

CAUSE NO. 202037763

ROBB KING, ABUNDIA AGUIRRE, § IN THE DISTRICT COURT OF
INDIVIDUALLY AND AS NEXT §
FRIEND OF A.A., AND A.A., MINORS, §
ADA MONTOYA-TORRES, AS NEXT §
FRIEND OF V.M., MINOR, §
ADRIAN AGUIRRE-HERNANDEZ, §
ADRIAN TRUJILLO, ALBA JUDITH §
IBARRA, ALBA MONTESINO, ALBERTO §
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A.B. AND I.B., MINORS AND ZACKEITH §
EASON §

Plaintiffs,

VS.

HARRIS COUNTY, TEXAS

WATSON VALVE SERVICES, INC.,
WATSON GRINDING AND
MANUFACTURING, CO., MATHESON
TRI-GAS, INC., WESTERN
INTERNATIONAL GAS & CYLINDERS,
INC., KMHJ, LTD., KMHJ MANAGEMENT
COMPANY, LLC, 3M COMPANY,
FIRESTONE CRYOGENICS, INC.,
FIRESTONE CRYOGENIC EQUIPMENT,
INC., TELEDYNE EXPLORATION
COMPANY, TELEDYNE TECHNOLOGIES,
INC. F/K/A DETCON, INC., DETCON, INC.
D/B/A OLDHAM, ARC SPECIALTIES, INC.,
AUTOMATION PLUS, INC., TRCC, LLC,
DATAONLINE, LLC, AND INDUSTRIAL
SCIENTIFIC CORPORATION

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Defendants.

333rd JUDICIAL DISTRICT

**PLAINTIFFS’ ORIGINAL PETITION ALONG WITH
RULE 194 REQUESTS FOR DISCLOSURE TO ALL DEFENDANTS**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, ROBB KING, ABUNDIA AGUIRRE, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, ADA MONTOYA-TORRES, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, ADRIAN AGUIRRE-HERNANDEZ, ADRIAN TRUJILLO, ALBA JUDITH IBARRA, ALBA MONTESINO, ALBERTO O’CONNOR, ALEJANDRO TOWNS, ALEXANDER LUNA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, ALEXIS PARRA, ALFONSO SANTANA, ALICIA DETAMORE, ALICIA SANCHEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] AND [REDACTED], MINORS, ALVARO ARREOLA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, ALVARO MENDIETA, ALVARO MENDIETA, JR., AMELIA DIOSDADO, INDIVIDUALLY AND AS

NEXT FRIEND OF [REDACTED], MINOR, ANA ARACELY VILLATORO, ANA CRISTINA SERPAZ, ANA ORELLANA, ANDRE CRUZ NAVA, ANDRES ALBERTO URIOSTEGUI, ANDRES URIOSTEGUI AND MARIA URIOSTEGUI, INDIVIDUALLY AND AS NEXT FRIENDS OF [REDACTED], MINOR, ANGELA MCIVER, ANGELA PRUDENCIO, ANGELICA DIAZ-SANCHEZ, ANN RAWLINSIN AKA ANN RAWLINSON, ANNIEVA STOKAN, ANTONIO HECTOR LEAL, JR., ARTURO ZAMORA, ASHLEY FOSTER, AURORA COBOS, AUSTIN LASPRILLA, COURTYARD WESTWAY HOMEOWNERS ASSOCIATION, INC., AZUCENA SANCHEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS, AZUL MARINA PORRES, BARBARA ROGERS, BEATRIZ SALAZAR, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, BELKIS RIVERA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, BENITO AMBRIZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] [REDACTED] AND [REDACTED] [REDACTED], MINORS, BENJAMIN KING, BERNITA SIMON, BERTA ROMERO, BERTHA ALICIA SALVADOR, BESSY SANCHEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED] [REDACTED], MINORS, BETTY BAILEY, BIANKA CERVANTES-VAZQUEZ, BLANCA E. GUEVARA, BLANCA ELIZABETH QUIROZ MOJICA, BLANCA RAMOS, BLANCA SILVA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, BLANCA SOLORZANO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, BOB YEUNG, BRENDA PHAM, INDIVIDUALLY AND DBA MOMENTO TATTOO STUDIO, BRIGIDA CARBAJAL TAPIA LOPEZ, BRISA ZUNO, CALEB OLIVER, CANDELARIO

ORTIZ, CANDIDA VASQUEZ, CARLOS ARTEAGA, CARLOS GONZALEZ, CARLOS HERNANDEZ, CARLOS ALEXANDER LAZO, CAROLINA BELTRAN, INDIVIDUALLY AND OBO MONTENEGRO ENTERPRISES LLC DBA NEWTHINGS HOME FURNITURE, CASEY WOLFRAM, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS, CATHRINE M. NORTON, CECILIA ARREOLA, CELEA MURCIA, CELIA BALLESTEROS, CESAR CERVANTES, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, CHRIS MANZKE, CHRISTIAN BALLESTEROS, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, CHRISTIAN FUENTES, CHRISTIE HULTS, CHRISTINA HAND, CHRISTINA PHAM, CHRISTINE CHUMA, CINDY HERNANDEZ, CLABURNE LONG, CLAUDIA ARROYO, CLAUDIA OROZCO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, COLEMAN PEAY, COLLEEN PRICE, CONSTANTINO SOSA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, CORY BUZNEGO, CRISOFORO TORRES, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], [REDACTED] AND [REDACTED], MINORS, CRISTINE JOLINK, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS, CRISTHIAN MARTINEZ, CRISTIAN ZUNO, CUONG TU "WENDY" NGUYEN, CYNTHIA ISOME, CYNTHIA SEGOVIA, DALLANDYSHE TUSHE, DANIEL ALCALA, DANIEL ALCALA, SR., DANIEL MARTINEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, DARLEEN B. SCROGGIN, DARRELL LINDSEY, DARRELL SMITH, DAVID DIOSDADO, DAVID SOLORZANO, DAVID STOJAN, DEAN ENRIGHT, DEAN PIERCE, DEBORA MCLAUGHLIN, INDIVIDUALLY AND AS NEXT FRIEND OF

██████████ AND ██████████, MINORS, DEION HENDERSON, DELMY SALGADO, DEVIN YOUNG, DIANA DIAZ, DIANA HERNANDEZ, DIANA ZEPEDA, DINORAH GONZALEZ, DOLORES BOADO, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████, MINOR, DORA TURRUBIATES, DORA VALDEZ, DORIS RICHARDSON, DULCE IVONE SANCHEZ, DULCE RODRIGUEZ, DULCE ZUNO, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████, ██████████ AND ██████████, MINORS, DUNG HUNG PHAM, DYSHEBA FORD, EDUARDO FLORES, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████, MINOR, EDUARDO GALLEGOS, EDWARD RODRIGUEZ, EDWARD SNYDER, EDWIN A. MONTESINO, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████ AND ██████████, MINORS, EDWIN ALVAREZ, EFRAIN MORALES, ELIDA GUERRERO, ELIVIA ORTIZ, ELIZABETH DUBUQUE, ELVIRA LUNA, ELWOOD WHITFIELD NELSON, ELYSE KING, EMMANUEL QUIROZ, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████ AND ██████████, MINORS, ERIC INFANTE, ERICA BRAVO, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████ AND ██████████, MINORS, ERICK BADILLO, ESMERALDA GUZMAN, ESPERANZA CIFUENTES, ESPERANZA WEBBER, ESTHER RUIZ, EVELIN IBARRA, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████ ██████████ ██████████, MINOR, EVER BAUTISTA, INDIVIDUALLY AND DBA B&J TEXAS LONE STAR, FABIAN MONTENEGRO, INDIVIDUALLY AND OBO MONTENEGRO ENTERPRISES LLC DBA NEWTHINGS HOME FURNITURE, FABIOLA REGALADO, FAUSTINO QUIROZ, FAUSTINO ROMAN, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████, MINOR, FERNANDO CASTRO-CHAVEZ, FERNANDO ORDONEZ, FLOWER GARCIA, FRANCINE GRANT,

FRANCISCO COBOS, FRANCISCO LOZANO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, FRANCO AGUIRRE, FRANK WAYNE ROGERS, FRANKY ESTRADA, FREDDY MARTINEZ SANCHEZ, GABRIEL OLIVER, GABRIELA GUTIERREZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, GABRIELA MARTINEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, GABRIELA ZUNIGA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS, GARY TODD, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, GEORGE ALVARADO, GILBERT ORELLANA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, GINA IIAMS, GLADYS ZELAYA DE SANCHEZ, GLENDA LEE, GLORIA BETANCOURT, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, GLORIA SOLORZANO, GONZALO FISHER LOPEZ, GREG PRIOR, GREG SANDERS, GREYSI YOELY RIVERA AYALA, GUADALUPE BANDERA, GUADALUPE GARCIA CASTRO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, GUADALUPE SANCHEZ CONTRERAS, GUILLERMINA DIOSDADO, GUILLERMO DURAN, GUSTAVO BARAJAS, GUSTAVO VASQUEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, HANH NGUYEN, HAO ANH NGUYEN, HECTOR A. CERVANTES, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] [REDACTED], MINOR, HECTOR RUIZ, ENRIQUETA GARCIA AKA ERIQUETA GARCIA, INDIVIDUALLY AND AS REPRESENTATIVE OF HERBERTO CARDENAS ALMENDAREZ, DECEASED, HIEN THANH TRUONG, HILDA LIMAS,

INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, HOMERO REGALADO, JR., HORACIO RODRIGUEZ, HORTENCIA MONTES, HUEY LONG, I. J. CHANG, ILIANA OLMOS, INES VAZQUEZ-LOPEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, IRLANDA COPE, IRVIN GUEVARA, ISAMAR BALLESTEROS, ISIDORO FUENTES, ISUF TUSHE, J. CARMEN BOTELLO, JACQUELYN ST. JULES, JACQUIE VON HOHN, JAMES BAILEY, SR., JAMESHIA MITCHELL, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] [REDACTED], [REDACTED] AND [REDACTED], MINORS, JANET MARIE PRIOR, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, JEAN RICE, JEANETTE MCDANIEL, JEFFREY CREEL, JENEVA SMITH, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, JENNI DE GUZMAN, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, JENNIFER ESQUEDA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] [REDACTED], MINOR, JEREMIAH OLIVER, JERMAINE AUSTIN, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS, JESSEE RUIZ, JESSICA SOLIS, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, JESUS GONZALEZ, JESUS GUERRERO RODRIGUEZ, JESUS IBARRA, JESUS SANCHEZ MORAN, JIM CHAN, JIMENA ESCUDERO, JIMMY NGUYEN, JIN CHAN NA, JOAQUIN ALVAREZ, JONATHAN BERRONES, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, JORGE CHACON, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, JORGE LUIS GARZA, JORGE LUIS GARZA REYES, JOSE ALBERTO GARZA REYES, JOSE BANDERA, JOSE DAMIAN MEDELLIN, JOSE ELOY ORTEGA,

INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, JOSE GIRON, JOSE LUIS TORRES, JOSE MONTALVAN, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], [REDACTED], [REDACTED] AND [REDACTED], MINORS, JOSE PAULINO NAJAR, JOSE PAZ HERNANDEZ, JOSE R. SOLIS, SR., JOSE RAMOS, JOSE ROMERO, INDIVIDUALLY AND DBA LA SALVADORENA SPORTS BAR AND SAN MIGUELITO SPORT BAR, JOSE TOVAR, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, JOSEPH PHAN AKA KHANH PHAN AND LINDSEY TRAN, INDIVIDUALLY AND AS NEXT FRIENDS OF [REDACTED], [REDACTED], [REDACTED] AND [REDACTED], MINORS, JOSEPH VANCE BOYD, JOSHUA LEE, JOSHUA OLIVER, JOSHUA REESE, JOSUE BALLESTEROS, JOSUE TORRES, JOYCE OWENS, JUAN CARLOS MATA, JUAN FRANCISCO AYALA, JUAN TORRES, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS, JUAN VALDEZ, JUANA ONTIVEROS, JUANA QUIROZ, JUANA SOLORZANO, JULIA SANDOVAL, JULIAN RAMIREZ, JULIE ONTIVEROS, JULIO GRONILLO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, JULIO ONTIVEROS, JULIO CESAR RAMIREZ, KAREN FISHER, KAREN TORRES, KARINA RAMOS, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, KARLA CARILLO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, KARLA PARRA, KARYN LAAKE, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, KATHERINE E. DRAWSAND, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] [REDACTED], MINOR, KENIA VANESSA MORALES SANCHEZ,

INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED],
MINORS, KEVIN BONNY, KEVIN JACKSON, KHAN NGUYEN, KIMBERLY POLLARD,
KIM SIN, KIMBERLY SHOLARS, KRISTOPHER VON HOHN, KUM SUN SONG, LAN
TRAN, LATONETTE SMITH, LATRECIA AUSTIN, LAURA DIAZ, LAURA JOHNSON,
INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] [REDACTED] & [REDACTED]
[REDACTED], MINORS, LAURA TORRES, INDIVIDUALLY AND AS NEXT FRIEND OF
[REDACTED], MINOR, LAZARO ALVAREZ VASQUEZ, LENA CARDENAS, LENE
BACCAM, LEONARDO FORTUNO, LEONEL RAMIREZ, INDIVIDUALLY AND DBA
TEXAS RADIATOR AUTO REPAIR, INC., LEONOR BALLINAS DE FUENTES, LETICIA
PALACIOS, LINDA DANG, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED]
[REDACTED], MINOR, LINDSEY TRAN, LIZBETH HERNANDEZ, LOURDES RAMIREZ, LUIS
AGUILERA, LUIS ANTONIO MELGAR, LUIS MEDELLIN, INDIVIDUALLY AND AS
NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, LUIS
TOWNS, LYNDIA MILNER, LYNN EDWARD DONOVAN, MAIRA ROMAN, MANUEL
RUIZ, MARCELLA BONNY, MARCELO FALICK, MARGARET CARLIN, MARGARITA
GUTIERREZ, MARGARITA IBARRA, MARGARITO FLORES, MARIA ARTEAGA,
MARIDE LOURDES TAMAYO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED]
[REDACTED] AND [REDACTED], MINORS, MARIA DIOSDADO, MARIA
DEL CARMEN RUIZ, MARIA ELIZALDE, INDIVIDUALLY AND AS NEXT FRIEND OF
[REDACTED], [REDACTED], [REDACTED], [REDACTED] AND
[REDACTED], MINORS, MARIA ELOINA LOPEZ, MARIA FIGUEROA, MARIA
GIRALDO, MARIA HERNANDEZ, MARIA PEDRAZA, MARIA REGALADO, MARIA
SOLORZANO, MARIA TORRES, MARIA ZAMUDIO, MARIA ZUNO, MARICRUZ

MUNOZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, MARIO GIRALDO, MARIO HERNANDEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, MARISOL ORDONEZ, MARISOL URIOSTEGUI, MARK BRADY, MARK IIAMS, MARLON HENRY, MARSEDEZ HAUGHTON, MARTA LUEVANO, MARTA SANCHEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, MARTHA KNOTTS, MARTHA TREJO, MARTIN DE JESUS BOADO, MARTIN DE JESUS BOADO PEREZ, MARTIN ESQUEDA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, MARTIN GUZMAN, MARY BALLINGER, MARY CHURCH, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, MARY DONOVAN, MARY VU, MAYRA REYES, INDIVIDUALLY AND DBA 24/7 LAS VEGAS VIEW CINE, MAXINE C. WILLIAMS, MELISSA GARZA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, MELODY BANKS, MELVA IRIS HERNANDEZ AKA MELBA HERNANDEZ, MICHAEL DENNIS, MICHAEL HENRY, MICHAEL MORRISON, MICHAEL SCHARRINGHAUSEN, MIGUEL ANGEL CASTILLO OLMOS, MIGUEL ANGEL GARCIA, MIGUEL ANGEL SILVA, MIGUEL ANGEL TORRES, MIGUEL BELTRAN, MIGUEL MAJANO, MILAGRO DEL CARMEN GUANDIGUO AKA MILAGRO D. VASQUEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] [REDACTED], [REDACTED] AND [REDACTED], MINORS, MILAGRO ORDONEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, MINH HO, MIRIAM DEL CASTILLO, MIRIAN CRUZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], AND [REDACTED], MINORS, MOISES SALVADOR LEON, JR., MOISES SALVADOR

SANCHEZ, MOISES ZAMUDIO, MONICA CARDENAS, NAM STAPP, NANCY ROMAN, NANCY TOWNS, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, NATALIA DE JESUS BOADO PEREZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, NATHALIA RAMIREZ, NECKER ARCHELUS, NELSON SIMOES DOS SANTOS, NEVIE MARTINEZ, NGA DANG, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS, NICHOLAS ARROYO, NICOLE GRAY, NIRALI PATEL, NOE PULIDO, NONG PHAN, NORA GARCIA, NORMA BALLESTEROS, NURDAN SCHIAFFO, OMAR GARZA, OSCAR CIFUENTES, PABLO LOPEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, PABLO RIVAS, PATRICIA ADAME FUJII, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, PATRICIA PORTALES SANDOVAL, PAULA FISHER, PEDRO ARRIAGA, PEDRO LUNA, PEGGY SANDERS, PHONG NGUYEN, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], [REDACTED] AND [REDACTED], MINORS, POEY ENG TIERMAN, PRENTIS KNOTTS, QUYEN THUYEN NGUYEN, RADKEY JOLINK, RAMIRO ZUNIGA, RAMON GUSTAVO HERNANDEZ-MARTINEZ, RAMSES AYALA, RAUMIR JACOME, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, RAYMUNDO RAMOS, REFUGIO GUTIERREZ, REJNAL TUSHE, RENE RIVERA, RETTA FITZJARRALD, REYNA SANTANA, RICARDO BUSTAMANTE, RICARDO REYES, RICHARD MIKEL, ABRAHAM NA, ROBERT PEUGH, ROBERT SINGLETON, RODRIGO FLORES, ROLAND RAMIREZ, ROLANDO GARCIA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS, ROMANA TEREZA CERVANTES, RONNIE OLMEDO, ROSA PARADA, ROSALBA

MARTINEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED],
[REDACTED], [REDACTED] AND [REDACTED], MINORS,
ROSALINA GOMEZ, ROSALBA MENDIETA, INDIVIDUALLY AND AS NEXT FRIEND OF
[REDACTED], MINOR, ROSAURA ALCALA, INDIVIDUALLY AND AS NEXT
FRIEND OF [REDACTED], MINOR, ROSAURA ZAPATA CALIX, INDIVIDUALLY
AND AS NEXT FRIEND OF [REDACTED], MINOR, RUBEN JAMES
VILLALPANDO, RUBEN ZUNO, RUBENIA GARCIA, INDIVIDUALLY AND AS NEXT
FRIEND OF [REDACTED], MINOR, RUTHIE ARCHELUS, RYAN NGUYEN,
SALOMON D. NUNEZ, SALOMON TORRES, SAMUEL GARCIA, JR., SANDRA BOTELLO,
SANDRA CEPADA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND
[REDACTED], MINORS, SARA ESQUEDA, SARA RAMIREZ MELGAR, SARVELIO
CAMPOS, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED]
[REDACTED] AND [REDACTED], MINORS, SATOHIRO FUJII, SAUMIL PATEL,
SERGIO LIMAS, SHANTERIA AVERIL, INDIVIDUALLY AND AS NEXT FRIEND OF
[REDACTED], MINOR, SIDES ZAMUDIO, SILVESTRE SAUL HERNANDEZ, SINDY
YOJANA CASTILLO-SANCHEZ, SOLEIDY CRUZ, INDIVIDUALLY AND AS NEXT
FRIEND OF [REDACTED], MINOR, SONIA HERNANDEZ, INDIVIDUALLY AND AS
NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS, SOOK
JA NA, STEPHANIE COBOS, STEVEN STEGER, SULMA BEJARANO, SUSAN WATKINS,
SUSANA ESPARZA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED],
MINOR, SUSANA GARZA, SUSANNE DENNIS, SUZANNE SLAVINSKY, TANA
MOCHMAN PIERCE, TATIANA E. LARA, TED BACCAM, TERRI SEPULVEDA, TERRI
YOUNG, THELMA ZAMORA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED]

██████████ AND ██████████, MINORS, THERESA DILLARD, THERESA STOJAN, THOMAS MATHEW, TOM HAND, TONYA BRITTON-AVERIL, TRACY STEPHENSON, TRANG NGUYEN, ANDREA HORTON AS NEXT FRIEND OF ██████████, ██████████ ██████████, ██████████ ██████████ AND ██████████ ██████████, MINORS, TRENICA HAUGHTON, TRIVIA DOUGLAS, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████ ██████████, MINOR, VANESSA BALTIERREZ, VELMA HENRY, VERONICA MORENO VARGAS, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████ ██████████ AND ██████████ ██████████, MINORS, VERONICA RODRIGUEZ, VICENTE PAITA, VICTONIA PEAY, VICTOR ALFONSO GUZMAN CASTILLO, VICTOR QUIJADA, VICTORIA HERNANDEZ, W.R. WOLFRAM, III, WENCESLAO GUZMAN GRAJEDA, WENER SANCHEZ TORRES, WILLIAM PURSLEY, WILLIAM SCHIAFFO, XIAOJUAN ZHOU, XIMENA ZAMUDIO, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████ ██████████, MINOR, XITHLALY PULIDO, XOCHITL FUENTES, YOLANDA WELLS-BROUGHTON, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████ ██████████ AND ██████████ ██████████, MINORS AND ZACKEITH EASON, Plaintiffs in the above-styled and numbered cause, files their Plaintiffs' Original Petition along with Rule 194 Requests for Disclosure to All Defendants complaining of Defendants, WATSON VALVE SERVICES, INC., WATSON GRINDING AND MANUFACTURING, CO., MATHESON TRI-GAS, INC., WESTERN INTERNATIONAL GAS & CYLINDERS, INC., KMHJ, LTD., KMHJ MANAGEMENT COMPANY, LLC, 3M COMPANY, FIRESTONE CRYOGENICS, INC., FIRESTONE CRYOGENIC EQUIPMENT, INC., TELEDYNE EXPLORATION COMPANY, TELEDYNE TECHNOLOGIES, INC. F/K/A DETCON, INC., DETCON, INC. D/B/A OLDHAM, ARC SPECIALTIES, INC., AUTOMATION PLUS, INC., TRCC, LLC, DATAONLINE, LLC,

AND INDUSTRIAL SCIENTIFIC CORPORATION and for cause(s) of action would respectfully show this Honorable Court as follows:

I.
DISCOVERY PLAN

1. Discovery in this case is to be conducted under Level 2 of Rule 190.3 of the Texas Rules of Civil Procedure as the Plaintiffs seek monetary relief over \$1,000,000.00.

