILVEIRA, CAROLYN JEAN	)
	SIMMONS, CONNIE SUSAN	)
22	SIMMONS, DONNA SUSAN	)
	SIMMONS, CHEY ASHTON	)
23	SIMMONS, TAGEN RAE	)
	SIMONIAN, SAMANTHA ALYSSA	)
24	SIMPSON, DEL MAE	)
	SIMS, MARCUS DIONDRE	)
25	SKINNER, SCOTT ANDREW	)
	SLOWN, SCOTT EDWARD	)
26	SLOWN, SHARON	)
	SLOWN, GEORGE EDWARD	)
27	SLOWN-BENTON, KIM A.	)

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1 SMITH, FRANCES )  
2 SMITH, JACQUELINE SUMMER )  
3 SMITH, RONALD DALE, JR. )  
4 SMITH, JOHN SWAZIE )  
5 SMITH, KERSTIN LYNN )  
6 SMITH, DELBERT ASTON )  
7 SMITH, THERESA LYNN )  
8 SMITH, ALETA MONET )  
9 SMITH, DEANGELO JAQUELL )  
10 SMITH, TROY WYATT )  
11 SMITH, DEMARCO LATRELL )  
12 SNELL, JOSIE )  
13 SNELL, DANIEL BILLY )  
14 SNETHEN, RONALD LEE, JR. )  
15 SNYDER, DENNIS BRIAN )  
16 SNYDER, LORRIE JANE )  
17 SOARES, LAURIE ANNE )  
18 SOARES, CAROL ANN )  
19 SOARES, COURTNEY NICOLE )  
20 SOARES, TOBY N. )  
21 SOARES, MANUEL VAZ, JR. )  
22 SOARES, CADEN NEAL )  
23 SOARES, CONNER DAVID )  
24 SOLIS, VERONICA ADRIANA )  
25 SOLORIO, MARIA )  
26 SOUTHARD, NAKKITA SKY )  
27 SPARKMAN, JOSEPH WAYNE )  
28 SPARKMAN-MENDOZA, ALYSA MAREN )  
SPEAR, AMANDA JEAN )  
SPEED, MARIAH MARY LEE )  
SPEED, MIRANDA MISTY LYNN )  
SPENCE (EDWARDS), LORETTA )  
SPRAGUE, AUDREY LEE )  
SPRAGUE, JARED LEE )  
SPRAGUE, ELIZABETH LYNN )  
SROUJI, RAMZI DAOUD )  
STALEY, DONOVAN JOSEPH )  
STANDISH, MELISSA KAY )  
STANFORD, LYNELLE RAILEY )  
STANFORD, GARY WAYNE )  
STANLEY, ESTHER B. )  
STARKS, IRENEA PUMANES )  
STARKS, CARL )  
STEELMAN, ODESSA MELISSA )  
STEELMAN, JOSEPH BENJAMIN )  
STOKER, SARAH LYNN )  
STOKER, BRITTANY GAIL )  
STOKER, MICHELLE ELIZABETH )  
STOKER, ROBERT EDMON )  
STONE, ANGELA NOEL )  
STONE, JASON JACK )  
STOREY, EARLISHA JAMISHA )

1	STOREY, DEBORAH JOYCE	)
2	STOREY, MARLON, SR.	)
	STOREY, TYRONE	)
3	STOREY, ROSA LEE	)
	STUBBS, NATHANIEL LEROY, SR.	)
4	STUBBS, NATHANIEL LEROY, JR.	)
	STUBBS, CONNEE LYNN	)
5	STUBBS, CYNTHIA SANDOVAL	)
	STULTZ, HAZEL E.	)
6	SUA, JEREMY BUSTAMANTE	)
	SUA, DOLORES A.	)
7	SUA, JESS, JR.	)
	SUA, JUSTIN BUSTAMANTE	)
8	SUA, JESS, SR.	)
	SUA, JOSEPH BUSTAMANTE	)
9	SUAREZ, JULIA LOURDES	)
	TALBERT, JIMMY WAYNE	)
10	TALBERT, EVELYN	)
	TAPETILLO, GABRIEL DAVID	)
11	TAPETILLO, AARON NATHANIEL	)
	TAPETILLO, DAVID JOSE	)
12	TATE, ALVIN, JR.	)
	TATE, LILLIE MARIE	)
13	TATE, ALVIN, III	)
	TATRO, KIARA MARIE HELEN	)
14	TATRO, APRIL MAY	)
	TAYLOR, GREGORY AIDEN	)
15	TAYLOR, MARY KATHERINE	)
	TAYLOR, HANNAH MARIE	)
16	TAYLOR, ALEXANDRIA ROSE	)
	TAYLOR, SHERI LYNNE	)
17	TEJEDA, MONIQUE ESTELLA	)
	TEJEDA, JERICHO ALONZO	)
18	TEJEDA, SHAYNDEL LUCY	)
	TEJEDA, EDUARDO	)
19	TEJEDA, BRENDA	)
	TEJEDA, ANTONIO	)
20	TEJEDA, LUIS MANUEL	)
	TEJEDA, FRANCISCO JAVIER, JR.	)
21	TEJEDA, OLVIA	)
	TEJEDA, ALEJANDRO	)
22	TEJEDA, FRANCISCO JAVIER, SR.	)
	TERRY, DREW MICHAEL	)
23	TERRY, CHASE COLLEEN	)
	TERRY, EDWARD EUGENE	)
24	TERRY, KELLY ELIZABETH	)
	TERRY, E. LEHUA	)
25	THOMAS, ROBERT KELLY	)
	THOMAS, SYLVIA MARINA	)
26	THOMAS, MATTHEW KELLY	)
	THOMAS, GREGORY ROBERT	)
27	THOMAS, NANCY ANN	)

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1 TITO, GODOFREDA LEE )  
2 TORRES, BERTHA )  
3 TORRES, HECTOR, JR. )  
4 TORRES, ROBERT )  
5 TORRES, MARIA DE JESUS )  
6 TORRES, HECTOR, SR. )  
7 TORREZ, CARL DAVID )  
8 TORREZ, HELENA )  
9 TOURTLOTTE, LINDA MARY )  
10 TOWELL, ANGIE I. )  
11 TOWELL, WILLIAM BARRETT, JR. )  
12 TREAT, MARY JANET )  
13 TRIEU, MINH VAN )  
14 TRIGG, JOSHUA LEROY )  
15 TRIGG, LANA JEAN )  
16 TRINDADE, BRUCE ROBERT )  
17 TULARE, MARIE BERTHA )  
18 TULLY, CAYTLYNN DANIELLE )  
19 TURNER, ALONZO EUGENE )  
20 TYRELL, GEORGE MYRON )  
21 URQUIZO, VALENTIN, III )  
22 VACA, ROSEMARIE CHRISTINA )  
23 VACA, MARY H. )  
24 VACA, ALANA )  
25 VACA, ROSENDO )  
26 VALDEZ, HAIDE VIRIDIANNA )  
27 VALDEZ, NAYELI )  
28 VALDEZ, KATIA )  
29 VALDEZ, JOSE HECTOR )  
30 VALDEZ, OFELIA )  
31 VALDEZ, STEFANI )  
32 VALENCIA, EDUARDO )  
33 VALENCIA, ELVIA IRENE )  
34 VALENCIA, MAURICIO )  
35 VALENCIA, DANIEL )  
36 VALENCIA, PETRA )  
37 VALENCIA, ARCELIA )  
38 VALENCIA-ALVAREZ, CLARISSA ANDREA )  
39 VALENCIA-ALVAREZ, OBDULIA JANET )  
40 VALENCIA-ALVAREZ, MONZERRAT )  
41 LIZBETH )  
42 VALENCIA-BENAVIDEZ, ISIS ABIGAIL )  
43 VALLIER, REYISHA )  
44 VALLIER, PATRICIA ANN )  
45 VALLIER, CHARLES RAYMOND )  
46 VAN BUREN, FELICIA ELIZABETH )  
47 VAN BUREN, JONATHAN DOUGLAS )  
48 VAN BUREN, NATHANIEL JAMES )  
49 VAN BUREN, KRISTEN ELIZABETH )  
50 VAN BUREN, JAMES DOUGLAS )  
51 VAN BUREN, DAWNA ELIZABETH )  
52 VANDER MOLEN, SYLVIA )

28

1 VANDERPLOEG, JOHN ROBERT )  
2 VANG, SANDRA DUAB NTXOO )  
3 VANG, CHERPAO, JR. )  
4 VANG, LILY )  
5 VANG, ASHLEY HNUB-CI )  
6 VANG, MICHELLE MAI CUA )  
7 VANG, BRIAN KOOB PHEI )  
8 VANG, MARTHA T. )  
9 VANG, BRENDA KALIAB )  
10 VANG, MEGAN NKOUJ SUA )  
11 VANG, YANG KHOUA )  
12 VANG, CHERPAO PAUL, SR. )  
13 VANG, JUSTIN KOOB MENG )  
14 VANG, ELIZABETH N. )  
15 VANG, SHAWN T. )  
16 VANG, SHANE T. )  
17 VANG, BRANDON SAMSAI )  
18 VANG, AUSTIN MEEJMOM )  
19 VANG, LINDA KAUI ZOO )  
20 VANG, SHIREEM DIAB CUA )  
21 VANN, ADELINA )  
22 VARGAS, ANGEL, JR. )  
23 VASQUEZ, SANDINO )  
24 VASQUEZ, YADIRA )  
25 VASQUEZ, SALVADOR, JR. )  
26 VASQUEZ, EMERALD DESIREE )  
27 VASQUEZ-QUILAN, CYNTHIA MARGARITA )  
28 VEGA, GILBERTO )  
29 VEGA, MIRIAM )  
30 VEGA, FELIX IGNACIO )  
31 VEGA, ESTIVALIS )  
32 VEGA, IGNACIO )  
33 VEGA, LUIS ENRIQUE )  
34 VEGA, JACOB MATTHEW )  
35 VEGA, RODRIGO ARGENIS )  
36 VEGA, HUGO ARNALDO )  
37 VEGA, JESUS T. )  
38 VEGA, EVELYNN JUNE )  
39 VEGA, ROSA MARIA )  
40 VEGA, CESAR I., JR. )  
41 VEGA, DANIEL )  
42 VEGA, SILVIA )  
43 VEGA, JESUS, JR. )  
44 VEGA, GABRIELA )  
45 VEGA, MARGARITA )  
46 VEGA, NELSON JESUS )  
47 VEGA, NORMA GUADALUPE )  
48 VEGA, MARIA DEL CARMEN )  
49 VEGA, CESAR )  
50 VEGA, MARILYNN ANNE )  
51 VEILLEUX, CHARLES EDWARD )  
52 VELOZ, HOLLY ANN )



1 VELOZ, KENNETH JAMES )  
2 VENEGAS, RIVER FRANK )  
3 VENEGAS, CASSANDRA LINDA )  
4 VENEGAS, NOAH ELIAS )  
5 VENEGAS, CHEYEANNE RENEE )  
6 VERRINDER, MADIE DEAN )  
7 VERRINDER, MICHAEL EDWARD )  
8 VINAS, JIMLY B. )  
9 VINAS, OPHELIA B. )  
10 VINCENT, TERESA MARY )  
11 VIRGEN, JULIO ALBERTO )  
12 VOJTA, SHERRI NANETTE )  
13 VOJTA, SHEENA ARLENE )  
14 VOLK, BRANDON )  
15 VOLZ, NICK RAY )  
16 VUE, SOUA )  
17 WAHLBERG, REBECCA JEAN )  
18 WAHLBERG, MARK KEVIN )  
19 WALKER, PATRICIA NELLIE )  
20 WALKER, ALAN EMORY )  
21 WALSH, JOHN THEODORE )  
22 WALSTAD, VICTORIA ROSE )  
23 WALSTAD, TIFFANY NICOLE )  
24 WALSTAD, ALICIA FERNANDEZ )  
25 WALSTAD, MICHAEL ANTHONY )  
26 WALSTAD, ALEXANDRIA ALICIA )  
27 WALSTAD, VINCENT LARA )  
28 WALSTAD, VICTOR ALEXANDER )  
WALSTAD, NORME ANTHONY )  
WALTER, SHERYL M. )  
WALTS, TINA LOUISE )  
WARD, WILLIAM JOHN )  
WARD, ROSALIE MARY )  
WARIO, JORGE LUIS, SR. )  
WARIO, JORGE LUIS, JR. )  
WARIO, MARIA ISABEL )  
WARIO, TERESA (2) )  
WARIO, TERESA (1) )  
WARIO, MARGARITA )  
WARNER, GARY CARL )  
WATERSTRAAT, JOSEPH THOMAS )  
WATERSTRAAT, MELISSA LYNN )  
WEATHERFORD, KAREN ANN )  
WEBB, DARLA JANE )  
WEBB, MARY ANN )  
WEBB, HEATHER ELIZABETH )  
WEBSTER, STEPHANIE DENISE )  
WEBSTER, JOSHUA )  
WEBSTER, LLOYD DEAN )  
WEBSTER, AMBER )  
WEGER, ANITA STELLA )  
WEGER, DENNIS WAYNE )  
WHEELER, JALAJHN M. )  
WHITAKER, MARQUESHA DANISE )

