

**SUMMONS
(CITACION JUDICIAL)**

FOR C
(SOLO PAI)



5075558

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

U-HAUL CO. OF CALIFORNIA, a California Corporation, AMERCO, a Nevada Corporation, U-HAUL INTERNATIONAL, INC., a Nevada Corporation

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):
THE PEOPLE OF THE STATE OF CALIFORNIA**

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.courtinfo.ca.gov/selfhelp/espanol/), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.courtinfo.ca.gov/selfhelp/espanol/) o poniéndose en contacto con la corte o el colegio de abogados locales.

The name and address of the court is:
(El nombre y dirección de la corte es):
ALAMEDA COUNTY SUPERIOR COURT
1225 Fallon Street, Room 109
Oakland, California 94612

CASE NUMBER:
(Número del Caso): RG06-281117

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
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Post Office Box 70550- Oakland, CA 94612-0550

DATE: (Fecha) OCT 13 2006
Clerk, by Pat S. Sweeten (Secretario) Deputy (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



- NOTICE TO THE PERSON SERVED:** You are served
- as an individual defendant.
 - as the person sued under the fictitious name of (specify):
 - on behalf of (specify):
under: CCP 416.10 (corporation) CCP 416.60 (minor)
 CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
 CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
 other (specify):
 - by personal delivery on (date):

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20
 21 SUPERIOR COURT OF CALIFORNIA
 22 COUNTY OF ALAMEDA

23
 24 THE PEOPLE OF THE STATE OF CALIFORNIA,
 Plaintiff,
 25 v.
 26 U-HAUL CO. OF CALIFORNIA, a California
 Corporation, AMERCO, a Nevada Corporation,
 27 U-HAUL INTERNATIONAL, INC., a Nevada
 Corporation, and DOES 1 through 98
 28 Defendants.

Case No.: RG06-281117

**FIRST AMENDED
 COMPLAINT FOR CIVIL
 PENALTIES AND
 INJUNCTIVE RELIEF**

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1 PLAINTIFF, PEOPLE OF THE STATE OF CALIFORNIA, is informed and believes, and
2 based thereon, alleges as follows:

3 **PLAINTIFF**

4 1. Plaintiff, PEOPLE OF THE STATE OF CALIFORNIA (“People”), brings this
5 action by and through Bill Lockyer, Attorney General of the State of California (“Attorney
6 General”), and by and through Stephan R. Passalacqua, Sonoma County District Attorney;
7 Thomas J. Orloff, Alameda County District Attorney; Jan Scully, Sacramento County District
8 Attorney; James P. Willett, San Joaquin District Attorney; David W. Paulson, Solano County
9 District Attorney; Kamala Harris, District Attorney of the City and County of San Francisco;
10 George Kennedy, District Attorney of the County of Santa Clara, and Grover Trask II, District
11 Attorney of the County of Riverside (collectively “the Local Prosecutors”).

12 2. Pursuant to California Health and Safety Code section 25145.4, the Attorney
13 General may bring a civil action in the name of the People of the State of California to enjoin any
14 violation of Chapter 6.5 of Division 20 of the California Health and Safety Code (hereinafter
15 “Chapter 6.5”) and seek civil penalties for violations of the provisions of Chapter 6.5.

16 3. Pursuant to California Health and Safety Code section 25182, the Local
17 Prosecutors may bring a civil action in the name of the People of the State of California to enjoin
18 any violation of Chapter 6.5 and to seek civil penalties for violations of the provisions of Chapter
19 6.5.

20 4. Chapter 6.5 was promulgated to protect the public health and the environment and
21 to conserve natural resources by establishing regulations and incentives to ensure that the
22 generators of hazardous waste employ technology and management practices for the safe
23 handling, treatment, recycling, and destruction of hazardous wastes prior to disposal.

24 5. Pursuant to the California Health and Safety Code sections 25514 and 25516.1,
25 the Attorney General and the Local Prosecutors may bring an action for civil penalties for
26 violations of California Health and Safety Code sections 25503.5 to 25505, inclusive, and
27 sections 25508 to 25520, inclusive. Pursuant to California Health and Safety Code section
28 25516, the Attorney General and the Local Prosecutors, may bring an action to enjoin a violation

1 of Chapter 6.95 of Division 20 of the California Health and Safety Code (hereinafter "Chapter
2 6.95").

3 6. Chapter 6.95 was promulgated in order to prevent or mitigate the damage to health
4 and safety of the public and the environment from the release of hazardous materials into the
5 workplace and environment. In enacting Chapter 6.95, the California Legislature declared that in
6 order to protect the public health and safety and the environment, it was necessary to establish
7 business and area plans relating to the handling and release or threatened release of hazardous
8 materials. The Legislature recognized that the information provided in business and area plans is
9 necessary in order to prevent or mitigate the damage to health and safety of persons and the
10 environment from the release or threatened release of hazardous materials into the workplace and
11 environment.

12 7. Pursuant to California Fish and Game Code section 5650.1(d), the Attorney General
13 and the Local Prosecutors may bring an action for civil penalties and injunctive relief in the name
14 of the People of the State of California for violations of section 5650 of the California Fish and
15 Game Code.

16 8. Pursuant to California Business and Professions Code sections 17203, 17204, and
17 17206, the Attorney General and the Local Prosecutors may bring actions in the name of the People
18 of the State of California in a superior court for an injunction against any person who engages, had
19 engaged, or proposes to engage in unfair competition and for civil penalties for each act of unfair
20 competition.

21 9. Plaintiff brings this action without prejudice to any other action or claims which it
22 may have based on separate, independent and unrelated violations of Chapters 6.5 or 6.95 of
23 Division 20 of the California Health and Safety Code by the defendants and/or on facts which are
24 not alleged in this Complaint.

25 **DEFENDANT U-HAUL CO. OF CALIFORNIA**

26 10. Defendant U-Haul Co. of California (hereinafter "UHC") is now, and at all times
27 mentioned in this complaint, was a California corporation which does and did business in the
28 State of California, including but, not limited to, business at the facilities identified in Exhibit A,

1 which is incorporated herein by reference (hereinafter collectively referred to as "Covered
2 Facilities"). UHC managed hazardous wastes and hazardous materials at facilities throughout
3 California, including the Covered Facilities. UHC's principal address is 44511 S. Grimmer
4 Boulevard, Fremont, California. Plaintiff is informed and believes and thereon alleges that UHC
5 is an owner and/or operator of some or all of the Covered Facilities.