II.
REQUEST PURSUANT TO RULE 28 FOR SUBSTITUTION OF TRUE NAME

2. To the extent that any of the above-named Defendants are conducting business pursuant to a trade name or assumed name, suit is brought against them pursuant to the provisions of Rule 28 of the Texas Rules of Civil Procedure, and Plaintiffs demand upon answering this suit, that the Defendants answer in their correct legal and assumed names.

III.
PARTIES

3. Plaintiff ROBB KING is a natural person residing in Harris County, Texas.

4. Plaintiffs ABUNDIA AGUIRRE, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

5. Plaintiffs ADA MONTOYA-TORRES, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

6. Plaintiff ADRIAN AGUIRRE-HERNANDEZ is a natural person residing in Harris County, Texas.

7. Plaintiff ADRIAN TRUJILLO is a natural person residing in Harris County, Texas.

8. Plaintiff ALBA JUDITH IBARRA is a natural person residing in Harris County, Texas.

9. Plaintiff ALBA MONTESINO is a natural person residing in Harris County, Texas.
10. Plaintiff ALBERTO O'CONNOR is a natural person residing in Harris County, Texas.
11. Plaintiff ALEJANDRO TOWNS is a natural person residing in Harris County, Texas.
12. Plaintiffs ALEXANDER LUNA, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████, MINOR are natural persons residing in Harris County, Texas.
13. Plaintiff ALEXIS PARRA is a natural person residing in Harris County, Texas.
14. Plaintiff ALFONSO SANTANA is a natural person residing in Harris County, Texas.
15. Plaintiff ALICIA DETAMORE is a natural person residing in Harris County, Texas.
16. Plaintiffs ALICIA SANCHEZ, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████, ██████████, ██████████, ██████████ AND ██████████, MINORS are natural persons residing in Harris County, Texas.
17. Plaintiffs ALVARO ARREOLA, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████, MINOR are natural persons residing in Harris County, Texas.
18. Plaintiff ALVARO MENDIETA is natural person residing in Harris County, Texas.
19. Plaintiff ALVARO MENDIETA, JR. is a natural person residing in Harris County, Texas.
20. Plaintiffs AMELIA DIOSDADO, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████, MINOR are natural persons residing in Harris County, Texas.

21. Plaintiff ANA ARACELY VILLATORO is a natural person residing in Harris County, Texas.

22. Plaintiff ANA CRISTINA SERPAZ is a natural person residing in Harris County, Texas.

23. Plaintiff ANA ORELLANA is a natural person residing in Harris County, Texas.

24. Plaintiff ANDRE CRUZ NAVA is a natural person residing in Harris County, Texas.

25. Plaintiff ANDRES ALBERTO URIOSTEGUI is a natural person residing in Harris County, Texas.

26. Plaintiffs ANDRES URIOSTEGUI AND MARIA URIOSTEGUI, INDIVIDUALLY AND AS NEXT FRIENDS OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

27. Plaintiff ANGELA MCIVER is a natural person residing in Harris County, Texas.

28. Plaintiff ANGELA PRUDENCIO is a natural person residing in Harris County, Texas.

29. Plaintiff ANGELICA DIAZ-SANCHEZ is a natural person residing in Harris County, Texas.

30. Plaintiff ANN RAWLINSIN AKA ANN RAWLINSON is a natural person residing in Harris County, Texas.

31. Plaintiff ANNIEVA STOKAN is a natural person residing in Harris County, Texas.

32. Plaintiff ANTONIO HECTOR LEAL, JR. is a natural person residing in Harris County, Texas.

33. Plaintiff ARTURO ZAMORA is a natural person residing in Harris County, Texas.

34. Plaintiff ASHLEY FOSTER is a natural person residing in Harris County, Texas.
35. Plaintiff AURORA COBOS is a natural person residing in Harris County, Texas.
36. Plaintiff AUSTIN LASPRILLA is a natural person residing in Harris County, Texas.
37. Plaintiff COURTYARD WESTWAY HOMEOWNERS ASSOCIATION, INC. is a homeowners association doing business in Harris County, Texas.
38. Plaintiffs AZUCENA SANCHEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.
39. Plaintiff AZUL MARINA PORRES is a natural person residing in Harris County, Texas.
40. Plaintiff BARBARA ROGERS is a natural person residing in Harris County, Texas.
41. Plaintiffs BEATRIZ SALAZAR, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.
42. Plaintiffs BELKIS RIVERA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.
43. Plaintiffs BENITO AMBRIZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.
44. Plaintiff BENJAMIN KING is a natural person residing in Harris County, Texas.
45. Plaintiff BERNITA SIMON is a natural person residing in Harris County, Texas.

46. Plaintiff BERTA ROMERO is a natural person residing in Harris County, Texas.

47. Plaintiff BERTHA ALICIA SALVADOR is a natural person residing in Harris County, Texas.

48. Plaintiffs BESSY SANCHEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

49. Plaintiff BETTY BAILEY is a natural person residing in Harris County, Texas.

50. Plaintiff BIANKA CERVANTES-VAZQUEZ is a natural person residing in Harris County, Texas.

51. Plaintiff BLANCA E. GUEVARA is a natural person residing in Harris County, Texas.

52. Plaintiff BLANCA ELIZABETH QUIROZ MOJICA is a natural person residing in Harris County, Texas.

53.

54. Plaintiff BLANCA RAMOS is a natural person residing in Harris County, Texas.

55. Plaintiffs BLANCA SILVA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

56. Plaintiffs BLANCA SOLORZANO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

57. Plaintiff BRENDA PHAM, INDIVIDUALLY AND DBA MOMENTO TATTOO STUDIO is a natural person doing business in and residing in Harris County, Texas.

58. Plaintiff BOB YEUNG is a natural person residing in Harris County, Texas.
59. Plaintiff BRIGIDA CARBAJAL TAPIA LOPEZ is a natural person residing in Harris County, Texas.
60. Plaintiff BRISA ZUNO is a natural person residing in Harris County, Texas.
61. Plaintiff CALEB OLIVER is a natural person residing in Harris County, Texas.
62. Plaintiff CANDELARIO ORTIZ is a natural person residing in Harris County, Texas.
63. Plaintiff CANDIDA VASQUEZ is a natural person residing in Harris County, Texas.
64. Plaintiff CARLOS ARTEAGA is a natural person residing in Harris County, Texas.
65. Plaintiff CARLOS GONZALEZ is a natural person residing in Harris County, Texas.
66. Plaintiff CARLOS HERNANDEZ is a natural person residing in Harris County, Texas.
67. Plaintiff CARLOS ALEXANDER LAZO is a natural person residing in Harris County, Texas.
68. Plaintiff CAROLINA BELTRAN, INDIVIDUALLY AND OBO MONTENEGRO ENTERPRISES LLC DBA NEWTHINGS HOME FURNITURE is a natural person operating a commercial business in and residing in Harris County, Texas.
69. Plaintiffs CASEY WOLFRAM, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.
70. Plaintiff CATHRINE M. NORTON is a natural person residing in Harris County,

Texas.

71. Plaintiff CECILIA ARREOLA is a natural person residing in Harris County, Texas.

72. Plaintiff CELEA MURCIA is a natural person residing in Harris County, Texas.

73. Plaintiff CELIA BALLESTEROS is a natural person residing in Harris County,

Texas.

74. Plaintiffs CESAR CERVANTES, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

75. Plaintiff CHRIS MANZKE is a natural person residing in Harris County, Texas.

76. Plaintiffs CHRISTIAN BALLESTEROS, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

77. Plaintiff CHRISTIAN FUENTES is a natural person residing in Harris County,

Texas.

78. Plaintiff CHRISTIE HULTS is a natural person residing in Harris County, Texas.

79. Plaintiff CHRISTINA HAND is a natural person residing in Harris County, Texas.

80. Plaintiff CHRISTINA PHAM is a natural person residing in Harris County, Texas.

81. Plaintiff CHRISTINE CHUMA is a natural person residing in Harris County,

Texas.

82. Plaintiff CINDY HERNANDEZ is a natural person residing in Harris County,

Texas.

83. Plaintiff CLABURNE LONG is a natural person residing in Harris County, Texas.

84. Plaintiff CLAUDIA ARROYO is a natural person residing in Harris County, Texas.

85. Plaintiffs CLAUDIA OROZCO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR, are natural persons residing in Harris County, Texas.

86. Plaintiff COLEMAN PEAY is a natural person residing in Harris County, Texas.

87. Plaintiff COLLEEN PRICE is a natural person residing in Harris County, Texas.

88. Plaintiffs CONSTANTINO SOSA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

89. Plaintiff CORY BUZNEGO is a natural person residing in Harris County, Texas.

90. Plaintiffs CRISOFORO TORRES, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

91. Plaintiffs CRISTINE JOLINK, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

92. Plaintiff CRISTHIAN MARTINEZ is a natural person residing in Harris County, Texas.

93. Plaintiff CRISTIAN ZUNO is a natural person residing in Harris County, Texas.

94. Plaintiff CUONG TU “WENDY” NGUYEN is a natural person residing in Harris County, Texas.

95. Plaintiff CYNTHIA ISOME is a natural person residing in Harris County, Texas.

96. Plaintiff CYNTHIA SEGOVIA is a natural person residing in Harris County, Texas.

97. Plaintiff DALLANDYSHE TUSHE is a natural person residing in Harris County, Texas.

98. Plaintiff DANIEL ALCALA is a natural person residing in Harris County, Texas.

99. Plaintiff DANIEL ALCALA, SR. is a natural person residing in Harris County, Texas.

100. Plaintiffs DANIEL MARTINEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

101. Plaintiff DARLEEN B. SCROGGIN is a natural person residing in Harris County, Texas.

102. Plaintiff DARRELL LINDSEY is a natural person residing in Harris County, Texas.

103. Plaintiff DARRELL SMITH is a natural person residing in Harris County, Texas.

104. Plaintiff DAVID DIOSDADO is a natural person residing in Harris County, Texas.

105. Plaintiff DAVID SOLORZANO is a natural person residing in Harris County, Texas.

106. Plaintiff DAVID STOJAN is a natural person residing in Harris County, Texas.

107. Plaintiff DEAN ENRIGHT is a natural person residing in Harris County, Texas.

108. Plaintiff DEAN PIERCE is a natural person residing in Harris County, Texas.

109. Plaintiffs DEBORA MCLAUGHLIN, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

110. Plaintiff DEION HENDERSON is a natural person residing in Harris County, Texas.

111. Plaintiff DELMY SALGADO is a natural person residing in Harris County, Texas.

112. Plaintiff DEVIN YOUNG is a natural person residing in Harris County, Texas.

113. Plaintiff DIANA DIAZ is a natural person residing in Harris County, Texas.

114. Plaintiff DIANA HERNANDEZ is a natural person residing in Harris County, Texas.

115. Plaintiff DIANA ZEPEDA is a natural person residing in Harris County, Texas.

116. Plaintiff DINORAH GONZALEZ is a natural person residing in Harris County, Texas.

117. Plaintiffs DOLORES BOADO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

118. Plaintiff DORA TURRUBIATES is a natural person residing in Harris County, Texas.

119. Plaintiff DORA VALDEZ is a natural person residing in Harris County, Texas.

120. Plaintiff DORIS RICHARDSON is a natural person residing in Harris County, Texas.

121. Plaintiff DULCE IVONE SANCHEZ is a natural person residing in Harris County, Texas.

122. Plaintiff DULCE RODRIGUEZ is a natural person residing in Harris County, Texas.

123. Plaintiffs DULCE ZUNO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

124. Plaintiff DUNG HUNG PHAM is a natural person residing in Harris County, Texas.

125. Plaintiff DYSHEBA FORD is a natural person residing in Harris County, Texas.

126. Plaintiffs EDUARDO FLORES, INDIVIDUALLY AND AS NEXT FRIEND OF

██████████, MINOR are natural persons residing in Harris County, Texas.