1	WHITAKER, HENRIETTA JANICE	)
2	WHITAKER, MARK HENRY, JR.	)
	WHITAKER, MARCUS DEON	)
3	WHITAKER, MARQUITTA JENICE	)
	WHITE, MIRANDA DEE	)
4	WHITE, JASMINE NICOLE	)
	WHITE, VERNON	)
5	WHITE, KEINAN DEANDRE	)
	WHITE, KEISHAUNA NIKEA	)
6	WHITE, SUNI	)
	WHITE-BREWTON, HONOREE	)
7	WHITFORD, VICTORIA MIRANDA	)
	WHITFORD, KATHLEEN MIRANDA	)
8	WHITFORD, ROBERT ALAN	)
	WILLIAMS, DEBRA ANN	)
9	WILLIAMS, ROBERT EARL, JR.	)
	WILLIAMS, DAVID JOHN	)
10	WILLIAMS, KATHY ELAINE	)
	WILLIAMS, BRITTANY FAY	)
11	WILLIAMS, KIM ROSHIDA	)
	WILLIAMS, REGGIE BENJAMIN	)
12	WILLIAMS, NATHANIEL W.	)
	WILLIAMS, WANDA JOYCE	)
13	WILLIAMS, CHASE BRADLEY MICHAEL	)
	WILLIAMS, ROGER BENJAMIN	)
14	WILLIAMS, MAKAYLA VINAS	)
	WILLIAMS, KRISTINE VINAS	)
15	WILLIAMS, CHRYSANTHEMUM REGINA	)
	WILLIAMS, AMANDA VINAS	)
16	WILLIAMS, CHARLES BRADLEY	)
	WILLIAMS, FLORINE GENEVA	)
17	WILLIAMS, WENDY MICHELLE	)
	WINDER, DONNA LOUISE	)
18	WINDER, JEFFREY JAY	)
	WINTON, CHARLOTTE DENISE	)
19	WINZER, REAYNA SHIRLEEN	)
	WINZER, JEREMY ANTHONY	)
20	WINZER, DELVINIA SHAREE	)
	WINZER, ISAIAH LAVELLE	)
21	WINZER, SHIRLEY ANN	)
	WINZER, LAVELLE, JR.	)
22	WOMACK, GARY LEE	)
	WOODS-PEDERSON, SHERRY	)
23	XIONG, PHOUA	)
	XIONG, LEE	)
24	YANEZ, SERGIO CANELA	)
	YANEZ, RAUL COONS	)
25	YANEZ, OLIVIA MEGHAN AGUIRRE	)
	YANEZ, CARMEN RUVALCABA	)
26	YANEZ, ANET	)
	YANEZ, ANA MARIA	)
27	YANEZ, PEDRO IGINIO	)
	YANEZ, GERARDO RUBALCAVA	)
28	YANEZ, ADRIAN COONS	)

- 1 YANEZ, JOSE ALBERTO )
- 2 YANEZ, BETALINA CANELA )
- 3 YANEZ, ISAAC AGUIRRE )
- 4 YANEZ, ADRIAN RUBALCAVA )
- 5 YANEZ, SOCORRO J. )
- 6 YANG, ANGELA MARIE )
- 7 YANG, LEE SYLVESTER )
- 8 YANG, YONG VA SEAN )
- 9 YANG, GHOWZHOUA KATHERINE )
- 10 YANG, GOWZHONG JOSEPHINE )
- 11 YANG, LONG )
- 12 YANG, CHIA HANG )
- 13 YANG, SOUA )
- 14 YANG, GHOWNTXI TIFFANY )
- 15 YANG, BEE )
- 16 YANG, AMY MARIE )
- 17 YANG, GHOWLIE VICTORIA )
- 18 YAPIT, FELIPE F. )
- 19 YBARRA, RUDY, SR. )
- 20 YBARRA, TRISHA DOROTHY LOUISE )
- 21 YBARRA, RUDY, JR. )
- 22 YBARRA, JOANNE )
- 23 YOUNG, DARLENE FAYE )
- 24 YOUNG, LARRY ARNOLD )
- 25 ZAMARRIPA, JESUS RODRIGUEZ )
- 26 ZAMARRIPA, VIRGINIA MAE )
- 27 ZAMARRIPA, CYNTHIA RENEE )
- 28 ZAMARRIPA, STEPHEN ANDREW )
- ZAMARRIPA, MARICELIA )
- ZAMORA, RUBEN, SR. )
- ZAMORA, ERLINDA )
- ZAMORA, RUBEN, JR. )
- ZAMORA, JOSEPH CIPRIANO )
- ZAMORA, LUIS )
- ZAMORA, MARIA ELENA )
- ZAMUDIO, CARLA JEAN )
- ZAMUDIO, MICHAEL MANUEL )
- ZAMUDIO, MELISSA ANN )
- ZARAGOZA, MARY LOU )
- ZARAGOZA, JESUS )
- ZARAGOZA, GLORIBELLA )
- ZARAGOZA, ELVIRA )
- ZARAGOZA, PEDRO, JR. )
- ZARAGOZA, RUBI )
- ZARAGOZA, PEDRO, SR. )
- ZARAGOZA, CIPRIANA )
- ZARAGOZA, LUIS A. )
- ZARATE, ANDREA RAQUEL )
- ZARATE, DIEGO BRIAN )
- ZARATE, LORENZO )
- ZARATE, ATHINA VIRGINIA )
- ZARATE, JOSE ARMANDO )
- ZARATE, DORA ESTER )
- ZARATE, JOSE SAMUEL )

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ZARATE, ARMANDO MOSES )  
ZARATE, DESTINEE SARAH )  
ZARATE, MONIQUE ESTER )  
ZARATE, ALEJANDRA )  
ZARATE, MARIA GUADALUPE )  
ZUNIGA, MARTHA ESTHER )

Plaintiffs,

vs.

MERCK & CO., INC.; AMSTED )  
INDUSTRIES, INC.; BALTIMORE AIRCOIL )  
COMPANY, INC.; BAC-PRITCHARD, INC.; )  
TRACK FOUR, INC.; FRANKLIN )  
COUNTY WATER DISTRICT; MERCED )  
IRRIGATION DISTRICT; MERCED )  
IRRIGATION DISTRICT NO. 1; COUNTY )  
OF MERCED; CITY OF MERCED; )  
RANCHWOOD HOMES CORP.; )  
MEADOWBROOK WATER CO. OF )  
MERCED, INC.; and DOES 1-100, inclusive, )

Defendants.

**JURISDICTION**

1. Subject matter jurisdiction is conferred upon this Court by 33 U.S.C. § 1365(a)(1), which states in part that, “any citizen may commence a civil action on his own behalf against any person . . . who is alleged to be in violation of (A) an effluent standard or limitation . . . or (B) an order issued by the Administrator or a State with respect to such a standard or limitation.” For purposes of 33 U.S.C. § 1365, “the term ‘citizen’ means a person or persons having an interest which is or may be adversely affected.” Subject matter jurisdiction is also confirmed upon this Court pursuant to RCRA §7002(a) and (b) and 28 U.S.C. §1221 (an action for declaratory and injunctive relief arising under the Constitution and laws of the United States) and 42 U.S.C. §6972(a) and (b). The federal courts have original jurisdiction over all civil actions arising under the Constitution, laws or treaties of the United States. 28 U.S.C. § 1331.

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1           10.     DEFENDANT MERCED COUNTY is a governmental entity. Its administrative  
2 offices are located at 715 Martin Luther King Jr. Way, Merced, California.

3           11.     DEFENDANT RANCHWOOD HOMES CORP. (“RANCHWOOD HOMES”) is a  
4 California corporation authorized to do business and doing business in the County of Merced.

5           12.     Defendant MERCK & CO., INC. (“MERCK”) is a New Jersey Corporation authorized  
6 to and doing business in the State of California, County of Merced.

7           13.     Defendant AMSTED INDUSTRIES, INC. (“AMSTED”) is an Illinois corporation  
8 authorized to and doing business in the State of California, County of Merced.

9           14.     Defendant BALTIMORE AIRCOIL CO., INC. (“BAC”) is an Illinois corporation  
10 authorized to and doing business in the State of California, County of Merced.

11          15.     Defendant MEADOWBROOK WATER CO. OF MERCED, INC.  
12 (“MEADOWBROOK”) is a California corporation authorized to and doing business in the County  
13 of Merced.

14          16.     Defendant TRACK FOUR, INC. (“TRACK FOUR”) is a Delaware corporation  
15 authorized to and doing business in the State of California, County of Merced, and at all times relevant  
16 to this complaint was a wholly owned subsidiary of defendant AMSTED.

17          17.     Defendants DOES 1 - 50, respectively, are public entities, their employees, agents, and  
18 contractors, which owned, designed, constructed, or maintained the public improvements involved  
19 herein, or participated in the same, or otherwise contributed to the conduct which is the subject of this  
20 complaint.

21          18.     Defendants DOES 52 - 100, respectively, are persons, partnerships, corporations and  
22 entities, who are, or were, responsible for, or in some way contributed to, the violations which are the  
23 subject of this complaint or are, or were, responsible for the maintenance, supervision, management,  
24 operations, or insurance coverage of defendants’ facilities and operations. The names, identities,  
25 capacities, and functions of Defendants DOES 1 - 100 are presently unknown to Plaintiffs. Plaintiffs  
26 shall seek leave of court to amend this complaint to insert the true names of said DOE defendants  
27 when the same have been ascertained.

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1            19.     Plaintiffs are informed and believe and upon information and belief allege that each  
2 of the defendants designated herein as DOE is legally responsible in the same manner for the events  
3 and happenings referred to and proximately caused the damages to plaintiffs as herein alleged.

4            20.     Unless specifically identified, the term “DEFENDANTS” as used throughout this  
5 complaint, will refer to each and every defendant identified above.

6            21.     Hereinafter the term “DAIRY PLAINTIFFS” shall refer to the following Plaintiffs who  
7 own real property and/or reside or resided at all relevant times herein on Franklin Road in Merced  
8 County, generally between Highway 99 and the Franklin Road Bridge: Manual Soares, Carol A.  
9 Soares, Toby Soares, Laurie Soares, Courtney D. Soares, Caden N. Soares, Conner D. Soares dba  
10 Mater Dei Dairy,

11           22.     Hereinafter the term “THORNTON/LOPES PLAINTIFFS” shall refer to the following  
12 Plaintiffs who own real property and/or reside or resided at all relevant times herein in Merced  
13 County, generally in an area bounded by Thornton Road to the west, Lopes to the south, Highway 140  
14 to the north and Massasso Street to the east: Mercedes D. Avalos, Robert Brown, Burnetta Brown,  
15 James Bryant, Virginia Bryant, Angelina Bryant, Jeanette Bryant, Christie Bryant, Jaimee Bryant,  
16 Tony Dalmaso, Sydney Dalmaso, Zachary Dalmaso, Nadine M. Dhanju, James M. Flagg, Mary Lou  
17 Flagg, Dennis Frank, Brenda Frank, Salvador Guzman, Sr., Stephen Guzman, Doug Huggins, Denice  
18 Huggins, Richard Macias, Jeannette Macias, Victor A. Meissonnier, Chris Meissonnier, Cornelio  
19 Minor, Virginia Minor, Herbert Ortega, Candelaria Ortega, Morris Peterson, Alice Peterson, Ralph  
20 Martinez, Mary Martinez, Beatrice Dart, Dalton Jay Dart, Felix Masasso, Imogene Masasso, Ken  
21 Masasso, Lori Mileur, Rusty Mileur, Maggen Mileur, Everett Penfold, Laverne Penfold, Lenora  
22 Penfold, Bruce Trindade, Roger S. Janz, Roger Lee Janz, Kelly Thomas, Nancy Thomas, Martha E.  
23 Zuniga, Michael C. Garces and Daniel M.J. Garces.

24           23.     Hereinafter the term “YOSEMITE PLAINTIFFS” shall refer to the following Plaintiffs  
25 who own real property and/or reside or resided at all relevant times herein in Merced County,  
26 generally in an area bounded by Kirby Road to the west, Black Rascal Creek to the north, a raised  
27 irrigation lateral to the south and Fairfield Canal to the east: Carrie Borges, Roland Borges, Sr.,

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1 Roland Borges, Jr., Tiphonie Borges, Michelle Crider, Philip Gauthier, Jaime Farias, Maria Magdalena  
2 Camacho, Jaime Farias II,

3 24. Hereinafter the term “BEACHWOOD PLAINTIFFS” shall refer to all remaining  
4 plaintiffs who own real property and/or reside or resided at all relevant times herein in Merced County,  
5 generally in an area bounded by Ashby Road to the south, Beachwood Avenue to the west, the El  
6 Capitan Canal to the east and Coronado Avenue to the north.

7 25. Hereinafter the term “BAC CONTAMINATION PLAINTIFFS” shall refer to all  
8 plaintiffs listed in the caption of this Complaint with the exception of the “YOSEMITE PLAINTIFFS”  
9 for whom no BAC contamination claims are being pursued.

10 26. Hereinafter, the term “RANCHWOOD PLAINTIFFS” shall refer to plaintiffs who own  
11 real property and/or reside or resided at all relevant times herein in Merced County, generally in an  
12 area bounded by Drake Avenue to the north, Big Sandy Avenue and Shoemaker Avenue to the west,  
13 Chesler Street to the south and Drake Avenue to the east.

14 27. Throughout this complaint, if plaintiffs are not specifically designated as set forth  
15 above, the term “PLAINTIFFS” will refer to all plaintiffs in this action.

16 28. Some of the plaintiffs in this action are minors for whom a Guardian ad litem has or  
17 will be appointed. Any order appointing Guardian ad Litem will be deemed incorporated within this  
18 complaint, so as to constitute an amendment of the complaint without the need for a subsequent filing  
19 of an amended pleading.

20 29. From September 5, 2006 to May 24, 2007, PLAINTIFFS, and each of them, presented  
21 to the CITY OF MERCED claims for damages arising out of the aforementioned flood, contamination,  
22 and BAC contamination. These claims were rejected by the CITY OF MERCED.

23 30. From September 7, 2006 to May 24, 2007, PLAINTIFFS, and each of them, presented  
24 to the COUNTY OF MERCED claims for damages arising out of the aforementioned flood,  
25 contamination and BAC contamination. These claims were rejected by the COUNTY OF MERCED.

26 31. From August 30, 2006 to May 24, 2007, PLAINTIFFS, and each of them, presented  
27 to the MERCED IRRIGATION DISTRICT claims for damages arising out of the aforementioned  
28 flood and contamination. These claims were rejected by the MERCED IRRIGATION DISTRICT.