6 11. In this complaint, when reference is made to any act of Defendant UHC, such
7 allegations shall mean that the owners, officers, directors, agents, employees, contractors, or
8 representatives of Defendant UHC did, or UHC authorized, such acts, or negligently failed and
9 omitted to adequately or properly supervise, control or direct its employees and agents while
10 engaged in the management, direction, operation or control of the affairs of the business
11 organization and did so while acting within the course and scope of employment or agency of
12 UHC.

13 12. Defendant UHC is now, and at all times mentioned in this complaint, was a
14 subsidiary of defendant U-Haul International, Inc.

15 **DEFENDANT AMERCO**

16 13. Defendant AMERCO is now, and at all times mentioned in this complaint, was a
17 Nevada corporation with its principal place of business in Reno, Nevada. AMERCO does and
18 did business in the State of California, including but not limited to business at and through the
19 Covered Facilities. Plaintiff is informed and believes and thereon alleges that Defendant
20 AMERCO owned and/or operated some or all of the Covered Facilities, either directly or through
21 control of its subsidiaries, including but not limited to UHC and UHI.

22 14. AMERCO is the holding company of the U-Haul family of companies, which
23 includes defendant U-Haul International, Inc., AMERCO's moving and self-storage business,
24 and UHC, a second level subsidiary of Amerco.

25 **DEFENDANT U-HAUL INTERNATIONAL INC.**

26 15. Defendant U-Haul International, Inc. (hereinafter "UHI"), is now, and at all times
27 mentioned in this complaint, was a Nevada corporation with its principal place of business in
28 Phoenix, Arizona which does and did business in the State of California, including, but not

1 limited to, business at and through the Covered Facilities. Defendant UHI is now, and at all
2 times mentioned in this complaint, was a first level subsidiary of defendant AMERCO. Plaintiff
3 is informed and believes and thereon alleges that defendant UHI owned and/or operated some or
4 all of the Covered Facilities, either directly or through control of its subsidiaries, including UHC.

5 16. Plaintiff is ignorant of the names of those defendants identified as Does 1 through
6 98, who are therefore sued under fictitious names. When the true names of these defendants
7 have been ascertained, Plaintiff will amend the complaint to substitute the true names of each
8 Doe defendant in place of the fictitious names.

9 **ALTER-EGO, AGENTS, AIDERS, ABETTORS, AND CO-CONSPIRATORS**

10 17. At all times mentioned herein, a unity of interest and ownership existed among
11 defendants UHC and AMERCO and UHI, such that the separateness of these defendants from
12 each other never existed. Recognition of the privilege of separate existence would promote
13 injustice because AMERCO and UHI control and at all relevant times controlled defendant UHC
14 such that it is now, and at all time mentioned in this complaint was, merely an instrumentality,
15 agency, conduit, or adjunct of defendants AMERCO and UHI.

16 18. Defendants, and each of them, at all relevant times, acted as the principal, agent, or
17 representative of each of the other defendants, and in doing the acts alleged, each defendant was
18 acting within the course and scope of the agency relationship with each of the other defendants.

19 19. Whenever reference is made in this complaint to any act of any defendant, such
20 reference shall mean that such defendant did the act alleged through its officers, directors,
21 employees, agents and/or representatives while they were acting within the actual or ostensible scope
22 of their authority.

23 20. Each defendant intended to, and did encourage, facilitate, or assist in the
24 commission of the acts alleged, and thereby aided and abetted the other defendants in the
25 unlawful conduct. The unlawful acts alleged in this complaint were those acts defendants
26 intended to and did facilitate or were the natural and reasonable consequences of the acts
27 defendants intended to and did facilitate.

28 21. Defendants have engaged in a conspiracy, common enterprise, and common

1 course of conduct, the purpose of which is and was to engage in the violations of law alleged in
2 this complaint. The conspiracy, common enterprise, and common course of conduct continue to
3 the present.

4 22. Defendants, and each of them, are, and at all times relevant to the claims in this
5 complaint, were legally responsible for compliance with the provisions of the California Health
6 and Safety Code, including, but not limited to, Chapters 6.5 and 6.95 of Division 20, at their
7 California facilities, including the Covered Facilities.

8 **VENUE**

9 23. Venue is proper in this county pursuant to California Health and Safety Code section
10 25183 in that violations alleged in the Complaint occurred in the County of Alameda and that the
11 other statewide violations alleged in the complaint are related to such violations. UHC's principal
12 office is located in Alameda County.

13 **GENERAL ALLEGATIONS**

14 24. Plaintiff and Defendant UHC entered into a series of agreements to toll any
15 applicable statute of limitations. As a result of these agreements, the period of time from
16 October 20, 2005, through the date of the filing of the Complaint herein, inclusive, ("Tolling
17 Period"), will not be included in computing the time limited by any statute of limitations under
18 the causes of action that may arise out of claims covered by the tolling agreement. Those claims
19 include the claims that are brought in this action.

20 25. Plaintiff and Defendant UHI entered into a tolling agreement to toll any applicable
21 statute of limitations. As a result of this agreement, the period of time from October 20, 2005,
22 through, at least August 21, 2006, will not be included in computing the time limited by any
23 statute of limitations under the causes of action that may arise out of claims covered by the
24 tolling agreement. Those claims include the claims that are brought in this action.

