

1 ADAM B. WOLF (Bar No. 215914)  
2 MELISA A. ROSADINI-KNOTT (Bar No. 316369)  
3 PEIFFER WOLF CARR KANE CONWAY & WISE, LLP  
4 5042 Wilshire Blvd., No. 304  
5 Los Angeles, CA 90036  
6 T (415) 766-3545  
7 F (415) 402-0058  
8 Email: awolf@peifferwolf.com  
9 mrosadini@peifferwolf.com

10 *Attorneys for Plaintiffs*

11 **SUPERIOR COURT OF CALIFORNIA**  
12 **FOR THE COUNTY OF ORANGE**

13 A.B., an individual; and C.D., an individual,

14 Plaintiffs,

15 v.

16 FUJIFILM IRVINE SCIENTIFIC, INC.;;  
17 and DOES 1-50, inclusive,

18 Defendants.

19 Case No.

20 **COMPLAINT**

- 21 1. STRICT PRODUCTS LIABILITY—  
22 MANUFACTURING DEFECT
- 23 2. STRICT PRODUCTS LIABILITY—  
24 DESIGN DEFECT
- 25 3. STRICT PRODUCTS LIABILITY—  
26 FAILURE TO WARN
- 27 4. NEGLIGENCE
- 28 5. NEGLIGENT FAILURE TO RECALL

**DEMAND FOR JURY TRIAL**

1 Plaintiffs A.B. and C.D. (collectively, “Plaintiffs”) respectfully bring this Complaint  
2 against Defendant FUJIFILM IRVINE SCIENTIFIC, INC. (hereinafter, “Irvine Scientific” or  
3 “Defendant”), and allege as follows:

4 **NATURE OF THE ACTION**

5 1. Defendant’s defective product and negligent conduct destroyed Plaintiffs’ precious  
6 and irreplaceable embryos.

7 2. Irvine Scientific manufactured, marketed, promoted, distributed, and/or sold oil to  
8 be used for culturing and storing human embryos. Irvine Scientific further marketed that its oil  
9 would protect embryos from changes in osmolality and pH, among other things, which is  
10 necessary to ensure that stored human embryos survive and remain viable for implantation.

11 3. Irvine Scientific further represented that it properly and adequately tested its oil  
12 before distributing such oil to the public, including clinics and/or healthcare practitioners who  
13 would use such oil for the storage of human embryos.

14 4. Despite these representations, Irvine Scientific did not sufficiently test the oil that it  
15 manufactured, marketed, promoted, distributed, and/or sold. As a result, it sold defective lots of  
16 oil, which turned out to be toxic to embryos.

17 5. Irvine Scientific’s manufacturing, marketing, promoting, distributing, and/or selling  
18 its toxic oil resulted in the death of Plaintiffs’ embryos.

19 6. Only after Plaintiffs’ embryos died upon coming into contact with Defendant’s  
20 defective oil did Irvine Scientific recall multiple lots of its oil, including a lot that ruined Plaintiffs’  
21 embryos.

22 **PARTIES**

23 7. Plaintiff A.B. is a citizen of Los Angeles, California.

24 8. Plaintiff C.D. is a citizen of Los Angeles, California.

25 9. Given the sensitive nature of their claims, Plaintiffs are using pseudonymous initials  
26 in this litigation to protect their privacy. If the Court so requires, Plaintiffs will seek permission to  
27 proceed under these pseudonyms.



1 **GENERAL FACTUAL ALLEGATIONS**

2 **General Background of Assisted Reproductive Technology**

3 18. ART involves fertility-related treatments in which human eggs or embryos are  
4 manipulated. The most common type of ART is in vitro fertilization (“IVF”). Since the first  
5 successful IVF procedure in humans, dating back to at least the 1970s, IVF and other forms of  
6 ART have developed and expanded significantly worldwide.

7 19. During the IVF process, eggs are extracted from a woman and fertilized in a  
8 laboratory with sperm to create a viable embryo. Later in the IVF process, the embryo is  
9 transplanted into a uterus.

10 20. The process of extracting human eggs from a woman is a lengthy process, typically  
11 requiring significant medication, monitoring through ultrasound and other scans to check the  
12 development of the eggs, and performing a surgical procedure to collect the eggs.

13 21. Following the collection of the eggs, sperm is mixed with the eggs in a laboratory to  
14 create embryos.

15 22. Many people, including Plaintiffs, elect to have their embryos stored for a period of  
16 time before the embryo is transferred to a woman’s uterus.

17 23. There can be many reasons for undergoing these expensive and extensive  
18 procedures well in advance of the embryo implantation, including that human eggs are a limited  
19 and precious resource. A woman has a limited number of eggs at birth, and this supply diminishes  
20 as part of the natural aging process (commonly referred to as a “biological clock”). Moreover, not  
21 only does the quantity of a woman’s eggs diminish with time, but so does a woman’s egg quality,  
22 with miscarriages and chromosomal abnormalities occurring more frequently for women who are  
23 older at the time of a natural conception and pregnancy. The most determinative factor in IVF  
24 success is the woman’s age when her eggs were extracted.