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32. From September 12, 2006 through May 24, 2007, PLAINTIFFS, and each of them, presented to the FRANKLIN COUNTY WATER DISTRICT claims for damages arising out of the aforementioned flood and contamination. These claims were rejected by the FRANKLIN COUNTY WATER DISTRICT.

**NATURE OF THE CASE**

33. This is a citizens’ suit for relief brought by PLAINTIFFS under the Clean Water Act (or “CWA” or “Act”), 33 U.S.C. § 1251 et seq., specifically 33 U.S.C. § 1311, 33 U.S.C. § 1342, and 33 U.S.C. § 1365, to stop the hereinafter designated DEFENDANTS from repeated and ongoing violations of the Act. These violations are detailed in the Notices of Violations and Intent to File Suit made part of the pleadings of this case and attached hereto as Exhibits A - D and O - X (or “CWA NOTICES”). DEFENDANTS are either discharging pollutants from a point source without a NPDES permit in violation of 33 U.S.C. § 1311(a), discharging storm water without a NPDES permit in violation of 33 U.S.C. § 1342(p) or DEFENDANTS are routinely violating the terms of the NPDES permits (“PERMITS”) that regulate its discharges.

34. Further, this is a civil suit brought against the hereinafter designated DEFENDANTS under the citizen suit enforcement provisions of the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (hereafter, “RCRA”) and the Clean Water Act (or “CWA” or “Act”), 33 U.S.C. § 1251 et seq., specifically 33 U.S.C. § 1311, 33 U.S.C. § 1342, and 33 U.S.C. § 1365, to stop DEFENDANTS from repeated and ongoing violations in conjunction with the BAC Contamination Site.. These violations are detailed in the Notices of Violations and Intent to File Suit made part of the pleadings of this case and attached hereto as Exhibits E - BB. These violations arise out of DEFENDANTS’ discharge of pollution from the site (“SITE”) identified in the attached NOTICES. This SITE has caused pollutants, hazardous waste or hazardous substances to be released into the ground waters and/or surface waters of the State of California and of the United States in violation of RCRA and the CWA.

35. Plaintiffs seek (1) to enjoin DEFENDANTS from discharging pollutants from its SITE into the ground and surface waters surrounding its SITE; (2) a court order directing DEFENDANTS to comply with the substantive and procedural requirements of RCRA and the CWA; (3) a court order

1 directing DEFENDANTS to pay civil penalties, or establish rededication projects in lieu of penalties,  
2 for violations of RCRA and the CWA; (4) a court order directing DEFENDANTS to reimburse  
3 PLAINTIFFS costs of suit, including attorney’s fees, as allowed under 42 U.S.C. § 6972(e) and 33  
4 U.S.C. § 1365(d).

5 36. Plaintiffs further seek declaratory relief, injunctive relief to protect future violations,  
6 the imposition of civil penalties and other relief for defendants’ violations of the CWA and RCRA.

7 37. Under plaintiffs’ state law claims, PLAINTIFFS seek monetary damages and other  
8 forms of relief permitted by state law controlling those claims.

9  
10 **GENERAL ALLEGATIONS RELATED TO PLAINTIFFS’**  
**CLEAN WATER ACT CLAIMS FOR RELIEF**

11 38. PLAINTIFFS incorporate by reference all the foregoing paragraphs and the NOTICES  
12 attached to this complaint as Exhibits A - D.

13 39. Under 33 U.S.C. § 1251(e), Congress declared its goals and policies with regard to  
14 public participation in the enforcement of the CWA. 33 U.S.C. § 1251(e) provides, in pertinent part:

15 *Public participation in the development, revision, and enforcement of any*  
16 *regulation, standard, effluent limitation, plan or program established by*  
17 *the Administrator or any State under this chapter shall be provided for,*  
*encouraged, and assisted by the Administrator and the States.*

18 **CWA Parties**

19 40. DEFENDANT FCWD is a public entity. Its administrative offices are located at 2126  
20 North Drake Avenue, Merced, California. FRANKLIN COUNTY WATER DISTRICT owns,  
21 maintains, and/or operates a wastewater treatment, refuse and disposal facility which includes a  
22 sewage collection/conveyance system (“FCWD Facility”) that serves the adjacent community and  
23 adjacent areas. Regional Water Quality Control Board (“RWQCB”) Order 89-171 acts as the  
24 FCWD’s Waste Discharge Requirements (“WDR”) permit. Order 89-171 is not and cannot act as a  
25 NPDES permit. As described in Exhibit A, through the actions of FRANKLIN COUNTY WATER  
26 DISTRICT, the FCWD Facility discharges from a point source to waters of the United States without  
27 a NPDES permit in violation of CWA, 33 U.S.C. § 1311(a).

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1           41.     A A & A ASSOCIATES, INC. is a private corporation whose business address is 120  
2 Howell Road, Chowchilla, California. A A & A ASSOCIATES, INC. maintains, and/or operates the  
3 FCWD Facility. As described in Exhibit A through the actions of A A & A ASSOCIATES, INC., the  
4 FCWD Facility discharges from a point source to a waters of the United States without a NPDES  
5 permit in violation of CWA, 33 U.S.C. § 1311(a).

6           42.     DEFENDANT MID is a public entity. Its administrative offices are located at 744  
7 West 20<sup>th</sup> St., Merced, California. The discharge of a pollutant from a point source to a water of the  
8 United States without a NPDES permit is a violation of the Clean Water Act. In its various operations  
9 discussed in Exhibit B, MERCED IRRIGATION DISTRICT is causing or creating pollutants which  
10 are being discharged to waters of the United States without a NPDES permit. 33 U.S.C. § 1311(a).  
11 In certain circumstances where MERCED IRRIGATION DISTRICT may have a NPDES permit or  
12 sought coverage under certain State General Permits, MERCED IRRIGATION DISTRICT is violating  
13 the terms of those permits. Any violations of the terms of a NPDES permit are violations of the CWA.  
14 [40 C.F.R. § 122.41(a)] As described in Exhibit B through its actions MID is violating the Clean  
15 Water Act.

16           43.     DEFENDANT MERCED IRRIGATION DISTRICT DRAINAGE DISTRICT #1  
17 (“MIDDD#1”) is a public entity. Its administrative offices are located at 744 W 20<sup>th</sup> St., Merced,  
18 California. MID created the MIDDD#1 in 1994. Although legally separate from MID, the MIDDD#1  
19 is reported as if it were part of the primary governmental entity because it shares a common Board of  
20 Directors with the MID whose sole purpose is to provide construction and maintenance of the MID’s  
21 storm water drainage facilities. To the extent MIDDD#1 can be considered an operator or exercises  
22 control over the discharges from the MID’s facilities, the MIDDD#1 is liable for discharges of a  
23 pollution to a water of the United States without a NPDES permit. As described in Exhibit B through  
24 its actions MIDDD#1 is discharging from a point source to a waters of the United States without a  
25 NPDES permit in violation of CWA, 33 U.S.C. § 1311(a) and violating the terms of any NPDES  
26 permits it might have in violation of the CWA. [40 C.F.R. § 122.41(a)]

27           44.     DEFENDANT CITY OF MERCED (“MERCED”) is a governmental entity. The City  
28 of Merced’s office of public works is located at 1776 Grogan Ave., Merced, California. The city of

1 Merced owns, maintains, and/or operates a wastewater treatment, refuse and disposal facility which  
2 includes a sewage collection/conveyance system (“the Merced Facility”). The waste water treatment  
3 plant is located at 10260 Gove Road, Merced, California. Due to either by-pass or sewage system  
4 overflows (or “SSOs”) wastes are discharged to surface waters. These discharges occur both surface  
5 and subsurface. The Merced Facility alone, or in combination with other sources, causes or threatens  
6 to cause degradation of area groundwater by allowing polluted waste leaving the collection system to  
7 be deposited in areas such as those PLAINTIFFS’ residences where the polluted waste is discharged  
8 into groundwater. Merced fails to report many of these violations and fails to take corrective action  
9 as required by its NPDES permit, RWQCB Standard Provisions and 40 C.F.R. § 122.41 Conditions  
10 Applicable to All Permits which have been made part of Merced’s NPDES permit. As described in  
11 Exhibit C the CITY OF MERCED is violating the terms of its NPDES permit in violation of the Act.  
12 [40 C.F.R. § 122.41(a)]

13 45. DEFENDANT MERCED COUNTY (“COUNTY”) is a governmental entity. Its  
14 administrative offices are located at 715 Martin Luther King Jr. Way, Merced, California. MERCED  
15 COUNTY has no NPDES permit allowing it to discharge pollutants to waters of the United States as  
16 required by 33 U.S.C. § 1311(a), and 33 U.S.C. §§ 1342(a), 1342(b) and 1342(p). In case of the use  
17 of pesticides as described in Exhibit D the County does not have a current permit for such discharges  
18 or MERCED COUNTY is violating the terms of the current General Permit for the use of aquatic and  
19 vector pesticides. [40 C.F.R. § 122.41(a)]

20 46. The BEACHWOOD, DAIRY and THORNTON/LOPES PLAINTIFFS (hereinafter  
21 referred to in this claim as the CWA PLAINTIFFS) reside in the vicinity of, derive livelihoods from,  
22 own property near, and/or recreate on, in or near and/or otherwise use, enjoy and benefit from the  
23 waterways and associated natural resources into which the previously designated DEFENDANTS  
24 discharge pollutants, or by which these DEFENDANTS’ operations adversely affect CWA  
25 PLAINTIFFS’ interests, in violation of DEFENDANTS’ PERMITS, or lack thereof, and 33 U.S.C.  
26 § 1311(a). The health, economic, recreational, aesthetic and environmental interests of PLAINTIFFS  
27 may be, have been, are being, and will continue to be adversely affected by DEFENDANTS’ unlawful  
28 violations. CWA PLAINTIFFS contend there exists an injury in fact to its members, causation of that

1 injury by the previously designated DEFENDANTS' complained of conduct, and a likelihood that the  
2 requested relief will redress that injury.

3 **Statutory 60 Day Notices**

4 47. Pursuant to 33 U.S.C. § 1365(b)(1)(a), 40 C.F.R. §§ 135.2 and 135.3, PLAINTIFFS  
5 gave notice of the violations alleged in this complaint more than sixty (60) days prior to  
6 commencement of this lawsuit, to: (a) the DEFENDANTS, (b) the United States Environmental  
7 Protection Agency, federal and regional, and (c) the State of California Water Resources Control  
8 Board.

9 48. Pursuant to 33 USC § 1365(c)(3), a copy of this Complaint has been provided to the  
10 United States Attorney General and the Administrator of the Federal EPA.

11 49. All illegal discharges and activities complained of in this Complaint occur in the  
12 waterways which are waters of the United States or the State of California.

13 50. The California Regional Water Quality Control Board Region 6 ("RWQCB") has  
14 determined that the watershed areas and affected waterways are beneficially used for drinking water,  
15 water contact recreation, non-contact water recreation, fresh water habitat, wildlife habitat,  
16 preservation of rare and endangered species, fish migration, fish spawning, industrial service supply,  
17 navigation, and sport fishing.

18 51. Pursuant to 33 U.S.C. § 1311(a) the EPA and the State of California have formally  
19 concluded that discharges by DEFENDANTS of the type complained of in the NOTICES (Exhibits  
20 A - D) are prohibited by law. Beneficial uses of most portions of the specified waterways are being  
21 affected in a prohibited manner by the illegal discharges and activities of DEFENDANTS.  
22 Additionally, pursuant to 33 U.S.C. § 1311(a), and 33 U.S.C. §§ 1342(a),(b) and (p) the EPA and the  
23 State of California have identified the facilities owned and operated respectively by DEFENDANTS  
24 as a point source, the discharges from which contribute to violations of applicable water quality  
25 standards.

26 **Statutory and Regulatory Background of the Clean Water Act**

27 52. The CWA prohibits the discharge of pollutants from a "point source" into the navigable  
28 waters of the United States, unless such discharge is in compliance with applicable effluent limitations

1 as set by the EPA or the State. These limits are to be incorporated into an NPDES permit for that  
2 point source specifically. In certain cases the State promulgates a general state permit which covers  
3 certain specified discharges such as discharging aquatic pesticides or for vector control. In the  
4 instances of State General Permit the discharged must either seek coverage under the General Permit  
5 or its own individualized permit for the same category of discharges. Additional sets of regulations  
6 are set forth in the Basin Plan, California Toxics Rule, the Code of Federal Regulation and other  
7 regulations promulgated by the EPA and the SWRCB. 33 U.S.C. § 1311(a) prohibits discharges of  
8 pollutants not authorized by, or in violation of an effluent standard or limitation or an order issued by  
9 the EPA or a State with respect to such a standard or limitation including an NPDES permit issued  
10 pursuant to 33 U.S.C §§ 1342(a), (b) and/or (p).

11 53. The affected waterways detailed in this complaint and in the NOTICES are navigable  
12 waters of the United States within the meaning of 33 U.S.C. § 1362(7).

13 54. The Administrator of the EPA has authorized the RWQCB to issue NPDES permits,  
14 subject to specified conditions and requirements, pursuant to 33 U.S.C § 1342(b).

15 55. The RWQCB adopted NPDES permits prescribing effluent limitations and other  
16 conditions of compliance. If issued, the PERMIT numbers are identified in the NOTICES. These  
17 PERMITS authorize DEFENDANTS to discharge limited quantities of pollutants into the  
18 aforementioned waterways and require DEFENDANTS to comply with its terms including reporting  
19 and monitoring requirements.

20 56. The PERMITS also prescribe conditions to ensure compliance with the Act. They  
21 require DEFENDANTS to establish and maintain records, to install, use and maintain monitoring  
22 equipment, to regularly monitor and sample pollutants in their discharges, to design and implement  
23 adequate Best Management Practices and to report to the RWQCB in specified ways on a regular basis  
24 regarding discharge of pollutants from the activities, facilities and point sources owned or operated  
25 by DEFENDANTS. The reports may include mandatory monthly Self Monitoring Reports (hereafter,  
26 “SMRs”). All conditions of the PERMITS are enforceable in a citizens’ suit.