25 26. Plaintiff is informed and believes and thereupon alleges that defendants, and each
26 of them, engaged in actions in violation of applicable laws, including but not limited to the
27 following violations, and including violations which occurred at or in connection with their
28 Covered Facilities:

- 1 a. Failed to provide training to employees, including employees at the Covered
2 Facilities in accordance with California Code of Regulations, title 22, sections
3 66265.16 and 66265.56;
- 4 b. Failed to maintain documentation of training of employees, including employees
5 at the Covered Facilities in accordance with California Code of Regulations, title
6 22, section 66265.16;
- 7 c. Failed to establish and implement business plans for its facilities, including the
8 Covered Facilities in accordance with the requirements of California Health and
9 Safety Code section 25504;
- 10 d. Failed to provide adequate training of all employees, including employees at the
11 Covered Facilities, to respond to a hazardous material spill, including the failure
12 to familiarize employees with release reporting procedures in the business
13 response plans in accordance with California Health and Safety Code section
14 25504;
- 15 e. Failed to maintain inventories of hazardous materials, including inventories at the
16 Covered Facilities, in accordance with California Health and Safety Code sections
17 25505 and 25509;
- 18 f. Failed to prepare hazardous waste manifests, including manifests at the Covered
19 Facilities, in accordance with California Code of Regulations, title 22, section
20 66262.20;
- 21 g. Failed to identify the date of accumulation on containers of hazardous waste,
22 including hazardous waste at the Covered Facilities, in accordance with California
23 Code of Regulations, title 22, section 66262.34(a);
- 24 h. Failed to manage containers of hazardous waste, including hazardous waste at the
25 Covered Facilities, in accordance with California Code of Regulations, title 22,
26 section 66262.34(a)(1);
- 27 i. Failed to label containers containing hazardous waste, including hazardous waste at
28 the Covered Facilities, in accordance with California Code of Regulations, title 22,

- 1 section 66262.34(f);
- 2 j. Failed to close containers containing hazardous waste, including containers at the
- 3 Covered Facilities, in accordance with California Code of Regulations, title 22,
- 4 section 66265.173;
- 5 k. Failed to equip facilities, including the Covered Facilities, in accordance with
- 6 California Code Regulations, title 22, section 66265.32;
- 7 l. Failed to have contingency plans at facilities, including the Covered Facilities, in
- 8 accordance with California Code of Regulations, title 22, sections 66265.51 and
- 9 66265.52;
- 10 m. Failed to comply with emergency procedures for facilities, including for the Covered
- 11 Facilities, in accordance with California Code of Regulations, title 22, section
- 12 66265.56;
- 13 n. Failed to report releases of hazardous materials at facilities, including at the Covered
- 14 Facilities, to an administering agency in accordance with California Health and
- 15 Safety Code section 25507(a);
- 16 o. Failed to have material safety data sheets readily available for all regulated hazardous
- 17 materials on the premises at facilities, including the Covered Facilities in violation
- 18 of the Uniform Fire Code as adopted by the California Fire Code section 8001.6;
- 19 p. Failed to have secondary containment for hazardous materials present on the
- 20 premises of facilities, including the Covered Facilities, in violation of the Uniform
- 21 Fire Code as adopted by the California Fire Code section 8003.1.3.3;
- 22 q. Transferred custody of hazardous wastes to a transporter which did not hold a valid
- 23 registration issued by the Department of Toxic Substances Control in violation of
- 24 California Health and Safety Code section 25163(a)(1);
- 25 r. Carried, and engaged in the transportation of, hazardous waste at, to, from and
- 26 between facilities, including at the Covered Facilities, without a valid registration
- 27 issued by the California Department of Toxic Substances Control in violation of
- 28 California Health and Safety Code section 25163(a)(1);

- 1 s. Deposited, permitted to pass into, or placed where it could pass into waters of the
2 State of California, at facilities, including at the Covered Facilities, substances or
3 materials deleterious to fish, plant life, or bird life in violation of Fish and Game
4 Code section 5650;
- 5 t. Permitted the discharge of vehicle wash water containing pollutants and/or
6 contaminants to the storm water conveyance system and to the waters of the State of
7 California at facilities, including the Covered Facilities, without an appropriate
8 discharge permit;
- 9 u. Failed to retain manifests on site at facilities, including the Covered Facilities, in
10 accordance with California Code of Regulations, title 22, section 66262.40(a);
- 11 v. Failed to submit and certify a business plan for facilities, including the Covered
12 Facilities, in accordance with Health and Safety Code section 25505(a)(1);
- 13 w. Failed to modify and submit modified business plans for facilities, including the
14 Covered Facilities, in accordance with Health and Safety Code section 25505(b) and
15 25510;
- 16 x. Failed to inspect hazardous waste areas at facilities, including the Covered Facilities,
17 on a weekly basis in accordance with California Code of Regulations, title 22, section
18 66264.174;
- 19 y. Failed to label containers of hazardous waste before transporting or offering
20 hazardous waste for transportation off-site at facilities, including at the Covered
21 Facilities, in accordance with California Code of Regulations, title 22, section
22 66262.31;
- 23 z. Failed to operate facilities, including the Covered Facilities, in a manner to minimize
24 the possibility of a fire, explosion or any unplanned sudden or non sudden release of
25 hazardous waste or hazardous waste constituents to air, soil, or surface water which
26 could threaten human health or the environment in accordance with California Code
27 of Regulations, title 22, section 66264.31;
- 28 aa. Failed to inspect tanks and tank equipment at facilities, including the Covered

1 Facilities, in accordance with California Code of Regulations, title 22, section
2 66265.195;

3 bb. Failed to comply with the requirements of numerous local ordinances in violation of
4 California Business and Professions Code section 17200.

5 27. Defendants' noncompliance threatened public health and safety and the environment.

6

7 **FIRST CAUSE OF ACTION**
8 **(Intentional Violations of Hazardous Waste Control Laws)**

8 28. Plaintiff realleges Paragraphs 1 through 27, inclusive.

9 29. Defendants, and each of them, are liable for civil penalties as set forth in
10 California Health and Safety Code section 25189(b) for each intentional violation of any
11 provision of Chapter 6.5 of the California Health and Safety Code and any permit, rule,
12 regulation, standard, or requirement issued or promulgated pursuant thereto which occurred
13 within five years after the discovery of the facts constituting grounds for commencing the action
14 on these claims, exclusive of the tolling periods set forth in Paragraphs 24 and 25 herein.

15 30. Defendants must be permanently enjoined from further violations of Chapter 6.5.

16

17 **SECOND CAUSE OF ACTION**
18 **(Negligent Violations of Hazardous Waste Control Laws)**

18 31. Plaintiff realleges Paragraphs 1 through 27, inclusive.

