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13 **UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

14 NEWPORT SURFRIDER, LLC, on
15 behalf of itself and all others similarly
16 situated,

17 Plaintiff,

18 vs.

19 AMPLIFY ENERGY CORPORATION, a
20 Delaware corporation, BETA
21 OPERATING COMPANY LLC, dba
22 BETA OFFSHORE, a Delaware LLC,
23 SAN PEDRO BAY PIPELINE
24 COMPANY, a California corporation,
and JOHN DOES 1 through 10,

25 Defendants.

Case No. _____

CLASS ACTION

COMPLAINT

DEMAND FOR JURY TRIAL

1 **I. INTRODUCTION**

2
3 1. Plaintiff Newport Surfrider, LLC (“Plaintiff”), individually and
4 on behalf of all others similarly situated, alleges the following against
5 Defendants Amplify Energy Corp., Beta Operating Company LLC dba Beta
6 Offshore, San Pedro Bay Pipeline Company, and John Does 1 through 10
7 (collectively “Defendants”), based on personal knowledge, information and
8 belief, and, where applicable, the investigation and research of counsel.

9 **II. NATURE OF THE ACTION**

10 2. This complaint has its genesis in the pollution of the waters of
11 San Pedro Bay adjacent to the Southern California coastline. On October 2,
12 2021, and reportedly as early as October 1, 2021, an underwater oil pipeline
13 about 5 miles off the coast of Huntington Beach, California ruptured,
14 releasing thousands of barrels of crude oil into the Pacific Ocean. The
15 rupture created a toxic, 13-square-mile, and migrating, slick off the shore of
16 Huntington Beach. The oil slick has since spread east and south, depositing
17 oil on beaches and into coastal wetlands rich in biodiversity.

18 3. The 17-mile long, 41-year-old pipeline (“Old Bay Pipeline”)
19 from where this oleaginous slick (the “Spill”) emanated rests mostly atop
20 the Pacific Ocean floor about 98 feet under the surface of the water; water of
21 vital and irreplaceable significance to human and other biological life as
22 well as to human commerce. About 16-inches in diameter, the steel pipe is
23 encased in concrete and traverses San Pedro Bay, an inlet of the Pacific
24 Ocean. The Old Bay Pipeline, operated by Beta Offshore and/or San Pedro
25 Bay Pipeline Company (“San Pedro Bay”), both subsidiaries of Houston-
26 based Amplify Energy Corporation (“Amplify”), connects a series of three
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1 offshore oil rig platforms with an onshore oil storage, processing and
2 transportation facility in the Port of Long Beach.

3 4. In Orange County, California, the county closest to the rupture,
4 the Spill has deposited crude oil along stretches of shoreline and wetlands
5 in Newport Beach, Laguna Beach, Dana Point, and Huntington Beach,
6 killing fish and birds, threatening ecologically sensitive wetlands, and
7 closing numerous beaches in what officials are calling an environmental
8 catastrophe.



20 Photo: Workers walk past dead marine life in Newport Beach on October 6, 2021.

21 5. On October 4, 2021, in response to this human-made
22 catastrophe, Governor Gavin Newsom proclaimed a state of emergency
23 ([KM C454e-20211004211817 \(ca.gov\)](https://www.ca.gov/newsroom/2021/10/04/governor-newsom-proclames-state-of-emergency-in-orange-county-to-respond-to-oil-spill-off-the-coast-of-huntington-beach)) in Orange County to support the
24 emergency response to the oil spill off the coast of Huntington Beach that
25 originated in federal waters. “The state is moving to cut red tape and
26 mobilize all available resources to protect public health and the
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1 environment,” said Governor Newsom. “As California continues to lead the
2 nation in phasing out fossil fuels and combating the climate crisis, this
3 incident serves as a reminder of the enormous cost fossil fuels have on our
4 communities and the environment.”



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17 Photo: AP photo of Southern California Oil Spill.

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19 6. At the Governor’s direction, the state has deployed personnel
20 from the Department of Fish and Wildlife’s Office of Spill Prevention and
21 Response and the Governor’s Office of Emergency Services to the incident
22 command in Long Beach to closely coordinate with the U.S. Coast Guard,
23 local agencies and responsible parties on the response, cleanup and
24 mitigation of the oil spill. In addition, agencies from across the
25 administration are on the ground actively supporting various elements of
26 the response, including staff from California State Parks, California
27 Volunteers, California State Lands Commission, CAL FIRE and the Office of

1 Environmental Health Hazard Assessment, among others.

2 7. Just days later, on Thursday, October 7, 2021, officials in San
3 Diego County issued a related public health advisory recommending that
4 residents avoid contact with beach “tar balls” ([Incident Page](#)
5 [\(sdcountyemergency.com\)](#)). This was in response to reports of clumps of tar
6 that have begun appearing on beaches in the San Diego County
7 communities of Oceanside, Encinitas and Carlsbad. The extent of the crude
8 oil’s southern migration is evolving and remains unclear. As of October 10,
9 2021, Shoreline Cleanup and Assessment Teams continue to closely monitor
10 and clean up numerous beaches in both San Diego County and Orange
11 County ([Incident Page \(sdcountyemergency.com\)](#)).

12 8. Further, as a precautionary measure, Officials of the Department
13 of Fish and Wildlife deployed a protective boom across the mouth of the
14 Agua Hedionda Lagoon (“AH Lagoon”) in Carlsbad. The AH Lagoon is a
15 vital but threatened coastal wetland ecosystem that provides a home to
16 hundreds of fish, mammals, birds, plants and other species. The AH Lagoon
17 also feeds into a desalinization plant. On a daily basis, the plant provides
18 approximately 50 million gallons of water to San Diego County.

19 9. The Spill has also required massive expenditures on cleanup
20 efforts:

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Photo: Workers clean up oil in Newport Beach on 10/6/21.

10. The pipeline (the “Old Bay Pipeline” or the “Pipeline”) is owned and/or operated by Defendant Amplify and its subsidiaries, Defendants Beta Offshore and San Pedro Bay (collectively, the “Pipeline Defendants”). The Pipeline rupture sent tens of thousands of gallons of toxic crude oil flowing over some of Southern California’s most beautiful beaches and waters.

