UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA—ORLANDO DIVISION

EMILIO SAN MARTIN; ERIC RUTLEDGE; WENDY STONE; KEVIN KIELY; KRISTEN SHEEN; JEFF KOZAK; BRIAN SLUSARZ; KRISTI HUJIK; HELEN TOSTI; BRENDAN HAVENS; ERIC SAPERSTEIN; ANA SAPERSTEIN; and ARI SAPERSTEIN; Plaintiffs, v. LOCKHEED MARTIN CORPORATION Defendant.	Case No.: **COMPLAINT** **JURY TRIAL DEMANDED**

Plaintiffs Emilio San Martin, Eric Rutledge, Wendy Stone, Kevin Kiely, Kristen Sheen, Jeff Kozak, Brian Slusarz, Kristi Hujik, Helen Tosti, Brendan Havens, Eric Saperstein, Ana Saperstein, and Ari Saperstein, ("Plaintiffs") sue Defendant Lockheed Martin Corporation ("Lockheed Martin" or "Defendant") and, based on personal knowledge and on investigation of counsel and review of public documents and information, alleges as follows:

INTRODUCTION

1. Plaintiffs bring this action against Lockheed Martin Corporation, the owner and operator of weapons manufacturing facilities at 5600 Sand Lake Road, Orlando, FL 32819 ("Orlando Facility"), for damages resulting from Defendant's dangerous and reckless mismanagement of extremely hazardous toxins, including but not limited to,, heavy metals, persistent environmental pollutants, and Volatile Organic Compounds ("VOC").

2. Lockheed Martin's dangerous failures at the Orlando Facility occurred over decades. The Orlando Facility manufactures weaponry and associated components, and began

operations in 1957. The operations at the Orlando Facility utilize chemicals that are among the most toxic to human health on earth, and require the utmost care and handling.

3. Instead of carefully managing these toxins from the moment they arrived at the facility, and ensuring they were properly used, stored, and disposed of, Lockheed Martin stored toxins in leaking storage tanks, collected and transported waste materials in leaking underground piping systems, and dumped thousands of tons of highly toxic waste sludges into trenches dug throughout the Orlando Facility.

4. Lockheed Martin's stunning indifference to environmental protection and human health resulted in staggering levels of contamination at the Orlando Facility. For instance, the EPA has set a regulatory limit of 5 parts per billion, and a goal of 0 parts per billion ("ppb"), for contaminants such as methylene chloride and trichloroethylene. Trichloroethylene has been detected in concentrations as high as 386,000 ppb in groundwater under the Orlando Facility. Methylene Chloride has been detected in concentrations as high as 213,600 ppb in groundwater under the Orlando Facility.

5. Trichloroethylene and methylene chloride, like many of the contaminants present at the Orlando Facility, are artificial chemicals that do not occur naturally. They are known as Volatile Organic Compounds because they are unstable and vaporize into the air from contaminated soil and groundwater. Once these chemicals are airborne, they can be inhaled and cause profoundly harmful effects to the human body.

6. The contaminants present at the Orlando Facility damage virtually every human bodily system. These contaminants have intense effects on the central nervous system, cause blood disorders, are toxic to the liver, kidneys, skin, heart, and the immune system. These

contaminants damage the respiratory system, skeletal system, reproductive system, and endocrine system, and cause birth defects and developmental disorders.

7. Many of the contaminants present at the Orlando Facility are powerful carcinogens and cause a wide array of different cancers.

8. The contaminants present at the Orlando Facility are harmful to humans through any route of exposure. They will damage human health if they are inhaled, swallowed, or touch the skin.

9. The severe and widespread soil and groundwater contamination at the Orlando Facility poses extreme risks to those who live and work nearby. Residents and workers in the area, including plaintiffs, have been exposed to this contamination by activities that cause contaminated soils to become airborne and move offsite. Due to the volatile nature of the contaminants originating from the Orlando Facility, residents and workers nearby, including plaintiffs, have also been exposed to contaminants that have off-gassed from the soil and groundwater and moved offsite with the wind.

10. After creating an environmental nightmare at the Orlando Facility, Lockheed Martin's subsequent efforts to treat contaminated soil and groundwater Orlando Facility have perversely, and dramatically, increased the risks of exposure and harm to those working and living nearby.

11. Lockheed Martin installed numerous packed tower air strippers and air sparge systems designed to separate contaminants from millions of gallons of groundwater. Likewise, several soil vapor extraction systems were installed to remove contaminants from millions of tons of soil.

12. These air strippers, air sparge systems, and soil vapor extraction systems do not destroy the contaminants, they merely induce a phase change which causes the pollutants to become gaseous. To protect residents and workers nearby from exposure, the air strippers and soil vapor extraction systems would have to collect the gaseous toxins in sealed collection systems.

13. Astonishingly, Lockheed Martin failed to contain the gaseous toxins extracted from the soil and groundwater treatment systems, but instead expelled concentrated amounts of these harmful chemicals directly into the air that plaintiffs breathed.

14. In doing so, Lockheed Martin addressed a situation which was already hazardous to plaintiffs, and other people working and living nearby, by dramatically and recklessly increasing their risks, and the amounts, of exposure to the contamination at the Orlando Facility.

15. Plaintiffs come now seeking damages relating to the lifechanging and debilitating diseases they have suffered as a result of their exposure to contaminants released from Lockheed Martin's Orlando Facility.

PARTIES

16. Plaintiff Emilio San Martin is a citizen of Florida and lives in Miami-Dade County, Florida. Because of Defendant's operations at the Orlando Facility, plaintiff has been exposed to, and consumed, harmful levels of contamination. This exposure and consumption has caused plaintiff to suffer the injuries alleged herein.

17. Plaintiff Eric Rutledge is a citizen of Florida and lives in Orange County, Florida. Because of Defendant's operations at the Orlando Facility, plaintiff has been exposed to, and consumed, harmful levels of contamination. This exposure and consumption has caused plaintiff to suffer the injuries alleged herein.

18. Plaintiff Wendy Stone is a citizen of Florida and lives in Lake County, Florida. Because of Defendant's operations at the Orlando Facility, plaintiff has been exposed to, and consumed, harmful levels of contamination. This exposure and consumption has caused plaintiff to suffer the injuries alleged herein.

19. Plaintiff Kevin Kiely is a citizen of Pennsylvania and lives in Allegheny County, Pennsylvania. Because of Defendant's operations at the Orlando Facility, plaintiff has been exposed to, and consumed, harmful levels of contamination. This exposure and consumption has caused plaintiff to suffer the injuries alleged herein.

20. Plaintiff Kristen Sheen is a citizen of Florida and lives in Orange County, Florida. Because of Defendant's operations at the Orlando Facility, plaintiff has been exposed to, and consumed, harmful levels of contamination. This exposure and consumption has caused plaintiff to suffer the injuries alleged herein.

21. Plaintiff Jeff Kozak is a citizen of Florida and lives in Orange County, Florida. Because of Defendant's operations at the Orlando Facility, plaintiff has been exposed to, and consumed, harmful levels of contamination. This exposure and consumption has caused plaintiff to suffer the injuries alleged herein.

22. Plaintiff Brian Slusarz is a citizen of Florida and lives in Orange County, Florida. Because of Defendant's operations at the Orlando Facility, plaintiff has been exposed to, and consumed, harmful levels of contamination. This exposure and consumption has caused plaintiff to suffer the injuries alleged herein.

23. Plaintiff Kristi Hujik is a citizen of Florida and lives in Orange County, Florida. Because of Defendant's operations at the Orlando Facility, plaintiff has been exposed to, and

consumed, harmful levels of contamination. This exposure and consumption has caused plaintiff to suffer the injuries alleged herein.

24. Plaintiff Helen Tosti is a citizen of Florida and lives in Orange County, Florida. Because of Defendant's operations at the Orlando Facility, plaintiff has been exposed to, and consumed, harmful levels of contamination. This exposure and consumption has caused plaintiff to suffer the injuries alleged herein.

25. Plaintiff Brendan Havens is a citizen of Florida and lives in Orange County, Florida. Because of Defendant's operations at the Orlando Facility, plaintiff has been exposed to, and consumed, harmful levels of contamination. This exposure and consumption has caused plaintiff to suffer the injuries alleged herein.

26. Plaintiff Eric Saperstein is a citizen of Florida and lives in Orange County, Florida. Because of Defendant's operations at the Orlando Facility, plaintiff has been exposed to, and consumed, harmful levels of contamination. This exposure and consumption has caused plaintiff to suffer the injuries alleged herein. Plaintiff brings claims on behalf of himself and his minor child Ari Saperstein.

27. Plaintiff Ana Saperstein is a citizen of Florida and lives in Orange County, Florida. Because of Defendant's operations at the Orlando Facility, plaintiff has been exposed to, and consumed, harmful levels of contamination. This exposure and consumption has caused plaintiff to suffer the injuries alleged herein. Plaintiff brings claims on behalf of herself and her minor child Ari Saperstein.

28. Plaintiff Ari Saperstein is a minor child and citizen of Florida and lives in Orange County, Florida. Because of Defendant's operations at the Orlando Facility, plaintiff has been

exposed to, and consumed, harmful levels of contamination. This exposure and consumption has caused plaintiff to suffer the injuries alleged herein.

29. Defendant Lockheed Martin Corporation is a Delaware corporation with its headquarters and principal place of business at 6801 Rockledge Drive, Bethesda, Maryland 60093. At all relevant times, Lockheed Martin and its predecessors in interest in law and fact owned and operated the Orlando Facility.

JURISDICTION AND VENUE

30. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332. The parties are citizens of different states and the amount in controversy exceeds $75,000 exclusive of interest and costs.