127. Plaintiff EDUARDO GALLEGOS is a natural person residing in Harris County, Texas.

128. Plaintiff EDWARD RODRIGUEZ is a natural person residing in Harris County, Texas.

129. Plaintiff EDWARD SNYDER is a natural person residing in Harris County, Texas.

130. Plaintiffs EDWIN A. MONTESINO, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████ AND ██████████, MINORS are natural persons residing in Harris County, Texas.

131. Plaintiff EDWIN ALVAREZ is a natural person residing in Harris County, Texas.

132. Plaintiff EFRAIN MORALES is a natural person residing in Harris County, Texas.

133. Plaintiff ELIDA GUERRERO is a natural person residing in Harris County, Texas.

134. Plaintiff ELIVIA ORTIZ is a natural person residing in Harris County, Texas.

135. Plaintiff ELIZABETH DUBUQUE is a natural person residing in Harris County, Texas.

136. Plaintiff ELVIRA LUNA is a natural person residing in Harris County, Texas.

137. Plaintiff ELWOOD WHITFIELD NELSON is a natural person residing in Harris County, Texas.

138. Plaintiff ELYSE KING is a natural person residing in Harris County, Texas.

139. Plaintiffs EMMANUEL QUIROZ, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████ AND ██████████, MINORS are natural persons residing in Harris County, Texas.

140. Plaintiff ERIC INFANTE is a natural person residing in Harris County, Texas.

141. Plaintiffs ERICA BRAVO, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████ AND ██████████, MINORS are natural persons residing in Harris County, Texas.
142. Plaintiff ERICK BADILLO is a natural person residing in Harris County, Texas.
143. Plaintiff ESMERALDA GUZMAN is a natural person residing in Harris County, Texas.
144. Plaintiff ESPERANZA CIFUENTES is a natural person residing in Harris County, Texas.
145. Plaintiff ESPERANZA WEBBER is a natural person residing in Harris County, Texas.
146. Plaintiff ESTHER RUIZ is a natural person residing in Harris County, Texas.
147. Plaintiffs EVELIN IBARRA, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████, MINORS are natural persons residing in Harris County, Texas.
148. Plaintiff EVER BAUTISTA, INDIVIDUALLY AND DBA B&J TEXAS LONE STAR, is a natural person operating a commercial business in and residing in Harris County, Texas.
149. Plaintiff FABIAN MONTENEGRO, INDIVIDUALLY AND OBO MONTENEGRO ENTERPRISES LLC DBA NEWTHINGS HOME FURNITURE is a natural person operating a commercial business in and residing in Harris County, Texas.
150. Plaintiff FABIOLA REGALADO is a natural person residing in Harris County, Texas.
151. Plaintiff FAUSTINO QUIROZ is a natural person residing in Harris County, Texas.
152. Plaintiffs FAUSTINO ROMAN, INDIVIDUALLY AND AS NEXT FRIEND OF ██████████, MINOR are natural persons residing in Harris County, Texas.

153. Plaintiff FERNANDO CASTRO-CHAVEZ is a natural person residing in Harris County, Texas.

154. Plaintiff FERNANDO ORDONEZ is a natural person residing in Harris County, Texas.

155. Plaintiff FLOWER GARCIA is a natural person residing in Harris County, Texas.

156. Plaintiff FRANCINE GRANT is a natural person residing in Harris County, Texas.

157. Plaintiff FRANCISCO COBOS is a natural person residing in Harris County, Texas.

158. Plaintiffs FRANCISCO LOZANO, AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

159. Plaintiff FRANCO AGUIRRE is a natural person residing in Harris County, Texas.

160. Plaintiff FRANK WAYNE ROGERS is a natural person residing in Harris County, Texas.

161. Plaintiff FRANKY ESTRADA is a natural person residing in Harris County, Texas.

162. Plaintiff FREDDY MARTINEZ SANCHEZ is a natural person residing in Harris County, Texas.

163. Plaintiff GABRIEL OLIVER is a natural person residing in Harris County, Texas.

164. Plaintiffs GABRIELA GUTIERREZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

165. Plaintiffs GABRIELA MARTINEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

166. Plaintiffs GABRIELA ZUNIGA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

167. Plaintiffs GARY TODD, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

168. Plaintiff GEORGE ALVARADO is a natural person residing in Harris County, Texas.

169. Plaintiffs GILBERT ORELLANA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

170. Plaintiff GINA IIAMS is a natural person residing in Harris County, Texas.

171. Plaintiff GLADYS ZELAYA DE SANCHEZ is a natural person residing in Harris County, Texas.

172. Plaintiff GLENDA LEE is a natural person residing in Harris County, Texas.

173. Plaintiffs GLORIA BETANCOURT, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

174. Plaintiff GLORIA SOLORZANO is a natural person residing in Harris County, Texas.

175. Plaintiff GONZALO FISHER LOPEZ is a natural person residing in Harris County, Texas.

176. Plaintiff GREG PRIOR is a natural person residing in Harris County, Texas.

177. Plaintiff GREG SANDERS is a natural person residing in Harris County, Texas.

178. Plaintiff GREYSI YOELY RIVERA AYALA is a natural person residing in Harris

County, Texas.

179. Plaintiff GUADALUPE BANDERA is a natural person residing in Harris County, Texas.

180. Plaintiffs GUADALUPE GARCIA CASTRO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

181. Plaintiff GUADALUPE SANCHEZ CONTRERAS is a natural person residing in Harris County, Texas.

182. Plaintiff GUILLERMINA DIOSDADO is a natural person residing in Harris County, Texas.

183. Plaintiff GUILLERMO DURAN is a natural person residing in Harris County, Texas.

184. Plaintiff GUSTAVO BARAJAS is a natural person residing in Harris County, Texas.

185. Plaintiffs GUSTAVO VASQUEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

186. Plaintiff HANH NGUYEN is a natural person residing in Harris County, Texas.

187. Plaintiff HAO ANH NGUYEN is a natural person residing in Harris County, Texas.

188. Plaintiffs HECTOR A. CERVANTES, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

189. Plaintiff HECTOR RUIZ is a natural person residing in Harris County, Texas.

190. Plaintiff ENRIQUETA GARCIA AKA ERIQUETA GARICA, INDIVIDUALLY AND AS REPRESENTATIVE OF [REDACTED], DECEASED is a natural person residing in Harris County, Texas bringing suit Individually and on behalf of a deceased person.

191. Plaintiff HIEN THANH TRUONG is a natural person residing in Harris County, Texas.

192. Plaintiffs HILDA LIMAS, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

193. Plaintiff HOMERO REGALADO, JR. is a natural person residing in Harris County, Texas.

194. Plaintiff HORACIO RODRIGUEZ is a natural person residing in Harris County, Texas.

195. Plaintiff HORTENCIA MONTES is a natural person residing in Harris County, Texas.

196. Plaintiff HUEY LONG is a natural person residing in Harris County, Texas.

197. Plaintiff I. J. CHANG is a natural person residing in Harris County, Texas.

198. Plaintiff ILIANA OLMOS is a natural person residing in Harris County, Texas.

199. Plaintiffs INES VAZQUEZ-LOPEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

200. Plaintiff IRLANDA COPE is a natural person residing in Harris County, Texas.

201. Plaintiff IRVIN GUEVARA is a natural person residing in Harris County, Texas.

202. Plaintiff ISAMAR BALLESTEROS is a natural person residing in Harris County, Texas.

203. Plaintiff ISIDORO FUENTES is a natural person residing in Harris County, Texas.

204. Plaintiff ISUF TUSHE is a natural person residing in Harris County, Texas.

205. Plaintiff J. CARMEN BOTELLO is a natural person residing in Harris County, Texas.

206. Plaintiff JACQUELYN ST. JULES is a natural person residing in Harris County, Texas.

207. Plaintiff JACQUIE VON HOHN is a natural person residing in Harris County, Texas.

208. Plaintiff JAMES BAILEY, SR. is a natural person residing in Harris County, Texas.

209. Plaintiffs JAMESHIA MITCHELL, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

210. Plaintiffs JANET MARIE PRIOR, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

211. Plaintiff JEAN RICE is a natural person residing in Harris County, Texas.

212. Plaintiff JEANETTE MCDANIEL is a natural person residing in Harris County, Texas.

213. Plaintiff JEFFREY CREEL is a natural person residing in Harris County, Texas.

214. Plaintiffs JENEVA SMITH, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

215. Plaintiffs JENNI DE GUZMAN, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.
216. Plaintiffs JENNIFER ESQUEDA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.
217. Plaintiff JEREMIAH OLIVER is a natural person residing in Harris County, Texas.
218. Plaintiffs JERMAINE AUSTIN, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.
219. Plaintiff JESSEE RUIZ is a natural person residing in Harris County, Texas.
220. Plaintiffs JESSICA SOLIS, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], MINOR are natural persons residing in Harris County, Texas.
221. Plaintiff JESUS GONZALEZ is a natural person residing in Harris County, Texas.
222. Plaintiff JESUS GUERRERO RODRIGUEZ is a natural person residing in Harris County, Texas.
223. Plaintiff JESUS IBARRA is a natural person residing in Harris County, Texas.
224. Plaintiff JESUS SANCHEZ MORAN is a natural person residing in Harris County, Texas.
225. Plaintiff JIM CHAN is a natural person residing in Harris County, Texas.
226. Plaintiff JIMENA ESCUDERO is a natural person residing in Harris County, Texas.
227. Plaintiff JIMMY NGUYEN is a natural person residing in Harris County, Texas.
228. Plaintiff JIN CHAN NA is a natural person residing in Harris County, Texas.
229. Plaintiff JOAQUIN ALVAREZ is a natural person residing in Harris County, Texas.

Texas.