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1 **FIRST CLAIM FOR RELIEF**

2 **DISCHARGING POLLUTANTS IN VIOLATION OF A NPDES**  
3 **Permit - 33 U.S.C. § 1251 et seq.; 33 U.S.C. § 1311(a); 33 U.S.C. §§ 1342(a), (b)**  
4 **and (p); 33 U.S.C. § 1365; 40 C.F.R § 122.41(a)**

5 **(Brought by the BEACHWOOD, DAIRY and THORNTON/LOPES Plaintiffs**  
6 **Against FCWD, MID, MIDD#1, COUNTY OF MERCED and CITY OF MERCED)**

7 57. PLAINTIFFS reallege and incorporate by reference the allegations of Paragraphs 1  
8 through 56 as though fully set forth herein including all allegations in Exhibits A - D incorporated  
9 herein by reference.

10 58. As described in Exhibits A - D, DEFENDANTS FCWD, MID, MID#1, County of  
11 Merced, City of Merced, MERCK, AMSTED, BAC, MEADOWBROOK, and J.F. PRITCHARD -  
12 hereinafter referred to as the CWA DEFENDANTS - have violated and continue to violate the  
13 Clean Water Act as evidenced by the violations of the terms of its PERMITS as well as applicable  
14 State and Federal standards. These violations have been continuously occurring since November of  
15 1970 to the present. By law and by the terms of its PERMITS, to which CWA DEFENDANTS  
16 have not objected, violations of the NPDES PERMITS are violations of the Clean Water Act.  
17 (See 40 C.F.R. § 122.41(a)).

18 59. CWA PLAINTIFFS are informed and believe and on such information and belief  
19 allege CWA DEFENDANTS' violations are ongoing, and will continue after the filing of this  
20 complaint. CWA PLAINTIFFS allege all violations which may have occurred or will occur prior  
21 to trial, but for which data may not have been available or submitted or apparent from the face of  
22 the reports or data submitted by CWA DEFENDANTS to the RWQCB or to CWA PLAINTIFFS  
23 prior to the filing of this complaint. CWA PLAINTIFFS will file additional amended complaints  
24 if necessary to address CWA DEFENDANTS' State and Federal violations of the PERMITS  
25 which may occur after the filing of this complaint. Each of CWA DEFENDANTS' violations in  
26 excess of the PERMITS' limits, violations of narrative standards, provisions or State and Federal  
27 standards has been and are separate violations of the Clean Water Act. CWA DEFENDANTS  
28 have violated and continue to violate an effluent standard or limitation or an order issued by the  
State or Federal government with respect to such a standard or limitation.

1            60.     CWA PLAINTIFFS aver and believe and on such belief allege that without the  
2 imposition of appropriate civil penalties and the issuance of appropriate equitable relief, CWA  
3 DEFENDANTS will continue to violate the limits and terms of its PERMITS as well as State and  
4 Federal standards with respect to the enumerated discharges and releases. CWA PLAINTIFFS  
5 aver and believe and on such belief allege the relief requested in this complaint will redress the  
6 injury to CWA PLAINTIFFS, prevent future injury, and protect the interests of CWA  
7 PLAINTIFFS which are or may be adversely affected by CWA DEFENDANTS' violations of its  
8 PERMITS, State and Federal standards enforceable under the Clean Water Act.

9                                    **SECOND CLAIM FOR RELIEF**

10                                    **DISCHARGING POLLUTANTS TO WATERS  
11 OF THE UNITED STATES WITHOUT A NPDES**

12                                    **Permit 33 U.S.C. § 1251 et seq.; 33 U.S.C. § 1311(a); 33 U.S.C. §§ 402(a), (b)  
13 and (p); 33 U.S.C. § 1365**

14                                    **(Brought by the BEACHWOOD, DAIRY and THORNTON/LOPES Plaintiffs  
15 Against FCWD, MID, MIDD#1, COUNTY OF MERCED and CITY OF MERCED)**

16            61.     PLAINTIFFS reallege and incorporate by reference the allegations of Paragraphs 1  
17 through 60 as though fully set forth herein including all allegations in Exhibits A - D incorporated  
18 herein by reference.

19            62.     As described in Exhibits A - D, CWA DEFENDANTS have violated and continue  
20 to violate the Clean Water Act as evidenced by CWA DEFENDANTS discharge of pollutants to  
21 waters of the U.S. without applying for or acquiring the necessary PERMITS required by  
22 applicable State and Federal laws enforceable under the CWA. These violations have been  
23 continuously occurring since November of 1970 to the present.

24            63.     CWA PLAINTIFFS are informed and believe and on such information and belief  
25 allege CWA DEFENDANTS' violations are ongoing, and will continue after the filing of this  
26 complaint. PLAINTIFFS allege all violations which may have occurred or will occur prior to trial,  
27 but for which data may not have been available or submitted or apparent from the face of the  
28 reports or data submitted by CWA DEFENDANTS to public agencies prior to the filing of this  
complaint. CWA PLAINTIFFS will file additional amended complaints if necessary to address  
CWA DEFENDANTS' State and Federal violations which may occur after the filing of this



1 complaint. Each of CWA DEFENDANTS' violations are separate violations of the Clean Water  
2 Act. CWA DEFENDANTS have violated and continue to violate 33 U.S.C. § 1311(a) in that  
3 CWA DEFENDANTS have not acquired the required PERMITS as required by the Clean Water  
4 Act.

5 64. CWA PLAINTIFFS aver and believe and on such belief allege that without the  
6 imposition of appropriate civil penalties and the issuance of appropriate equitable relief, CWA  
7 DEFENDANTS will continue to violate the Clean Water Act with respect to the enumerated  
8 discharges and releases. CWA PLAINTIFFS aver and believe and on such belief allege the relief  
9 requested in this complaint will redress the injury to CWA PLAINTIFFS, prevent future injury,  
10 and protect the interests of CWA PLAINTIFFS which are or may be adversely affected by CWA  
11 DEFENDANTS' violations of its PERMITS, State and Federal standards enforceable under the  
12 Clean Water Act.

13 **THIRD CLAIM FOR RELIEF**

14 **VIOLATION OF RCRA - 42 U.S.C. § 6972 (A)(1)CA**

15 **(Brought by the BAC CONTAMINATION Plaintiffs Against**  
16 **FCWD, MID, MIDD#1, COUNTY OF MERCED,**  
17 **CITY OF MERCED, MERCK, BAC, AMSTED, MEADOWBROOK,**  
18 **BAC-PRITCHARD, TRACK FOUR and DOES 51 - 100)**

19 65. Plaintiffs reallege, refer to, and herein incorporate by reference as if set out in full  
20 Paragraphs 1 through 56 as set forth above.

21 66. PLAINTIFFS provided to DEFENDANTS above-named written notice of  
22 DEFENDANTS' violations of RCRA, and of its intent to file suit against DEFENDANTS to the  
23 Administrator of the United States Environmental Protection Agency (hereafter, "EPA"), the  
24 Administrator of the Environmental Protection Agency - Region IX, the Executive Director of the  
25 State Water Resources Control Board, the Executive Director of the California Integrated Waste  
26 Management Board, and to DEFENDANTS, as required by RCRA. A true and correct copy of the  
27 RCRA Notice letters are attached hereto as Exhibits E - N and AA - BB and fully incorporated  
28 into this Complaint.

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1           67.     BAC CONTAMINATION PLAINTIFFS reside in the vicinity of, derive  
2 livelihoods from, own property near, and/or recreate on, in or near, and/or otherwise use, enjoy and  
3 benefit from the affected watershed area and associated natural resources into which the  
4 DEFENDANTS described above discharges, or by which DEFENDANTS' operations adversely  
5 affect the BAC PLAINTIFFS' interests, in violation of the above-enumerated laws or statutes. The  
6 health, economic, recreational, aesthetic and environmental interests of the BAC PLAINTIFFS  
7 have been, are being, and will continue to be adversely affected by DEFENDANTS' unlawful and  
8 continuing violations of the above-enumerated laws or statutes. The BAC PLAINTIFFS contend  
9 that there exists an injury in fact and causation of that injury by the conduct of DEFENDANTS  
10 complained of herein, and a likelihood that the requested relief will specifically redress that injury.  
11 The BAC PLAINTIFFS have standing to bring this action. A copy of this Complaint shall be  
12 provided to the United States Attorney General, the Administrator of the United States EPA, and  
13 the Attorney General of California.

14           68.     The BAC PLAINTIFFS are informed and believe, and on said information and  
15 belief allege that DEFENDANTS are past or present generators, past or present transporters, or  
16 past or present owners or operators of the SITE (as described in the Notices attached as Exhibits E  
17 - N and AA - BB, and incorporated herein), and have contributed or are contributing to the past or  
18 present handling, storage, treatment, transportation, or disposal solid or hazardous waste which  
19 may present an imminent and substantial endangerment to health or the environment. Furthermore  
20 DEFENDANTS have no permits allow them to store or treat hazardous or solid waste at the SITE.

21           69.     The BAC PLAINTIFFS are further informed and believe, and on said information  
22 and belief allege that DEFENDANTS have and are discharging pollutants from the SITE to waters  
23 of the U.S. without a NPDES permit in violation of the CWA.

24           70.     The liability of defendants FCWD, MID, MIDD#1, MEADOWBROOK,  
25 COUNTY OF MERCED, and CITY OF MERCED arise out of their ownership and operation of  
26 wells which have caused pollutants to be discharged to surface and ground waters via defendants'  
27 conduit such as sewer lines, utilities, and the like, facilitating pollutant migration and discharge to  
28 waters of the United States and contributing to the past or present handling, storage, treatment,

1 transportation, or disposal of hazardous waste which may present an imminent and substantial  
2 endangerment to the health or the environment of the BAC CONTAMINATION PLAINTIFFS.

3 71. The liability of defendants MERCK, AMSTEAD, BALTIMORE AIR COIL, BAC-  
4 PRITCHARD, and TRACK FOUR arises out of their ownership of the SITE and/or activities  
5 conducted on the SITE by these companies which violate the provisions of CWA and RCRA and  
6 have contributed to the discharge of pollutants into the waters of the United States, in and around  
7 PLAINTIFFS' property and to the past or present handling, storage, treatment, transportation, or  
8 disposal of hazardous waste which has presented an imminent and substantial endangerment to the  
9 BAC PLAINTIFFS' health and the environment surrounding PLAINTIFFS' real property.

10 72. Regulatory Agencies have ordered certain DEFENDANTS to investigate and  
11 remediate the contamination at the SITE. These DEFENDANTS have conducted some  
12 investigative work at the SITE in response to Agency directives; however, significant levels of  
13 contamination remain in soil and groundwater beneath and adjacent to the SITE and have not been  
14 remediated.

15 73. Regulatory Agencies have designated surface and ground waters in this area of  
16 California as capable of supporting domestic supply. Regulatory Agencies have also established  
17 Maximum Contaminant Levels ("MCLs") and Water Quality Objectives ("WQOs") for these  
18 pollutants in surface and ground waters.

19 74. Hexavalent chromium, copper, arsenic and pentachlorophenol are known  
20 carcinogens and/or reproductive toxins, and have been listed chemicals under Proposition 65 since  
21 at least 1991. Surface and groundwater at and around the SITE are potential sources of drinking  
22 water under applicable Regional Water Quality Control Board (Water Quality Control Plans aka  
23 Basin Plans). The BAC PLAINTIFFS are informed and believe, and on said information and  
24 belief allege that DEFENDANTS in the course of doing business have discharged hexavalent  
25 chromium, copper, arsenic and pentachlorophenol to surface and groundwater at and around the  
26 SITE as discussed in the attached NOTICES.

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1           75.     DEFENDANTS have used and/or stored pollutants at the SITE in a manner which  
2 has allowed significant quantities of hazardous constituents to be discharged to soil, ground and  
3 surface waters beneath and around the SITE and beneath and around adjacent properties.

4           76.     DEFENDANTS have conducted some site investigations and monitoring work at  
5 the SITE, but very little remediation, and the contamination at the Site remains unabated. To date,  
6 the levels of pollutants remain high above the allowable MCLs or WQOs for said constituents,  
7 creating an imminent and substantial endangerment to public health and the environment.

8           77.     The discharges by DEFENDANTS as alleged in the NOTICES have been both  
9 knowing and intentional. At the present time and in the past DEFENDANTS have used, stored or  
10 sold products, which are known to contain the aforementioned pollutants and have intended that  
11 such products be sold to and used by the public, or used in its own operations. DEFENDANTS  
12 have known of the contamination at the SITE for at least 5 years, and are also aware that failing to  
13 remediate the pollution allows the contamination to migrate through the ground and groundwater  
14 at and adjacent to the SITE, and to continually contaminate and re-contaminate actual and  
15 potential sources of drinking water as well as surface waters.

16           78.     Violations of this and other statutes alleged in this Complaint are a major cause of  
17 the continuing decline in water quality, and a continuing threat to existing and future drinking  
18 water supplies in Northern California. With every discharge, groundwater supplies are  
19 contaminated. These discharges can and must be controlled in order for the groundwater supply to  
20 be returned as a safe source of drinking water.

21           79.     RCRA § 7002(a)(1)(A), [42 U.S.C. § 6972(a)(1)(A)], provides that any person may  
22 commence a civil action against any person or governmental entity alleged to be in violation of any  
23 permit, standard, regulation, condition, requirement, prohibition, or order which has become  
24 effective pursuant to RCRA. Civil penalties may be assessed against any person or entity in  
25 violation of such permits, etc. pursuant to RCRA under the provisions of RCRA, 42 U.S.C. § 6928  
26 (a) and (g).