31. This Court has jurisdiction over Lockheed Martin because Lockheed Martin operates the Orlando Facility in this District. Through its regular business operations in this District, Lockheed Martin intentionally and regularly avails itself of the markets and jurisdiction in this District, conferring this Court with personal jurisdiction over Lockheed Martin.

32. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(1) and (2) because a substantial part of the events and omissions giving rise to this action occurred in this District, Defendant's operations in this District caused contamination to be emitted within this District, causing harm to Plaintiffs residing and working in this District.

STATEMENT OF FACTS

A. THE ORLANDO FACILITY

33. The Orlando Facility was built and began operations in 1957. The facility was initially owned and operated by the Martin Company, which became Martin Marietta in 1961. In March 1995, Martin Marietta and Lockheed Corp. merged to become Lockheed Martin.

34. The facility occupies a site approximately 2.5 miles by 1.8 miles between Sand Lake Road to the north, Bee Line Expressway to the south, and Universal Boulevard (formerly known as Republic Drive) to the west. It is approximately a half mile from Sea World and a mile from Universal Studios.

35. Throughout the course of its operations, the Orlando Facility has been used to manufacture heavy weaponry and artillery, including nuclear capable Pershing ballistic missiles, nuclear capable Sprint antiballistic missiles, Walleye and Bullpup guided missiles, Lacrosse and Patriot surface to air missiles, and Hellfire air to surface missiles. The facility also produced communications and microelectronics systems, processed and reproduced photographic imagery, and engaged in plating and micro-plating activities. Lockheed Martin serviced and modified helicopters and armored vehicles at the facility and operated a two-mile long laser target range. Other areas of focus at the Orlando Facility include electro-optics, smart munitions, anti-armor, and air defense technologies.

36. Since beginning operations at the Orlando Facility, Lockheed Martin has been storing, utilizing and disposing of toxic chemicals for process operations.

B. LOCKHEED MARTIN'S TOXIC MISMANAGEMENT

37. The operations at the Orlando Facility generated dangerous wastes including metal cuttings and scraps, oils and greases, electroplating solutions and sludge, metallic hydroxide sludge, acid and alkali solutions, cyanide, chromate rinse waste, spent acid solutions, waste-cutting oils, and various solvents used to degrease machinery and weaponry. Additionally, the Orlando Facility stored large volumes of chemicals to be used in the facility's operations.

38. The chemicals stored and used at the Orlando Facility, and the wastes generated by the facility's operations, are extremely dangerous to human health. The utmost care and attention is required to ensure that these materials are properly stored, transported, collected, and disposed.

39. Because of the danger inherent to the toxins used at the Orlando Facility, the risks posed to human health can never be eliminated. However, the risks of exposure can be greatly exacerbated if these toxins are mismanaged, as they were by Lockheed Martin.

40. Lockheed Martin's storage, transportation, collection, and disposal practices at the Orlando Facility were outrageously and recklessly indifferent to human health.

41. The Main Plant area, at the northern portion of the Orlando Facility, has been involved in electroplating and waste treatment operations since becoming operational in 1958. The electroplating operations involved heat treatment, vapor degreasing, electro/electroless plating of chromium, copper and nickel into various components, and the chemical conversion coating of aluminum. Wastewater treatment operations consisted predominantly of the treatment of electroplating rinse water.

42. Since 1958, electroplating operations have included an initial degreasing step which utilized a solvent bath of either trichloroethylene ("TCE") or tetrachloroethylene ("PCE") and 1,1,1-trichloroethane ("Methyl Chloroform"). Cyanide was then used in plating bath operations. Acid and alkaline rinse water wastes from the plating operations were neutralized with concentrated sodium hydroxide or sulfuric acid. Hexavalent chromium was a byproduct of these operations as well. The sludges remaining from these operations were pumped to a sludge storage tank. Cyanide wastes were transferred to cyanide captive pits and batch tanks.

43. The initial system design at the Orlando Facility collected plating operation wastes in concrete troughs that transferred the wastes to captive pits. These troughs leaked into underlying soils for many years, perhaps as early as the late 1950's. Further, lines carrying solvents to collection and treatment systems leaked, causing further contamination.

44. The contamination underneath and surrounding the Main Plant is extensive, both in soil and groundwater.

45. Beginning in 1959, Lockheed Martin received and stored hazardous materials and toxic chemicals at the northwest boundary of the Orlando Facility, adjacent to Sand Lake Road. The hazardous materials and toxic chemicals stored in this area were repeatedly mismanaged by Lockheed Martin, causing the soil and groundwater in this area to become contaminated. Processes undertaken in this area further contributed to the contamination. Lockheed Martin discharged wastes from oil filled transformers, and drained industrial wastewaters and process discharges directly to soil in this area.

46. In the late 1960's and early 1970's, Lockheed Martin dug shallow unlined trenches across 8 acres of land on the west-central portion of the Orlando Facility, and filled the trenches with 1,700 cubic feet of toxic sludge and 3,700 tons of other hazardous wastes.

47. In the early 1970's, Lockheed Martin dug shallow unlined trenches across 3.5 acres on the western boundary of the Orlando Facility and filled the trenches with 1,200 cubic feet of toxic sludge. Lockheed Martin then constructed a canal, called the New-Over Canal, that received wastes from these trenches and carried them off in surface waters.

48. From 1973 to 1983, Lockheed Martin dumped 7,800 tons of hazardous wastes in an 11-acre landfill on the Southeast portion of the Orlando Facility. Three sludge ponds adjacent to the landfill were filled to capacity with sludges, including metal hydroxide sludge generated from spent plating solutions and cyanide bearing wastes. A large "sludge cake" was also disposed at this site.

49. In 1981 and 1982, Lockheed Martin dug shallow unlined ditches across 5 acres on the south-central portion of the Orlando Facility, and filled them with 1,900 tons of hazardous wastes.

50. For many years prior to 1985, Lockheed Martin collected, stored, and transported toxic wastes from the Orlando Facility's Microelectronics Center in an inaccessible and complicated maze of underground piping and solvent holding tanks. Lockheed Martin operated this collection system for many years despite the piping being in a state of disrepair and leaking highly toxic wastes into soil and groundwater.

51. These activities, along with others undertaken by Lockheed Martin at the Orlando Facility, have resulted in extensive contamination of soil and groundwater throughout the site. There are, and have been, numerous plumes of highly contaminated groundwater underneath the Orlando Facility. Additionally, large areas of highly toxic soil exist, and have existed, throughout the Orlando Facility.

C. CONTAMINATION PRESENT AT THE ORLANDO FACILITY

52. Trichloroethylene ("TCE") is an artificial VOC that does not occur in nature. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 28,000 ppb, TCE has a sweet odor similar to ether or chloroform.[1] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of TCE are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of TCE detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects

[1] EPA Fact Sheet—TCE, January 2017. https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/trichloroethylene.pdf

include, but are not limited to, damage and toxicity to the nervous system, liver, kidneys, immune system, endocrine system, reproductive system, neurological defects, developmental defects, and the injuries suffered by plaintiffs herein.[2] TCE is a potent human carcinogen. It is classified by the International Agency for Research on Cancer ("IARC") as "carcinogenic to humans", and classified as a "known human carcinogen" by the U.S. Department of Health and Human Services ("HHS"). The U.S. Environmental Protection Agency ("EPA") has characterized TCE as "likely to be carcinogenic to humans by all routes of exposure".[3] TCE can cause numerous types of cancer, including but not limited to, kidney cancer, liver cancer, malignant lymphoma, non-Hodgkin's lymphoma, leukemia, testicular cancer, lung tumors, and the injuries suffered by plaintiffs herein.[4]

53. Tetrachloroethylene ("PCE") is an artificial VOC that does not occur in nature. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 1,000 ppb, TCE has a sharp, sweet odor.[5] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of PCE are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of PCE detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the nervous system, liver, kidneys, reproductive system, unborn children, brain chemistry, developmental defects and the injuries suffered by plaintiffs herein.[6]

[2] ATSDR Toxicological Profile for TCE, June 2019. https://www.atsdr.cdc.gov/toxprofiles/tp19.pdf
[3] ATSDR Toxicological Profile for TCE, June 2019. https://www.atsdr.cdc.gov/toxprofiles/tp19.pdf
[4] ATSDR Toxicological Profile for TCE, June 2019. https://www.atsdr.cdc.gov/toxprofiles/tp19.pdf
[5] EPA Fact Sheet—PCE, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/tetrachloroethylene.pdf
[6] ATSDR Toxicological Profile for PCE, June 2019. https://www.atsdr.cdc.gov/toxprofiles/tp18.pdf

PCE is a potent human carcinogen. It is classified by the IARC as "probably carcinogenic to humans", and EPA has characterized PCE as "likely to be carcinogenic to humans by all routes of exposure".[7] PCE can cause numerous types of cancer, including but not limited to, bladder cancer, multiple myeloma, non-Hodgkin's lymphoma, liver cancer, kidney cancer, cancers of the blood system, and the injuries suffered by plaintiffs herein.[8]

54. 1,1,1-Trichloroethane ("Methyl Chloroform"), is an artificial VOC that does not occur in nature. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 120,000 ppb, Methyl Chloroform has a sharp, sweet odor similar to chloroform.[9] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of Methyl Chloroform are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of Methyl Chloroform detected at the Orlando Facility can cause harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage to the nervous system, liver, kidneys, reproductive system, unborn children, and the injuries suffered by plaintiffs herein.[10]

55. Vinyl Chloride is an artificial VOC that does not occur in nature. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 3,000,000 ppb, Vinyl Chloride has a mild, sweet odor.[11] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed

[7] ATSDR Toxicological Profile for PCE, June 2019. https://www.atsdr.cdc.gov/toxprofiles/tp18.pdf
[8] ATSDR Toxicological Profile for PCE, June 2019. https://www.atsdr.cdc.gov/toxprofiles/tp18.pdf
[9] EPA Fact Sheet— Methyl Chloroform, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/methyl-chloroform.pdf
[10] ATSDR Toxicological Profile for Methyl Chloroform, July 2006. https://www.atsdr.cdc.gov/toxprofiles/tp70.pdf
[11] ATSDR Toxicological Profile for Vinyl Chloride, July 2006. https://www.atsdr.cdc.gov/toxprofiles/tp20.pdf

Martin's unreasonable, reckless, and egregious conduct, dangerous levels of Vinyl Chloride are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of Vinyl Chloride detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the nervous system, cardiovascular system, lungs, liver, kidneys, reproductive system, unborn children, nerve damage, and the injuries suffered by plaintiffs herein.[12] Vinyl Chloride is a potent human carcinogen. It is classified by the IARC as "carcinogenic to humans", and EPA has characterized PCE as "a human carcinogen".[13] Vinyl Chloride can cause numerous types of cancer, including but not limited to, liver cancer, brain cancer, breast cancer, hematopoietic cancers, and the injuries suffered by plaintiffs herein.[14]

56. Methylene Chloride is an artificial VOC that does not occur in nature. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 200,000 ppb, Methylene Chloride has a mild, sweet odor.[15] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of Methylene Chloride are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of Methylene Chloride detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the liver, kidneys, ocular system, unborn children, nervous system, cardiovascular system, lungs, and the

[12] ATSDR Toxicological Profile for Vinyl Chloride, July 2006. https://www.atsdr.cdc.gov/toxprofiles/tp20.pdf
[13] ATSDR Toxicological Profile for Vinyl Chloride, July 2006. https://www.atsdr.cdc.gov/toxprofiles/tp20.pdf
[14] ATSDR Toxicological Profile for Vinyl Chloride, July 2006. https://www.atsdr.cdc.gov/toxprofiles/tp20.pdf
[15] ATSDR Toxicological Profile for Methylene Chloride, September 2000. https://www.atsdr.cdc.gov/toxprofiles/tp14.pdf

injuries suffered by plaintiffs herein.[16] Methylene Chloride is a potent carcinogen. EPA has characterized Methylene Chloride as "a probable cancer causing agent in humans".[17] Methylene Chloride can cause numerous types of cancer, including but not limited to, lung cancer, liver cancer, breast cancer, mouth cancer, and the injuries suffered by plaintiffs herein.[18]

57. Toluene is a VOC that is found naturally in crude oil. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 2,140 ppb, Toluene has a sweet, pungent odor.[19] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of Toluene are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of Toluene detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the nervous system, brain, immune system, kidney, liver, lungs, reproductive system, unborn children, developmental defects, and the injuries suffered by plaintiffs herein.[20]

58. Benzene is a VOC that is found naturally in crude oil. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 60,000 ppb, Benzene has a sweet odor.[21] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of Benzene are, and have been, present in the soil and

[16] ATSDR Toxicological Profile for Methylene Chloride, September 2000. https://www.atsdr.cdc.gov/toxprofiles/tp14.pdf
[17] ATSDR Toxicological Profile for Methylene Chloride, September 2000. https://www.atsdr.cdc.gov/toxprofiles/tp14.pdf
[18] ATSDR Toxicological Profile for Methylene Chloride, September 2000. https://www.atsdr.cdc.gov/toxprofiles/tp14.pdf
[19] ATSDR Toxicological Profile for Toluene, June 2017. https://www.atsdr.cdc.gov/toxprofiles/tp56.pdf
[20] ATSDR Toxicological Profile for Toluene, June 2017. https://www.atsdr.cdc.gov/toxprofiles/tp56.pdf
[21] ATSDR Toxicological Profile for Benzene, August 2007. https://www.atsdr.cdc.gov/toxprofiles/tp3.pdf

groundwater at the Orlando Facility. The concentrations of Benzene detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the blood, bone marrow, immune system, reproductive system, unborn children and the injuries suffered by plaintiffs herein.[22] Benzene is a potent human carcinogen. It is classified by the HHS as a "known carcinogen"; IARC and EPA have both determined that benzene is "carcinogenic to humans", and EPA has characterized Benzene as "a human carcinogen".[23] Benzene can cause numerous types of cancer, including but not limited to, leukemia, and the injuries suffered by plaintiffs herein.[24]

59. Chlorobenzene is an artificial VOC that does not occur in nature. Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of Chlorobenzene are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of Chlorobenzene detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation or ingestion. These harmful effects include, but are not limited to, damage and toxicity to the blood, bone marrow, liver, kidneys, immune system, nervous system, and the injuries suffered by plaintiffs herein.[25]

60. Ethylbenzene is a VOC that is found naturally in coal tar. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 2,300 ppb, Ethylbenzene has a sweet, gas-like odor.[26] Because it is volatile, it readily converts to a gas and

[22] ATSDR Toxicological Profile for Benzene, August 2007. https://www.atsdr.cdc.gov/toxprofiles/tp3.pdf
[23] ATSDR Toxicological Profile for Benzene, August 2007. https://www.atsdr.cdc.gov/toxprofiles/tp3.pdf
[24] ATSDR Toxicological Profile for Benzene, August 2007. https://www.atsdr.cdc.gov/toxprofiles/tp3.pdf
[25] ATSDR Toxicological Profile for Chlorobenzene, December 2019. https://www.atsdr.cdc.gov/toxprofiles/tp131.pdf
[26] ATSDR Toxicological Profile for Ethylbenzene, November 2010. https://www.atsdr.cdc.gov/toxprofiles/tp110.pdf

travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of Ethylbenzene are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of Ethylbenzene detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the inner ear and hearing, kidney, respiratory system, nervous system, eyes, blood, and the injuries suffered by plaintiffs herein.[27]

61. 1,2-dichlorobenzene ("1,2-DCB") is an artificial VOC that does not occur in nature. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 50,000 ppb, 1,2-DCB has a pleasant, aromatic odor.[28] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of 1,2-DCB are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of 1,2-DCB detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the lungs, liver, blood, kidneys, thyroid, pituitary gland, nervous system, and the injuries suffered by plaintiffs herein.[29]

62. 1,3-dichlorobenzene ("1,3-DCB") is an artificial VOC that does not occur in nature. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 50,000 ppb, 1,3-DCB has a pleasant, aromatic odor.[30] Because it is volatile, it readily

[27] ATSDR Toxicological Profile for Ethylbenzene, November 2010. https://www.atsdr.cdc.gov/toxprofiles/tp110.pdf; EPA Fact Sheet—Ethylbenzene, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/ethylbenzene.pdf
[28] ATSDR Toxicological Profile for DCBs, August 2006. https://www.atsdr.cdc.gov/toxprofiles/tp10.pdf
[29] ATSDR Toxicological Profile for DCBs, August 2006. https://www.atsdr.cdc.gov/toxprofiles/tp10.pdf
[30] ATSDR Toxicological Profile for DCBs, August 2006. https://www.atsdr.cdc.gov/toxprofiles/tp10.pdf

converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of 1,3-DCB are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of 1,3-DCB detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the lungs, liver, blood, kidneys, thyroid, pituitary gland, nervous system, and the injuries suffered by plaintiffs herein.[31]

63. Carbon Disulfide is a VOC that is used to produce rubber chemicals and pesticides. Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of Carbon Disulfide are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of Carbon Disulfide detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the respiratory system, brain, nervous system, blood, liver, kidneys, eyes, cardiovascular system, reproductive system, unborn children, developmental problems and the injuries suffered by plaintiffs herein.[32]

64. Carbon Tetrachloride is an artificial VOC that does not occur in nature. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 10,000 ppb, Carbon Tetrachloride has a sweet odor.[33] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to

[31] ATSDR Toxicological Profile for DCBs, August 2006. https://www.atsdr.cdc.gov/toxprofiles/tp10.pdf
[32] EPA Fact Sheet—Carbon Disulfide, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/carbon-disulfide.pdf
[33] EPA Fact Sheet—Carbon Tetrachloride, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/carbon-tetrachloride.pdf

Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of Carbon Tetrachloride are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of Carbon Tetrachloride detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the liver, kidneys, nervous system, respiratory system, unborn children, reproductive system and the injuries suffered by plaintiffs herein.[34] Carbon tetrachloride is a potent human carcinogen. EPA has characterized Carbon Tetrachloride as "a probable human carcinogen".[35] Carbon Tetrachloride can cause numerous types of cancer, including, liver cancer and the injuries suffered by plaintiffs herein.[36]

65. 1,1-Dichloroethane ("1,1-DCA") is an artificial VOC that does not occur in nature. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 120,000 ppb, 1,1-DCA has a mild, sweet odor similar to ether.[37] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of 1,1-DCA are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of 1,1-DCA detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the nervous system, cardiovascular system,

[34] EPA Fact Sheet—Carbon Tetrachloride, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/carbon-tetrachloride.pdf
[35] EPA Fact Sheet—Carbon Tetrachloride, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/carbon-tetrachloride.pdf
[36] EPA Fact Sheet—Carbon Tetrachloride, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/carbon-tetrachloride.pdf
[37] EPA Fact Sheet—1,1-DCA, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/ethylidene-dichloride.pdf

kidneys, unborn children, and the injuries suffered by plaintiffs herein.[38] 1,1-DCA can cause cancer, and is classified by EPA as "a possible human carcinogen".[39] 1,1-DCA can cause numerous types of cancer, including but not limited to, cancer of the blood vessel walls, breast cancer, liver cancer, endometrial cancer, and the injuries suffered by plaintiffs herein.[40]