11. Before the Pipeline Defendants shut off the Pipeline, it had discharged crude oil in an amount initially estimated to be in excess of one hundred thousand gallons. Current estimates range between 25,000 and 131,000 gallons. Oil coated the shoreline and clung to rocks, sand, wild animals, and marine life. The Spill has polluted beaches and damaged coastal private properties. The damage to Plaintiff and the related Class members is sudden in onset, massive in scope, indeterminate in duration, and cross-species in impact.

1 12. The beachfront properties along the Southern Coast of
2 California, like coastal properties throughout the state, are highly valuable.
3 The property owners enjoy the unspoiled sand and water, direct access to
4 fishing, surfing, kayaking, and other activities.

5 13. This depressingly familiar story could have been averted had
6 the Pipeline Defendants: (a) adequately maintained the Pipeline, making it
7 less susceptible to corrosion and rupture, (b) adequately monitored the
8 Pipeline for indications of damage that could lead to future leaks, and (c)
9 been properly prepared and promptly acted when the spill began, including
10 when a low-pressure alarm first indicated that there was a problem.

11 14. Regular maintenance of pipelines is a crucial step that owners of
12 pipelines must take in order to avoid exactly the disaster that occurred with
13 the Pipeline.

14 15. Plaintiff brings this action pursuant to Federal Rule of Civil
15 Procedure 23 on behalf of itself and as a representative of others similarly
16 situated to recover significant economic losses they have incurred and will
17 continue to incur because of Defendants' oil spill.

18 **III. PARTIES**

19 16. Plaintiff Newport Surfrider, LLC is a citizen of Orange County,
20 California. Plaintiff is a business that operates ocean tours in Orange
21 County, California, including whale and dolphin tours, Pacific Ocean sunset
22 tours, and tours of Newport Harbor. Plaintiff employs captains and other
23 employees and independent contractors in the provision of its services.
24 Plaintiff also owns water craft used in its business. Due to the beach
25 closures in Orange County, California that have resulted from the oil spill
26 caused by Defendants, Plaintiff has lost money and profits and its business
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1 will continue to be affected in the future.

2 17. Defendant Amplify Energy Corporation (“Amplify”), is a
3 Delaware corporation with its headquarters and principal place of business
4 in Houston, Texas. Pursuant to 28 U.S.C. § 1332(c)(1), Defendant Amplify is
5 therefore a citizen of Delaware and Texas.

6 18. Defendant Beta Operating Company, LLC, dba Beta Offshore
7 (“Beta”) is a Delaware LLC, with its headquarters and principal place of
8 business in Houston, Texas. It is a subsidiary of Amplify. Under the Class
9 Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1332(d)(10), Defendant
10 Beta is therefore a citizen of Delaware and Texas.

11 19. Defendant San Pedro Bay Pipeline Company (“San Pedro Bay”)
12 is a California corporation with its corporate offices in Texas. San Pedro
13 Bay is a subsidiary company of Amplify. San Pedro Bay operates the
14 Pipeline which transports crude oil from Elly and other rigs to an oil storage
15 and transportation facility in Long Beach, California.

16 20. Defendants John Does 1-10 are persons whose identity is not yet
17 known to Plaintiff, but who, upon information and belief, are responsible
18 for the injuries suffered by Plaintiff. Plaintiff will amend the complaint
19 once the identities of the Doe defendants are ascertained.

20 21. On information and belief, Plaintiff alleges that Amplify, Beta,
21 San Pedro Bay, and John Does 1-10 are jointly and severally liable for the
22 actions and conduct enumerated herein that form the basis of the following
23 claims for negligence and/or wrongdoing.

24 22. On information and belief, Defendants John Does 1 through 10,
25 are corporations, partnerships, or entities, the names and addresses of
26 which are currently unknown. Plaintiff reserves the right to obtain leave of
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1 court to amend this Complaint to specify the identities of Defendants John
2 Does as the information becomes available.

3 23. Defendants own and operate the Pipeline, a crude oil pipeline
4 system approximately 17 miles long, beginning offshore at Platform Elly
5 and related platforms and ending onshore at the Beta Pump Station.

6 **IV. JURISDICTION AND VENUE**

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8 24. This court has subject matter jurisdiction over this case. This
9 Court has diversity jurisdiction over this action pursuant to CAFA, 28
10 U.S.C. § 1332(d), because at least one class member is of diverse citizenship
11 from one defendant; there are more than 100 class members; and the
12 aggregate amount in controversy exceeds \$5 million, exclusive of interest
13 and costs. Further, this court has federal question jurisdiction because this
14 case involves rights and obligations that arise under federal laws, including
15 43 U.S.C. § 1331.

16 25. This Court has personal jurisdiction over Defendants because
17 they are registered to conduct business in California, they regularly do
18 conduct business in California, and otherwise have sufficient minimum
19 contacts with California.

20 26. Venue is proper in this District under 28 U.S.C. § 1391(b)
21 because a substantial part of the events or omissions giving rise to the
22 claims occurred and/or emanated from this District, and because
23 Defendants have caused harm to Class members residing in this District.

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1 **V. FACTS**

2 **A. The Orange County Coast**

3 27. The Orange County Coast is a special place with blue water,
4 iconic piers, famous surf breaks, and beautiful beaches.

5 28. Much of the economic life in this region revolves around the
6 coastal areas and beaches. Thousands of people in Orange County depend
7 on the ocean and beaches for work and play. Beachfront property owners
8 enjoy direct access to blue waters and magnificent coastline, and residents
9 walk the beaches, fish from the shores, swim, surf, kayak and use and enjoy
10 their properties.

11 29. Now contamination by Defendants' oil spill has undermined the
12 health of the environment, and the coastal beachfront real property.

13 30. Threats to the Southern California environment and economy
14 from oil development are not new. In 1969, a blowout at Union Oil's off-
15 shore drill rig sent millions of gallons of oil into the waters and onto the
16 beaches of Santa Barbara County. The blowout killed thousands of birds,
17 dolphins, fish, and other marine life, and swamped beaches along the coast
18 with oil. The litigation that followed effectively led to the birth of the
19 environmental movement and legislation to protect the environment and
20 the public from oil and gas operations on and off shore.

21 31. Six years ago, the Plains oil pipeline spill near Santa Barbara
22 decimated fishing areas and oil washed up on beaches from Santa Barbara
23 to Orange County. While state and local governments and some companies
24 have taken significant steps to make the production and transportation of
25 crude oil safer and more reliable, Defendants do not have a respectable
26 track record.