27           80.     The BAC PLAINTIFFS are informed and believe, and thereon allege, that  
28 DEFENDANTS have failed to comply with the statutory and regulatory prevention, detection,

1 monitoring, and remediation requirements imposed under RCRA and described in the RCRA  
2 Notices attached as Exhibits E - N.

3 81. The BAC PLAINTIFFS are informed and believe, and thereon allege, that  
4 DEFENDANTS have no permit issues under RCRA or by the state of California for the storage or  
5 treatment of hazardous or solid waste.

6 82. The continuing failure by DEFENDANTS to effectively remediate the on-going  
7 contamination at the SITE will irreparably harm the BAC PLAINTIFFS, for which harm the BAC  
8 PLAINTIFFS have no plain, speedy or adequate remedy at law.

9 83. Wherefore, THE BAC PLAINTIFFS pray judgment against DEFENDANTS as set  
10 forth hereafter.

11 **FOURTH CLAIM FOR RELIEF**

12 **VIOLATION OF RCRA - 42 U.S.C. § 6972(a)(1)(B)**

13 **(Brought by the BAC CONTAMINATION Plaintiffs Against FCWD, MID, MIDD#1,  
14 COUNTY OF MERCED, CITY OF MERCED, MERCK, AMSTED,  
MEADOWBROOK, BAC-PRITCHARD, TRACK FOUR and DOES 51 - 100)**

15 84. PLAINTIFFS incorporate the allegations set forth above in paragraphs 1 through 56  
16 and 83 and Exhibits E - N and AA - BB as though fully set forth herein. The BAC PLAINTIFFS  
17 are informed and believe, and based on such information and belief allege:

18 85. RCRA § 7002(a)(1)(B), [42 U.S.C. § 6972(a)(1)(B)], provides that any person may  
19 commence a civil action against any person or governmental entity including a past or present  
20 generator, transporter, owner or operator of a treatment, storage or disposal facility who has  
21 contributed to the past or present handling, storage, treatment, transportation, or disposal of any  
22 solid or hazardous waste which may present an imminent and substantial endangerment to health  
23 or to the environment. Civil penalties may be assessed against any person or entity in violation of  
24 this section, under the provisions of RCRA, 42 U.S.C. § 6928 (a) and (g).

25 86. DEFENDANTS are of the class of entities covered by this section of RCRA.

26 87. The SITE has used or stored aforementioned pollutants which have leaked into  
27 groundwater and have been washed off or migrated from the SITE into nearby surface waters.

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1 limitations specified in an NPDES permit define the scope of the authorized exception to the  
2 CWA § 301(a), 33 U.S.C. § 1311(a) prohibition. Without an NPDES permit all surface and  
3 subsurface discharges from Polluters to waters of the United States are illegal.

4 95. PLAINTIFFS provided written notice of DEFENDANTS' violations of CWA, and  
5 of its intent to file suit against DEFENDANTS to the Administrator of the United States  
6 Environmental Protection Agency (hereafter, "EPA"), the Administrator of the Environmental  
7 Protection Agency - Region IX, the Executive Director of the State Water Resources Control  
8 Board and to DEFENDANTS, as required by the CWA. A true and correct copy of the CWA  
9 Notice letters are attached hereto as Exhibits O - Z and fully incorporated into this Complaint.

10 96. DEFENDANTS have no NPDES permit allowing it to discharge pollutants to  
11 waters of the United States as required by CWA § 301(a), 33 U.S.C. § 1311(a).

12 **SIXTH CLAIM FOR RELIEF**

13 **VIOLATION OF CWA - 33 U.S.C. § 1342(a) AND 1342(b)**

14 **(Brought by the BAC CONTAMINATION Plaintiffs Against FCWD, A A & A**  
15 **MID, MIDD#1, COUNTY OF MERCED, CITY OF MERCED, MERCK, AMSTED,**  
16 **MEADOWBROOK, BAC-PRITCHARD, TRACK FOUR and DOES 51 - 100)**

17 97. PLAINTIFFS incorporate the allegations set forth above in paragraphs 1 through 56  
18 and 83-96 and Exhibits O - Z as though fully set forth herein. PLAINTIFFS are informed and  
19 believe, and based on such information and belief allege:

20 98. The Clean Water Act regulates the discharge of pollutants into navigable waters.  
21 The statute is structured in such a way that all discharge of pollutants is prohibited with the  
22 exception of several enumerated statutory exceptions. One such exception authorizes a polluter  
23 who has been issued a NPDES permit pursuant to the Clean Water Act, to discharge designated  
24 pollutants at certain levels subject to certain conditions. Entities must apply for and acquire a  
25 NPDES permit before discharging pollutants to waters of the U.S.

26 99. DEFENDANTS have failed to apply for or acquire a NPDES allowing it to  
27 discharge pollutants to waters of the United States as required by 33 U.S.C. §§ 1342(a) and  
28 1342(b).

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1 **SEVENTH CLAIM FOR RELIEF**

2 **INVERSE CONDEMNATION (Cal. Const. Art. I, Section 19)**

3 **(Brought by the BEACHWOOD Plaintiffs Against FCWD, MID,**  
4 **COUNTY OF MERCED, CITY OF MERCED and DOE Defendants)**

5 100. Plaintiffs reallege, refer to, and herein incorporate by reference as if set out in full  
6 Paragraphs 1 through 64 as set forth above.

7 101. As alleged in plaintiffs' claims for relief under the Clean Water Act, defendants  
8 FCWD, MID, County of Merced, City of Merced and DOE 1 - 50, hereinafter referred to in this  
9 claim as the "PUBLIC ENTITY DEFENDANTS", and each of them, have, since 1970 to the  
10 present, discharged pollutants into surface and subsurface water contaminating the ground water  
11 and soil in the vicinity of the BEACHWOOD PLAINTIFFS real property and/or residence,  
12 resulting in loss of value and habitability of their property. Plaintiffs were unaware of this  
13 ongoing contamination until October of 2006 and could not have been aware of it due to its  
14 latency.

15 102. The contamination as set forth above and in PLAINTIFFS' claims for relief under  
16 the Clean Water Act resulted from public improvements deliberately designed, constructed,  
17 repaired and/or maintained for the benefit of the public and over which THE PUBLIC ENTITY  
18 DEFENDANTS and each of them had and did exercise control and dominion. Therefore said  
19 public improvements were substantial factors in causing PLAINTIFFS' damages as hereinafter set  
20 forth and constituted a taking under Article I, section 19 of the Constitution of the State of  
21 California.

22 103. Further, the PUBLIC ENTITY DEFENDANTS and each of them, deliberately  
23 designed, constructed, and maintained, along El Capitan Canal, dirt embankments having an  
24 inherent tendency to deteriorate, and on April 4, 2006, a portion of the embankment failed to  
25 function as intended and collapsed, allowing water to escape the canal and flood the  
26 BEACHWOOD PLAINTIFFS' real and personal property.

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1           104. Further, the PUBLIC ENTITY DEFENDANTS and each of them, designed,  
2 constructed, and maintained Ashby Road located to the south of the BEACHWOOD  
3 PLAINTIFFS' property and/or residence and in close proximity to the portion of the embankment  
4 which collapsed as described above. Ashby Road is raised above ground level without any means  
5 by which flood water might travel underneath or around the roadway. As a result, Ashby Road  
6 obstructed the flow of flood water which had escaped the channel, causing it to back up and pool  
7 on the BEACHWOOD PLAINTIFFS' real and personal property.

8           105. Further, the PUBLIC ENTITY DEFENDANTS, and each of them, converted Black  
9 Rascal Creek from a natural waterway for use as an irrigation canal and as part of a storm drain  
10 system such that the quantity of water delivered to El Capitan Canal in conjunction with the  
11 rainfall on April 4, 2006, was such as to overtop and/or collapse the dirt embankment, allowing  
12 water to escape from the canal and flood plaintiffs' real and personal property.

13           106. Further, the PUBLIC ENTITY DEFENDANTS, and each of them, failed to  
14 adequately design the channel for and the dirt embankments along El Capitan Canal in that it was  
15 reasonably foreseeable that irrigation water, storm drain runoff, and rainfall, either alone or in  
16 combination, would exceed the capacity of the canal and overtop so as to flood plaintiffs' real and  
17 personal property, which plaintiffs are informed and believe may have occurred before the collapse  
18 of the portion of the embankment as aforesaid and in other areas of the embankment not subject to  
19 collapse.

20           107. Further, the PUBLIC ENTITY DEFENDANTS, and each of them, deliberately  
21 constructed and designed the dirt embankment on the west side of the El Capitan Canal at a height  
22 substantially lower than the embankment on the opposite or east side of the channel. On April 4,  
23 2006, the substantially higher embankment acted so as to cause flood water to flow solely with  
24 injurious momentum onto plaintiffs' real and personal property, instead of with lesser force over  
25 property on both sides of the canal.

26           108. The conditions as set forth above resulted from public improvements deliberately  
27 designed, constructed, repaired and/or maintained for the benefit of the public and over which the  
28 PUBLIC ENTITY DEFENDANTS and each of them had and did exercise control and dominion.

1 Therefore, said public improvements were substantial factors in causing BEACHWOOD  
2 PLAINTIFFS' damages as hereinafter set forth and constituted a taking under Article I, section 19  
3 of the Constitution of the State of California.

4 109. As a legal cause of the public improvements identified above, BEACHWOOD  
5 PLAINTIFFS have sustained and will continue to sustain flooding and contamination resulting in  
6 real and personal property damages, including, but not limited to damage to the structures,  
7 foundations, walls, and personal contents resulting in decreased market value, stigma damage and  
8 loss of habitability of their residences, all in an amount according to proof. The BEACHWOOD  
9 PLAINTIFFS have further incurred and will continue to incur costs of repair for this damage in an  
10 amount not yet ascertained.

11 110. As a further legal cause of the public improvements as identified above,  
12 BEACHWOOD PLAINTIFFS have sustained and will continue to sustain flooding and  
13 contamination, which has prevented plaintiffs from the use and enjoyment of their property all to  
14 their damage in an amount not yet ascertained.

15 111. As a further legal cause of the public improvements as identified above,  
16 BEACHWOOD PLAINTIFFS have sustained and will continue to sustain flooding and  
17 contamination, resulting in economic losses, including, but not limited to wage loss, loss of past  
18 and future income, loss of rental income, relocation expenses, clean-up costs and business  
19 interruption losses, in an amount according to proof.

20 112. As a further legal cause of the damages sustained as a result of the public  
21 improvements identified above, the BEACHWOOD PLAINTIFFS have incurred and will continue  
22 to incur attorneys' fees, appraisal fees, and engineering fees because of this proceeding in an  
23 amount that cannot yet be ascertained but which are recoverable under the provisions of Section  
24 1036 of California Code of Civil Procedure.

25 113. BEACHWOOD PLAINTIFFS have received no compensation from defendants for  
26 their damages.

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1 **EIGHTH CLAIM FOR RELIEF**

2 **INVERSE CONDEMNATION (Cal. Const. Art. I, Section 19)**

3 **(Brought by the DAIRY Plaintiffs Against FCWD, MID, CITY OF MERCED,**  
4 **COUNTY OF MERCED and DOE Defendants)**

5 114. Plaintiffs reallege, refer to, and herein incorporate by reference as if set out in full  
6 Paragraphs 1 through 64 as set forth above.

7 115. The FCWD, MID, City of Merced, County of Merced and DOES 1 - 50, hereinafter  
8 referred to in this claim as the "PUBLIC ENTITY DEFENDANTS" and each of them, have, since  
9 1970 to the present, discharged into surface and subsurface water pollutants which traveled or  
10 migrated to the vicinity of the DAIRY PLAINTIFFS, contaminating their ground water and soil  
11 resulting in loss of value and habitability of their real property. Plaintiffs were unaware of this  
12 ongoing contamination until October of 2006 and could not have been aware of it due to its  
13 latency.

14 116. The contamination as set forth above and in PLAINTIFFS' claims for relief under  
15 the Clean Water Act resulted from public improvements deliberately designed, constructed,  
16 repaired and/or maintained for the benefit of the public and over which the PUBLIC ENTITY  
17 DEFENDANTS, and each of them, had and did exercise control and dominion. Therefore said  
18 public improvements were substantial factors in causing PLAINTIFFS' damages as hereinafter set  
19 forth and constituted a taking under Article I, section 19 of the Constitution of the State of  
20 California.

21 117 Further, the public entity defendants as identified above, DOES 1 - 50, and each of  
22 them, designed, constructed, and maintained, along Black Rascal Creek dirt embankments, having  
23 an inherent tendency to deteriorate and on April 4, 2006, a portion of the embankment failed to  
24 function as intended and collapsed, allowing water to escape Black Rascal Creek and flood the  
25 DAIRY PLAINTIFFS' real and personal property.

26 118. The DAIRY PLAINTIFFS are located generally to the north of Black Rascal Creek  
27 between the creek and Franklin Road. The public entity defendants as identified above, DOES 1 -  
28 50, and each of them, deliberately designed, constructed, and maintained, the embankment on the

1 opposite side of the creek such that it was substantially higher than the embankment adjacent to  
2 and on the DAIRY PLAINTIFFS' side of the creek. On April 4, 2006, the substantially higher  
3 embankment acted so as to cause flood water to flow solely with injurious momentum onto  
4 DAIRY PLAINTIFFS' real property instead of with lesser force over property on both sides of the  
5 creek.

6 119. Further, the PUBLIC ENTITY DEFENDANTS and each of them, designed,  
7 constructed, and maintained, Franklin Road in such a way as it was raised above ground level  
8 without a means by which flood water might travel underneath or around the roadway. As a result,  
9 Franklin Road obstructed the flow of water and caused it to pond on plaintiffs' real property.

10 120. Further, the PUBLIC ENTITY DEFENDANTS and each of them, converted  
11 Black Rascal Creek from a natural waterway for use as an irrigation canal and as part of a storm  
12 drain system such that the quantity of water delivered to Black Rascal Creek in conjunction with  
13 the rainfall on April 4, 2006, was such as to overtop and collapse a portion of the dirt  
14 embankment, allowing water to escape Black Rascal Creek and flood the DAIRY PLAINTIFFS'  
15 real and personal property.