230. Plaintiffs JONATHAN BERRONES, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

231. Plaintiffs JORGE CHACON, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

232. Plaintiff JORGE LUIS GARZA is a natural person residing in Harris County, Texas.

233. Plaintiff JORGE LUIS GARZA REYES is a natural person residing in Harris County, Texas.

234. Plaintiff JOSE ALBERTO GARZA REYES is a natural person residing in Harris County, Texas.

235. Plaintiff JOSE BANDERA is a natural person residing in Harris County, Texas.

236. Plaintiff JOSE DAMIAN MEDELLIN is a natural person residing in Harris County, Texas.

237. Plaintiffs JOSE ELOY ORTEGA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

238. Plaintiff JOSE GIRON is a natural person residing in Harris County, Texas.

239. Plaintiff JOSE LUIS TORRES is a natural person residing in Harris County, Texas.

240. Plaintiffs JOSE MONTALVAN, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

241. Plaintiff JOSE PAULINO NAJAR is a natural person residing in Harris County, Texas.

242. Plaintiff JOSE PAZ HERNANDEZ is a natural person residing in Harris County, Texas.

243. Plaintiff JOSE R. SOLIS, SR. is a natural person residing in Harris County, Texas.

244. Plaintiff JOSE RAMOS is a natural person residing in Harris County, Texas.

245. Plaintiff JOSE ROMERO, INDIVIDUALLY AND DBA LA SALVADORENA SPORTS BAR AND SAN MIGUELITO SPORTS BAR is a natural person doing commercial business in and residing in Harris County, Texas.

246. Plaintiffs JOSE TOVAR, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

247. Plaintiffs JOSEPH PHAN AKA KHANH PHAN AND LINDSEY TRAN, INDIVIDUALLY AND AS NEXT FRIENDS OF [REDACTED] [REDACTED], [REDACTED] [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

248. Plaintiff JOSEPH VANCE BOYD is a natural person residing in Harris County, Texas.

249. Plaintiff JOSHUA LEE is a natural person residing in Harris County, Texas.

250. Plaintiff JOSHUA OLIVER is a natural person residing in Harris County, Texas.

251. Plaintiff JOSHUA REESE is a natural person residing in Harris County, Texas.

252. Plaintiff JOSUE BALLESTEROS is a natural person residing in Harris County, Texas.

253. Plaintiff JOSUE TORRES is a natural person residing in Harris County, Texas.

254. Plaintiff JOYCE OWENS is a natural person residing in Harris County, Texas.
255. Plaintiff JUAN CARLOS MATA is a natural person residing in Harris County, Texas.
256. Plaintiff JUAN FRANCISCO AYALA is natural person residing in Harris County, Texas.
257. Plaintiffs JUAN TORRES, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.
258. Plaintiff JUAN VALDEZ is a natural person residing in Harris County, Texas.
259. Plaintiff JUANA ONTIVEROS is a natural person residing in Harris County, Texas.
260. Plaintiff JUANA QUIROZ is a natural person residing in Harris County, Texas.
261. Plaintiff JUANA SOLORZANO is a natural person residing in Harris County, Texas.
262. Plaintiff JULIA SANDOVAL is a natural person residing in Harris County, Texas.
263. Plaintiff JULIAN RAMIREZ is a natural person residing in Harris County, Texas.
264. Plaintiff JULIE ONTIVEROS is a natural person residing in Harris County, Texas.
265. Plaintiffs JULIO GRONILLO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.
266. Plaintiff JULIO ONTIVEROS is a natural person residing in Harris County, Texas.
267. Plaintiff JULIO CESAR RAMIREZ is a natural person residing in Harris County, Texas.
268. Plaintiff KAREN FISHER is a natural person residing in Harris County, Texas.

269. Plaintiff KAREN TORRES is a natural person residing in Harris County, Texas.

270. Plaintiffs KARINA RAMOS, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

271. Plaintiffs KARLA CARILLO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

272. Plaintiff KARLA PARRA is a natural person residing in Harris County, Texas.

273. Plaintiffs KARYN LAAKE, AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

274. Plaintiffs KATHERINE E. DRAWSAND, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

275. Plaintiffs KENIA VANESSA MORALES SANCHEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

276. Plaintiff KEVIN BONNY is a natural person residing in Harris County, Texas.

277. Plaintiff KEVIN JACKSON is a natural person residing in Harris County, Texas.

278. Plaintiff KHAN NGUYEN is a natural person residing in Harris County, Texas.

279. Plaintiff KIMBERLY POLLARD is a natural person residing in Harris County, Texas.

280. Plaintiff KIM SIN is a natural person residing in Harris County, Texas.

281. Plaintiff KIMBERLY SHOLARS is a natural person residing in Harris County,

Texas.

282. Plaintiff KRISTOPHER VON HOHN is a natural person residing in Harris County,

Texas.

283. Plaintiff KUM SUN SONG is a natural person residing in Harris County, Texas.

284. Plaintiff LAN TRAN is a natural person residing in Harris County, Texas.

285. Plaintiff LATONETTE SMITH is a natural person residing in Harris County,

Texas.

286. Plaintiff LATRECIA AUSTIN is a natural person residing in Harris County, Texas.

287. Plaintiff LAURA DIAZ is a natural person residing in Harris County, Texas.

288. Plaintiffs LAURA JOHNSON, INDIVIDUALLY AND AS NEXT FRIEND OF

██████████ & ██████████, MINORS are natural persons residing in Harris County, Texas.

289. Plaintiffs LAURA TORRES, INDIVIDUALLY AND AS NEXT FRIEND OF

██████████, MINOR are natural persons residing in Harris County, Texas.

290. Plaintiff LAZARO ALVAREZ VASQUEZ is a natural person residing in Harris

County, Texas.

291. Plaintiff LENA CARDENAS is a natural person residing in Harris County, Texas.

292. Plaintiff LENE BACCAM is a natural person residing in Harris County, Texas.

293. Plaintiff LEONARDO FORTUNO is a natural person residing in Harris County,

Texas.

294. Plaintiff LEONEL RAMIREZ, INDIVIDUALLY AND DBA TEXAS RADIATOR AUTO REPAIR, INC. is a natural person operating a commercial business in and residing in Harris County, Texas.

295. Plaintiff LEONOR BALLINAS DE FUENTES is a natural person residing in Harris County, Texas.

296. Plaintiff LETICIA PALACIOS is a natural person residing in Harris County, Texas.

297. Plaintiffs LINDA DANG, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], MINOR are natural persons residing in Harris County, Texas.

298. Plaintiff LINDSEY TRAN is a natural person residing in Harris County, Texas.

299. Plaintiff LIZBETH HERNANDEZ is a natural person residing in Harris County, Texas.

300. Plaintiff LOURDES RAMIREZ is a natural person residing in Harris County, Texas.

301. Plaintiff LUIS AGUILERA is a natural person residing in Harris County, Texas.

302. Plaintiff LUIS ANTONIO MELGAR is a natural person residing in Harris County, Texas.

303. Plaintiffs LUIS MEDELLIN, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

304. Plaintiff LUIS TOWNS is a natural person residing in Harris County, Texas.

305. Plaintiff LYNDA MILNER is a natural person residing in Harris County, Texas.

306. Plaintiff LYNN EDWARD DONOVAN is a natural person residing in Harris County, Texas.

307. Plaintiff MAIRA ROMAN is a natural person residing in Harris County, Texas.

308. Plaintiff MANUEL RUIZ is a natural person residing in Harris County, Texas.

309. Plaintiff MARCELLA BONNY is a natural person residing in Harris County, Texas.

310. Plaintiff MARCELO FALLICK is a natural person residing in Harris County, Texas.

311. Plaintiff MARGARET CARLIN is a natural person residing in Harris County, Texas.

312. Plaintiff MARGARITA GUTIERREZ is a natural person residing in Harris County, Texas.

313. Plaintiff MARGARITA IBARRA is a natural person residing in Harris County, Texas.

314. Plaintiff MARGARITO FLORES is a natural person residing in Harris County, Texas.

315. Plaintiff MARIA ARTEAGA is a natural person residing in Harris County, Texas.

316. Plaintiffs MARIDE LOURDES TAMAYO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

317. Plaintiff MARIA DIOSDADO is a natural person residing in Harris County, Texas

318. Plaintiff MARIA DEL CARMEN RUIZ is a natural person residing in Harris County, Texas.

319. Plaintiffs MARIA ELIZALDE, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

320. Plaintiff MARIA ELOINA LOPEZ is a natural person residing in Harris County,

Texas.

321. Plaintiff MARIA FIGUEROA is a natural person residing in Harris County, Texas.

322. Plaintiff MARIA GIRALDO is a natural person residing in Harris County, Texas.

323. Plaintiff MARIA HERNANDEZ is a natural person residing in Harris County,

Texas.

324. Plaintiff MARIA PEDRAZA is a natural person residing in Harris County, Texas.

325. Plaintiff MARIA REGALADO is a natural person residing in Harris County,

Texas.

326. Plaintiff MARIA SOLORZANO is a natural person residing in Harris County,

Texas.

327. Plaintiff MARIA TORRES is a natural person residing in Harris County, Texas.

328. Plaintiff MARIA ZAMUDIO is a natural person residing in Harris County, Texas.

329. Plaintiff MARIA ZUNO is a natural person residing in Harris County, Texas.

330. Plaintiffs MARICRUZ MUNOZ, INDIVIDUALLY AND AS NEXT FRIEND OF

██████████, MINOR are natural persons residing in Harris County, Texas.

331. Plaintiff MARIO GIRALDO is a natural person residing in Harris County, Texas.

332. Plaintiffs MARIO HERNANDEZ, INDIVIDUALLY AND AS NEXT FRIEND

OF ██████████, MINOR are natural persons residing in Harris County, Texas.

333. Plaintiff MARISOL ORDONEZ is a natural person residing in Harris County,

Texas.

334. Plaintiff MARISOL URIOSTEGUI is a natural person residing in Harris County,

Texas.

335. Plaintiff MARK BRADY is a natural person residing in Harris County, Texas.

336. Plaintiff MARK IIAMS is a natural person residing in Harris County, Texas.
337. Plaintiff MARLON HENRY is a natural person residing in Harris County, Texas.
338. Plaintiff MARSEDEZ HAUGHTON is a natural person residing in Harris County, Texas.
339. Plaintiff MARTA LUEVANO is a natural person residing in Harris County, Texas.
340. Plaintiffs MARTA SANCHEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.
341. Plaintiff MARTHA KNOTTS is a natural person residing in Harris County, Texas.
342. Plaintiff MARTHA TREJO is a natural person residing in Harris County, Texas.
343. Plaintiff MARTIN DE JESUS BOADO is a natural person residing in Harris County, Texas.
344. Plaintiff MARTIN DE JESUS BOADO PEREZ is a natural person residing in Harris County, Texas.
345. Plaintiffs MARTIN ESQUEDA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.
346. Plaintiff MARTIN GUZMAN is a natural person residing in Harris County, Texas.
347. Plaintiff MARY BALLINGER is a natural person residing in Harris County, Texas.
348. Plaintiffs MARY CHURCH, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.
349. Plaintiff MARY DONOVAN is a natural person residing in Harris County, Texas.
350. Plaintiff MARY VU is a natural person residing in Harris County, Texas.

351. Plaintiff MAYRA REYES, INDIVIDUALLY AND DBA 24/7 LAS VEGAS VIEW CINE, is a natural person doing commercial business in and residing in Harris County, Texas.