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B. The Failure of Defendants' Pipeline

32. The San Pedro Bay Pipeline is approximately 17 miles in length, beginning offshore at Platform Elly and traveling onshore to the Beta Pump Station in the City of Long Beach, California. The offshore portion of the Pipeline is approximately 15 miles in length and the onshore portion is approximately 2 miles in length.

33. The San Pedro Bay Pipeline traverses a High Consequence Area (HCA) as defined in 49 C.F.R. § 195.450 and an ecologically unusually sensitive area as defined in § 195.6.

34. The Pipeline was installed in 1980. It has a 16-inch nominal diameter with 0.500-inch wall thickness for the offshore portion and 0.375-inch wall thickness for the onshore portion. The Pipeline consists of X-42 grade pipe, and has a double-submerged arc-welded longitudinal seam. The pipe coating type is concrete. The onshore portion is cathodically-protected and the offshore portion has sacrificial anodes on the pipeline.

35. Prior to the rupture, the San Pedro Bay Pipeline was reported to be operating at approximately 300-400 psig. The maximum operating pressure (MOP) of the San Pedro Bay Pipeline is 1152 psig.

36. Reports about a possible oil spill off the coast of Huntington Beach were left on a federal hotline on Friday night, October 1, 2021, nearly

1 16 hours before the U.S. Coast Guard and local officials publicly confirmed
2 the spill's existence, according to government records.¹

3 37. At approximately 02:30 PDT on October 2, 2021, Defendants'
4 control room personnel received a low-pressure alarm on the San Pedro Bay
5 Pipeline, indicating a possible failure.

6 38. Despite the presence of this alarm, it was over three hours
7 before Defendants reported, at approximately 06:01 PDT on October 2, 2021,
8 that the San Pedro Bay Pipeline had been shut down.

9 39. At 09:07 PDT on October 2, 2021, more than six hours after the
10 initial alarm, and three hours after Defendants shut down the Pipeline,
11 Defendants reported the incident to the National Response Center ("NRC"),
12 indicating that there was a release of crude oil in the vicinity of its pipeline
13 near Platform Elly. The U.S. Coast Guard subsequently submitted NRC
14 reports reporting the presence of oiled marine life and dead fish, and
15 reporting that the failure may have been caused by a crack in the Pipeline.

16 40. The exact failure location is currently unknown, but preliminary
17 reports indicate the failure location is approximately 5 miles offshore at a
18 depth of approximately 98 feet. On October 6, 2021, Defendants' CEO,

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21 ¹ <https://www.ocregister.com/2021/10/04/first-reports-of-oil-slick-off-huntington-beach-came-day-before-public-was-notified/>, last visited
22 October 7, 2021.

1 Martyn Willsher stated that a 4,000 ft section of the pipeline appears to have
2 a 13-inch split along the length of the pipe.²

3 41. Various state and federal agencies responded to the scene,
4 including the U.S. Coast Guard, BSEE, NTSB, PHMSA, CDFW, and local
5 law enforcement. Private oil spill response organizations under contract
6 with Defendants also responded to the incident.

7 42. While the precise timeline of events is currently under
8 investigation, it appears that Defendants did not promptly act to respond to
9 signs of the Pipeline's failure or notify relevant government agencies. That
10 apparent delay and inadequate response runs contrary to Defendants' oil
11 spill response plan.

12 43. Despite the efforts of volunteers and professional responders,
13 the spill affected numerous Marine Protected Areas as well as beaches from
14 Huntington Beach and south.

15 44. As the oil spread, so did its terrible consequences. Fish, birds,
16 and marine mammals died after being covered in oil or exposed to the oil's
17 toxic compounds. Tar balls and oil sheen from Defendants' oil spill fouled
18 beaches far to the south of Huntington Beach.

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20 ² [https://losangeles.cbslocal.com/2021/10/06/huntington-beach-oil-spill-](https://losangeles.cbslocal.com/2021/10/06/huntington-beach-oil-spill-section-pipeline-damaged-moved-100-feet-along-ocean-floor/)
21 [section-pipeline-damaged-moved-100-feet-along-ocean-floor/](https://losangeles.cbslocal.com/2021/10/06/huntington-beach-oil-spill-section-pipeline-damaged-moved-100-feet-along-ocean-floor/) , last visited
22 October 7, 2021.

1 45. In Southern California, these environmental impacts translate to
2 profound economic impacts. The spill's pollution of coastal private
3 properties impairs the ability of property owners to use and enjoy their
4 land.

5 46. Finally, the oil spill presents a serious risk to human life.
6 Residents are being warned to avoid all areas affected by the spill, due to
7 risk of fumes.

8 47. Long term, the impacts may be as-yet-unknown, but they are no
9 less certain. Even with the best spill response, toxic oil will remain in the
10 environment for a long time, continuing to harm the environment, pollute
11 beaches, and wreak economic havoc on residents and businesses.

12 **C. Defendants Have a History of Reckless Compliance**
13 **Violations**

14 48. While this spill is a disaster, it is not an accident. Defendants
15 wantonly disregarded the health and safety of the public and environment
16 by operating the Pipeline when they knew they did not have proper safety
17 systems in place.

18 49. Between 2013 and 2014, federal regulators fined Beta a total of
19 \$85,000 for violations that, in two instances, led to injuries of workers. Since
20 2010, Beta has also been issued 125 noncompliance violations by federal
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1 inspectors, according to a database maintained by the federal Bureau of
2 Safety and Environmental Enforcement, which is responsible for inspecting
3 offshore oil platforms.³

4 50. Defendants have profited and continue to profit from their
5 failure to comply with safety requirements and guidelines. Their decision
6 not to maintain, repair and/or replace the Pipeline, or keep it safe from
7 damage, demonstrates Defendants' willingness to prioritize profits over
8 public safety.

9 51. Defendants knew of the extremely high risk of catastrophic
10 injury inherent in the transportation of oil through a pipeline. Defendants
11 avoided taking action to protect Plaintiff and the Class from apparent risks
12 the Pipeline presented. Defendants demonstrated a callous and reckless
13 disregard for human life, health, and safety by operating the Pipeline
14 without proper maintenance and safety equipment.

15 52. This disregard for the rights of others and the rule of law is part
16 of a pattern and practice that Defendants have demonstrated. Defendants
17 acted with such indifference to the consequences of their misconduct, with
18 such recklessness, and as part of a well-established pattern, as to be willful,
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21 ³ <https://www.data.bsee.gov/Company/INCs/Default.aspx> , last visited
22 October 7, 2021.