66. 1,2-Dichloroethane ("1,2-DCA") is an artificial VOC that does not occur in nature. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 6,000 ppb, 1,2-DCA has a mild, sweet odor similar to chloroform.[41] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of 1,2-DCA are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of 1,2-DCA detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the nervous system, cardiovascular system, respiratory system, liver, kidneys, immune system, and the injuries suffered by plaintiffs herein.[42] 1,2-DCA is a potent human carcinogen, and has been classified by EPA as "a probable human carcinogen".[43] 1,2-DCA can cause numerous types of cancer, including but not limited to, colon cancer, rectal cancer, stomach cancer, blood vessel wall cancer,

[38] EPA Fact Sheet—1,1-DCA, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/ethylidene-dichloride.pdf
[39] EPA Fact Sheet—1,1-DCA, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/ethylidene-dichloride.pdf
[40] EPA Fact Sheet—1,1-DCA, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/ethylidene-dichloride.pdf
[41] EPA Fact Sheet—1,2-DCA, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/ethylene-dichloride.pdf
[42] EPA Fact Sheet—1,2-DCA, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/ethylene-dichloride.pdf
[43] EPA Fact Sheet—1,2-DCA, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/ethylene-dichloride.pdf

breast cancer, lung cancer, endometrial cancer, liver cancer, and the injuries suffered by plaintiffs herein.[44]

67. 1,1-Dichloroethene ("1,1-DCE") is an artificial VOC that does not occur in nature. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 190,000 ppb, 1,1-DCE has a mild, sweet odor similar to chloroform.[45] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of 1,1-DCE are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of 1,1-DCE detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the nervous system, liver, kidneys, lungs, and the injuries suffered by plaintiffs herein.[46] 1,1-DCE can cause numerous types of cancer, including but not limited to, kidney cancer, breast cancer, and the injuries suffered by plaintiffs herein.[47]

68. 1,2-Dichloroethene ("1,2-DCE") is an artificial VOC that does not occur in nature. It is colorless and odorless.[48] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of 1,2-DCE are, and have been, present in the soil and groundwater at the Orlando Facility. 1,2-DCE has also been found at the

[44] EPA Fact Sheet—1,2-DCA, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/ethylene-dichloride.pdf
[45] EPA Fact Sheet—1,1-DCE, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/vinylidene-chloride.pdf
[46] EPA Fact Sheet—1,2-DCE, Date Unknown. https://archive.epa.gov/water/archive/web/pdf/archived-technical-fact-sheet-on-1-2-dichloroethylene.pdf
[47] EPA Fact Sheet—1,2-DCE, Date Unknown. https://archive.epa.gov/water/archive/web/pdf/archived-technical-fact-sheet-on-1-2-dichloroethylene.pdf
[48] EPA Fact Sheet—1,2-DCE, Date Unknown. https://archive.epa.gov/water/archive/web/pdf/archived-technical-fact-sheet-on-1-2-dichloroethylene.pdf

Orlando Facility in as Cis-1,2-DCE and Trans-1,2-DCE forms. The concentrations of 1,2-DCE detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the nervous system, liver, circulatory system, and the injuries suffered by plaintiffs herein.[49]

69. 1,1,2-Trichloroethane ("1,1,2-TCA") is an artificial VOC that does not occur in nature. It is colorless and odorless unless present in extremely high and dangerous concentrations. Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of 1,1,2-TCA are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of 1,1,2-TCA detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the nervous system, respiratory system, liver, kidneys, immune system, and the injuries suffered by plaintiffs herein.[50] 1,1,2-TCA causes cancer, and has been classified by EPA as "possibly carcinogenic to humans".[51] 1,1,2-TCA can cause numerous types of cancer, including but not limited to, liver cancer, adrenal cancer, and the injuries suffered by plaintiffs herein.[52]

70. Chloroform is a VOC that readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of chloroform are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of chloroform detected at the

[49] EPA Fact Sheet—1,2-DCE, Date Unknown. https://archive.epa.gov/water/archive/web/pdf/archived-technical-fact-sheet-on-1-2-dichloroethylene.pdf
[50] ATSDR Toxicological Profile for 1,1,2-TCA, June 2019. https://www.atsdr.cdc.gov/toxprofiles/tp148.pdf
[51] ATSDR Toxicological Profile for 1,1,2-TCA, June 2019. https://www.atsdr.cdc.gov/toxprofiles/tp148.pdf
[52] ATSDR Toxicological Profile for 1,1,2-TCA, June 2019. https://www.atsdr.cdc.gov/toxprofiles/tp148.pdf

Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the liver, blood, kidney, nervous system, reproductive system, unborn children, developmental defects, and the injuries suffered by plaintiffs herein.[53] Chloroform is a potent carcinogen, and has been classified by EPA as "likely to be carcinogenic to humans by all routes of exposure".[54] Chloroform can cause numerous types of cancer, including but not limited to, intestinal cancer, rectal cancer, bladder cancer, kidney cancer, liver cancer and the injuries suffered by plaintiffs herein.[55]

71. 1,2-Dichloropropane is an artificial VOC that does not occur in nature. It is colorless and odorless unless present in extremely high and dangerous concentrations. Above 250 ppb, 1,2-Dichloropropane has a chloroform-like odor.[56] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of 1,2-Dichloropropane are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of 1,2-Dichloropropane detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the nervous system, blood, liver, reproductive system, and the injuries suffered by plaintiffs herein.[57] 1,2-Dichloropropane is

[53] EPA Fact Sheet—Chloroform, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/chloroform.pdf
[54] EPA Fact Sheet—Chloroform, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/chloroform.pdf
[55] EPA Fact Sheet—Chloroform, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/chloroform.pdf
[56] EPA Fact Sheet—1,2-Dichloropropane, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/propylene-dichloride.pdf
[57] EPA Fact Sheet—1,2-Dichloropropane, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/propylene-dichloride.pdf

a potent carcinogen, and has been classified by EPA as a "probable human carcinogen".[58] 1,2-Dichloropropane can cause numerous types of cancer, including but not limited to, breast cancer, liver cancer and the injuries suffered by plaintiffs herein.[59]

72. Dichlorobromomethane is a VOC that is colorless and odorless. Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of Dichlorobromomethane are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of Dichlorobromomethane detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation or ingestion. These harmful effects include, but are not limited to, damage and toxicity to the liver, kidneys, immune system, unborn children, developmental defects, and the injuries suffered by plaintiffs herein.[60] Dichlorobromomethane is a potent human carcinogen. EPA characterizes Dichlorobromomethane as "a probable human carcinogen".[61] Dichlorobromomethane can cause numerous types of cancer, including but not limited to, rectal cancer, kidney cancer, intestinal cancer, liver cancer, and the injuries suffered by plaintiffs herein.[62]

73. Bis(2-ethylhexyl)phthalate ("DEHP") is an artificial VOC that does not occur in nature, and is colorless and odorless. Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of DEHP are, and have been,

[58] EPA Fact Sheet—1,2-Dichloropropane, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/propylene-dichloride.pdf
[59] EPA Fact Sheet—1,2-Dichloropropane, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/propylene-dichloride.pdf
[60] ATSDR Toxicological Profile for Dichlorobromomethane, June 2019. https://www.atsdr.cdc.gov/toxprofiles/tp129.pdf
[61] ATSDR Toxicological Profile for Dichlorobromomethane, June 2019. https://www.atsdr.cdc.gov/toxprofiles/tp129.pdf
[62] ATSDR Toxicological Profile for Dichlorobromomethane, June 2019. https://www.atsdr.cdc.gov/toxprofiles/tp129.pdf

present in the soil and groundwater at the Orlando Facility. The concentrations of DEHP detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the liver, kidneys, respiratory system, reproductive system, immune system, unborn children, developmental defects, and the injuries suffered by plaintiffs herein.[63] DEHP causes cancer, and has been classified by EPA as a "probable human carcinogen".[64] DEHP can cause numerous types of cancer, including but not limited to, liver cancer, pancreatic cancer, testicular cancer and the injuries suffered by plaintiffs herein.[65]

74. Xylene is a VOC that is colorless and odorless unless present in extremely high and dangerous concentrations. Above 1,100 ppb, Xylene has a sweet odor.[66] Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of Xylene are, and have been, present in the soil and groundwater at the Orlando Facility. Xylene has also been found at the Orlando Facility in as m-Xylene, p-Xylene, and o-Xylene. The concentrations of Xylene detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation or ingestion. These harmful effects include, but are not limited to, damage and toxicity to the respiratory system, gastrointestinal

[63] EPA Fact Sheet—DEHP, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/bis-2-ethylhexyl-phthalate.pdf; ATSDR Toxicological Profile for DEHP, December 2019. https://www.atsdr.cdc.gov/toxprofiles/tp9.pdf

[64] EPA Fact Sheet—DEHP, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/bis-2-ethylhexyl-phthalate.pdf

[65] EPA Fact Sheet—DEHP, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/bis-2-ethylhexyl-phthalate.pdf; ATSDR Toxicological Profile for DEHP, December 2019. https://www.atsdr.cdc.gov/toxprofiles/tp9.pdf

[66] EPA Fact Sheet—Xylene, January 2017. https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/xylenes.pdf

system, nervous system, cardiovascular system, kidneys, unborn children, developmental defects and the injuries suffered by plaintiffs herein.[67]

75. Methylnaphthalene is a VOC that is found naturally in crude oil. Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of Methylnaphthalene are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of Methylnaphthalene detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the blood, gastrointestinal system, respiratory system, and the injuries suffered by plaintiffs herein.[68] Methylnaphthalene can cause cancer, and is classified by EPA as "a possible human carcinogen".[69] Methylnaphthalene can cause numerous types of cancer, including but not limited to, lung cancer, throat cancer, colorectal cancer, and the injuries suffered by plaintiffs herein.[70]