16 121. Further, the PUBLIC ENTITY DEFENDANTS and each of them, failed to  
17 adequately design the channel for and the dirt embankments along Black Rascal Creek in that it  
18 was reasonably foreseeable that irrigation water, storm drain runoff, and rainfall, either alone or in  
19 combination, would exceed the capacity of the creek and overtop it so as to flood plaintiffs' real  
20 property, which plaintiffs are informed and believe may have occurred before the collapse of the  
21 portion of the embankment as aforesaid and in other areas of the embankment not subject to  
22 collapse.

23 122. The conditions as set forth above resulted from public improvements deliberately  
24 designed, constructed, repaired and/or maintained for the benefit of the public and over which the  
25 PUBLIC ENTITY DEFENDANTS and each of them had and did exercise control and dominion.  
26 Therefore said public improvements were substantial factors in causing the DAIRY PLAINTIFFS'  
27 damages as hereinafter set forth and constituted a taking under Article I, section 19 of the  
28 Constitution of the State of California.

1           123. As a legal cause of the public improvements identified above, the DAIRY  
2 PLAINTIFFS sustained and will continue to sustain contamination and flooding to their real and  
3 personal property, such that real and personal property sustained and will continue to sustain,  
4 damage, including, but not limited to damage to the structures, foundations, walls, and personal  
5 contents resulting in decreased market value, stigma damage and loss of habitability of their  
6 residences, all in an amount according to proof. The DAIRY PLAINTIFFS have incurred and will  
7 continue to incur costs of repair for this damage in an amount not yet ascertained.

8           124. As a further legal cause of the public improvements identified above, the DAIRY  
9 PLAINTIFFS sustained and will continue to sustain contamination and flooding to their property,  
10 such that plaintiffs have been prevented from the use and enjoyment of their property all to their  
11 damage in an amount not yet ascertained.

12           125. As a further legal cause of the public improvements as identified above, the  
13 DAIRY PLAINTIFFS sustained and will continue to sustain contamination and flooding to their  
14 real and personal property, such that plaintiffs have suffered economic losses, including, but not  
15 limited to wage loss, loss of past and future income, loss of rental income, relocation expenses,  
16 clean-up costs and business interruption losses, in an amount according to proof.

17           126. As a further legal cause of the damages sustained a result of the public  
18 improvements identified above, the DAIRY PLAINTIFFS have incurred, and will continue to  
19 incur, attorneys' fees, appraisal fees, and engineering fees because of this proceeding in an amount  
20 that cannot yet be ascertained but which are recoverable under the provisions of Section 1036 of  
21 California Code of Civil Procedure.

22           127. DAIRY PLAINTIFFS have received no compensation from defendants for their  
23 damages.

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1 **NINTH CLAIM FOR RELIEF**

2 **INVERSE CONDEMNATION (Cal. Const. Art. I, Section 19)**

3 **(Brought by the THORNTON/LOPES Plaintiffs Against FCWD, MID,**  
4 **COUNTY OF MERCED, CITY OF MERCED and DOE Defendants)**

5 128. Plaintiffs reallege, refer to, and herein incorporate by reference as if set out in full  
6 Paragraphs 1 through 64 as set forth above.

7 129. Defendants FCWD, MID, County of Merced, City of Merced and DOES 1 - 50, and  
8 each of them, hereinafter referred to throughout this claim as the "PUBLIC ENTITY  
9 DEFENDANTS" have, since 1970 to the present, discharged into surface and subsurface water  
10 pollutants which traveled or migrated to the vicinity of the THORNTON/LOPES PLAINTIFFS  
11 real property and/or residence contaminating their ground water and soil, thereby resulting in loss  
12 of value and habitability of their property. Plaintiffs were unaware of this ongoing contamination  
13 until October of 2006 and could not have been aware of it due to its latency.

14 130. The contamination as set forth above and in PLAINTIFFS' claims for relief under  
15 the Clean Water Act resulted from public improvements deliberately designed, constructed,  
16 repaired and/or maintained for the benefit of the public and over which the PUBLIC ENTITY  
17 DEFENDANTS, and each of them, had and did exercise control and dominion. Therefore said  
18 public improvements were substantial factors in causing PLAINTIFFS' damages as hereinafter set  
19 forth and constituted a taking under Article I, section 19 of the Constitution of the State of  
20 California.

21 131. The PUBLIC ENTITY DEFENDANTS, and each of them, deliberately designed,  
22 constructed, and maintained, along Bear Creek dirt embankments, having an inherent tendency to  
23 deteriorate and on April 4, 2006, a portion of the embankment failed to function as intended and  
24 collapsed, allowing water to escape Bear Creek and flood the THORNTON/LOPES PLAINTIFFS'  
25 real and personal property.

26 132. Further, PUBLIC ENTITY DEFENDANTS and each of them, deliberately  
27 designed, constructed, and maintained, the embankments along El Capitan Canal which diverted  
28 the natural flow of the water that had escaped Bear Creek toward plaintiffs' real property.

1           133. Further, a raised earthen berm, deliberately designed, constructed and maintained  
2 by the PUBLIC ENTITY DEFENDANTS and each of them, which ran parallel to Lopes Avenue,  
3 dammed or obstructed the flow of water, and caused it to pond on plaintiffs' real property.

4           134. Further, the PUBLIC ENTITY DEFENDANTS and each of them, converted Bear  
5 Creek from a natural waterway for use as an irrigation canal and as part of a storm drain system  
6 such that the quantity of water delivered to Bear Creek in conjunction with the rainfall on April 4,  
7 2006, was such as to overtop and collapse a portion of the dirt embankment, allowing water to  
8 escape Bear Creek and flood the THORNTON/LOPES PLAINTIFFS' real and personal property.

9           135. Further the PUBLIC ENTITY DEFENDANTS, and each of them, failed to  
10 adequately design the channel for and the dirt embankments along Black Rascal Creek in that it  
11 was reasonably foreseeable the irrigation water, storm drain runoff, and rainfall, either alone or in  
12 combination, would exceed the capacity of the creek and overtop it so as to flood plaintiffs'  
13 property, which plaintiffs are informed and believe may have occurred before the collapse of the  
14 portion of the embankment as aforesaid and in other areas of the embankment not subject to  
15 collapse.

16           136. The conditions as set forth above resulted from public improvements deliberately  
17 designed, constructed, repaired and/or maintained for the benefit of the public and over which the  
18 PUBLIC ENTITY DEFENDANTS and each of them had and did exercise control and dominion.  
19 Therefore said public improvements were substantial factors in causing the THORNTON/LOPES  
20 PLAINTIFFS' damages as hereinafter set forth and constituted a taking under Article I, section 19  
21 of the Constitution of the State of California.

22           137. As a legal cause of the public improvements identified above, THORNTON/  
23 LOPES PLAINTIFFS sustained and will continue to sustain contamination and flooding, such that  
24 real and personal property sustained and will continue to sustain, damage, including, but not  
25 limited to damage to the structures, foundations, walls, and personal contents resulting in  
26 decreased market value, stigma damage and loss of habitability of their residences, all in an  
27 amount according to proof. The THORNTON/LOPES PLAINTIFFS have incurred and will  
28 continue to incur costs of repair for this damage in an amount not yet ascertained.





1           144. Further, the public entity defendants, DOES 1 - 50, and each of them, deliberately  
2 designed, constructed, and maintained, the raised embankment for a lateral irrigation canal  
3 adjacent and behind and to the south of plaintiffs' property which served to dam and obstruct  
4 flood water and cause it to pond on the YOSEMITE PLAINTIFFS' real property.

5           145. Further, the public entity defendants, DOES 1 - 50, and each of them, deliberately  
6 designed, constructed, and maintained, Kirby Road in such a way that it was raised above ground  
7 level without a means by which flood water might travel underneath or around the roadway. As a  
8 result, Kirby Road obstructed the flow of water and caused it to pond on the YOSEMITE  
9 PLAINTIFFS' real property.

10           146. Further, the public entity defendants, DOES 1 - 50, and each of them, deliberately  
11 designed, constructed, and maintained, the Fairfield channel as part of an irrigation system such  
12 that the quantity of water delivered to the Fairfield channel in conjunction with the rainfall on  
13 April 4, 2006, was such as to overtop and collapse a portion of the dirt embankment, allowing  
14 water to escape the Fairfield channel and flood the YOSEMITE PLAINTIFFS' real property.

15           147. Further, the public entity defendants, DOES 1 - 50, and each of them, failed to  
16 adequately design the channel and the dirt embankments along the Fairfield Canal in that it was  
17 reasonably foreseeable that irrigation water, storm drain runoff, and rainfall, either alone or in  
18 combination, would exceed the capacity of the creek and overtop it so as to flood plaintiffs'  
19 property, which plaintiffs are informed and believe may have occurred before the collapse of the  
20 portion of the embankment as aforesaid and in other areas of the embankment not subject to  
21 collapse.

22           148. The conditions as set forth above resulted from public improvements deliberately  
23 designed, constructed, repaired and/or maintained for the benefit of the public and over which the  
24 PUBLIC ENTITY DEFENDANTS, and each of them, had and did exercise control and dominion.  
25 Therefore said conditions and/or structures were substantial factors in causing PLAINTIFFS'  
26 damages as hereinafter set forth and constituted a taking under Article I, section 19 of the  
27 Constitution of the State of California.

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1           155. As alleged in the BAC PLAINTIFFS' claims for relief under the CWA and RCRA  
2 alleged above, defendants FCWD, MID, County of Merced, City of Merced, and DOES 1 - 50,  
3 hereinafter referred to in this claim as the "PUBLIC ENTITY DEFENDANTS," and each of them,  
4 have owned and operated wells which have caused pollutants to be discharged to surface and  
5 ground waters via defendants' conduits such as sewer lines, utilities and the like, facilitating  
6 pollutant migration and discharge to waters of the United States and contributing to the past or  
7 present handling, storage, treatment, transportation or disposal of hazardous waste which may  
8 present an imminent and substantial endangerment to health or the environment of the BAC  
9 CONTAMINATION PLAINTIFFS.

10           156. The contamination and conditions as set forth above and in PLAINTIFFS' claims  
11 for relief under the CWA and RCRA resulted from public improvements deliberately designed,  
12 constructed, repaired and/or maintained for the benefit of the public and over which THE PUBLIC  
13 ENTITY DEFENDANTS and each of them had and did exercise control and dominion. Therefore  
14 said public improvements were substantial factors in causing the BAC PLAINTIFFS' damages as  
15 hereinafter set forth and constituted a taking under Article I, section 19 of the Constitution of the  
16 State of California.

17           157. Upon information and belief, such contamination and pollutant migration has been  
18 occurring on an ongoing basis since at least the 1960s but the BAC CONTAMINATION  
19 PLAINTIFFS were ignorant of such contamination, pollution, and/or the imminent threat of such  
20 contamination or pollution until their receipt of the "Fact Sheet, February 2007" issued by the  
21 California Regional Water Quality Board, mailed to the BAC PLAINTIFFS in or about February  
22 2007.

23           158. As a legal cause of the operation of the public improvements as identified above,  
24 the BAC CONTAMINATION PLAINTIFFS have sustained and will continue to sustain decreased  
25 market value, stigma damage and loss of habitability of their residences, all in an amount  
26 according to proof.

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1 for relief) and/or activities conducted on the site by these companies which violate the provisions  
2 of CWA and RCRA and have contributed to the discharge of pollutants into waters of the United  
3 States in and around Plaintiffs' property and to the past or present handling, storage, treatment,  
4 transportation, or disposal of hazardous waste which has presented an imminent or substantial  
5 endangerment to plaintiffs' health and the environment surrounding plaintiffs' real property.

6 165. Upon information and belief, such contamination and pollutant migration has been  
7 occurring on an ongoing basis since at least the 1960s but the BAC CONTAMINATION  
8 PLAINTIFFS were ignorant of such contamination, pollution, and/or the imminent threat of such  
9 contamination or pollution until their receipt of the "Fact Sheet, February 2007" issued by the  
10 California Regional Water Quality Board, mailed to the BAC PLAINTIFFS in or about February  
11 2007.

12 166. As a legal cause of the negligence alleged above, the BAC PLAINTIFFS have been  
13 exposed to pollutants and to toxic substances and have sustained and will continue to sustain  
14 contamination and/or the imminent threat of such contamination to BAC PLAINTIFFS' real  
15 property resulting in decreased market value, stigma damage and loss of habitability of their  
16 residences, all in an amount according to proof.

17 167. As a further legal cause of the negligence alleged above, the BAC PLAINTIFFS  
18 have been prevented from the use and enjoyment of their property, all to their damage in an  
19 amount according to proof.

20 168. As a further legal cause of the negligence alleged above, BAC PLAINTIFFS have  
21 suffered and will continue to suffer economic losses, including, but not limited to wage loss, loss  
22 of past and future income, loss of rental income, relocation expenses, clean-up costs and business  
23 interruption losses, in an amount according to proof.

24 169. As a further legal cause result of negligence alleged above, BAC PLAINTIFFS  
25 have suffered and will continue to suffer personal injuries. As such, plaintiffs have incurred and  
26 will to continue to incur medical and related expenses, including medical monitoring expenses, all  
27 in an amount according to proof.

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1 contamination and/or the imminent threat of such contamination to BAC PLAINTIFFS' real  
2 property resulting in decreased market value, stigma damage and loss of habitability of their  
3 residences, all in an amount according to proof.

4 175. As a further legal cause of the negligence alleged above, the BAC PLAINTIFFS  
5 have been prevented from the use and enjoyment of their property, all to their damage in an  
6 amount according to proof.