1 malicious, and oppressive, and in disregard of the rights of the Plaintiff and
2 the Class, thereby meriting an award of punitive and/or exemplary
3 damages against Defendants.

4 53. In short, Defendants operated a pipeline that failed. The
5 communities through which it transports oil, and most particularly the
6 beachfront property owners and renters, suffer the consequences.

7 54. This lawsuit therefore seeks to compensate the victims of the
8 spill and to ensure that Defendants are prevented from causing additional
9 damage to the state economy, the environment, and real property residents
10 in the future.

11 **VI. PLAINTIFF'S FACTS**

12 55. Plaintiff is a family owned and operated whale watching and
13 adventure tour provider in Orange County California. Plaintiff employs
14 experienced sea captains to guide expeditions on the Pacific Ocean and
15 Newport Harbor and employs various independent contractors to provide
16 mechanic and other boat related services. Plaintiff offers whale watching
17 tours, dolphin watching tours, sunset cruises, and cruises of Newport
18 Harbor and the Pacific Ocean. Plaintiff's entire business is operated on or
19 adjacent to Orange County beaches that depend on the beaches remaining
20 open for Plaintiff to derive business and income from local residents and
21 tourists.

22 56. Due to the beach closures in Orange County, California that
23 have resulted from the oil spill caused by Defendants, Plaintiff has lost
24 money, wages and profits and its earnings and profits will continue to be
25 adversely affected in the future.
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1 **VII. CLASS ACTION ALLEGATIONS**

2 57. Plaintiff asserts this class action individually and on behalf of all
3 other similarly situated class members pursuant to Federal Rules of Civil
4 Procedure 23(a), 23(b)(1)(A), and 23(b)(3). This action is asserted and
5 properly maintained as a class action because the requirements of
6 numerosity, adequacy, typicality, and commonality set forth in the Rules
7 are satisfied by Plaintiff. Plaintiff is therefore qualified and entitled to act as
8 a representative party pursuant to Federal Rule of Civil Procedure 23(a).

9 58. As detailed in the individual counts below, Plaintiff seeks to
10 represent a Class defined as follows:

11 **All persons, real and corporate, and other entities**
12 **experiencing business, personal and/or commercial losses in**
13 **the Orange County and San Diego County, California coastal**
14 **cities, including but not limited to Huntington Beach,**
15 **Newport Beach, Dana Point, Laguna Beach, Oceanside,**
16 **Carlsbad, Encinitas, Del Mar and La Jolla, beginning on or**
17 **around October 1, 2021 and ongoing as a result of the Spill.**

18 Excluded from the above Class is any entity in which Defendants have a
19 controlling interest, and Defendants' officers and directors. Also excluded
20 from this Class is any judge or judicial officer presiding over this matter and
21 the members of his or her immediate family and judicial staff.

22 59. Due to the nature of the Spill, the Class is ascertainable. The
23 Class, as defined, categorizes groups of unnamed plaintiffs by setting forth
24 a set of common characteristics sufficient to allow a member of that group
25 to self-identify as having a right to recover based on the description. The
26 description includes reference to a specific time frame and governmental
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1 and geographic subdivisions. Either direct, or otherwise proper and
2 sufficient, notice of this action may be provided to the Class members
3 through notice published in local and national newspapers, or other
4 appropriate publications.

5 60. The Class satisfies the numerosity requirement. The affected
6 beach cities enumerated above, spanning two Counties with millions of
7 residents and thousands of businesses, have been directly affected by the
8 Spill. Huntington Beach, directly adjacent to the Spill, is home to over
9 10,000 businesses.⁴ The Class is therefore likely to exceed tens of thousands
10 of members, making the Class so numerous that a joinder of all members
11 would be impracticable.

12 61. Common questions of law and fact abound. A specific
13 community of interests in the questions of law or fact that affects all
14 members of the Class exists. Common questions of law or fact are
15 substantially similar to, and predominate over, questions that may affect
16 only individual Class members. This action is open to a class-wide
17 calculation of damages by utilizing expert testimony to determine damages
18 applicable to all Class members. Common questions of law and fact include
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21 ⁴ Taken from Huntington Beach's website:
22 <https://www.huntingtonbeachca.gov/business/> last visited October 7, 2021.
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1 the following:

2 A. Whether Defendants are strictly liable for the harm
3 created by the Spill from the pipeline;

4 B. Whether Defendants have engaged in an
5 ultrahazardous activity as defined by the relevant statutes;

6 C. Whether Defendants have created a public nuisance,
7 and the nature and extent of that nuisance;

8 D. Whether Defendants have created a private nuisance,
9 and the nature and extent of that nuisance;

10 E. Whether the Defendants were negligent in their
11 construction, repair, maintenance, supervision and operation of
12 the Old Bay Pipeline;

13 F. Whether Defendants owed any duties to Class
14 Members, and the extent of those duties;

15 G. Whether Defendants breached one or more of those
16 duties to Class Members;

17 H. Whether Defendants' actions and/or inactions were a
18 substantial factor in damaging Class Members;

19 I. Whether Defendants' Spill and surrounding actions
20 caused physical and/or economic damages to Class Members'
21 businesses, and the extent of those damages;

22 J. Whether Defendants violated any California statutes,
23 including California's laws related to the environment and to
24 business and employment; and

25 K. The calculation of damages incurred by the Class
26 Members.

1 62. Plaintiff's claims are typical of the members of the Class. The
2 factual evidence regarding the Spill and related actions and the legal
3 theories regarding Defendants' actions and inactions related to the Spill are
4 substantially the same for Plaintiff and the other members of the Class.

5 63. Plaintiff will fairly and adequately protect the interests of the
6 Class members. Plaintiff has suffered harm from the Spill. Plaintiff has now
7 retained competent, knowledgeable, and experienced class action litigation
8 counsel to ensure fair and adequate representation of the Plaintiff and the
9 Class. Plaintiff and its counsel intend to prosecute this action carefully and
10 vigorously.

11 64. Prosecution of separate actions by separate Class members
12 creates a risk of inconsistent or varying judgments and adjudications with
13 respect to individual Class members that could establish incompatible
14 standards of conduct for the party (or parties) opposing the Class and could
15 lead to unnecessary, expensive, and repetitious trials of the numerous
16 common questions of fact and law.