19 32. Defendants, and each of them, are liable for civil penalties as set forth in
20 California Health and Safety Code section 25189(b) for each negligent violation of any provision
21 of Chapter 6.5 of the California Health and Safety Code and any permit, rule, regulation,
22 standard, or requirement issued or promulgated pursuant thereto which occurred within five years
23 after the discovery of the facts constituting grounds for commencing the action on these claims,
24 exclusive of the tolling periods set forth in Paragraphs 24 and 25 herein.

25 33. Defendants must be permanently enjoined from further violations of Chapter 6.5

26

27 **THIRD CAUSE OF ACTION**
28 **(Strict Liability for Violations of Hazardous Waste Control Laws)**

28 34. Plaintiff realleges Paragraphs 1 through 27, inclusive.

1 35. Defendants, and each of them are liable for civil penalties as set forth in
2 California Health and Safety Code section 25189.2(b) for each violation of any provision of
3 Chapter 6.5 of the California Health and Safety Code and any permit, rule, regulation, standard,
4 or requirement issued or promulgated pursuant thereto which occurred within five years after the
5 discovery of the facts constituting grounds for commencing the action on these claims, exclusive
6 of the Tolling Period set forth in Paragraphs 24 and 25 herein.

7 36. Defendants must be permanently enjoined from further violations of Chapter 6.5.

8
9 **FOURTH CAUSE OF ACTION**
(Violations of Hazardous Materials Release Response Plans and Inventory Laws)

10 37. Plaintiff realleges Paragraphs 1 through 27, inclusive.

11 38. Defendants, and each of them are liable for civil penalties as set forth in
12 California Health and Safety Code section 25514 for each violation of California Health and
13 Safety Code sections 25503.5, 25504, 25505, 25509 and 25510 as set forth above.

14 39. Defendants must be permanently enjoined from further violations of Chapter 6.95.

15
16 **FIFTH CAUSE OF ACTION**
(Violations of Fish & Game Code)

17 40. Plaintiff realleges Paragraph 1 through 27, inclusive.

18 41. Pursuant to Fish and Game Code section 5650.1, any person who violates Fish
19 and Game Code section 5650 is subject to civil penalties for each violation.

20 42. Defendants, and each of them are liable for civil penalties as set forth in
21 California Fish and Game Code section 5650.1 for each violation which occurred within three
22 years after the discovery of the facts constituting grounds for commencing the action on these
23 claims, exclusive of the tolling period set forth in Paragraphs 24 and 25 herein.

24 43. Defendants must be permanently enjoined from further violations of California
25 Fish and Game Code section 5650.

26
27 **SIXTH CAUSE OF ACTION**
(Violations of Unfair Competition Laws)

28 44. Plaintiff realleges Paragraphs 1 through 43, inclusive.

1 45. By the acts described herein, defendants, and each of them, engaged in daily acts of
2 unlawful and/or unfair competition prohibited by California Business and Professions Code sections
3 17200-17208. Each act constitutes an unlawful and/or unfair business practice.

4 46. Pursuant to California Business and Professions Code section 17206, defendants, and
5 each of them, are liable for civil penalties for each violation that accrued within four years of this
6 complaint, exclusive of the tolling periods set forth in Paragraphs 24 and 25 herein.

7 47. Defendants must be permanently enjoined from engaging in activities that, as alleged
8 in this Complaint, violate Chapters 6.5 and 6.95 of Division 20 of the California Health and Safety
9 Code, the Uniform Fire Code as adopted by the California Fire Code, applicable waste discharge
10 requirements, Fish and Game Code section 5650, and local ordinances, and which thereby constitute
11 unfair competition within the meaning of California Business and Professions Code section 17200.

12 WHEREFORE, PLAINTIFF PRAYS FOR THE FOLLOWING RELIEF:

13 1. A permanent injunction requiring defendants, and each of them, to comply with those
14 provisions of California Health and Safety Code, Division 20, Chapter 6.5 which it is alleged to have
15 violated;

16 2. A permanent injunction requiring defendants, and each of them, to comply with those
17 provisions of California Health and Safety Code, Division 20, Chapter 6.95 which it is alleged to
18 have violated;

19 3. A permanent injunction prohibiting defendants, and each of them, from violating
20 California Fish and Game Code section 5650;

21 4. A permanent injunction prohibiting defendants, and each of them, from engaging in
22 activity that violates the provisions of Chapters 6.5 and 6.95 of Division 20 of the California Health
23 and Safety Code, the Uniform Fire Code as adopted by the California Fire Code, applicable waste
24 discharge requirements, and Fish and Game Code section 5650 as alleged in this complaint which
25 thereby constitute unfair competition within the meaning of California Business and Professions
26 Code section 17200;

27 5. Civil penalties according to proof against defendants, and each of them, pursuant to
28 California Health and Safety Code section 25189(b);

1 6. Civil penalties according to proof against defendants, and each of them, pursuant to
2 California Health and Safety Code section 25189.2;

3 7. Civil penalties according to proof against defendants, and each of them, pursuant to
4 California Health and Safety Code section 25514;

5 8. Civil penalties according to proof against defendants, and each of them, pursuant to
6 Fish and Game Code section 5650.1;

7 9. Civil penalties according to proof against defendants, and each of them, pursuant to
8 California Business and Professions Code section 17206 for each act of unfair competition engaged
9 in by defendants, and each of them;

10 10. Grant the Plaintiff its cost of inspection, investigation, attorneys fees, enforcement,
11 prosecution, and suit, herein, including but not limited to such costs as are authorized for
12 reimbursement pursuant to Code of Civil Procedure section 1021.8; and,

13 11. Grant such other and further relief as the Court deems just and proper.
14

15 RESPECTFULLY REQUESTED:

16 Dated: October 13, 2006

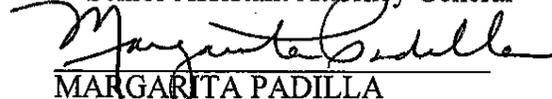
BILL LOCKYER, Attorney General
of the State of California

TOM GREENE

Chief Assistant Attorney General

THEODORA P. BERGER

Senior Assistant Attorney General



MARGARITA PADILLA

Deputy Attorney General

Attorneys for Plaintiff, People of the State of
California

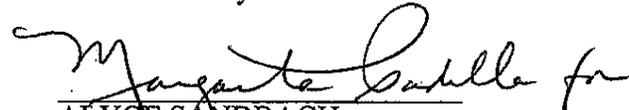
1 Dated: October 13, 2006

STEPHAN R. PASSALACQUA, District Attorney
of the County of Sonoma

2
3 
4 JEFFREY W. HOLTZMAN
5 Deputy District Attorney
6 Attorneys for Plaintiff, People of the State
7 of California