352. Plaintiff MAXINE C. WILLIAMS is a natural person residing in Harris County, Texas.

353. Plaintiffs MELISSA GARZA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

354. Plaintiff MELODY BANKS is a natural person residing in Harris County, Texas.

355. Plaintiff MELVA IRIS HERNANDEZ AKA MELBA HERNANDEZ is a natural person residing in Harris County, Texas.

356. Plaintiff MICHAEL DENNIS is a natural person residing in Harris County, Texas.

357. Plaintiff MICHAEL HENRY is a natural person residing in Harris County, Texas.

358. Plaintiff MICHAEL MORRISON is a natural person residing in Harris County, Texas.

359. Plaintiff MICHAEL SCHARRINGHAUSEN is a natural person residing in Harris County, Texas.

360. Plaintiff MIGUEL ANGEL CASTILLO OLMOS is a natural person residing in Harris County, Texas.

361. Plaintiff MIGUEL ANGEL GARCIA is a natural person residing in Harris County, Texas.

362. Plaintiff MIGUEL ANGEL SILVA is a natural person residing in Harris County, Texas.

363. Plaintiff MIGUEL ANGEL TORRES is a natural person residing in Harris County,

Texas.

364. Plaintiff MIGUEL BELTRAN is a natural person residing in Harris County, Texas.

365. Plaintiff MIGUEL MAJANO is a natural person residing in Harris County, Texas.

366. Plaintiffs MILAGRO DEL CARMEN GUANDIGUO AKA MILAGRO D. VASQUEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED]

[REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

367. Plaintiffs MILAGRO ORDONEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

368. Plaintiff MINH HO is a natural person residing in Harris County, Texas.

369. Plaintiff MIRIAM DEL CASTILLO is a natural person residing in Harris County, Texas.

370. Plaintiffs MIRIAN CRUZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

371. Plaintiff MOISES SALVADOR LEON, JR. is a natural person residing in Harris County, Texas.

372. Plaintiff MOISES SALVADOR SANCHEZ is a natural person residing in Harris County, Texas.

373. Plaintiff MOISES ZAMUDIO is a natural person residing in Harris County, Texas.

374. Plaintiff MONICA CARDENAS is a natural person residing in Harris County, Texas.

375. Plaintiff NAM STAPP is a natural person residing in Harris County, Texas.

376. Plaintiff NANCY ROMAN is a natural person residing in Harris County, Texas.

377. Plaintiffs NANCY TOWNS, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

378. Plaintiffs NATALIA DE JESUS BOADO PEREZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

379. Plaintiff NATHALIA RAMIREZ is a natural person residing in Harris County, Texas.

380. Plaintiff NECKER ARCHELUS is a natural person residing in Harris County, Texas.

381. Plaintiff NELSON SIMOES DOS SANTOS is a natural person residing in Harris County, Texas.

382. Plaintiff NEVIE MARTINEZ is a natural person residing in Harris County, Texas.

383. Plaintiffs NGA DANG, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

384. Plaintiff NICHOLAS ARROYO is a natural person residing in Harris County, Texas.

385. Plaintiff NICOLE GRAY is a natural person residing in Harris County, Texas.

386. Plaintiff NIRALI PATEL is a natural person residing in Harris County, Texas.

387. Plaintiff NOE PULIDO is a natural person residing in Harris County, Texas.

388. Plaintiff NONG PHAN is a natural person residing in Harris County, Texas.

389. Plaintiff NORA GARCIA is a natural person residing in Harris County, Texas.
390. Plaintiff NORMA BALLESTEROS is a natural person residing in Harris County, Texas.
391. Plaintiff NURDAN SCHIAFFO is a natural person residing in Harris County, Texas.
392. Plaintiff OMAR GARZA is a natural person residing in Harris County, Texas.
393. Plaintiff OSCAR CIFUENTES is a natural person residing in Harris County, Texas.
394. Plaintiffs PABLO LOPEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.
395. Plaintiff PABLO RIVAS is a natural person residing in Harris County, Texas.
396. Plaintiffs PATRICIA ADAME FUJII, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.
397. Plaintiff PATRICIA PORTALES SANDOVAL is a natural person residing in Harris County, Texas.
398. Plaintiff PAULA FISHER is a natural person residing in Harris County, Texas.
399. Plaintiff PEDRO ARRIAGA is a natural person residing in Harris County, Texas.
400. Plaintiff PEDRO LUNA is a natural person residing in Harris County, Texas.
401. Plaintiff PEGGY SANDERS is a natural person residing in Harris County, Texas.
402. Plaintiffs PHONG NGUYEN, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.
403. Plaintiff POEY ENG TIERMAN is a natural person residing in Harris County, Texas.

404. Plaintiff PRENTIS KNOTTS is an natural person residing in Harris County, Texas.
405. Plaintiff QUYEN THUYEN NGUYEN is a natural person residing in Harris County, Texas.
406. Plaintiff RADKEY JOLINK is natural person residing in Harris County, Texas.
407. Plaintiff RAMIRO ZUNIGA is natural person residing in Harris County, Texas.
408. Plaintiff RAMON GUSTAVO HERNANDEZ-MARTINEZ is a natural person residing in Harris County, Texas.
409. Plaintiff RAMSES AYALA is a natural person residing in Harris County, Texas.
410. Plaintiffs RAUMIR JACOME, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.
411. RAYMUNDO RAMOS is a natural person residing in Harris County, Texas.
412. Plaintiff REFUGIO GUTIERREZ is a natural person residing in Harris County, Texas.
413. Plaintiff REJNAL TUSHE is a natural person residing in Harris County, Texas.
414. Plaintiff RENE RIVERA is a natural person residing in Harris County, Texas.
415. Plaintiff RETTA FITZJARRALD is a natural person residing in Harris County, Texas.
416. Plaintiff REYNA SANTANA is a natural person residing in Harris County, Texas.
417. Plaintiff RICARDO BUSTAMANTE is a natural person residing in Harris County, Texas.
418. Plaintiff RICARDO REYES is a natural person residing in Harris County, Texas.
419. Plaintiff RICHARD MIKEL is a natural person residing in Harris County, Texas.
420. Plaintiff ABRAHAM NA is a natural person residing in Harris County, Texas.

421. Plaintiff ROBERT PEUGH, IS A natural persons residing in Harris County, Texas.

422. Plaintiff ROBERT SINGLETON is a natural person residing in Harris County, Texas.

423. Plaintiff RODRIGO FLORES is a natural person residing in Harris County, Texas.

424. Plaintiff ROLAND RAMIREZ is a natural person residing in Harris County, Texas.

425. Plaintiffs ROLANDO GARCIA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

426. Plaintiff ROMANA TEREZA CERVANTES is a natural person residing in Harris County, Texas.

427. Plaintiff RONNIE OLMEDO is a natural person residing in Harris County, Texas.

428. Plaintiff ROSA PARADA is a natural person residing in Harris County, Texas.

429. Plaintiffs ROSALBA MARTINEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

430. Plaintiff ROSALINA GOMEZ is a natural person residing in Harris County, Texas.

431. Plaintiffs ROSALBA MENDIETA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

432. Plaintiffs ROSAURA ALCALA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

433. Plaintiffs ROSAURA ZAPATA CALIX, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas

434. Plaintiff RUBEN JAMES VILLALPANDO is a natural person residing in Harris County, Texas.

435. Plaintiff RUBEN ZUNO is a natural person residing in Harris County, Texas.

436. Plaintiffs RUBENIA GARCIA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

437. Plaintiff RUTHIE ARCHELUS is a natural person residing in Harris County, Texas.

438. Plaintiff RYAN NGUYEN is a natural person residing in Harris County, Texas.

439. Plaintiff SALOMON D. NUNEZ is a natural person residing in Harris County, Texas.

440. Plaintiff SALOMON TORRES is a natural person residing in Harris County, Texas.

441. Plaintiff SAMUEL GARCIA, JR. is a natural person residing in Harris County, Texas.

442. Plaintiff SANDRA BOTELLO is a natural person residing in Harris County, Texas.

443. Plaintiffs SANDRA CEPADA, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

444. Plaintiff SARA ESQUEDA is a natural person residing in Harris County, Texas.

445. Plaintiff SARA RAMIREZ MELGAR is a natural person residing in Harris County, Texas.

446. Plaintiffs SARVELIO CAMPOS, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural

persons residing in Harris County, Texas.

447. Plaintiff SATOHIRO FUJII is a natural person residing in Harris County, Texas.

448. Plaintiff SAUMIL PATEL is a natural person residing in Harris County, Texas.

449. Plaintiff SERGIO LIMAS is a natural person residing in Harris County, Texas.

450. Plaintiffs SHANTERIA AVERIL, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

451. Plaintiff SIDES ZAMUDIO is a natural person residing in Harris County, Texas.

452. Plaintiff SILVESTRE SAUL HERNANDEZ is a natural person residing in Harris County, Texas.

453. Plaintiff SINDY YOJANA CASTILLO-SANCHEZ is a natural person residing in Harris County, Texas.

454. Plaintiffs SOLEIDY CRUZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

455. Plaintiffs SONIA HERNANDEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

456. Plaintiff SOOK JA NA is a natural person residing in Harris County, Texas.

457. Plaintiff STEPHANIE COBOS is a natural person residing in Harris County, Texas.

458. Plaintiff STEVEN STEGER is a natural person residing in Harris County, Texas.

459. Plaintiff SULMA BEJARANO is a natural person residing in Harris County, Texas.

460. Plaintiff SUSAN WATKINS is a natural person residing in Harris County, Texas.

461. Plaintiffs SUSANA ESPARZA, INDIVIDUALLY AND AS NEXT FRIEND OF

██████████, MINOR, ARE natural persons residing in Harris County, Texas.

462. Plaintiff SUSANA GARZA is a natural person residing in Harris County, Texas.

463. Plaintiff SUSANNE DENNIS is a natural person residing in Harris County, Texas.

464. Plaintiff SUZANNE SLAVINSKY is a natural person residing in Harris County, Texas.

465. Plaintiff TANA MOCHMAN PIERCE is a natural person residing in Harris County, Texas.

466. Plaintiff TATIANA E. LARA is a natural person residing in Harris County, Texas.

467. Plaintiff TED BACCAM is a natural person residing in Harris County, Texas.

468. Plaintiff TERRI SEPULVEDA is a natural person residing in Harris County, Texas.

469. Plaintiff TERRI YOUNG is a natural person residing in Harris County, Texas.

470. Plaintiffs THELMA ZAMORA, INDIVIDUALLY AND AS NEXT FRIEND OF

██████████ AND ██████████, MINORS are natural persons residing in Harris County, Texas.