17 65. Common questions of law and fact predominate over questions
18 affecting only individual members, and a class action is superior to other
19 available methods for the fair and efficient adjudication of the dispute.
20 Plaintiff knows of no difficulty that will be encountered in the management
21 of this litigation that would preclude its maintenance as a class action.
22 Because the injury suffered by any individual Class member may be
23 relatively small, the time, expense and burden of individual litigation
24 makes it virtually impossible for Plaintiff and Class members individually
25 to pursue actions for the Defendants' wrongful conduct related to the Spill.
26 If individual Class members could afford individual litigation, it could be
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1 unduly burdensome to the courts in which those actions would proceed.
2 The class action expedient is preferable to individual litigation because it
3 provides the economies of scale inherent in a single, comprehensive
4 adjudication.

5 **VIII. CAUSES OF ACTION**

6 **First Claim for Relief**

7 **Strict Liability under Lempert-Keene-Seastrand Oil Spill Prevention and** 8 **Response Act, Government Code Section 8670, *et seq.***

9 66. Plaintiff incorporates by reference each and every prior and
10 subsequent allegation of this Complaint as if fully restated here.

11 67. The Lempert-Keene-Seastrand Oil Spill Prevention and
12 Response Act (“the Act”) provides that “[a] responsible party, as defined in
13 Section 8670.3, shall be absolutely liable without regard to fault for any
14 damages incurred by any injured party which arise out of, or are caused by,
15 the discharge or leaking of oil into or onto marine waters.” Cal. Gov’t Code
16 Section 8670.56.5(a).

17 68. The Pacific Ocean and the waters off the California Coast are
18 “marine waters” as defined in Section 8670.3(j).

19 69. Defendants are “responsible part[ies],” which includes “the
20 owner or transporter of oil or a person or entity accepting responsibility for
21 the oil.”

22 70. The oil transported through the Pipeline is “oil” within the
23 meaning of the Act, which defines “oil” as “any kind of petroleum, liquid
24 hydrocarbon, or petroleum products or any fraction or residues therefrom,”
25 including “crude oil.”

26 71. As the responsible parties for the oil transported through Line
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1 901, the Pipeline Defendants are absolutely liable under the Lempert-Keene-
2 Seastrand Act.

3 72. On or before October 2, 2021, Defendants discharged or leaked
4 crude oil into the Pacific Ocean, and are therefore absolutely liable without
5 regard to fault for all damages that Plaintiff and the Class sustained or will
6 sustain. That discharge was not permitted by state or federal law.

7 73. The Act entitles a plaintiff to recover a wide variety of damages,
8 including, but not limited to, loss of subsistence use of natural resources;
9 injury to, or economic losses resulting from destruction of or injury to, real
10 or personal property, which shall be recoverable by any claimant who has
11 an ownership or leasehold interest in property; loss of taxes, royalties, rents,
12 or net profit shares caused by the injury, destruction, loss, or impairment of
13 use of real property, personal property, or natural resources; and loss of
14 profits or impairment of earning capacity due to the injury, destruction, or
15 loss of real property, personal property, or natural resources. *See generally*
16 Cal. Gov't Code Section 8670.56.5(h).

17 74. The contamination illegally caused by the discharge of crude oil
18 into or upon area beaches and the Pacific Ocean caused injury to and
19 destruction of real or personal property, as well as impairment of earning
20 capacity of Plaintiff and the Class.

21 75. Plaintiff has ownership or leasehold interests in real or personal
22 property damaged by Defendants' oil spill; Plaintiff's livelihood and
23 earning capacity, and the livelihoods of its employees and independent
24 contractors, depend directly on the integrity of the pipeline not rupturing
25 and damaging real and personal property and the natural resources in and
26 around the Pacific Ocean, and along the California coastline; and/or
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1 Defendants' damage to real property, personal property, and natural
2 resources has caused Plaintiff a loss of taxes, royalties, rents, or net profit; or
3 all of the above, Defendants are liable to Plaintiff and the Class under the
4 Act.

5 76. The injury, destruction, loss, and/or impairment of usability of
6 these natural resources has caused Plaintiff and the Class to lose profits, and
7 will cause future losses of profits and/or impair their earning capacities.

8 77. The lasting effects of contamination related to the discharge of
9 toxic crude oil into the Pacific Ocean and coastal areas, which Plaintiff and
10 the Class rely on, requires that Plaintiff and the Class continue future
11 monitoring and testing activities in order to ensure that the toxic oil from
12 the spill does not further contaminate and degrade Plaintiff's property, and
13 that their earning capacity is not impaired.

14 **Second Claim for Relief**
15 **Strict Liability for Ultrahazardous Activities**

16
17 78. Plaintiff incorporates by reference each and every prior and
18 subsequent allegation of this Complaint as if fully restated here.

19 79. At all times herein, Defendants were the owners and operators
20 of the Pipeline.

21 80. At all times relevant to this action, Defendants had supervision,
22 custody, and control of the Pipeline.

23 81. At all times herein, Defendants were under a continuing duty to
24 protect the Plaintiff and the Class from the harm caused by the Pipeline.

25 82. Defendants were engaged in ultrahazardous activities by
26 transporting flammable, hazardous, and toxic oil through the Pipeline.

27 83. Plaintiff and the Class have suffered harm from the discharge of

1 toxic oil from the Pipeline and have suffered immediate, direct and negative
2 impacts from the spill.

3 84. The injuries sustained by Plaintiff and the Class as a result of the
4 oil spill were the direct and proximate result of Defendants' activities.

5 85. The harm to Plaintiff and the Class was and is the kind of harm
6 that would be reasonably anticipated as a result of the risks created by
7 transporting flammable, hazardous, and toxic oil in a Pipeline which was
8 not properly or safely maintained in close proximity to the Pacific Ocean.

9 86. Defendants' operation of the Pipeline and its failure was a
10 substantial factor in causing the harms suffered by Plaintiff and the Class.

11 87. Due to Defendants' strict liability, Plaintiff and Class members
12 are entitled to recover actual damages.

13 88. The acts and omissions of Defendants were conducted with
14 malice, fraud, and/or oppression as set out in this Complaint.

15 **Third Claim for Relief**

16 **Negligence**

17 89. Plaintiff incorporates by reference each and every prior and
18 subsequent allegation of this Complaint as if fully restated here.