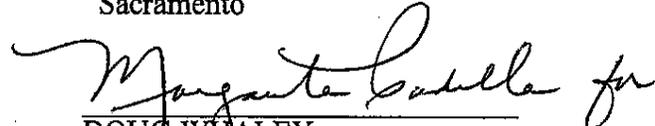
6 Dated: October 13, 2006

THOMAS J. ORLOFF, District Attorney
of the County of Alameda

7
8 
9 ALYCE SANDBACH
10 Deputy District Attorney
11 Attorneys for Plaintiff, People of the State
12 of California

11 Dated: October 13, 2006

JAN SCULLY, District Attorney of the County of
Sacramento

12
13 
14 DOUG WHALEY
15 Deputy District Attorney
16 Attorneys for Plaintiff, People of the State of
17 California

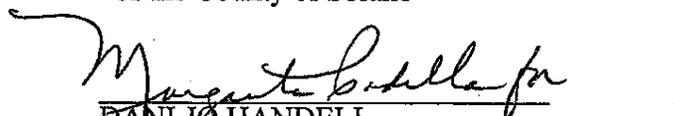
16 Dated: October 13, 2006

JAMES P. WILLETT, District Attorney
of the County of San Joaquin

17
18 
19 DAVID LIREY
20 Supervising Deputy District Attorney
21 Attorneys for Plaintiff, People of the State of
22 California

21 Dated: October 13, 2006

DAVID PAULSON, District Attorney
of the County of Solano

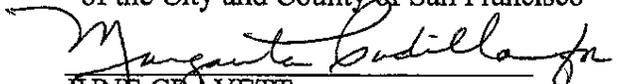
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23 
24 DANI JO HANDELL
25 Deputy District Attorney
26 Attorneys for Plaintiff, People of the State of
27 California

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Dated: October 13, 2006

KAMALA HARRIS, District Attorney
of the City and County of San Francisco



JUNE CRAVETT
Assistant District Attorney
Attorneys for Plaintiff, People of the State of
California

Dated: October 13, 2006

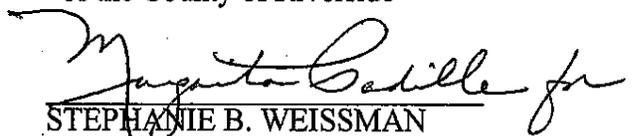
GEORGE W. KENNEDY, District Attorney of
the County of Santa Clara



KENNETH ROSENBLATT
Deputy District Attorney
Attorneys for Plaintiff, People of the State of
California

Dated: October 13, 2006

GROVER TRASK II, District Attorney
of the County of Riverside



STEPHANIE B. WEISSMAN
Deputy District Attorney
Attorneys for Plaintiff, People of the State of
California

EXHIBIT A

| Location | Street/ Intersection | City | State | Zip Code |
|---|--------------------------------|------------------|-------|----------|
| PARAMOUNT MFG CO INC | 5884 PARAMOUNT BOULEVARD | LONG BEACH | CA | 90805 |
| U-HAUL CTR OF TAHOE | 1105 EMERALD BAY RD | SOUTH LAKE TAHOE | CA | 96150 |
| U-HAUL CENTER OF ROSEVILLE | 111 WILLIS ROAD | ROSEVILLE | CA | 95678 |
| UHC OF EAST SACRAMENTO U-HAUL CTEL CAMINO | 1650 EL CAMINO AVE | SACRAMENTO EAST | CA | 95815 |
| WATT AVENUE MOVING CENTER | 7407 WATT AVENUE #1 | NORTH HIGHLANDS | CA | 95660 |
| U-HAUL CTR 65TH ST | 2738 65TH STREET | SACRAMENTO EAST | CA | 95817 |
| U-HAUL CTR DOWNTOWN | 2830 BROADWAY | SACRAMENTO EAST | CA | 95817 |
| U-HAUL CTR OF RANCHO | 11351 PYRITES WAY | RANCHO CORDOVA | CA | 95670 |
| U-HAUL CT OF MATHER | 10161 MILLS STATION | SACRAMENTO EAST | CA | 95827 |
| U-HAUL HSC SACRAMENTO | 5220 AUBURN BLVD | SACRAMENTO EAST | CA | 95841 |
| U-HAUL STOPJAGE EL CAMINO AVE | 1850 GLENROSE AVENUE | SACRAMENTO EAST | CA | 95815 |
| UHC OF EAST BAY U-HAUL CTR FREMONT | 44511 GRIMMER BLVD. | FREMONT | CA | 94538 |
| U-HAUL CT LIVERMORE | 3429 GARDELLA PLAZA | LIVERMORE | CA | 94550 |
| U-HAUL CTR HAYWARD | 529 JACKSON ST | HAYWARD | CA | 94544 |
| U-HAUL CTR OAKLAND | 5330 INTERNATIONAL BLVD | OAKLAND | CA | 94601 |
| U-HAUL CTR DUBLIN | 6265 SCARLETT COURT | DUBLIN | CA | 94568 |
| U-HAUL CTR THORNTON | 4833 THORNTON AVE | FREMONT | CA | 94536 |
| U-HAUL CTR CAMPBELL | 1266 WHITE OAKS AVE | CAMPBELL | CA | 95008 |
| U-HAUL CTR OAKLAND | 2395 OAKLAND RD | SAN JOSE | CA | 95131 |
| U-HAUL CTR CURTNER | 705 CURTNER AVE | SAN JOSE | CA | 95125 |
| U-HAUL CTR DOWNTOWN | 1027 THE ALAMEDA | SAN JOSE | CA | 95126 |
| U-HAUL CTR TULLY RD | 2395 SENTER RD | SAN JOSE | CA | 95112 |
| U-HAUL CT OF EUREKA | 3220 JACOBS AVE | EUREKA | CA | 95501 |
| U-HAUL SAN RAFAEL | 1205 FRANCISCO BLVD | SAN RAFAEL | CA | 94901 |
| U-HAUL CTR OF UKIAH | 1140 N STATE ST | UKIAH | CA | 95482 |
| SAN FRANCISCO RERS | 1505 BAYSHORE BLVD | SAN FRANCISCO | CA | 94124 |
| UHC OF SAN FRANCISCO | 500 PAUL AVENUE | SAN FRANCISCO | CA | 94124 |
| U-HAUL CENTER EAST SIDE | 1788-3RD STREET | SAN FRANCISCO | CA | 94107 |
| U-HAUL CENTER 11TH STREET | 436-444 11THST | SAN FRANCISCO | CA | 94103 |
| U-HAUL CTR DOWNTOWN | 100 VALENCIA ST | SAN FRANCISCO | CA | 94103 |
| U-HAUL CTR BAYSHORE | 1575 BAYSHORE BLVD | SAN FRANCISCO | CA | 94124 |
| U-HAUL REDWOOD CITY | 2200 EL CAMINO REAL | REDWOOD CITY | CA | 94063 |
| U-HAUL CTR BELMONT | 554 EL CAMINO REAL | BELMONT | CA | 94002 |
| U-HAUL EL CAMINO REAL | 62 W EL CAMINO REAL | MOUNTAIN VIEW | CA | 94040 |
| U-HAUL OF SANTA CLARA | 1890 EL CAMINO REAL | SANTA CLARA | CA | 95050 |
| U-HAUL CENTER SUNNYVALE | 939 E EL CAMINO REAL | SUNNYVALE | CA | 94086 |
| U-HAUL SANTA ROSA | 3601 SANTA ROSA AVE | SANTA ROSA | CA | |
| UHC OF FRESNO | 749 N BLACKSTONE AVE | FRESNO | CA | 93701 |
| U-HAUL CTR OF FRESNO | 6116 N BLACKSTONE AV | FRESNO | CA | 93710 |
| U-HAUL CENTER KINGS CANYON | 4036 E VENTURA | FRESNO | CA | 93702 |
| U-HAUL CENTER WHITE LANE | 6201 - 6261 WHITE LANE | BAKERSFIELD | CA | 93309 |
| U-HAUL CT SOUTHSIDE | 102 S UNION AVE | BAKERSFIELD | CA | 93307 |
| U-HAUL BAKERSFIELD | 107 N CHESTER AVE | BAKERSFIELD | CA | 93308 |
| U-HAUL CTR MERCED | 1247 MARTIN LUTHER KING JR WAY | MERCED | CA | 95340 |