76. Benzo(a)pyrene is a VOC that is found naturally in crude oil. Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of Benzo(a)pyrene are, and have been, present in the soil and groundwater at the Orlando Facility. Two related compounds with similar effects, Benzo(a)anthracene and Benzo(b)fluoranthene, have also been detected at the Orlando Facility at dangerously high concentrations. The concentrations of Benzo(a)pyrene detected at the Orlando Facility can cause

[67] EPA Fact Sheet—Xylene, January 2017. https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/xylenes.pdf
[68] ATSDR Toxicological Profile for Methylnaphthalene, August 2005. https://www.atsdr.cdc.gov/toxprofiles/tp67.pdf
[69] ATSDR Toxicological Profile for Methylnaphthalene, August 2005. https://www.atsdr.cdc.gov/toxprofiles/tp67.pdf
[70] ATSDR Toxicological Profile for Methylnaphthalene, August 2005. https://www.atsdr.cdc.gov/toxprofiles/tp67.pdf

extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the nervous system, reproductive system, immune system, unborn children, developmental defects, and the injuries suffered by plaintiffs herein.[71] Benzo(a)pyrene is a potent human carcinogen, and is classified by IARC as "a known human carcinogen".[72] Benzo(a)pyrene can cause numerous types of cancer, including but not limited to, gastrointestinal cancer, liver cancer, kidney cancer, throat cancer, lung cancer, and the injuries suffered by plaintiffs herein.[73]

77. Polychlorinated biphenyls ("PCBs") are artificial VOCs that do not occur in nature. They are colorless and odorless. Because they are volatile, PCBs readily converts to a gas and travels through air with wind. They also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of PCBs are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of PCBs detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the respiratory system, gastrointestinal system, liver, kidney, blood, nervous system, endocrine system, and the injuries suffered by plaintiffs herein.[74] PCBs are potent human carcinogens, and both EPA and IARC have determined that PCBs are

[71] EPA Toxicological Review of Benzo(a)pyrene, January 2017. https://cfpub.epa.gov/ncea/iris/iris_documents/documents/toxreviews/0136tr.pdf
[72] EPA Toxicological Review of Benzo(a)pyrene, January 2017. https://cfpub.epa.gov/ncea/iris/iris_documents/documents/toxreviews/0136tr.pdf
[73] EPA Toxicological Review of Benzo(a)pyrene, January 2017. https://cfpub.epa.gov/ncea/iris/iris_documents/documents/toxreviews/0136tr.pdf
[74] ATSDR Toxicological Profile for PCBs, November 2000. https://www.atsdr.cdc.gov/toxprofiles/tp17.pdf; Addendum to ATSDR Toxicological Profile for PCBs, April 2011. https://www.atsdr.cdc.gov/toxprofiles/pcbs_addendum.pdf

"probable human carcinogens".[75] PCBs can cause numerous types of cancer, including but not limited to, liver cancer, intestinal cancer, skin cancer, gallbladder cancer, non-Hodgkin's lymphoma, testicular cancer, prostate cancer, pancreatic cancer, lung cancer, ovarian cancer, uterine cancer, throat cancer, pancreatic cancer, uterine cancer, and the injuries suffered by plaintiffs herein.[76]

78. Dichlorodiphenyltrichloroethane ("DDT") is an artificial VOC that does not occur in nature. It is colorless and odorless. Because it is volatile, it readily converts to a gas and travels through air with wind. It also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of DDT are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of DDT detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to unborn children, birth and developmental defects, type 2 diabetes mellitus, liver, nervous system, and the injuries suffered by plaintiffs herein.[77] DDT is a potent carcinogen, and has been classified by IARC and EPA as a "probable human carcinogen".[78] DDT can cause numerous types of cancer, including but not limited to, liver cancer, lung cancer, and the injuries suffered by plaintiffs herein.[79]

79. 1,4-Dioxane is an artificial VOC that does not occur in nature. It is colorless and odorless. Because it is volatile, it readily converts to a gas and travels through air with wind. It

[75] ATSDR Toxicological Profile for PCBs, November 2000. https://www.atsdr.cdc.gov/toxprofiles/tp17.pdf; Addendum to ATSDR Toxicological Profile for PCBs, April 2011. https://www.atsdr.cdc.gov/toxprofiles/pcbs_addendum.pdf
[76] ATSDR Toxicological Profile for PCBs, November 2000. https://www.atsdr.cdc.gov/toxprofiles/tp17.pdf; Addendum to ATSDR Toxicological Profile for PCBs, April 2011. https://www.atsdr.cdc.gov/toxprofiles/pcbs_addendum.pdf
[77] ATSDR Toxicological Profile for DDT, December 2019. https://www.atsdr.cdc.gov/toxprofiles/tp35.pdf
[78] ATSDR Toxicological Profile for DDT, December 2019. https://www.atsdr.cdc.gov/toxprofiles/tp35.pdf
[79] ATSDR Toxicological Profile for DDT, December 2019. https://www.atsdr.cdc.gov/toxprofiles/tp35.pdf

also moves through soil and groundwater. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of 1,4-Dioxane are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of 1,4-Dioxane detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the liver, kidneys, respiratory system, brain, and the injuries suffered by plaintiffs herein.[80] 1,4-Dioxane causes cancer, and has been classified by IARC and EPA as a "probable human carcinogen".[81] 1,4-Dioxane can cause numerous types of cancer, including but not limited to, liver cancer, nasal cancer, gallbladder cancer, and the injuries suffered by plaintiffs herein.[82]

80. Dioxins are persistent environmental pollutants used in pesticides such as Agent Orange. Because dioxins are persistent, they remain in the environment for long periods of time and bioaccumulate in human bodies.[83] Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of dioxins are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of dioxins detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion, or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the epidermis, blood, liver, metabolic system, immune system, reproductive system, unborn children, thyroid, developmental defects, and the injuries suffered by plaintiffs herein.[84] Dioxins cause cancer, and have been classified by IARC and EPA as "probable human

[80] EPA Fact Sheet—1,4-Dioxane, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/1-4-dioxane.pdf
[81] EPA Fact Sheet—1,4-Dioxane, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/1-4-dioxane.pdf
[82] EPA Fact Sheet—1,4-Dioxane, January 2017. https://www.epa.gov/sites/production/files/2016-09/documents/1-4-dioxane.pdf
[83] ATSDR Toxicological Profile for Dioxins, December 1998. https://www.atsdr.cdc.gov/toxprofiles/tp104.pdf
[84] ATSDR Toxicological Profile for Dioxins, December 1998. https://www.atsdr.cdc.gov/toxprofiles/tp104.pdf

carcinogens".[85] Dioxins can cause numerous types of cancer, including but not limited to, liver cancer, thyroid cancer, skin cancer, and the injuries suffered by plaintiffs herein.[86]

81. Perfluoroalkyls ("PFAS") are persistent environmental pollutants used in plating and electronics manufacturing. Because PFAS are persistent, they remain in the environment for long periods of time and bioaccumulate in human bodies.[87] Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of PFAS are, and have been, present in the soil and groundwater at the Orlando Facility. PFAS have also been detected at unsafe levels at the Orlando Facility as perfluorooctanoic acid ("PFOA") and perfluorooctane sulfonic acid ("PFOS"). The concentrations of PFAS detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation or ingestion. These harmful effects include, but are not limited to, damage and toxicity to the liver, immune system, metabolic system, thyroid, respiratory system, reproductive system, unborn children, developmental defects, and the injuries suffered by plaintiffs herein.[88] PFAS can cause cancer, and have been classified by IARC and EPA as "possible human carcinogens".[89] PFAS can cause numerous types of cancer, including but not limited to, testicular cancer, kidney cancer, liver cancer, pancreatic cancer, and the injuries suffered by plaintiffs herein.[90]

82. Cadmium is a heavy metal used in electroplating. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of cadmium are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of cadmium detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs

[85] ATSDR Toxicological Profile for Dioxins, December 1998. https://www.atsdr.cdc.gov/toxprofiles/tp104.pdf
[86] ATSDR Toxicological Profile for PFAS, December 2018. https://www.atsdr.cdc.gov/toxprofiles/tp200.pdf
[87] ATSDR Toxicological Profile for PFAS, December 2018. https://www.atsdr.cdc.gov/toxprofiles/tp200.pdf
[88] ATSDR Toxicological Profile for PFAS, December 2018. https://www.atsdr.cdc.gov/toxprofiles/tp200.pdf
[89] ATSDR Toxicological Profile for PFAS, December 2018. https://www.atsdr.cdc.gov/toxprofiles/tp200.pdf
[90] ATSDR Toxicological Profile for PFAS, December 2018. https://www.atsdr.cdc.gov/toxprofiles/tp200.pdf

through inhalation, ingestion or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the lungs, respiratory system, kidneys, gastrointestinal system, musculoskeletal system, liver, nervous system, reproductive system, blood, immune system, and the injuries suffered by plaintiffs herein.[91] Cadmium is a potent human carcinogen. It has been classified by HHS as a "known human carcinogen" and by IARC as "carcinogenic to humans".[92] Cadmium can cause numerous types of cancer, including but not limited to, lung cancer, prostate cancer and the injuries suffered by plaintiffs herein.[93]

83. Chromium is a heavy metal used in plating operations. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of chromium are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of chromium detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the lungs, respiratory system, stomach, gastrointestinal system, blood, reproductive system, immune system, reproductive system, epidermis, eyes, and the injuries suffered by plaintiffs herein.[94] Chromium is a potent human carcinogen. It has been classified by EPA as a "known human carcinogen" and by IARC as "carcinogenic to humans".[95] Chromium can cause numerous types of cancer, including but not limited to, gastrointestinal cancer, mouth cancer, lung cancer and the injuries suffered by plaintiffs herein.[96]

84. Lead is a heavy metal used in the manufacture of munitions. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of lead are, and have