7 176. As a further legal cause of the negligence alleged above, BAC PLAINTIFFS have  
8 suffered and will continue to suffer economic losses, including, but not limited to wage loss, loss  
9 of past and future income, loss of rental income, relocation expenses, clean-up costs and business  
10 interruption losses, in an amount according to proof.

11 177. As a further legal cause result of negligence alleged above, BAC PLAINTIFFS  
12 have suffered and will continue to suffer personal injuries related to the contamination as  
13 previously alleged. As such, plaintiffs have incurred and will to continue to incur medical and  
14 related expenses, including medical monitoring expenses, all in an amount according to proof.

15 178. As a further legal result of the negligence alleged above, plaintiffs have suffered  
16 and will continue to suffer emotional distress, anxiety, fear of illness, depression and other  
17 psychological, emotional and mental injuries resulting from the contamination or threat of  
18 contamination as alleged above.

19  
20 **FOURTEENTH CLAIM FOR RELIEF**

21 **NEGLIGENT MAINTENANCE**

22 **(Brought by All Plaintiffs as to FCWD, MID, COUNTY OF  
23 MERCED, CITY OF MERCED and DOES 1 - 50)**

24 179. Plaintiffs reallege, refer to, and herein incorporate by reference as if set out in full  
25 Paragraphs 1 through 154 as set forth above.

26 180. The public entity defendants as described above, DOES 1 - 50, and each of them,  
27 through their employees, agents, and contractors, whose identities are presently unknown, failed to  
28 exercise due care in the maintenance of the embankments and channels previously identified so as  
to cause portions of the embankments to collapse and the water to otherwise overtop the

1 embankments. Further, defendants and each of them, since 1970 and continuing to the present,  
2 failed to maintain the wastewater treatment refuse and disposal facility which includes a sewage  
3 collection/conveyance system that serves the community where PLAINTIFFS reside, so as to  
4 permit the escape, discharge, seeping and/or migration of pollution to adjacent water ways  
5 resulting in contamination to the ground water and soil in and around plaintiffs' real property.  
6 Plaintiffs were unaware of this ongoing contamination until October of 2006.

7 181. Further, as set forth in the previous claims for relief, the public entity defendants, as  
8 identified above, and DOES 1 - 50, and each of them through their employees, agents, and  
9 contractors, whose identities are presently unknown, failed to exercise due care in the maintenance  
10 of certain wells, sewer lines, and other utilities which have resulted in the facilitation of pollutant  
11 migration and discharge to waters of the United States and contributing to the past or present  
12 handling, storage, treatment, transportation, or disposal of hazardous waste material which  
13 presents an imminent and substantial endangerment to the plaintiffs' health and the environment  
14 surrounding plaintiffs' real property. Plaintiffs were unaware of this ongoing contamination  
15 related to the BAC SITE until February of 2007.

16 182. As a legal cause of the negligent maintenance as alleged above, plaintiffs real and  
17 personal property was flooded and/or contaminated, such that they sustained damage to structures,  
18 foundations, walls and personal contents resulting in decreased market value, stigma damage and  
19 loss of habitability of their residences, all in an amount according to proof. Plaintiffs have  
20 incurred and will continue to incur costs of repair for this damage, in an amount according to  
21 proof.

22 183. As a legal cause of the negligent maintenance as alleged above, plaintiffs' real  
23 property was flooded and /or has and will continue to be contaminated with pollutants such that  
24 plaintiffs have been prevented from the use and enjoyment of their properties, all to their damage  
25 in an amount according to proof.

26 184. As a further legal cause of the negligent maintenance as alleged above, plaintiffs  
27 have suffered and will continue to suffer economic losses, including, but not limited to wage loss,

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1 loss of past and future income, loss of rental income, relocation expenses, clean-up costs and  
2 business interruption losses, in an amount according to proof.

3 185. As a further legal cause of negligent maintenance as alleged above, plaintiffs have  
4 suffered and will continue to suffer personal injuries related to contamination and flooding as  
5 previously alleged. As such, plaintiffs have incurred and will to continue to incur medical and  
6 related expenses, including medical monitoring expenses, all in an amount according to proof.

7 186. As a further legal result of the negligent maintenance as alleged above, plaintiffs  
8 have suffered and will continue to suffer emotional distress, anxiety, fear of illness, depression and  
9 other psychological, emotional and mental injuries resulting from the contamination and flooding  
10 as alleged above.

11 **FIFTEENTH CLAIM FOR RELIEF**

12 **DANGEROUS CONDITION OF PUBLIC PROPERTY**

13 **(Brought by All Plaintiffs Against FCWD, MID,  
14 COUNTY OF MERCED and CITY OF MERCED)**

15 187. Plaintiffs reallege, refer to, and herein incorporate by reference as if set out in full  
16 Paragraphs 1 through 154 as set forth above.

17 188. The defendants listed above and DOES 1 - 50, and each of them, through their  
18 employees, agents and contractors, whose identities are presently unknown, have, since 1970 to the  
19 present, carelessly, negligently, and improperly owned, operated, constructed, managed,  
20 maintained, supervised, and controlled the sewage and storm drain system and sewage treatment  
21 plants such that the close proximity of sewage treatment plants to the irrigation system, the  
22 inability to completely segregate the storm drain and sewage systems and the permeability of the  
23 dirt embankments along the irrigation system created a dangerous condition with the potential of  
24 discharge of pollutants into surface and sub-surface water so as to contaminate ground water. This  
25 condition of public property created a substantial risk of injury when the property was used with  
26 due care and in a reasonably foreseeable manner. Further, the condition created a reasonably  
27 foreseeable risk of the injuries suffered by plaintiffs as hereinafter alleged. The dangerous  
28 condition was created by public employee within the course and scope of his public employment or

1 the public entity had actual or constructive notice of the condition sufficiently before the injuries as  
2 hereinafter alleged to have taken measures to protect against the risk of injury. Plaintiffs were  
3 unaware of this ongoing contamination until October of 2006 and could not have been aware of it  
4 due to its latency.

5 189. The public entity defendants and DOES 1 - 50, and each of them, through their  
6 employees, agents and contractors, whose identities are presently unknown, through their  
7 ownership, operation, construction management, maintenance, supervision, and control of the  
8 levees, channel, water levels of adjoining canals, laterals, and creeks of the irrigation system  
9 created a dangerous condition in that the under-design of the channel and embankments, the  
10 different heights of the embankments on opposite sides of the channel, the natural tendency of dirt  
11 embankments to deteriorate, the discharge of excess water into the system, the presence of raised  
12 roadways and/or the presence of vegetation and debris, all as herein above alleged, created a  
13 dangerous condition with the potential in the event of modest rainfall for water in the system to  
14 overtop and embankments to collapse so as to flood plaintiffs' property. This condition of public  
15 property created a substantial risk of injury when the property was used with due care and in a  
16 reasonably foreseeable manner. Further, the condition created a reasonably foreseeable risk of the  
17 injuries suffered by plaintiffs as hereinafter alleged. The dangerous condition was created by  
18 public employee within the course and scope of his public employment or the public entity had  
19 actual or constructive notice of the condition sufficiently before the injuries as hereinafter alleged  
20 to have taken measures to protect against the risk of injury.

21 190. Further, as set forth in the previous claims for relief, defendants, as identified above,  
22 and DOES 1 - 50, and each of them through their employees, agents, and contractors, whose  
23 identities are presently unknown, failed to exercise due care in the maintenance of certain wells,  
24 sewer lines, and other utilities which have resulted in the facilitation of pollutant migration and  
25 discharge to waters of the United States and contributing to the past or present handling, storage,  
26 treatment, transportation, or disposal of hazardous waste material which presents an imminent and  
27 substantial endangerment to the plaintiffs' health and the environment surrounding plaintiffs' real  
28 property and creating a dangerous condition of public property. This condition of public property

1 created a substantial risk of injury when the property was used with due care and in a reasonably  
2 foreseeable manner. Further, the condition created a reasonably foreseeable risk of the injuries  
3 suffered by plaintiffs as hereinafter alleged. The dangerous condition was created by public  
4 employee within the course and scope of his public employment or the public entity had actual or  
5 constructive notice of the condition sufficiently before the injuries as hereinafter alleged to have  
6 taken measures to protect against the risk of injury. Plaintiffs were unaware of this contamination  
7 related to the BAC SITE until February of 2007.

8 191. As a legal cause of the dangerous conditions as identified above, plaintiffs real and  
9 personal property sustained and/or will continue to sustain damages, including, but not limited to  
10 damage to structures, foundations, walls and personal contents and/or face imminent danger of  
11 contamination resulting in decreased market value, stigma damage and loss of habitability of their  
12 residences, all in an amount according to proof. Plaintiffs have further incurred and will continue  
13 to incur costs of repair for this damage, in an amount according to proof.

14 192. As a legal cause of the dangerous conditions hereinabove alleged, plaintiffs' real  
15 property was flooded and/or has and will continue to be contaminated with pollutants, such that  
16 plaintiffs have been prevented from use and enjoyment of their properties all to their damage, in an  
17 amount according to proof.

18 193. As a further legal cause of the dangerous conditions of public property as alleged  
19 above, plaintiffs have suffered and will continue to suffer economic losses, including, but not  
20 limited to wage loss, loss of past and future income, loss of rental income, relocation expenses,  
21 clean-up costs and business losses, in an amount according to proof.

22 194. As a further legal cause of the dangerous conditions of public property as identified  
23 above, plaintiffs have suffered and will continue to suffer personal injuries. As such, plaintiffs  
24 have incurred and will to continue to incur medical expenses, including medical monitoring costs,  
25 all in an amount according to proof.

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1 plaintiffs have been prevented from use and enjoyment of their properties all to their damage, in an  
2 amount not yet ascertained.

3 201. As a further legal cause of the unreasonable flood barrier as alleged above, plaintiffs  
4 have suffered and will continue to suffer economic losses, including, but not limited to wage loss,  
5 loss of past and future income, loss of rental income, relocation expenses, clean-up costs, and  
6 business losses, in an amount according to proof.

7 202. As a further legal cause of unreasonable flood barrier as identified above, plaintiffs  
8 have suffered and will continue to suffer personal injuries related to the flooding as previously  
9 alleged. As such, plaintiffs have incurred and will to continue to incur medical expenses, including  
10 medical monitoring costs, all in an amount according to proof.

11 203. As a further legal result of the unreasonable flood barrier as identified above,  
12 plaintiffs have suffered and will continue to suffer emotional distress, anxiety, fear of illness,  
13 depression and other psychological, emotional and mental injuries resulting from the  
14 contamination and flooding as alleged above.

15 **SEVENTEENTH CLAIM FOR RELIEF**

16 **NEGLIGENT FAILURE TO DISCLOSE**

17 **(Brought by the RANCHWOOD PLAINTIFFS Against RANCHWOOD and DOES 51 - 100)**

18 204. Plaintiffs reallege, refer to, and herein incorporate by reference as if set out in full  
19 Paragraphs 1 through 37 as set forth above.

20 205. At all times mentioned herein, defendant RANCHWOOD had a legal duty to  
21 disclose to potential buyers of its real property, including but not limited to the RANCHWOOD  
22 PLAINTIFFS herein, any fact materially affecting the value and desirability of the real property  
23 being sold by RANCHWOOD including, but not limited to, any environmental hazards on the  
24 property; any soil or water contamination on the property; and/or any nuisance in or near the real  
25 property being sold by RANCHWOOD.

26 206. At all times relevant to this action, property in close proximity to the Ranchwood  
27 Home development site which is the subject of this litigation (previously referred to in this  
28 Complaint as the "site"), had experienced hazardous waste contamination including, but not

1 limited to, Chromium, Arsenic, Copper, PCP, petroleum constituents and associated solvents that  
2 had contaminated ground water in and around the Ranchwood Development. Upon information  
3 and belief, RANCHWOOD, by and through their agents and employees, knew or should have  
4 known through a reasonably competent and diligent inspection, of the extent of the contamination  
5 at the site and that such contamination presented a potential risk to the health and safety of  
6 residents in the area as well as the potential for soil and ground water contamination of the real  
7 property being sold by RANCHWOOD. Further, RANCHWOOD knew or should have known  
8 that the close proximity of the contamination site, as well as the potential and real threat of  
9 migrating contamination, was a fact materially affecting the value and desirability of the real  
10 property being sold by RANCHWOOD.

11 207. Notwithstanding RANCHWOOD's legal duty as identified above, RANCHWOOD  
12 failed to disclose to any potential home buyers including the RANCHWOOD PLAINTIFFS named  
13 in this action of the existence of the contamination at the BAC facility and its close proximity to  
14 the real property being sold by RANCHWOOD. Had the RANCHWOOD PLAINTIFFS been  
15 informed of such information, they would not have purchased homes from RANCHWOOD in that  
16 area, and would not have suffered the damages hereinafter alleged.

17 208. Upon information and belief, such contamination and pollutant migration has been  
18 occurring on an ongoing basis since at least the 1960s but the BAC CONTAMINATION  
19 PLAINTIFFS were ignorant of such contamination, pollution, and/or the imminent threat of such  
20 contamination or pollution until their receipt of the "Fact Sheet, February 2007" issued by the  
21 California Regional Water Quality Board, mailed to the BAC PLAINTIFFS in or about February  
22 2007. Prior to this time, the RANCHWOOD PLAINTIFFS were unaware of RANCHWOOD's  
23 failure to disclose the material facts known to them or those which should have been known to  
24 them had RANCHWOOD performed a reasonably competent and diligent inspection.

25 209. As a legal cause of RANCHWOOD's breach of its duty to disclose, the  
26 RANCHWOOD PLAINTIFFS have suffered and will continue to suffer decreased market value,  
27 stigma damage and loss of habitability of their residences, all in an amount according to proof.

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1 exercise due care with regard to their ownership and maintenance of the site (as previously  
2 described in plaintiffs' claim for relief under the Clean Water Act and the Resource Conservation  
3 and Recovery Act, incorporated within this claim for relief) and/or conducted activities or  
4 operated facilities on or near the site which violate the provisions of CWA and RCRA and have  
5 contributed to the discharge of pollutants into waters of the United States and to the past or present  
6 handling, storage, treatment, transportation, disposal or migration of hazardous waste or  
7 contaminants which has or may present an imminent or substantial endangerment to plaintiffs'  
8 health and the environment surrounding plaintiffs' real property.