471. Plaintiff THERESA DILLARD is a natural person residing in Harris County, Texas.

472. Plaintiff THERESA STOJAN is a natural person residing in Harris County, Texas.

473. Plaintiff THOMAS MATHEW is a natural person residing in Harris County, Texas.

474. Plaintiff TOM HAND is a natural person residing in Harris County, Texas.

475. Plaintiff TONYA BRITTON-AVERIL is a natural person residing in Harris County, Texas.

476. Plaintiff TRACY STEPHENSON is a natural person residing in Harris County, Texas.

477. Plaintiff TRANG NGUYEN is a natural person residing in Harris County, Texas.

478. Plaintiffs ANDREA HORTON AS NEXT FRIEND OF [REDACTED], [REDACTED], [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

479. Plaintiff TRENICA HAUGHTON is a natural person residing in Harris County, Texas.

480. Plaintiff TRIVIA DOUGLAS, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

481. Plaintiff VANESSA BALTIERREZ is a natural person residing in Harris County, Texas.

482. Plaintiff VELMA HENRY is a natural person residing in Harris County, Texas.

483. Plaintiffs VERONICA MORENO VARGAS, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

484. Plaintiff VERONICA RODRIGUEZ is a natural person residing in Harris County, Texas.

485. Plaintiff VICENTE PAITA is a natural person residing in Harris County, Texas.

486. Plaintiff VICTONIA PEAY is a natural person residing in Harris County, Texas.

487. Plaintiff VICTOR ALFONSO GUZMAN CASTILLO is a natural person residing in Harris County, Texas.

488. Plaintiff VICTOR QUIJADA is a natural person residing in Harris County, Texas.

489. Plaintiff VICTORIA HERNANDEZ is a natural person residing in Harris County, Texas.

490. Plaintiff W. R. WOLFRAM, III is a natural person residing in Harris County, Texas.

491. Plaintiff WENCESLAO GUZMAN GRAJEDA is a natural person residing in Harris County, Texas.

492. Plaintiff WENER SANCHEZ TORRES is a natural person residing in Harris County, Texas.

493. Plaintiff WILLIAM PURSLEY is a natural person residing in Harris County, Texas.

494. Plaintiff WILLIAM SCHIAFFO is a natural person residing in Harris County, Texas.

495. Plaintiff XIAOJUAN ZHOU is a natural person residing in Harris County, Texas.

496. Plaintiffs XIMENA ZAMUDIO, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR are natural persons residing in Harris County, Texas.

497. Plaintiff XITHLALY PULIDO is a natural person residing in Harris County, Texas.

498. Plaintiff XOCHITL FUENTES is a natural person residing in Harris County, Texas.

499. Plaintiffs YOLANDA WELLS-BROUGHTON, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED] AND [REDACTED], MINORS are natural persons residing in Harris County, Texas.

500. Plaintiff ZACKEITH EASON is a natural person residing in Harris County, Texas.

501. Defendant WATSON GRINDING AND MANUFACTURING CO. ("WATSON GRINDING") is a Texas entity with a principal place of business in Harris County. This Defendant may be served through its registered agent, John M. Watson located at 4525

Gessner Road, Houston, Texas 77041, and/or wherever he may be found for service.

502. Defendant WATSON VALVE SERVICES, INC. ("WATSON VALVE") is a Texas entity with a principal place of business in Harris County. This Defendant may be served with process through its registered agent, John M. Watson located at 4525 Gessner Road, Houston, Texas 77041, and/or wherever he may be found for service.

503. Defendant KMHJ, LTD. ("KMHJ") is Texas entity with a principal place of business located in Harris County. This Defendant may be served through its registered agent, KMHJ Management Company, LLC located at 1400 McKinney Street, #1212, Houston, Texas 77010, and/or wherever they may be found for service.

504. Defendant KMHJ MANAGEMENT COMPANY, LLC ("KMHJ MANAGEMENT") is Texas entity with a principal place of business located in Harris County. This Defendant may be served through its registered agent, Kelly Watson located at 1400 McKinney Street, #1212, Houston, Texas 77010, and/or wherever she may be found for service.

505. Defendant 3M COMPANY ("3M") is a foreign corporation that is registered and does a substantial amount of business in the state of Texas. This Defendant may be served through its registered agent, CSC-Lawyers Incorporating Service Company located at 211 E. 7th St, Suite 620, Austin, Texas 78701, and/or wherever they may be found for service.

506. Defendant FIRESTONE CRYOGENICS, INC. ("FIRESTONE") is a Texas entity with its principal place of business in Conroe, Texas and does a substantial amount of business in Harris County. This Defendant may be served through its registered agent, Linda Plummer located at 12446 Cutten Road, Houston Texas 77066, and/or wherever she may be found for service.

507. Defendant FIRESTONE CRYOGENIC EQUIPMENT, INC. ("FIRESTONE EQUIPMENT") is a Texas entity with its principal place of business in Conroe, Texas and does a substantial amount of business in Harris County. This Defendant may be served through its registered agent, Linda Plummer located at 12446 Cutten Road, Houston, Texas 77066, and/or wherever she may be found for service.

508. Defendant MATHESON TRI-GAS, INC. ("MATHESON") Is a foreign corporation with its principal place of business in Basking Ridge, New Jersey and does a substantial amount of business in Texas. This Defendant may be served through its registered agent, CT Corporation System located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201, and/or wherever they may be found for service.

509. Defendant WESTERN INTERNATIONAL GAS & CYLINDERS, INC. ("WESTERN") is a Texas entity with its principal place of business in Irving, Texas. This Defendant may be served through its registered agent Denise C. Haugen located at 7173 Highway 159 E., Bellville, Texas 77418, and/or wherever she may be found for service.

510. Defendant TELEDYNE EXPLORATION COMPANY ("TELEDYNE") is a foreign corporation with its principal place of business in Pittsburgh, Pennsylvania and does a substantial amount of business in Texas. This Defendant may be served through its registered agent, CT Corporation located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201, and/or wherever they may be found for service.

511. Defendant TELEDYNE TECHNOLOGIES, INC. F/K/A DETCON, INC. ("TELEDYNE TECHNOLOGIES") is a foreign corporation with its principal place of business in Thousand Oaks, California and does a substantial amount of business in Texas. This Defendant may be served through its registered agent, Cogency Global, Inc. located at 1601

Elm Street, Suite 4360, Dallas, Texas 75201, and/or wherever they may be found for service.

512. Defendant DETCON, INC. D/B/A OLDHAM (“DETCON”) is a domestic for-profit corporation doing business in the State of Texas. This defendant may be served through its registered agent, Cogency Global, Inc. - located at 1601 Elm St., Suite 4360, Dallas, Texas 75201, and/or wherever they may be found for service.

513. Defendant ARC SPECIALTIES, INC. (“ARC”) is a Texas corporation with a principal place of business in Harris County, Texas. This Defendant may be served through its registered agent, L. Don Knight located at 8100 Washington Ave, Ste 1000, Houston, Texas 77007, and/or wherever he may be found for service.

514. Defendant AUTOMATION PLUS, INC. ("AUTOMATION") is a Texas corporation with a principal place of business in Harris County, Texas. This Defendant may be served through its registered agent, Frank Lomelo located at 3705 Pine Lawn Drive, Pearland, Texas 77581, and/or wherever he may be found for service.

515. Defendant TRCC, LLC (“TRCC”) is a domestic limited liability corporation doing business in the State of Texas. This defendant may be served through its registered agent, Nader Salim located at 3303 Falling Brook Court, Sugar Land, Texas 77479, and/or wherever he may be found for service.

516. Defendant DATAONLINE, LLC (“DATAONLINE”) is a foreign limited liability company doing business in the State of Texas. This defendant may be served through its registered agent, Lloyd M. Eddings located at 3142 Waldrop Dr., Dallas, Texas 75229, and/or wherever he may be found for service.

517. Defendant INDUSTRIAL SCIENTIFIC CORPORATION (“INDUSTRIAL”) is a foreign-for-profit corporation doing business in the State of Texas. This Defendant may be

served through its registered agent, CT Corp. System located at 1999 Bryan St., Ste. 900, Dallas, Texas 75201, and/or wherever they may be found for service.

IV.
VENUE AND JURISDICTION

518. Venue is proper in Harris County, Texas, pursuant to §15.002 of the Texas Civil Practice and Remedies Code as all or a substantial part of the events or omissions giving rise to the claim occurred in Harris County, Texas.

519. Jurisdiction is proper because the amount in controversy exceeds the minimum jurisdictional limits of this Court. This Court has personal jurisdiction over all parties as set out in the below paragraph.

V.
FACTS

520. In the early morning hours of January 24, 2020, a violent explosion occurred at Watson Grinding and Manufacturing located at 4525 Gessner Road in Houston, Texas (the “WATSON Facility”). Plaintiffs’ homes and/or businesses were completely/partially destroyed by the explosion and many of their homes and/or businesses have been or will be condemned as unfit to live/work. At all times relevant to the explosion, Defendants WATSON and/or WATSON VALVE controlled and continues to control the premises where the explosion originated. Defendants MATHESON, WESTERN, 3M, ARC, AUTOMATION, TELEDYNE, TELEDYNE TECHNOLOGIES, DETCON, TRCC, and DATAONLINE marketed, sold, maintained, and/or provided the propylene gas, gas lines, gas tanks, component parts of warning systems for gas leak detection, LEL monitoring system, safety equipment, safety system, and all other direct-reading instruments for gas detection at the WATSON Facility which failed, causing this explosion. Defendants MATHESON and/or WESTERN’s monitoring of the propylene levels inside the

storage tank failed, causing this explosion. Defendants ARC, AUTOMATION, FIRESTONE, FIRESTONE EQUIPMENT, and INDUSTRIAL designed, installed, maintained and/or monitored the safety equipment, safety system, and direct-reading instruments at the WATSON Facility which failed, allowing copious amounts of propylene to escape without detection/warning, causing this explosion. As a result of the explosion, Plaintiffs suffered significant damages, including total disruption of their lives, including damages to their personal property, homes, businesses, and bodily injuries and/or death.

VI.
NEGLIGENCE OF ALL DEFENDANTS

521. Defendants' joint and several contemporaneous conduct constituted a breach of the duty of ordinary care owed by Defendants to Plaintiffs. Defendants directly and personally participated in the conduct giving rise to Plaintiffs' negligence claims through their joint and several actions and omissions. Defendants, acting in the course and scope of their employment, owed an independent duty to Plaintiffs and were guilty of negligence in the following respects:

- a. Failing to furnish reasonably safe instrumentalities;
- b. Failing to create, provide and enforce safety regulations, rules and guidelines;
- c. Failing to maintain properly functioning gas/LEL monitors and alarms at the Watson facility;
- d. Failing to properly maintain, inspect and service the propylene tanks and piping on site;
- e. Failing to monitor the amount of propylene in the storage tank and warn of a significant decrease in pressure;
- f. Failing to use correct and sufficient systems for propylene gases;
- g. Failing to provide adequate equipment and competent personnel;
- h. Creating latent dangers and failing to warn of the same;

- i. Failing to recognize and remediate hazards with an extreme degree of risk;
- j. Failing to have an adequate risk management plan;
- k. Failing to read, understand, and follow published safe work policies and procedures;
- l. Violating governmental regulations and standards including, but not limited to OSHA and the EPA;
- m. Failing to institute precautionary measures to protect individuals such as Plaintiffs;
- n. Failing to properly inspect, maintain and store volatile gasses on the premises;
- o. Failing to properly inspect and maintain pressure regulators on the premises;
- p. Failing to properly inspect the premises for gas leaks;
- q. Failing to properly maintain and repair storage tanks, gas lines, and valves;
- r. Failing to timely repair tanks, gas lines, and valves;
- s. Failing to properly screen, hire, train, control, manage or supervise their agents and employees;
- t. Failing to cordon off the hazardous area from all traffic, tools, and equipment near the ignition source;
- u. Failing to institute precautionary measures to prevent volatile gasses from escaping high-pressure gas lines;
- v. Failing to ensure a safe work area and workplace; and

522. Each of the above referenced acts or omissions by Defendants led to the explosion.

VII.