[91] ATSDR Toxicological Profile for Cadmium, September 2012. https://www.atsdr.cdc.gov/toxprofiles/tp5.pdf
[92] ATSDR Toxicological Profile for Cadmium, September 2012. https://www.atsdr.cdc.gov/toxprofiles/tp5.pdf
[93] ATSDR Toxicological Profile for Cadmium, September 2012. https://www.atsdr.cdc.gov/toxprofiles/tp5.pdf
[94] ATSDR Toxicological Profile for Chromium, September 2012. https://www.atsdr.cdc.gov/toxprofiles/tp7.pdf
[95] ATSDR Toxicological Profile for Chromium, September 2012. https://www.atsdr.cdc.gov/toxprofiles/tp7.pdf
[96] ATSDR Toxicological Profile for Chromium, September 2012. https://www.atsdr.cdc.gov/toxprofiles/tp7.pdf

been, present in the soil and groundwater at the Orlando Facility. The concentrations of lead detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the nervous system, kidneys, cardiovascular system, blood, immune system, reproductive system, unborn children, developmental defects, respiratory system, endocrine system, liver, musculoskeletal system, gastrointestinal system, and the injuries suffered by plaintiffs herein.[97] The toxic effects of lead have been observed in every organ system studied.[98] Lead is a potent human carcinogen. It has been classified by EPA as a "probable human carcinogen" and by IARC as "probably carcinogenic to humans".[99] Lead can cause numerous types of cancer, including but not limited to, lung cancer, respiratory tract cancer, stomach cancer, gastrointestinal cancer, throat cancer, glioma, and the injuries suffered by plaintiffs herein.[100]

85. Arsenic is a heavy metal used in rat poison, ammunition and semiconductors. Due to Lockheed Martin's unreasonable, reckless, and egregious conduct, dangerous levels of arsenic are, and have been, present in the soil and groundwater at the Orlando Facility. The concentrations of arsenic detected at the Orlando Facility can cause extremely harmful effects whether exposure occurs through inhalation, ingestion or dermal contact. These harmful effects include, but are not limited to, damage and toxicity to the epidermis, gastrointestinal system, blood, cardiovascular system, nervous system, respiratory system, unborn children, kidneys, bladder, and the injuries suffered by plaintiffs herein.[101] Arsenic is a potent human carcinogen. It has been classified by EPA as a "known human carcinogen" and by IARC as "carcinogenic to

[97] ATSDR Toxicological Profile for Lead, August 2020. https://www.atsdr.cdc.gov/toxprofiles/tp13.pdf
[98] ATSDR Toxicological Profile for Lead, August 2020. https://www.atsdr.cdc.gov/toxprofiles/tp13.pdf
[99] ATSDR Toxicological Profile for Lead, August 2020. https://www.atsdr.cdc.gov/toxprofiles/tp13.pdf
[100] ATSDR Toxicological Profile for Lead, August 2020. https://www.atsdr.cdc.gov/toxprofiles/tp13.pdf
[101] ATSDR Toxicological Profile for Arsenic, August 2007. https://www.atsdr.cdc.gov/toxprofiles/tp2.pdf

humans".[102] Arsenic can cause numerous types of cancer, including but not limited to, skin cancer, liver cancer, bladder cancer, lung cancer, and the injuries suffered by plaintiffs herein.[103]

D. LOCKHEED MARTIN EXPOSES THE COMMUNITY TO TOXIC WASTE

86. Lockheed Martin was well aware of the risks to human health posed by the toxic materials it used and handled at the Orlando Facility, including those described herein. Lockheed Martin knew, or should have known, that mismanagement and mishandling of these harmful chemicals could pose egregious risks of exposure, and result in debilitating, life-changing, and fatal illnesses and diseases.

87. Instead of taking proper, or in some cases, any, precautions to protect against potential exposures, Lockheed Martin created a toxic stew of contamination at the Orlando Facility. This contamination is the result of years of callous and reckless indifference to the health and safety of the environment, and individuals living and working nearby and around the Orlando Facility.

88. Lockheed Martin clearly knew, or at the very least should have known, that burying toxic wastes in trenches, transporting toxic wastes in leaking and inaccessible piping, dumping toxic sludge in ponds, and engaging in the other reckless conduct described herein, would cause profound and widespread soil and groundwater contamination throughout the Orlando Facility.

89. Lockheed Martin also knew, or should have known, that the contamination resulting from these activities, and present at the Orlando Facility, would pose significant health risks to people living and working nearby, including plaintiffs.

[102] ATSDR Toxicological Profile for Arsenic, August 2007. https://www.atsdr.cdc.gov/toxprofiles/tp2.pdf
[103] ATSDR Toxicological Profile for Arsenic, August 2007. https://www.atsdr.cdc.gov/toxprofiles/tp2.pdf

90. Lockheed Martin knew, or should have known, that Plaintiffs, and others working and living nearby, would be exposed to Lockheed Martin's contamination through inhaling, ingesting, and coming into dermal contact with contaminated soils that are regularly disrupted by the operations at the Orlando Facility, and thereafter become airborne and travel offsite.

91. Lockheed Martin also knew, or should have known, that Plaintiffs, and others working and living nearby, would be exposed to Lockheed Martin's contamination through inhaling VOCs that off-gassed from the soil and groundwater at the Orlando Facility, and traveled offsite with the wind.

92. Lockheed Martin knew, or should have known that, because of the dangerous constituents present in the soil and groundwater, and the high levels of contamination present in the soil and groundwater, such offsite exposures could, and would, cause severe and debilitating illnesses and diseases to individuals living and working near and around the Orlando Facility.

93. Nevertheless, Lockheed Martin continued to expose nearby residents and workers, including plaintiffs, to toxic contaminants from the Orlando Facility.

94. In fact, Lockheed Martin's efforts to treat the soil and groundwater at the Orlando Facility vastly increased the risks of exposure to toxic contaminants to plaintiffs and others living and working nearby.

95. Lockheed Martin utilized contaminated groundwater for spray irrigation, causing underground contaminants to make contact with air, vaporize, be carried offsite with winds, and inhaled by plaintiffs and others in the vicinity of the Orlando Facility.

96. Lockheed Martin installed numerous Air Stripping Towers, Soil Vapor Extraction Systems, and Air Sparging Systems at the Orlando Facility. These technologies remove harmful contaminants from soil and groundwater by inducing a phase change that causes VOCs to become

gaseous. These systems then separate the gaseous VOCs from the soil or groundwater that they are treating.

97. However, these treatment systems do not destroy the harmful contaminants, they simply separate contaminants from the treated soil or groundwater. To prevent exposing nearby residents and workers to the harmful toxic gases remaining after the soil or groundwater is treated, it is necessary to collect, contain, and seal the remaining toxic gases in airtight containers.

98. Lockheed Martin failed to contain the toxic gases remaining after the soil and groundwater was treated with Air Stripping Towers, Soil Vapor Extraction Systems, and Air Sparging Systems at the Orlando Facility. Instead, Lockheed Martin recklessly expelled these toxic gases directly into the air breathed by plaintiffs and others in the vicinity of the Orlando Facility.

99. By venting these toxic gases directly into the air, at low heights, Lockheed Martin unearthed high levels of toxic contamination that was present below the ground surface, concentrated the contamination into potent and dangerous gases, and injected the contamination directly into the air supply for the community near and around the Orlando Facility.

100. Plaintiffs, and others in the community, did inhale, ingest and come into dermal contact with contaminated soils originating from the Orlando Facility, and inhale VOCs off-gassing from soil and groundwater at the Orlando Facility, and as a result suffered injuries, as described herein.

101. Plaintiffs' exposures to VOCs, and those of others in the community, were increased, and exacerbated by Lockheed Martin's decision to extract harmful chemicals from soil and groundwater at the Orlando Facility, concentrate the contaminants in gaseous form, and vent the contaminants directly into the air that plaintiffs breathed. Plaintiffs, and others in the

community, did inhale concentrated VOCs emitted from the Air Stripping Towers, Soil Vapor Extraction Systems, and Air Sparging Systems at the Orlando Facility, and as a result suffered injuries, as described herein.

E. PLAINTIFFS WERE EXPOSED TO LOCKHEED MARTIN'S TOXIC WASTES, AND SUFFERED EGREGIOUS BODILY HARM

102. Plaintiffs, and others in the community, did inhale, ingest and come into dermal contact with contaminated soils originating from the Orlando Facility. Plaintiffs, and others in the community, also inhaled VOCs off-gassing from the Orlando Facility.

103. Plaintiffs' exposures to VOCs, and those of others in the community, were increased, and exacerbated by Lockheed Martin's decision to extract harmful chemicals from soil and groundwater at the Orlando Facility, concentrate the contaminants in gaseous form, and vent the contaminants directly into the air that plaintiffs breathed. Plaintiffs, and others in the community, did inhale concentrated VOCs emitted from the Air Stripping Towers, Soil Vapor Extraction Systems, and Air Sparging Systems at the Orlando Facility.

104. As a result of these exposures to Lockheed Martin's toxic wastes, plaintiffs suffered injuries, as described herein.

105. Emilio San Martin worked within the vicinity of the Orlando Facility, at the Golf Channel, from 1994 until 2014. Mr. San Martin also lived within the vicinity of the Orlando Facility during this time period. As a result of his exposure to Lockheed Martin's toxic wastes, Emilio San Martin was diagnosed with brain lesions, multiple sclerosis, and hypoactive thyroid in 2016. He has received extensive treatments for his conditions, and his life has been changed forever.

106. Eric Rutledge worked within the vicinity of the Orlando Facility, at the Golf Channel, from 2001 until 2020. As a result of his exposure to Lockheed Martin's toxic wastes,

Eric Rutledge was diagnosed with multiple sclerosis in 2014. He has received extensive treatments for his conditions, and his life has been changed forever.