| Location | Street/ Intersection | City | State | Zip Code |
|--------------------------------|---------------------------|-----------------|-------|----------|
| U-HAUL CTR STOCKTON | 2701 N WILSON WAY | STOCKTON | CA | 95205 |
| U-HAUL CT HAMMERTOWN | 7701 TAM O SHANTER | STOCKTON | CA | 95210 |
| U-HAUL CENTER LODI | 450 N CHEROKEE | LODI | CA | 95240 |
| U-HAUL CENTER OF MODESTO | 4131 MCHENRY AVENUE | MODESTO | CA | 95356 |
| U-HAUL CT KANSAS AV | 837 KANSAS AVE | MODESTO | CA | 95351 |
| U-HAUL CENTER VISALIA | 2310 EAST MAIN STREET | VISALIA | CA | 93292 |
| U-HAUL CENTER BERKELEY | 2100 SAN PABLO AVE | BERKELEY | CA | 94702 |
| U-HAUL CENTER OF CHICO | 600 COUNTRY DR | CHICO | CA | 95928 |
| U-HAUL CENTER CONCORD | 2291 MONUMENT BLVD | CONCORD | CA | 94520 |
| U-HAUL CENTER RICHMOND | 1017 23RDST | RICHMOND | CA | 94804 |
| U-HAUL CENTER PITTSBURG | 75 BLISS AVE | PITTSBURG | CA | 94565 |
| U-HAUL STOCKTON BLVD | 6425 STOCKTON BLVD | SACRAMENTO WEST | CA | 95823 |
| U-HAUL OF FLORIN RD | 3026 FLORIN RD | SACRAMENTO WEST | CA | 95822 |
| U-HAUL STORAGE 47TH AV 7 HY 99 | 6414 44TH STREET | SACRAMENTO WEST | CA | 95823 |
| U-HAUL OF REDDING | 205 EAST CYPRESS AVE | REDDING | CA | 96002 |
| UHC OF WEST SACRAMENTO | 1425 W TEXAS ST#A | FAIRFIELD | CA | 94533 |
| U-HAUL CENTER OF VACAVILLE | 1240 E MONTE VISTA AVE | VACAVILLE | CA | 95688 |
| U-HAUL CENTER OF VALLEJO | 2050 SOLANO AVE | VALLEJO | CA | 94590 |
| U-HAUL CENTER YUBA CITY | 1446 COLUSA AVE | YUBA CITY | CA | 95991 |
| U-HAUL CENTER CAPITOL | 1750 W CAPITOL AVE | WEST SACRAMENTO | CA | 95691 |
| UHC OF VAN NUYS/SLO | 15838 STRATHERNST | VAN NUYS | CA | 91406 |
| U-HAUL CTR VAN NUYS | 7610 VAN NUYS BLVD | VAN NUYS | CA | 91406 |
| U-HAUL CTR AGOURA | 28650 CANWOOD RD | AGOURA | CA | 91301 |
| U-HAUL CT SEPULVEDA | 8500 SEPULVEDA BLVD | SEPULVEDA | CA | 91343 |
| U-HAUL CHATSWORTH | 21326 DEVONSHIRE ST | CHATSWORTH | CA | 91311 |
| U-HAUL NORTHRIDGE | 18160 PARTHENIAST | NORTHRIDGE | CA | 91324 |
| U-HAUL SANTA BARBARA | 4417 HOLLISTER AVE | SANTA BARBARA | | 93110 |
| U-HAUL STORAGE STATE STREET | 4101 STATE STREET | SANTA BARBARA | CA | 93110 |
| U-HAUL CTR OXNARD | 3020 SAVIERS RD | OXNARD | CA | 93030 |
| U-HAUL CTR VENTURA | 1322 E THOMPSON BLVD | VENTURA | CA | 93001 |
| U-HAUL CENTER OF SIMI VALLEY | 1577 EAST LOS ANGELES AVE | SIMI VALLEY | CA | 93065 |
| UHC OF LOS ANGELES WEST | 14202 S VAN NESS AVE | GARDENA | CA | 90249 |
| U-HAUL VENICE BOULEVARD | 1600 S WESTERN AVE | LOS ANGELES | CA | 90006 |
| U-HAUL CENTER ATLANTIC | 7842 ATLANTIC AVE | CUDAHY | CA | 90201 |
| U-HAUL WESTERN AVE | 4167 S WESTERN AVE | LOS ANGELES | CA | 90062 |
| U-HAUL CT HOLLYWOOD | 4550 HOLLYWOOD BLVD | HOLLYWOOD | CA | 90027 |
| U-HAUL CENTER OLD TOWN | 21707 S WESTERN AVE | TORRANCE | CA | 90501 |
| U-HAUL SANTA MONICA | 1747 LINCOLN BLVD | SANTA MONICA | CA | 90404 |
| U-HAUL SOUTH CENTRA | 11020 S VERMONT AVE | LOS ANGELES | CA | 90044 |
| U-HAUL CENTER LYNWOOD | 11716 LONG BEACH BLVD | LYNWOOD | CA | 90262 |
| U-HAUL CENTER CRENSHAW | 2451 S CRENSHAW | LOS ANGELES | CA | 90016 |
| U-HAUL CENTER LA BREA | 964 S LA BREA AVE | INGLEWOOD | CA | 90301 |
| U-HAUL OF GARDENA | 14206 S VAN NESS AVE | GARDENA | CA | 90249 |
| U-HAUL CENTER DOWNTOWN | 1836 SARAPHOEST | LOS ANGELES | CA | 90006 |
| U-HAUL CENTER TORRANCE | 24091 HAWTHORNE BLVD | TORRANCE | CA | 90505 |
| UHC OF LOS ANGELES EAST | 1985 EAST COVINA | COVINA | CA | 91724 |
| U-HAUL LEFFINGWELL | 15707 LEFFINGWELL ROAD | WHITTIER | CA | 90603 |