9           216. The contamination of the ground water, soil and air at or near plaintiffs' property  
10 constituted an unlawful interference with plaintiffs' right to exclusive possession of real property  
11 and resulted from defendants' intentional, reckless, negligent, and/or ultra hazardous activities.  
12 The conduct of defendants and the presence of pollution and contamination in and around  
13 plaintiffs' real property occurred without plaintiffs' consent and constitutes an actionable trespass.

14           217. Defendant RANCHWOOD HOMES and DOES 51 - 60, and each of them,  
15 developed tract homes to the north of the Plaintiffs and in conjunction therewith designed and  
16 constructed a raised earthen berm or barrier that in the course of the flood of April 4, 2006,  
17 obstructed and blocked the flood water so as to cause it back up and pond on the property of the  
18 Plaintiffs. Defendant RANCHWOOD HOMES and DOES 51 - 60, and each of them, in their  
19 design and construction of the aforementioned earthen berm or barrier acted unreasonably,  
20 including, but not limited to, a failure to provide a means by which to divert the water away from  
21 plaintiffs' property. As a result of the unreasonable flood barrier constructed by RANCHWOOD  
22 HOMES and DOES 51 - 60, flood water ponded upon the Beachwood Plaintiffs' property and  
23 furthermore resulted in the spread of additional contaminants and pollution originally resulting  
24 from the operation of the Baltimore AirCoil facility and the Franklin County Waste Water  
25 Treatment Facility.

26           218. The presence of flood waters and the spread of contaminants and pollution to  
27 plaintiffs' real property was without plaintiffs' consent and constituted an unlawful interference  
28 with plaintiffs' right to exclusive possession of real property and resulted from defendants'



1 intentional, reckless, negligent, and/or ultra hazardous activities. The conduct of defendants and  
2 the presence of pollution and contamination in and around plaintiffs' real property occurred  
3 without plaintiffs' consent and constitutes an actionable trespass.

4 219. Upon information and belief, such contamination and pollutant migration has been  
5 occurring on an ongoing basis since at least the 1960s but the Plaintiffs were ignorant of such  
6 contamination, pollution, and/or the imminent threat of such contamination or pollution until their  
7 receipt of the "Fact Sheet, February 2007" issued by the California Regional Water Quality Board,  
8 mailed to the PLAINTIFFS in or about February 2007.

9 220. As a legal result of the trespass identified above, plaintiffs real and personal  
10 property sustained and will continue to sustain damages, including, but not limited to damage to  
11 structures, foundations, walls and personal contents, decreased market value, stigma damage and  
12 loss of habitability of their residences, all in an amount according to proof. Plaintiffs have further  
13 incurred and will continue to incur costs of repair for this damage, in an amount not yet  
14 ascertained.

15 221. As a legal cause of the trespass hereinabove alleged, plaintiffs' real property was  
16 flooded and has and will continue to be contaminated with pollutants, such that plaintiffs have  
17 been prevented from use and enjoyment of their properties all to their damage, in an amount  
18 according to proof.

19 222. As a further legal result of trespass as alleged above, plaintiffs have suffered and  
20 will continue to suffer economic losses, including, but not limited to wage loss, loss of past and  
21 future income, loss of rental income, relocation expenses, clean-up costs and business losses, all in  
22 an amount according to proof.

23 223. As a further legal cause of the trespass identified above, plaintiffs have suffered and  
24 will continue to suffer personal injuries. As such, plaintiffs have incurred and will to continue to  
25 incur medical and related expenses and medical monitoring expenses, all in an amount according  
26 to proof.

27 224. As a further legal result of the trespass identified above, plaintiffs have suffered and  
28 will continue to suffer emotional distress, anxiety, fear of illness, depression and other

1 psychological and emotional injuries resulting from the contamination and flooding as alleged  
2 above.

3 **NINETEENTH CLAIM FOR RELIEF**

4 **NUISANCE**

5 **(Brought by All Plaintiffs Against All Defendants)**

6 225. Plaintiffs reallege, refer to, and herein incorporate by reference as if set out in full  
7 Paragraphs 1 through 213 as set forth above.

8 226. The public entity defendants and DOES 1 - 50, and each of them, through their  
9 employees, agents and contractors, whose identities are presently unknown, since 1970 and  
10 continuing thereafter, owned, operated, constructed, managed, maintained, supervised and  
11 controlled the sewage and storm drain system and sewage treatment plants identified above, such  
12 that the discharge of pollutants into surface and subsurface waters , the close proximity of sewage  
13 treatment plants to the irrigation system, the inability to completely segregate the storm drain and  
14 sewage systems and the permeability of the dirt embankments along the irrigation system  
15 contaminated the ground water and soil in the vicinity of the plaintiffs. Plaintiffs were unaware of  
16 this ongoing contamination until October of 2006.

17 227. Further, the public entity defendants and DOES 1 - 50, and each of them, through  
18 their employees, agents and contractors, whose identities are presently unknown, owned, operated,  
19 constructed, managed, maintained, supervised, and controlled the roadways, levees, irrigation  
20 channels, water levels of adjoining channels, laterals, creeks of the irrigation system, raised berms,  
21 and/or raised flood barriers as previously identified and described, so as to cause water to escape  
22 from the irrigation canals, flood plaintiffs' property and pond on it.

23 228. The aforementioned ownership, operation, construction, management, maintenance,  
24 supervision, and control of the storm and sewage treatment systems, sewage treatment plants,  
25 roadways, levees, irrigation channel, water levels of adjoining channels, laterals and creeks of the  
26 irrigation system, contaminated the ground water in the vicinity of plaintiffs, flooded plaintiffs'  
27 property, and allowed water to pond on it, constituting a nuisance under California Civil Code §  
28 3479 in that it deprived plaintiffs of the quiet enjoyment of their property.

1           229. Defendants MERCK, AMSTED, BAC, MEADOWBROOK, J.F. PRITCHARD,  
2 SANTA FE AERO VISTA, and DOES 51 - 100, and each of them, through their employees,  
3 agents and contractors, whose identities are presently unknown, failed to exercise due care with  
4 regard to their ownership of the site (as previously described in plaintiffs' claim for relief under the  
5 Clean Water Act and the Resource Conservation and Recovery Act, incorporated within this claim  
6 for relief and/or activities conducted on the site by these companies which violate the provisions of  
7 CWA and RCRA and have contributed to the discharge of pollutants into waters of the United  
8 States and to the past or present handling, storage, treatment, transportation, or disposal of  
9 hazardous waste which has or may present an imminent or substantial endangerment to plaintiffs'  
10 health and the environment surrounding plaintiffs' real property.

11           230. As further alleged in PLAINTIFFS' claims for relief under the CWA and RCRA  
12 alleged above, defendants FCWD, MID, County of Merced, City of Merced, and DOES 1 - 50, and  
13 each of them, have owned and operated wells and other public facilities which have caused  
14 pollutants to be discharged to surface and ground waters via defendants' conduits such as sewer  
15 lines, utilities and the like, facilitating pollutant migration and discharge to waters of the United  
16 States and contributing to the past or present handling, storage, treatment, transportation or  
17 disposal of hazardous waste which may present an imminent and substantial endangerment to  
18 health or the environment of the PLAINTIFFS.

19           231. Upon information and belief, such contamination and pollutant migration has been  
20 occurring on an ongoing basis since at least the 1960s but the PLAINTIFFS were ignorant of such  
21 contamination, pollution, and/or the imminent threat of such contamination or pollution until their  
22 receipt of the "Fact Sheet, February 2007" issued by the California Regional Water Quality Board,  
23 mailed to the PLAINTIFFS in or about February 2007.

24           232. As a legal result of the nuisances identified above, plaintiffs real and personal  
25 property sustained and will continue to sustain damages, including, but not limited to damage to  
26 structures, foundations, walls and personal contents, decreased market value, stigma damage and  
27 loss of habitability of their residences, all in an amount according to proof. Plaintiffs have further

28 ///

1 incurred and will continue to incur costs of repair for this damage, in an amount not yet  
2 ascertained.

3 233. As a legal cause of the nuisances hereinabove alleged, plaintiffs' real property was  
4 flooded and has and will continue to be contaminated with pollutants, such that plaintiffs have  
5 been prevented from use and enjoyment of their properties all to their damage, in an amount  
6 according to proof.

7 234. As a further legal result of nuisances as alleged above, plaintiffs have suffered and  
8 will continue to suffer economic losses, including, but not limited to wage loss, loss of past and  
9 future income, loss of rental income, relocation expenses, clean-up costs and business losses, all in  
10 an amount according to proof.

11 235. As a further legal cause of the nuisances identified above, plaintiffs have suffered  
12 and will continue to suffer personal injuries. As such, plaintiffs have incurred and will to continue  
13 to incur medical and related expenses and medical monitoring expenses, all in an amount  
14 according to proof.

15 236. As a further legal result of the nuisance identified above, plaintiffs have suffered  
16 and will continue to suffer emotional distress, anxiety, fear of illness, depression and other  
17 psychological and emotional injuries resulting from the contamination and flooding as alleged  
18 above.

19 **PRAYER**

20 WHEREFORE, PLAINTIFFS pray that the Court grant the following relief:

21 **Clean Water Act Violations - Non BAC Contamination:**

22 1) Declare the CWA DEFENDANTS to have violated and to be in violation of the  
23 Clean Water Act;

24 2) Declare the rights of the CWA PLAINTIFFS and the liability of the CWA  
25 DEFENDANTS;

26 3) Issue an injunction ordering the CWA DEFENDANTS to operate in compliance  
27 with the Clean Water Act and, if applicable, the effluent and receiving water limitations in its  
28 NPDES PERMITS, as well as State and Federal standards enforceable under the Clean Water Act;

1           4)       Order the CWA DEFENDANTS to pay civil penalties per violation per day for its  
2 violations of the Clean Water Act;

3           5)       Order the CWA DEFENDANTS to pay the CWA PLAINTIFFS reasonable  
4 attorneys' fees and costs (including expert witness fees), as provided by 33 U.S.C. § 1365(d); and

5           6)       Grant such other and further relief as may be just and proper.

6       **RCRA AND CWA Claims Related to BAC Contamination:**

7           1)       Declare DEFENDANTS to have violated and to be in violation of RCRA.

8           2)       Declare DEFENDANTS to have violated and to be in violation of the CWA.

9           3)       Enjoin DEFENDANTS from violating RCRA;

10          4)       Enjoin DEFENDANTS from violating the CWA;

11          5)       Order DEFENDANTS to comply with the substantive and procedural requirements  
12 of RCRA;

13          6)       Order DEFENDANTS to comply with the substantive and procedural requirements  
14 of the CWA;

15          7)       Order DEFENDANTS to pay civil penalties, pursuant to RCRA provisions,  
16 including §§ 6928(a) and (g), and/or pay for remediation projects to redress harm caused by  
17 DEFENDANTS' violations of RCRA. Each of the above-described violations of RCRA subjects  
18 the violator to a civil penalties on a per day per violation basis. Civil penalties may be assessed for  
19 violations occurring within five (5) years prior to the initiation of a citizen enforcement action;

20          8)       Order DEFENDANTS to pay civil penalties on a per violation per day basis for  
21 their violations of the CWA pursuant to CWA § 309(d), 33 U.S.C. § 1319(d);

22          9)       Enter a judgment that DEFENDANTS be required to pay civil penalties and  
23 exemplary damages according to proof.

24          10)       Enter such preliminary injunctions, permanent injunctions or other orders pursuant  
25 to RCRA or the CWA requiring DEFENDANTS to enjoin and abate the nuisance resulting from  
26 the discharge and release of pollutants, and their migration into soil and groundwater and/or  
27 surface waters.

28       ///

1           11)    Impose injunctive relief requiring DEFENDANTS to immediately investigate,  
2 access and categorize the extent of pollution and implement the best available and current  
3 technology to remediate pollution at the SITE;

4           12)    Impose injunctive relief requiring DEFENDANTS to immediately commence  
5 complete remediation of the contamination at and adjacent to the SITE once the contaminant  
6 plumes have been adequately characterized.

7           13)    Award costs (including reasonable attorney, expert, witness, and consultant fees) to  
8 PLAINTIFFS as authorized by RCRA and the CWA;

9           14)    Award such other relief as this Court may deem appropriate.

10 **Related State Claims:**

11           1)    For general damages according to proof;

12           2)    For special damages including, but not limited to real and personal property  
13 damages, decreased market value, stigma damages, loss of habitability, cost of repair, loss of use  
14 and enjoyment of property, wage loss, loss of past and future income, loss of rental income,  
15 business interruption losses, medical and related expenses, medical monitoring costs, clean-up  
16 costs, and relocation expenses, all in an amount according to proof;

17           3)    For interest on said damages according to proof;

18           4)    For attorneys fees and cost of suit incurred herein, including engineering and  
19 appraisal fees, pursuant to California Code of Civil Procedure § 1036; and

20           5)    For such other and further relief as the court deems just and proper.

21 **DEMAND FOR JURY TRIAL**

22           PLAINTIFFS hereby demand a jury trial as provided by Rule 38(a) of the Federal Rules of  
23 Civil Procedure.

24 Dated: June 12, 2008

MARDEROSIAN, RUNYON, CERCONE  
LEHMAN & ARMO

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27 By: /s/ Michael G. Marderosian, Esq.  
MICHAEL G. MARDEROSIAN,  
Attorney for Plaintiffs above named

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Dated: June 12, 2008

SHERNOFF, BIDART, DARRAS & ECHEVERRIA

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MICHAEL J. BIDART,  
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Dated: June 12, 2008

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JACK SILVER,  
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Dated: June 12, 2008

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