107. Wendy Stone worked within the vicinity of the Orlando Facility, at the Golf Channel, from 1998 until 2018. As a result of her exposure to Lockheed Martin's toxic wastes, Wendy Stone was diagnosed with breast cancer in 2008 and ovarian and uterine cysts in 2016. She has received extensive treatments for her conditions, and her life has been changed forever.

108. Kevin Kiely worked within the vicinity of the Orlando Facility, at the Golf Channel, from 1994 until 1999. As a result of his exposure to Lockheed Martin's toxic wastes, Kevin Kiely was diagnosed with testicular cancer in 2010. He has received extensive treatments for his conditions, and his life has been changed forever.

109. Kristen Sheen worked within the vicinity of the Orlando Facility, at the Golf Channel, from 1994 until 2020. As a result of his exposure to Lockheed Martin's toxic wastes Kristen Sheen was diagnosed with breast cancer in 2008. She has received extensive treatments for her conditions, and her life has been changed forever.

110. Jeff Kozak worked within the vicinity of the Orlando Facility, at the Golf Channel, from 1995 until 2020. As a result of his exposure to Lockheed Martin's toxic wastes Jeff Kozak was diagnosed with numerous blood clots in 2016. He has also suffered multiple kidney stones and degenerative neurological effects. He has received extensive treatments for his conditions, and his life has been changed forever.

111. Brian Slusarz worked within the vicinity of the Orlando Facility, at the Golf Channel, from 2009 until 2017. As a result of his exposure to Lockheed Martin's toxic wastes Jeff Kozak was diagnosed with multiple sclerosis in 2013. He has received extensive treatments for his conditions, and his life has been changed forever.

112. Brian Slusarz worked within the vicinity of the Orlando Facility, at the Golf Channel, from 2009 until 2017. As a result of his exposure to Lockheed Martin's toxic wastes Jeff Kozak was diagnosed with multiple sclerosis in 2013. He has received extensive treatments for his conditions, and his life has been changed forever.

113. Kristi Hujik worked within the vicinity of the Orlando Facility, at the Golf Channel, from 2003 until 2020. As a result of his exposure to Lockheed Martin's toxic wastes Kristi Hujik was diagnosed with multiple sclerosis in 2017. She has received extensive treatments for her conditions, and her life has been changed forever.

114. Helen Tosti worked within the vicinity of the Orlando Facility, at the Golf Channel, from 2001 until 2003. As a result of his exposure to Lockheed Martin's toxic wastes Helen Tosti was diagnosed with cervical dystonia in 2010 and papillary renal cell carcinoma in 2019. She has received extensive treatments for his conditions, and her life has been changed forever.

115. Brendan Havens worked within the vicinity of the Orlando Facility, at the Golf Channel, from 2002 until 2020. As a result of his exposure to Lockheed Martin's toxic wastes Brendan Havens was diagnosed with thyroid cancer in 2005. He has received extensive treatments for his conditions, and his life has been changed forever.

116. Eric Saperstein worked within the vicinity of the Orlando Facility, at the Golf Channel, from 1994 until 2008. Mr. Saperstein also lived within the vicinity of the Orlando Facility between 2002-2012. As a result of his exposure to Lockheed Martin's toxic wastes Eric Saperstein was diagnosed with multiple sclerosis in 2020. Mr. Saperstein has also been diagnosed with 20 brain lesions, as well as thoracic and cervical lesions. He has received extensive treatments for his conditions, and his life has been changed forever. Eric Saperstein also suffers

the loss of consortium of his son Ari Saperstein as a result of his exposure to Lockheed Martin's toxic wastes, and their resulting injuries.

117. Ana Saperstein lived within the vicinity of the Orlando Facility from 2010 until 2012. As a result of her and her husband's exposure to Lockheed Martin's toxic wastes Ana Saperstein gave premature birth to a son born with deformities and chromosomal mutation. She has received extensive treatments for these conditions, and her life has been changed forever. She also suffers the loss of consortium of her husband Eric Saperstein and her son Ari Saperstein as a result of their exposure to Lockheed Martin's toxic wastes, and their resulting injuries.

118. Ari Saperstein's parents Eric Saperstein and Ana Saperstein lived within the vicinity of the Orlando Facility during the period in which Ari Saperstein was in utero of his mother Ana Saperstein. As a result of his and his parent's exposure to Lockheed Martin's toxic wastes, Ari Saperstein was born prematurely, with deformed hands, fingers, and toes, and ectodermal dysplasia. Ari Saperstein was born without tear ducts, and has lived in constant discomfort to breathe. He has received extensive treatments for these conditions, and his life has been changed forever.

119. As a direct and proximate result of their exposure to the proven hazardous contaminants originating from the Orlando Facility, at greater than normal background levels, caused by Lockheed Martin's negligence, Plaintiffs also presently suffer, and will continue to suffer, a present increased risk of contracting additional illnesses and diseases as described herein, and the resulting present need to incur the cost of reasonably medically necessary diagnostic testing for the early detection of these illnesses, diseases and disease processes. Monitoring regimes exist that make the early detection of these illnesses, diseases and disease processes

possible, and differ from what would normally be recommended in the absence of exposure to Lockheed Martin's toxic wastes.

COUNT I—STRICT LIABILITY; ULTRAHAZARDOUS ACTIVITY

120. Plaintiffs repeat, reallege, and incorporate by reference the allegations contained in paragraphs 1 through 119 as if fully set forth herein.

121. Defendant's handling, storage, use, and disposal of the toxic contaminants described herein constituted ultrahazardous activities.

122. Handling, storing, utilizing, disposing and emitting the toxic contaminants described herein is abnormally dangerous and cannot be made safe by the exercise of the utmost care. The operations at the Orlando Facility resulted in emissions of toxic substances into nearby homes and businesses, which posed a high degree of risk to Plaintiffs.

123. There is a reasonable likelihood that the handling, storing, utilizing, disposing, and emitting of the toxic substances described herein will result in life-threatening cancer and other devastating illnesses, diseases and disease processes. These risks cannot be eliminated as long as these toxic contaminants are handled, stored, utilized, disposed of, or emitted near populated areas. Likewise, it was completely inappropriate for Defendant to emit toxic contaminants into a populated area.

124. Defendant's handling, storing, utilizing, disposing and emitting of the toxic contaminants described herein created a high degree of risk of harm to those who live in the surrounding area and substantially increased their risk of developing cancer and other devastating illnesses, diseases and disease processes.

125. The activities conducted by Defendant are exceedingly dangerous and offer little or no value to the surrounding community.

126. Because these activities are ultrahazardous, Defendant is strictly liable for any injuries proximately resulting therefrom.

127. As a direct and proximate result of Defendant's ultrahazardous activity and the exposure to toxic contaminants resulting therefrom, Plaintiffs were exposed to Defendant's toxic wastes, and suffered injuries, as described herein.

128. Defendant knew or ought to have known that its conduct would naturally and probably result in injury to others, including plaintiffs and others in the vicinity of the Orlando Facility. Defendant carried on and continued such conduct in reckless disregard of the consequences. Punitive damages are thus warranted.

129. By reason of the foregoing, Defendant is liable to Plaintiffs for compensatory and punitive damages, in amounts to be proved at trial, together with interest, costs of suit, attorneys' fees and all such other relief as the Court deems proper.

COUNT II—STRICT LIABILITY; Fla. Stat. §376.313

130. Plaintiffs repeat, reallege, and incorporate by reference the allegations contained in paragraphs 1 through 119 as if fully set forth herein.

131. Defendant owned and operated the Orlando Facility, and caused discharges of the contaminants described herein, and polluting conditions which are prohibited by Fla. Stat. §376.30 et seq.

132. Defendant discharged hazardous substances, petroleum, petroleum products, and solvents, as described herein, in violation of Fla. Stat. §376.30 et seq.

133. Defendant's discharges of contaminants, hazardous substances, solvents, petroleum, petroleum products, and creation of polluting conditions, in violation of Fla. Stat.

§376.30 et seq., caused Plaintiffs to be exposed to Defendant's toxic wastes, and suffer injuries, as described herein

134. By reason of the foregoing, Defendant is strictly liable to Plaintiffs for compensatory damages resulting therefrom, together with interest, costs of suit, attorneys' fees and all such other relief as the Court deems proper.

COUNT III—PUBLIC NUISANCE

135. Plaintiffs repeat, reallege, and incorporate by reference the allegations contained in paragraphs 1 through 119 as if fully set forth herein.

136. Plaintiffs have a common right to breathe clean air and enjoy a clean environment without dangerous levels of harmful toxic wastes.

137. Defendant's unreasonable and reckless use, storage, transport, handling, disposal and emission of toxic wastes at its Orlando Facility substantially and unreasonably infringes upon and transgresses this public right.

138. At all times relevant hereto, Defendant knew these toxic wastes to be hazardous and harmful to human beings.

139. Defendant knew or should have known that the levels of toxic wastes emitted its Orlando Facility would have a deleterious effect upon the health, safety, and well-being of people living and working in nearby areas.

140. Defendant's operation of its Orlando Facility caused those who live and work in the surrounding area to inhale, ingest, and come into dermal contact with high levels of harmful toxic wastes on a routine and constant basis, causing a substantially elevated risk of cancer and other debilitating diseases.

141. As a proximate result of the Defendant's operations at its Orlando Facility, Plaintiffs' and the general public's common right to breathe clean air and enjoy a clean

environment without dangerous levels of harmful toxic wastes was eliminated and/or severely diminished.

142. As a proximate result of Defendant's operation of its Orlando Facility, dangerous levels of harmful toxic wastes continuously invaded and contaminated the areas surrounding Plaintiffs' workplace and residences, thereby exposing them harmful toxic wastes.