| Location | Street/ Intersection | City | State | Zip Code |
|--------------------------------|--------------------------|----------------------|-------|----------|
| U-HAUL CTR LAKEWOOD | 5880 PARAMOUNT BLVD | LONG BEACH | CA | 90805 |
| U-HAUL CENTER VALLEY BLVD | 17959 EAST VALLEY BLVD | CITY OF INDUSTRY | CA | 91744 |
| U-HAUL BALDWIN PARK | 1889 PUENTE AVE | BALDWIN PARK | CA | 91706 |
| U-HAUL E LOS ANGELES | 657 S ATLANTIC BLVD | LOS ANGELES EAST | CA | 90022 |
| U-HAUL CHARTER OAKS | 1961 E COVINA BLVD | COVINA | CA | 91724 |
| U-HAUL GARVEY AVE | 10704-28 GARVEY AVE | EL MONTE | CA | 91733 |
| U-HAUL CTR ROSEMEAD | 4251 N ROSEMEAD BLVD | ROSEMEAD | CA | 91770 |
| U-HAUL BELLFLOWER | 9302 ARTESIA BLVD | BELLFLOWER | CA | 90706 |
| U-HAUL CTR COVINA | 1040 NORTH AZUSA AVENUE | COVINA | CA | 91722 |
| U-HAUL LONG BEACH | 1600 E PAC COAST HWY | LONG BEACH | CA | 90806 |
| U-HAUL CHERRY AVE | 4045 CHERRY AVE | LONG BEACH | CA | 90807 |
| U-HAUL PICO RIVERA | 4425 ROSEMEAD BLVD | PICO RIVERA | CA | 90660 |
| U-HAUL STORAGE IVAR AVENUE | 3527 IVAR AVENUE | ROSEMEAD | CA | 91770 |
| U-HAUL STORAGE GLENDORA | 1301 E ROUTE 66 | GLENDORA | CA | 91740 |
| UHC OF SAN FERNANDO VALLEY | 27150 SIERRA HWY | CANYON COUNTRY | CA | 91351 |
| U-HAUL FLETCHER DRIVE | 2671 FLETCHER DRIVE | LOS ANGELES NORTH | CA | 90039 |
| U-HAUL CENTER FOOTHILLS | 2320 NORTH LINCOLN AVE | ALTADENA | CA | 91001 |
| U-HAUL CENTER BURBANK | 924 SOUTH VICTORY BLVD | BURBANK | CA | 91506 |
| U-HAUL NORTH HOLLYWOOD | 11666 VICTORY BLVD | NORTH HOLLYWOOD | CA | 91606 |
| U-HAUL SAN VALLEY | 7721 HOLLYWOOD WAY | BURBANK | CA | 91505 |
| U-HAUL CENTER GLENDALE | 1313 SOUTH BRAND AVE | GLENDALE | CA | 91204 |
| U-HAUL CENTER LANCASTER | 42925 SIERRA HWY | LANCASTER | CA | 93534 |
| U-HAUL CENTER PASADENA | 552 S RAYMOND AVE | PASADENA | CA | 91105 |
| U-HAUL STORAGE SYCAMORE AVENUE | 36 NORTH SYCAMORE AVENUE | PASADENA | CA | 91107 |
| PLACENTIA RERS | 862 S PLACENTIA AVE | PLACENTIA | CA | 92870 |
| UHC OF ORANGE CNTY | 920 W COMMONWEALTH AVE | FULLERTON | CA | 92832 |
| U-HAUL CENTER LAKE FOREST | 23211 OLIVE AVENUE | LAKE FOREST | CA | 92630 |
| U-HAUL SAN CLEMENTE | 310 AVE PICO | SAN CLEMENTE | CA | 92672 |
| U-HAUL HARBOR BLVD | 822 S HARBOR BLVD | SANTA ANA | CA | 92704 |
| U-HAUL COSTA MESA | 2680 NEWPORT BLVD | COSTA MESA | CA | 92627 |
| U-HAUL PLACENTIA | 860 S PLACENTIA AVE | PLACENTIA | CA | 92870 |
| U-HAUL BEACH BLVD | 19261 S BEACH | HUNTINGTON BEACH | CA | 92648 |
| U-HAUL CTR ANAHEIM | 626 S ANAHEIM BLVD | ANAHEIM | CA | 92805 |
| U-HAUL LAMBERT ROAD | 661 E LAMBERT | LAHABRA | CA | 90631 |
| U-HAUL CTR FAIRVIEW | 13042 FAIRVIEW AVE | GARDEN GROVE | CA | 92841 |
| U-HAUL WESTMINSTER | 7422 GARDEN GROVE BV | WESTMINSTER | CA | 92683 |
| U-HAUL CTR MIDWAY | 15182 BEACH BLVD | WESTMINSTER | CA | 92683 |
| U-HAUL CTR TUSTIN | 1431 EL CAMINO REAL | TUSTIN | CA | 92780 |
| U-HAUL STORAGE ORANGETHORPE | 2260 E ORANGETHORPE AVE | FULLERTON | CA | 92831 |
| U-HAUL CENTER GAREY AVENUE | 2190 NORTH GAREY AVENUE | POMONA | CA | 91767 |
| U-HAUL CENTER HOLT AVENUE | 1512 W HOLT AVE | POMONA | CA | 91768 |
| SAN BERNARDINO VAN BODY SHOP | 109 SOUTH D STREET | SAN BERNARDINO | CA | 92401 |
| UHC OF SAN BERNARDINO | 891 S ARROWHEAD AVE | SAN BERNARDINO | CA | 92408 |
| U-HAUL D STREET | 110 SOUTH D STREET | SAN BERNARDINO | CA | 92401 |
| U-HAUL CENTER ONTARIO | 831 E HOLT AVE | ONTARIO | CA | 91764 |