19 90. Defendants owed a duty to Plaintiff and the Class to exercise
20 reasonable and ordinary care. That duty arose generally as well as from,
21 among other things, federal, state, and local laws, ordinances and
22 regulations that require Defendants to operate a pipeline in a manner that
23 does not damage public health and safety, or pose a threat to real property.
24 These laws include, but are not limited to, the Lempert-Keene Act,
25 Government Code Section 8670, *et seq.*, the Porter-Cologne Act, Water Code
26 Sections 13000, *et seq.*, Cal. Fish & Game Code Section 5650, *et seq.*, the
27 Federal Clean Water Act, 33 U.S.C. § 1251 *et seq.*, and state and federal spill

1 response and notification laws.

2 91. Defendants breached their duty to Plaintiff and the Class by,
3 among other things, failing to install reasonable safety equipment to
4 prevent a spill, failing to detect and repair corrosion, and failing to
5 promptly respond to and contain the spill.

6 92. Defendants, in the exercise of reasonable care, should have
7 known that the Pipeline could rupture or otherwise fail, and spill significant
8 amounts of oil, and cause damage to beachfront real property.

9 93. In addition, Defendants' violations of the above-cited statutes,
10 ordinances, and/or regulations resulted in precisely the harm to Plaintiff
11 that the laws listed above were designed to prevent, and Plaintiff and the
12 Class are members of the class of persons for whose protection those laws
13 were adopted.

14 94. At all times herein mentioned, Defendants negligently,
15 wantonly, carelessly and/or recklessly maintained and operated the
16 Pipeline.

17 95. As a direct and proximate result of Defendants' negligence,
18 Plaintiff and the Class have sustained damages. Those damages take
19 primarily two forms: short-term and long-term. As a direct and legal cause
20 of the Defendants' wrongful acts and omissions herein set forth above,
21 Plaintiff and the Class have suffered and will continue to suffer real
22 property damage, economic harm, injury to earning capacity, and losses.

23 96. The short-term damages include loss of use and enjoyment of
24 beachfront and oceanfront real property because of oil polluting the beaches
25 and waters, as well as potential lost rental income and profits from
26 vacationers and tourists visiting Southern California.

1 97. The long-term damages include physical injury to property in
2 which Plaintiff has a direct ownership interest.

3 98. The oil spill's long-term damages may also diminish the values
4 of oceanfront and beachfront real properties along the coast that have been
5 polluted by Defendants' oil.

6 99. The acts and omissions of Defendants, and each of them, were
7 conducted with malice, fraud, and/or oppression as described in this
8 Complaint.

9 **Fourth Claim for Relief**
10 **Violations of California's Unfair Competition Law**
11 **Cal. Bus. & Prof. Code §§ 17200, *et seq.***

12 100. Plaintiff incorporates by reference each and every prior and
13 subsequent allegation of this Complaint as if fully restated here.

14 101. Defendants have engaged in and continue to engage in unfair
15 competition in violation of California's Unfair Competition Law ("UCL").

16 102. Defendants' conduct constitutes "fraudulent" business practices
17 within the meaning of the UCL in that members of the public have been
18 harmed.

19 103. Defendants' conduct amounts to "unfair" business practices as
20 the UCL forbids all wrongful business activities in any context in which
21 they appear. Moreover, as described above, Defendants' practices offend
22 established public policies, are immoral, unethical, oppressive, and
23 unscrupulous. The impact of Defendants' practices is in no way mitigated
24 by any justifications, reason, or motives. Defendants' conduct has no utility
25 when compared to the harm done to Plaintiff and members of the Class.

26 104. Defendants' conduct is "unlawful" because it violated laws
27 including but not limited to the Lempert-Keene Act, Government Code

1 Section 8670, *et seq.*, the Porter-Cologne Act, Water Code Sections 13000, *et*
2 *seq.*, Cal. Fish & Game Code Section 5650, *et seq.*, the Oil Pollution Act, and
3 local, state, and federal spill notification laws, and the oil spill response
4 plans required by federal, state, and local laws. Federal, state, and local
5 officials have announced investigations into Defendants' conduct related to
6 the spill, so it is reasonable to infer that Defendants may have violated other
7 laws.

8 105. As a direct and proximate result of Defendants' unfair,
9 fraudulent, and unlawful methods of competition and unfair and deceptive
10 acts or practices, Plaintiff and the Class have sustained injury in fact and
11 have lost money or property, including but not limited to a diminishment in
12 assets and value of assets, for which they seek injunctive relief. The relief
13 sought includes, but is not limited to, an order requiring Defendants to do
14 the following: restore the area real properties and beaches impacted by the
15 spill; repair short- and long-term damages to coastal properties; repair
16 reputational damage done to coastal property values; and prevent
17 Defendants from operating the Pipeline without adequate safety
18 mechanisms and ongoing monitoring, to ensure that no future spill occurs.

19 106. Plaintiff and the Class have no adequate remedy at law for the
20 injuries that will result from failure of the Defendants to safely replace
21 and/or repair, operate, and maintain the Pipeline and it could be impossible
22 for Plaintiff and the Class to determine the precise amount of damages they
23 will suffer if Defendants' conduct is not restrained and Plaintiff is forced to
24 institute a multiplicity of suits to obtain adequate compensation for injuries
25 and harm to the Class.

26 107. The acts and omissions of Defendants were done with malice,
27

1 fraud, and/or oppression as described in this Complaint.

2 **Fifth Claim for Relief**

3 **Public Nuisance**

4 108. Plaintiff incorporates by reference each and every prior and
5 subsequent allegation of this Complaint as if fully restated here.

6 109. Defendants have created a condition that is harmful to health
7 and interferes with the comfortable enjoyment of life and property by
8 discharging hundreds of thousands of gallons of crude oil into the Pacific
9 Ocean and onto the California coastline.

10 110. That nuisance affects a substantial number of individuals
11 similarly situated to the Plaintiff, such as citizens of and visitors to Southern
12 California beaches, and real property owners and lessees.

13 111. Defendants' oil spill is a condition which would reasonably
14 annoy and disturb an ordinary person, as shown by, for example, the health
15 impacts warned of by the county, the community outrage in response to
16 the spill, and the nationwide interest in the spill's impacts on the Southern
17 California Coast.

18 112. The seriousness and gravity of that harm outweighs the social
19 utility of Defendants' conduct. There is little or no social utility associated
20 with releasing tens of thousands of gallons of oil into the unique ecological
21 setting of Southern California.

22 113. Plaintiff and the Class suffered harm and injury to their
23 economic livelihood, which they did not consent to and which is different
24 from the type of harm suffered by the general public.