STRICT LIABILITY AGAINST DEFENDANTS WESTERN, MATHESON, 3M, TELEDYNE, TELEDYNE TECHNOLOGIES, DETCON, ARC, AUTOMATION, FIRESTONE, FIRESTONE EQUIPMENT, AND INDUSTRIAL

523. For the following section, "the products" shall refer to: tank(s) and associated piping/equipment for Defendants WESTERN and MATHESON; piping and associated equipment for Defendants ARC, AUTOMATION, FIRESTONE and FIRESTONE EQUIPMENT; gas

detection and monitoring equipment for Defendants 3M, WESTERN, TELEDYNE and TELEDYNE TECHNOLOGIES.

524. Defendants listed herein manufactured, designed, distributed and/or sold the products that injured Plaintiffs, which contained design, manufacturing, and/or marketing defects.

525. Marketing Defects and Failure to Warn: Defendants listed herein designed, manufactured, distributed, and/or sold the alleged defective products with one or more marketing defects.

- a. There was an unreasonable risk in the intended or reasonably foreseeable use of such products;
- b. Defendants knew, foresaw, or should have known for foreseen the above risks;
- c. Defendants failed to adequately warn Plaintiffs of the risks, failed to instruct Plaintiffs of the above risks, and/or failed to adequately instruct Plaintiffs and other third parties how to avoid the dangers; and
- d. The marketing defects rendered the products unreasonably dangerous.

526. Design Defects: The products were designed, manufactured, distributed and/or sold with one or more design defects.

- a. Defendants designed the products and knew of safer alternative designs that were available at the time of production;
- b. The safer alternative designs would have prevented or significantly reduced the above risks without substantially impairing the products' utility;
- c. The safer alternative design was economically and technologically feasible at the time the products left Defendants' control; and
- d. The design defects rendered the products unreasonably dangerous.

527. Manufacturing Defects: The complained of products were designed, manufactured, distributed, and/or sold with one or more manufacturing defects. The Defendants manufactured the condition and at the time deviated in the quality of construction, plan and/or specifications

rendering the condition unreasonably dangerous.

528. The design, manufacturing, and/or marketing defects rendered the products unreasonably dangerous.

529. The design, manufacturing, and/or marketing defects, which rendered the products unreasonably dangerous were the producing causes to Plaintiffs' injuries.

VIII.

BREACH OF WARRANTY AGAINST DEFENDANTS WESTERN, MATHESON, 3M, TELEDYNE, TELEDYNE TECHNOLOGIES, DETCON, ARC, AUTOMATION, FIRESTONE, FIRESTONE EQUIPMENT, AND INDUSTRIAL

530. Defendants, their agents, servants and employees impliedly and expressly warranted that they would properly, adequately and safely design, construct, test, maintain and install the tank(s) and associated equipment and systems at the WATSON Facility, including all its components, including but not limited to the detection, prevention and safety system(s). Defendants, their agents, servants and employees breached these warranties in one or more of the following ways:

- a. Failing to perform their work in a good and workmanlike manner;
- b. Failing to adequately design the tank systems;
- c. Failing to adequately design the safety and detection systems;
- d. Failing to adequately design the system component parts;
- e. Failing to properly test the tank systems;
- f. Failing to properly test the safety and detection systems;
- g. Failing to properly test the component parts;
- h. Failing to provide the tank systems for its intended purpose;
- i. Failing to provide the safety and detection systems for its intended purpose;
- j. Failing to provide the components parts for their intended purpose; and

k. Other various breaches of warranty.

531. Plaintiffs suffered injuries and direct damages as a proximate result of Defendants' breach of the express and implied warranties. Further, Plaintiffs suffered actual and consequential damages as a proximate result of Defendants' breach of express and implied warranties.

IX.
GROSS NEGLIGENCE OF ALL DEFENDANTS

532. The occurrence made the basis of this suit and the resulting injuries and damages to Plaintiffs was proximately caused by Defendants' wanton and reckless disregard for the safety of Plaintiffs, consisted of, but is not limited to, the following acts and/or omissions:

- a. Failing to furnish reasonably safe instrumentalities;
- b. Failing to create, provide and enforce safety regulations, rules and guidelines;
- c. Failing to have properly functioning monitors and alarms on the premises;
- d. Failing to properly maintain, inspect and service the propylene tanks and piping on site;
- e. Failing to use correct and sufficient systems for propylene gases;
- f. Failing to provide adequate equipment and competent personnel;
- g. Creating latent dangers and failing to warn of the same;
- h. Failing to recognize and remediate hazards with an extreme degree of risk;
- i. Failing to have an adequate risk management plan;
- j. Failing to read, understand, and follow published safe work policies and procedures;
- k. Violating governmental regulations and standards including, but not limited to OSHA and the EPA;
- l. Failing to institute precautionary measures to protect individuals such as Plaintiffs;
- m. Failing to properly inspect, maintain and store volatile gasses on the premises;

- n. Failing to properly inspect and maintain pressure regulators on the premises;
- o. Failing to properly inspect the premises for gas leaks;
- p. Failing to properly maintain and repair storage tanks, gas lines, and valves;
- q. Failing to timely repair tanks, gas lines, and valves;
- r. Failing to properly screen, hire, train, control, manage or supervise their agents and employees;
- s. Failing to cordon off the hazardous area from all traffic, tools, and equipment near the ignition source;
- t. Failing to institute precautionary measures to prevent volatile gasses from escaping high-pressure gas lines; and
- u. Failing to ensure a safe work area and workplace; and.
- v. Each of the above referenced acts or omissions by Defendants led to the explosion.

533. Each of these acts and/or omissions of Defendants constitutes a wanton and reckless disregard for the safety of Plaintiffs, and singularly or in concert, constitutes a proximate cause of the resulting injuries and damages to Plaintiffs as described below.

534. When viewed objectively from the standpoint of Defendants at the time of its occurrence, Defendants' conduct involved an extreme degree of risk, considering the probability and magnitude of the potential harm to others. In addition, each were actually, subjectively aware of the risk involved, but nevertheless proceeded with conscious indifference to the rights, safety, or welfare of others; therefore, Plaintiffs sue for exemplary damages in an amount to be determined by the trier of the fact.

X.
NEGLIGENCE OF DEFENDANTS
UNDER THE DOCTRINE OF *RESPONDEAT SUPERIOR*

535. Defendants are liable for the torts committed by their employees during the course

and scope of the employment. At the time of the incident, Defendants' employees were the agents, ostensible agents, servants, and employees of Defendants and were acting within the scope of his authority as such agents, ostensible agents, servants, and employees. Defendants' employees were negligent and/or grossly negligent more thoroughly described above was a proximate cause of Plaintiffs' injuries and damages described below. Therefore, Defendants should be held jointly and severally liable for tortious actions of their agents, ostensible agents, servants, and/or employees under the doctrine of *respondeat superior*.

XI. **DAMAGES OF PLAINTIFFS**

536. As a direct and proximate result of the occurrence made the basis of this lawsuit, Plaintiffs seek:

- a. Real property and personal property damage;
- b. Remedial costs for real property damage;
- c. Replacement costs for personal property damage;
- d. Diminished Value;
- e. Depreciation;
- f. Costs of completion;
- g. Expenses of temporary/alternate housing;
- h. Mental anguish in the past and future;
- i. Physical pain and suffering in the past and future;
- j. Medical expenses in the past and future;
- k. Physical impairment in the past and future;
- l. Disfigurement in the past and future;
- m. Loss of earnings and earnings capacity in the past and future;

- n. Loss of household services in the past and future;
- o. Loss of use;
- p. Costs of suit;
- q. Prejudgment and post-judgment interest;
- r. Cost of replacement;
- s. Incidental and consequential damages;
- t. Business interruption damages;
- u. Lost profits;
- v. Lost business;
- w. Lost income;
- x. Lost rentals;
- y. Punitive damages in such amount as may be found proper and just under the facts and circumstances as determined by the jury; and/or
- z. All other relief to which Plaintiffs may be justly entitled.

XII.
PRESERVATION OF EVIDENCE

537. Plaintiffs request and demand that Defendants and their employees, agents, ostensible agents, representatives, attorneys and insurers preserve and maintain all evidence pertaining to any claim or defense to the incident made the basis of this suit, or the damages resulting therefrom, including but not limited to photographs; videotapes; audiotapes; recordings; business records; memoranda; files; facsimiles; e-mails; voicemails; text messages; cell phone data; sales receipts; invoices; commission records; tax records; telephone messages; telephone calling card transactions; calendar entries; diary entries; bills of lading; any incident reports; and any electronically stored information including images; data or information related to the incident.

Failure to maintain such items, including but not limited to any other items preciously requested and demanded to be preserved before the subject lawsuit ensued, will constitute a “spoliation” of the evidence and may subject Defendants to sanctions.

XIII.
TEXAS RULE OF CIVIL PROCEDURE 193.7

538. Pursuant to Texas Rule of Civil Procedure 193.7, Defendants are hereby put on actual notice that any documents produced in response to written discovery will be used in pretrial proceedings and at trial and will be deemed authentic unless they make valid objections to authenticity pursuant to the rule.

XIV.
RULE 194 REQUESTS FOR DISCLOSURE

539. Pursuant to Tex. R. Civ. Proc. 194, ALL DEFENDANTS are requested to disclose, within fifty (50) days of service of this request, the information and material described in Rule 194.2(a)-(l).

XV.
PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that Defendants WATSON VALVE SERVICES, INC., WATSON GRINDING AND MANUFACTURING, CO., MATHESON TRI-GAS, INC., WESTERN INTERNATIONAL GAS & CYLINDERS, INC., KMHJ, LTD., KMHJ MANAGEMENT COMPANY, LLC, 3M COMPANY, FIRESTONE CRYOGENICS, INC., FIRESTONE CRYOGENIC EQUIPMENT, INC., TELEDYNE EXPLORATION COMPANY, TELEDYNE TECHNOLOGIES, INC. F/K/A DETCON, INC., DETCON, INC. D/B/A OLDHAM, ARC SPECIALTIES, INC., AUTOMATION PLUS, INC., TRCC, LLC, DATAONLINE, LLC, AND INDUSTRIAL SCIENTIFIC CORPORATION be cited to appear and answer, and upon final hearing of this

cause, Plaintiffs have judgment against Defendants for damages listed herein, for actual damages, exemplary damages, costs of suit, pre-judgment and post-judgment interest at the highest legal rate, and for such other and further relief, both general and special, at equity and in law, to which Plaintiffs may show themselves justly entitled.

Respectfully submitted,

KWOK DANIEL LTD., L.L.P.

/s/ Robert S. Kwok

Robert S. Kwok

SBN: 00789430

J. Ryan Loya

SBN: 24086531

Marcos H. Cardenas

SBN: 24116164

Alex P. Boylhart

SBN: 24087198

William W. Hoke*

SBN: 24046086

9805 Katy Freeway, Suite 850

Houston, Texas 77024

Telephone: (713) 773-3380

Facsimile: (713) 773-3960

Email: rkwok@kwoklaw.com

Email: rloya@kwoklaw.com

Email: mcardenas@kwoklaw.com

Email: aboylhart@kwoklaw.com

Email: whoke@whokelaw.com

* Of Counsel

ATTORNEYS FOR PLAINTIFFS