143. As a direct and proximate result of Defendant's creation of a public nuisance and the exposure to harmful toxic wastes resulting therefrom, Plaintiffs suffered injuries, as described herein.

144. Defendant's conduct was willful, wanton, and in reckless disregard for the rights of others, including plaintiffs, and punitive damages are thus warranted.

145. By reason of the foregoing, Defendant is liable to Plaintiffs for compensatory and punitive damages, in amounts to be proved at trial, together with interest, costs of suit, attorneys' fees and all such other relief as the Court deems proper.

COUNT IV—PRIVATE NUISANCE

146. Plaintiffs repeat, reallege, and incorporate by reference the allegations contained in paragraphs 1 through 119 as if fully set forth herein.

147. At all times relevant hereto, Defendant knew its toxic wastes to be hazardous and harmful to human beings.

148. Defendant's unreasonable and reckless torage, use, transport, handling, disposal and emission of toxic wastes from its Orlando Facility constituted an unreasonable invasion of Plaintiffs' interests and rights of reasonable use and enjoyment of property and their rights to enjoyment of life free from consuming toxic wastes.

149. Defendant's unreasonable and reckless storage, use, disposal and emission of toxic wastes from its Orlando Facility constituted negligent or reckless conduct.

150. Defendant's unreasonable and reckless storage, use, disposal and emission of toxic wastes from its Orlando Facility was an ultrahazardous or abnormally dangerous condition or activity and thus constitutes an absolute nuisance, or nuisance per se, for which Defendant is strictly liable.

151. Defendant's operation of its Orlando Facility caused those who live and work in the surrounding area to breathe, ingest, and come into dermal contact with high levels of toxic contaminants on a routine and constant basis, causing a substantially elevated risk of cancer and other debilitating disease.

152. As a proximate result of the Defendant's operation of its Orlando Facility, Plaintiffs' common rights to enjoy a clean environment, without dangerous levels of toxic wastes, were infringed and/or severely diminished.

153. As a proximate result of Defendant's operation of its Orlando Facility, toxic contaminants continuously invaded and contaminated the areas surrounding Plaintiffs' places of employment and residences, thereby exposing them to toxic wastes.

154. As a direct and proximate result of Defendant's creation of a private nuisance and the exposure to toxic wastes resulting therefrom, Plaintiffs suffered injuries, as described herein.

155. Defendant's conduct was willful, wanton, and in reckless disregard for the rights of others, including plaintiffs, and punitive damages are thus warranted.

156. By reason of the foregoing, Defendant is liable to Plaintiffs for compensatory and punitive damages, in amounts to be proved at trial, together with interest, costs of suit, attorneys' fees and all such other relief as the Court deems proper.

COUNT V—NEGLIGENCE

157. Plaintiffs repeat, reallege, and incorporate by reference the allegations contained in paragraphs 1 through 119 as if fully set forth herein.

158. Defendant owed Plaintiffs a duty to operate its Orlando Facility in a manner which would not cause Plaintiffs injury or harm. Plaintiffs were foreseeable victims located within the scope of the risk created by the Defendant's unreasonable and reckless conduct.

159. Defendant negligently breached its duty of care by mismanaging toxic contaminants in a way that would cause severe and widespread contamination at its Orlando Facility, by emitting dangerous levels of toxic wastes from its Orlando Facility, by failing to take steps to minimize or eliminate the release of toxic wastes from its Orlando Facility, by failing to utilize alternative processes that would not result in widespread contamination of the release of toxic wastes, failing to use proper materials in constructing the facility, failing to institute proper procedures and training, and by releasing toxic wastes into a heavily populated community.

160. Defendants owed Plaintiffs a duty of reasonable care commensurate with the risk of operating the Orlando Facility.

161. Defendant negligently breached its duty by, among other things:

a. Filling unlined trenches and ponds with toxic wastes;

b. Transporting toxic wastes through defective lines, piping systems, and broken concrete troughs;

c. Draining toxic wastes directly onto soil;

d. Emitting dangerous amounts of toxic wastes into the air;

e. Failing to employ safe methods to adequately control, reduce, or eliminate toxic waste emissions from its Orlando Facility;

f. Failing to use alternative practices and procedures which would not result in the emission of toxic wastes into neighboring communities;

g. Emitting dangerous amounts of toxic wastes into a populated area;

h. Failing to warn neighboring residents and workers that they were being exposed to toxic wastes and of the consequent risks of disease the residents and workers acquired because of that exposure;

i. Failing to take steps to minimize or eliminate the release of toxic wastes, by failing to utilize alternative procedures that would not result in the release of toxic wastes;

j. Failing to install closed loop treatment technologies which would contain toxic wastes in sealed containers;

k. Failing to use proper materials in constructing and maintaining the Orlando Facility; and

l. Failing to institute proper procedures and training to prevent releases of toxic wastes.

162. As a direct and proximate result of Defendants' negligence and their exposure to Defendant's toxic wastes, Plaintiffs suffered injuries, as described herein.

163. Defendant's conduct was willful, wanton, and in reckless disregard for the rights of others, including plaintiffs, and punitive damages are thus warranted.

164. By reason of the foregoing, Defendant is liable to Plaintiffs for compensatory and punitive damages, in amounts to be proved at trial, together with interest, costs of suit, attorneys' fees and all such other relief as the Court deems proper.

COUNT VI—WILLFUL AND WANTON CONDUCT

165. Plaintiffs repeat, reallege, and incorporate by reference the allegations contained in paragraphs 1 through 119 as if fully set forth herein.

166. At all times relevant, Defendant owed a duty to refrain from willful, wanton, reckless and outrageous conduct and/or conduct which exhibited an utter indifference and/or conscious disregard to the health, safety, and well-being of Plaintiffs and those living and working in the areas surrounding its Orlando Facility.

167. Upon information and belief, Defendant was, at all times relevant, aware that the toxic wastes it was storing, handling disposing and emitting at its Orlando Facility were highly carcinogenic, capable of causing debilitating diseases, and/or otherwise harmful to humans.

168. Upon information and belief, Defendant was, at all times relevant, aware of the considerable health risks associated with the mismanagement and emissions of its toxic wastes at the Orlando Facility, including the risk of causing various forms of cancer and other debilitating diseases in the surrounding population.

169. Upon information and belief, Defendant was, at all times relevant, aware that their handling, storage, use, disposal, and treatment of toxic wastes at the Orlando Facility actually resulted in the unreasonably dangerous emissions of toxic wastes into the surrounding communities.

170. Notwithstanding this actual knowledge, Defendant breached its duties by, among other things:

a. Filling unlined trenches and ponds with toxic wastes;

b. Transporting toxic wastes through defective lines, piping systems, and broken concrete troughs;

c. Draining toxic wastes directly onto soil;

d. Emitting dangerous amounts of toxic wastes into the air;

e. Failing to employ safe methods to adequately control, reduce, or eliminate toxic waste emissions from its Orlando Facility;

f. Failing to use alternative practices and procedures which would not result in the emission of toxic wastes into neighboring communities;

g. Emitting dangerous amounts of toxic wastes into a populated area;

h. Failing to warn neighboring residents and workers that they were being exposed to toxic wastes and of the consequent risks of disease the residents and workers acquired because of that exposure;

i. Failing to take steps to minimize or eliminate the release of toxic wastes, by failing to utilize alternative procedures that would not result in the release of toxic wastes;

j. Failing to use proper materials in constructing and maintaining the Orlando Facility; and

k. Failing to institute proper procedures and training to prevent releases of toxic wastes.

171. Defendant's failures in these and other respects in the face of actual knowledge regarding the risks of unreasonable levels of toxic contamination constitutes willful, wanton, reckless and outrageous conduct, and demonstrates an utter indifference and/or conscious disregard to the health, safety, and well-being of Plaintiffs and those living and working in the areas surrounding its Orlando Facility.

172. As a direct and proximate result of Defendant's willful, wanton, reckless and outrageous conduct, Plaintiffs suffered injuries, as described herein.

COUNT VII—MEDICAL MONITORING

173. Plaintiffs repeat, reallege, and incorporate by reference the allegations contained in paragraphs 1 through 119 as if fully set forth herein.

174. Plaintiffs have been significantly exposed to levels of toxic contaminants that are far higher than normal background levels. These toxic wastes include dangerous carcinogens that have been proven to cause cancer in humans, and substances which cause numerous other debilitating illnesses.

175. Plaintiffs came into direct contact with, and consumed, these toxic contaminants due to Defendant's negligence.

176. As a proximate result of their exposure to these toxic contaminants, Plaintiffs have a significantly increased risk of contracting several different types of cancer and other debilitating diseases. These increased risks make periodic diagnostic medical examinations reasonably necessary.

177. Monitoring procedures exist that makes early detection of these cancers and debilitating diseases possible. These monitoring procedures are different than those normally recommended in the absence of toxic exposures and are reasonably necessary due to Plaintiffs' exposures to toxic wastes from the Orlando Facility.

178. As a result, Plaintiffs should be awarded the quantifiable costs of such a monitoring regime.

REQUEST FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that the Court enter judgment in their favor and against Defendants as follows:

1. For an award of damages, including nominal and compensatory damages, including past and future pain and suffering, past and future treatment costs, and other amounts as allowed by law and in an amount to be determined;
2. For an award to fund a medical monitoring program in an amount determined just and reasonable;
3. For an award of punitive damages as allowed by law and in an amount to be determined;
4. For an award of attorneys' fees, costs, and litigation expenses, as allowed by law;
5. For prejudgment interest on all amounts awarded;
6. Such other and further relief as this Court may deem just and proper.

DEMAND FOR JURY TRIAL

The undersigned hereby demands a jury trial as to all issues so triable.

Date: September 28, 2020

/s/ T. Michael Morgan

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