25 114. The above acts and omissions also created a public nuisance vis-
26 à-vis the Plaintiff and the Class, interfering with the property rights of
27 Plaintiff and the Class, and rights incidental to those property rights.

1 115. The acts and omissions of Defendants described herein were
2 also in violation of various California state laws including but not limited to
3 the Lempert-Keene Act, Government Code Section 8670, *et seq.*, the Porter-
4 Cologne Act, Water Code Sections 13000, *et seq.*, Cal. Fish & Game Code
5 Section 5650, *et seq.*, and local laws.

6 116. Defendants' violations of those statutes directly and
7 proximately caused, and will cause, injury to the Plaintiff and the Class of a
8 type which the statutes are intended to prevent. Plaintiff and the Class are
9 of the class of persons for whose protection these statutes were enacted.

10 117. As a direct and legal cause of Defendants' wrongful acts and/or
11 omissions herein set forth above, Plaintiff and the Class have suffered and
12 will suffer economic harm, injury, and losses.

13 118. To remedy the harm caused by Defendants' nuisance, Plaintiff
14 will seek public injunctive relief, including, but not limited to, an order
15 requiring Defendants to do the following: restore the area real properties
16 and beaches impacted by the spill; repair short and long term damages to
17 coastal properties; repair reputational damage done to coastal property
18 values; and prevent Defendants from operating the Pipeline without
19 adequate safety mechanisms and ongoing monitoring, to ensure that no
20 future spill occurs.

21 119. In maintaining the nuisance, which is ongoing, Defendants are
22 acting with full knowledge of the consequences and damage being caused,
23 and the acts and omissions of Defendants, were done with malice, fraud,
24 and/or oppression as described in this Complaint.

25 **Sixth Claim for Relief**

26 **Negligent Interference with Prospective Economic Advantage**

27 120. Plaintiff incorporates by reference each and every prior and

1 subsequent allegation of this Complaint as if fully restated here.

2 121. Plaintiff and the Class have existing or prospective economic
3 relationships with citizens of Southern California, visitors to Orange
4 County, and other individuals and organizations doing business in and
5 related to Orange County.

6 122. These relationships have a reasonably probable likelihood of
7 resulting in future economic benefits or advantages to Plaintiff and the
8 Class.

9 123. Defendants knew or should have known of these existing and
10 prospective economic relationships.

11 124. Defendants owed a duty to Plaintiff and the Class to avoid
12 negligent or reckless conduct that would interfere with and adversely affect
13 the existing and prospective economic relationships of Plaintiff and the
14 Class.

15 125. Defendants breached that duty to Plaintiff and the Class by,
16 among other things, failing to install and/or maintain reasonable safety
17 equipment to prevent such a spill, failing properly to maintain the pipeline
18 in a safe condition, and failing to promptly respond to and contain the spill.

19 126. Defendants knew or should have known that, if they failed to
20 act with reasonable care, the existing and prospective economic
21 relationships of Plaintiff and the Class would be interfered with and
22 disrupted.

23 127. Defendants were negligent and failed to act with reasonable
24 care as herein set forth above.

25 128. Defendants engaged in wrongful acts and/or omissions as
26 herein set forth above, including but not limited to their violations of
27

1 federal, state, and local laws that require Defendants to operate the Pipeline
2 in a manner that does not damage public health and safety.

3 129. As a direct and proximate result of Defendants' wrongful acts
4 and/or omissions, Defendants negligently and recklessly interfered with
5 and disrupted the existing and prospective economic relationships of
6 Plaintiff and the Class.

7 130. As a direct and proximate result of Defendants' wrongful acts
8 and/or omissions, Plaintiff and the Class have suffered and will suffer
9 economic harm, injury, and losses as herein set forth above.

10 **Seventh Claim for Relief**

11 **Trespass**

12 131. Plaintiff who has a real property interest in water front property
13 brings this on behalf of itself and all other similarly situated land owners or
14 lessees. Plaintiff incorporates by reference each and every prior and
15 subsequent allegation of this Complaint as if fully restated here.

16 132. Defendants discharged a polluting matter beyond the boundary
17 of Plaintiff's and Class Members' real property in such a manner that it was
18 reasonably foreseeable that the pollutant would, in due course, invade
19 Plaintiff's and Class Members' real property and cause harm.

20 133. By discharging polluting matter, Defendants entered, invaded,
21 and intruded on the real properties of Plaintiff and the Class Members
22 without privilege, permission, invitation, or justification.

23 134. Defendants had a duty to use reasonable care not to enter,
24 intrude on, or invade Plaintiff's and Class Members' real properties.
25 Defendants also owed a duty to Plaintiff and members of the Class to
26 exercise reasonable care in the manufacture, maintenance, and operation of
27 the Pipeline.

1 135. Defendants had a heightened duty of care to Plaintiff and the
2 Class because of the great danger associated with transporting oil so near to
3 pristine coastal residential areas and nearby real properties along the
4 Southern California Coast.

5 136. Defendants breached the duty they owed to Plaintiff and
6 members of the Class when they failed to exercise reasonable care in the
7 manufacture, maintenance, and operation of the Pipeline, which conduct
8 resulted in entry, intrusion, or invasion on Plaintiff's and Class Members'
9 real properties.

10 137. Defendants knew or should have known that their conduct
11 would foreseeably result in a disastrous oil spill, causing damage to the real
12 properties and economic interests of persons in the area affected by the
13 spill.

14 138. As a direct and proximate result of Defendants' trespass,
15 Plaintiff and Class Members have suffered legal injury and damages, in an
16 amount to be proven at trial, including, but not limited to, property
17 damage, diminution of value of real estate, loss of income and other
18 economic loss.

19 139. Defendants' wanton or reckless conduct, as described herein,
20 entitles Plaintiff and Class Members to punitive damages.

21 **Eighth Claim for Relief**

22 **Private Nuisance**

23 140. Plaintiff who has a real property interest in water front property
24 brings this claim on behalf of itself and all other similarly situated land
25 owners or lessees. Plaintiff incorporates by reference each and every prior
26 and subsequent allegation of this Complaint as if fully restated here.

27 141. Defendants' actions and inactions caused, maintained, and/or

1 permitted the contamination alleged in this action by its negligence,
2 intentional or otherwise, actionable acts, and/or omissions.

3 142. Defendants created the contamination at issue, which is harmful
4 to both human health and the environment and interferes with Plaintiff's
5 comfortable use and enjoyment of the real property in which it has a
6 possessory interest.