| Location | Street/ Intersection | City | State | Zip Code |
|------------------------------|-----------------------------|----------------|-------|----------|
| U-HAUL FOOTHILL BLV | 16823 FOOTHILL BLVD | FONTANA | CA | 92335 |
| U-HAUL CTR REDLANDS | 1200 ALABAMA STREET | REDLANDS | CA | 92374 |
| U-HAUL CTR BASELINE | 1198 E BASE LINE | SAN BERNARDINO | CA | 92410 |
| U-HAUL VICTORVILLE | 15811 LORENE DRIVE | VICTORVILLE | CA | 92392 |
| U-HAUL CTR BARSTOW | 800 E MAIN ST | BARSTOW | CA | 92311 |
| U-HAUL STORAGE RIALTO | 2775 FOOTHILL BLVD | RIALTO | CA | 92376 |
| U-HAUL CT EL CENTRO | 1745S4THST | EL CENTRO | CA | 92243 |
| UHC OF SAN DIEGO | 1805 MASSACHUSETTAV | LEMON GROVE | CA | 91945 |
| U-HAUL POINT LOMA | 3820 MIDWAY DR | SAN DIEGO | CA | 92110 |
| U-HAUL CENTER CAMP PENDLETON | 13 AREA AUTO SVC CTR #13032 | CAMP PENDLETON | CA | 92055 |
| U-HAUL CHULA VISTA | 99 N FOURTH AVENUE | CHULA VISTA | CA | 91910 |
| U-HAUL CTR 43RD ST | 4311 EL CAJON BLVD | SAN DIEGO | CA | 92105 |
| U-HAUL CTR EL CAJON | 1186 EAST MAIN | EL CAJON | CA | 92021 |
| U-HAUL MISSION AVE | 950 W MISSION AVE | ESCONDIDO | CA | 92025 |
| U-HAUL CTR OF POWAY | 13210 POWAY RD | POWAY | CA | 92064 |
| U-HAUL CENTER MIRAMAR | 9650 CAMINO RUIZ | SAN DIEGO | CA | 92126 |
| U-HAUL CT OCEANSIDE | 802 SOUTH COAST HWY | OCEANSIDE | CA | 92054 |
| U-HAUL STORAGE SPRING VALLEY | 8847 JAMACHA ROAD | SPRING VALLEY | CA | 91977 |
| U-HAUL STORAGE CARLSBAD | 6175 PASEO DEL NORTE | CARLSBAD | CA | 92009 |
| U-HAUL CENTER PERRIS | 1-215 &NUEVO ROAD | PERRIS | CA | 92570 |
| U-HAUL CENTER OF INDIO | 83491 HWY 111 | INDIO | CA | 92201 |
| U-HAUL CENTER VAN BUREN | 3600 VAN BUREN | RIVERSIDE | CA | 92503 |
| U-HAUL CTR OF MORENO VALLEY | 23730 SUNNYMEAD BLVD | MORENO VALLEY | CA | 92553 |
| U-HAUL CIRCLE CITY | 314 E 6TH ST | CORONA | CA | 92879 |
| U-HAUL CENTER HEMET | 380 N STATE ST | HEMET | CA | 92544 |
| U-HAUL PALIVI SPRINGS | 68075 RAMON ROAD | CATHEDRAL CITY | CA | 92234 |
| U-HAUL RIVERSIDE #3 | 1834 SPRUCE STREET | RIVERSIDE | CA | 92507 |
| UHC OF RIVERSIDE | 23700 SUNNYMEAD BLVD | MORENO VALLEY | CA | 92064 |

DECLARATION OF SERVICE BY U.S. MAIL

Case Name: *People v. U-Haul Co. of California, et al.*

No.: **RG06-281117**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On October 13, 2006, I served the attached **FIRST AMENDED COMPLAINT FOR CIVIL PENALTIES AND INJUNCTIVE RELIEF** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General at 1515 Clay Street, Suite 2000, P.O. Box 70550, Oakland, California 94612-0550, addressed as follows:

Raymond E. Hane II
Ryan S. Levine
Waller Landsen Dortch & Davis LLP
520 S. Grand Avenue, Suite 800
Los Angeles, CA 90071

Laurence J. DeRespino
2727 North Central Avenue
Phoenix, Arizona 85004

*Attorneys for Defendant U-Haul Co. of
California*

*Attorneys for Defendant U-Haul Co. of
California*

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on October 13, 2006, at Oakland, California.

TANISHA MARSHALL

Declarant



Signature