7 143. Defendants were, at all relevant times, in sufficient control of the
8 Pipeline to have known of the threatened release of oil and associated
9 hydrocarbons and to have prevented the resulting contamination.
10 Defendants knew or should have known that their operation of the failed
11 pipeline would have, and did, cause the contamination described herein.

12 144. Despite knowledge and forewarning, Defendants failed to take
13 reasonable steps to prevent the failure which resulted in the contamination
14 at issue.

15 145. Defendants failed to take reasonable steps to abate the
16 contamination at issue, which continues to spread to previously
17 uncontaminated areas. The contamination is, however, abatable, and,
18 therefore, it is continuing in nature. This also confirms that Defendants have
19 knowingly maintained the nuisance, *i.e.* the contamination at issue. In the
20 alternative, the contamination and/or resulting diminution in property
21 value is not reasonably abatable and permanent in nature.

22 146. Plaintiff did not consent to the ongoing and/or permanent
23 damage to the use and enjoyment of its property as a result of Defendants'
24 actions and inactions.

25 147. After having a reasonable opportunity to do so, Defendants
26 failed to take reasonable measures to properly abate the contamination
27

1 described herein. In the alternative Defendants are unable to reasonably
2 abate the contamination and resulting diminution of value of Plaintiff's
3 property.

4 148. As a direct and proximate cause, Defendants' acts and omissions
5 have caused substantial actual damage and immediate and ongoing
6 diminution of the value of Plaintiff's real property and the property of the
7 Class and/or have caused substantial permanent diminution of value of
8 Plaintiff's property.

9 149. As a result, Plaintiff has and will continue to suffer damages,
10 both economic and otherwise.

11 150. The contamination described herein constitutes a nuisance
12 within the meaning of Section 3479 of California Civil Code.

13 151. Plaintiff is informed and believes, and on that basis alleges, that
14 the contamination is continuing and abatable and/or the contamination
15 and/or diminution in value of Plaintiff's property is permanent and not
16 reasonably abatable.

17 152. As a proximate result of the nuisance, Plaintiff has and will
18 suffer damages of a continuing and/or permanent nature.

19 **Ninth Claim for Relief**

20 **Nuisance Per Se**

21 153. Plaintiff who has a real property interest in water front property
22 brings this claim on behalf of itself and all other similarly situated land
23 owners or lessees. It incorporates by reference each and every prior and
24 subsequent allegation of this Complaint as if fully restated here.

25 154. The contamination constitutes a nuisance within the meaning of
26 Section 3479 of California Civil Code.

27 155. Plaintiff is in the class of persons protected under these statutes

1 from Defendants and their violations thereof due to the fact that Defendants
2 have, at all times relevant, owned, operated, maintained, supervised and/or
3 controlled the Pipeline.

4 156. Defendants violated California Civil Code section 3479 by their
5 failure to properly abate the contamination, and by allowing contamination
6 to continue to spread.

7 157. As a proximate result of the nuisance, Plaintiff has and will
8 suffer damages of a continuing and/or permanent nature.

9 **Tenth Claim for Relief**
10 **Permanent Injunction**

11 158. Plaintiff incorporates by reference each and every prior and
12 subsequent allegation of this Complaint as if fully restated here.

13 159. Beginning on or about October 2, 2021, and continuing to the
14 present time, Defendants, and each of them, wrongfully and unlawfully
15 caused oil to spill onto surrounding areas, into the Pacific Ocean, and onto
16 coastal real properties.

17 160. In the absence of an injunction, Defendants will continue to
18 violate the rights of Plaintiff and the Class. Defendants, and each of them,
19 have refused and still refuse to refrain from their wrongful conduct.

20 161. Defendants' wrongful conduct, unless and until enjoined and
21 restrained by order of this court, will cause great and irreparable injury to
22 Plaintiff and the Class.

23 162. Plaintiff and the Class have no adequate remedy at law for the
24 injuries that will result from failure of the Defendants to safely replace
25 and/or repair, operate, and maintain their pipeline and it could be
26 impossible for Plaintiff and the Class to determine the precise amount of
27 damages they will suffer if Defendants' conduct is not restrained and

1 Plaintiff is forced to institute a multiplicity of suits to obtain adequate
2 compensation for injuries and harm to the Class.

3 **IX. REQUEST FOR RELIEF**

4 Plaintiff, individually and on behalf of all others similarly situated,
5 requests judgment against Defendants as follows:

6 A. For an order certifying the Class and appointing Plaintiff as a
7 representative of the Class and appointing the lawyers and law firm
8 representing Plaintiff as counsel for the Class;

9 B. For an order permanently enjoining Defendants from operating
10 the Pipeline without adequate safety and response measures and ongoing
11 monitoring;

12 C. For all recoverable compensatory, statutory, and other damages
13 sustained by Plaintiff and the Class, including all relief allowed under
14 applicable laws;

15 D. For costs;

16 E. For both pre-judgment and post-judgment interest on any
17 amounts awarded;

18 F. For appropriate injunctive relief, including public injunctive
19 relief; *i.e.*, an order requiring Defendants to do the following: require
20 Defendants to restore property values impacted by the spill; repair
21 reputational damage done to oceanfront and beachfront real property along
22 California's Southern Coast; and an order requiring Defendants to operate
23 the Pipeline in such a way to ensure no further spills and resulting losses of
24 jobs;

25 G. For treble damages insofar as they are allowed by applicable
26 laws;

1 H. For appropriate individual relief as requested above;

2 I. For payment of attorneys' fees and expert fees as may be
3 allowable under applicable law, including Cal. Gov't Code section
4 8670.56.5(f) and the Private Attorneys General Act;

5 J. For exemplary or punitive damages under Cal. Civ. Code
6 Section 3294 for the oppression, fraud, and malice alleged above; and

7 K. For such other and further relief, including declaratory relief, as
8 the Court may deem just and proper.

9 **X. DEMAND FOR JURY TRIAL**

10 Plaintiff hereby demands a trial by jury on all issues so triable.

11
12 Dated: October 11, 2021

Respectfully submitted,
BOTTINI & BOTTINI, INC.
Francis A. Bottini, Jr. (SBN 175783)
Albert Y. Chang (SBN 296065)
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16
17 *s/ Francis A. Bottini, Jr.*

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Attorneys for Plaintiff

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Class Action Alleges Amplify Energy Could Have Prevented SoCal Oil Spill](#)