25 24. Thus, one purpose of embryo preservation and storage is to allow women and/or  
26 their reproductive partners to preserve their reproductive material so that the embryos may be  
27 implanted at a later time while preserving viable eggs and embryos and allow for flexibility in  
28 family planning.

1 25. As part of the embryo preservation and storage process, oil is used to prevent  
2 evaporation and insulate against changes in pH, among other things. This oil, which must be free  
3 of contaminants, is vital to preventing damage to or destruction of the embryos.

4 26. Irvine Scientific describes such oil as “highly purified by-products of the distillation  
5 of petroleum, and hav[ing] the properties of being immiscible with aqueous solutions, having a  
6 significantly lighter density than water, and being non-reactive.” Moreover, according to Irvine  
7 Scientific’s own marketing materials, “[t]his makes them ideal for use in micro-drop cell cultures,  
8 preventing evaporation of the aqueous phase, and proving an insulation against rapid changes in  
9 pH when the atmospheric (i.e. % CO<sub>2</sub>) conditions change.”

#### **Irvine Scientific’s Oil**

11 27. Irvine Scientific marketed and promoted its oil for use as an overlay to cover small  
12 volumes of media to prevent evaporation and changes in pH.

13 28. Irvine Scientific further marketed and represented that its oil is sterile filtered and  
14 aseptically processed to provide the highest quality oil available.

15 29. Moreover, Irvine Scientific marketed that all of its oil was properly tested, and thus  
16 that it could be relied upon and/or posed no harm in use with human embryos.

17 30. Defendant manufactured, marketed, distributed, and/or sold its oil while promoting  
18 that its oil was tested by superior methods, *e.g.*, a Mouse Embryo Assay, to ensure that no  
19 embryotoxic exposure would occur.

20 31. However, Irvine Scientific knew or should have known that its oil was not properly  
21 and/or adequately tested and/or inspected for embryotoxicity, and thus posed a severe risk of  
22 destruction to human embryos.

#### **Irvine Scientific’s January 2023 Recall of Its Oil for Embryo Culture**

24 32. On or about January 16, 2023, Irvine Scientific issued an “Urgent Field Safety  
25 Notice (product removal)” sent to its customers and users of its oil (the “Recall Letter”).

26 33. The Recall Letter stated that Irvine Scientific was recalling its “Oil for Embryo  
27 Culture, Catalog #9305, Lots 0000011351, 0000011367, 0000015999, 00000160001.” The  
28 recalled embryo oil lots are referred to herein as the “Recalled Oil Lots.”

1 34. In the Recall Letter, Irvine Scientific acknowledged that it had received several  
2 complaints regarding its Recalled Oil Lots, including the death of human embryos upon coming  
3 into contact with the oil.

4 35. Moreover, Irvine Scientific’s Recall Letter stated that—only after receiving these  
5 reports of defective oil—did Irvine Scientific test the reported lots and found oil toxicity for many  
6 of its oil lots.

7 36. On information and belief, Irvine Scientific previously has manufactured and sold  
8 numerous products used in ART, including oil, that were defective and sometimes recalled.

9 **Plaintiffs Learned Their Embryos Had Been Destroyed Due to the**  
10 **Recalled Embryo Oil Lots**

11 37. Plaintiffs utilized ART in order to fulfill their dream of having children. To that  
12 end, Plaintiffs entrusted a fertility clinic to create their embryos and store those embryos safely for  
13 a short period of time—when Plaintiffs would transfer their embryos to have one or more children.

14 38. Plaintiffs learned from their fertility clinic that their embryos were killed upon  
15 coming into contact with oil. Those embryos were viable prior to coming into contact with  
16 Defendant’s oil, and then were killed by Defendant’s oil.

17 39. Shortly after Irvine Scientific issued its Recall Letter, Plaintiffs were informed by  
18 their fertility clinic that the oil that killed their embryos was part of the Recalled Embryo Lots.

19 40. Plaintiffs are devastated. They may no longer be able to have children with their  
20 genetic material as a result of Defendant’s conduct.

21 **Irvine Scientific Knew or Should Have Known That the Recalled Embryo Oil Lots**  
22 **Posed an Unreasonable Risk of Toxicity to Viable Embryos**

23 41. As a manufacturer and distributor of numerous ART products, including oil, Irvine  
24 Scientific knew that contaminated and/or toxic oil could kill human embryos upon contact.  
25 Accordingly, Defendant knew it was vitally important that its oil was properly tested and/or  
26 inspected prior to the distribution of such oil.

27 42. Despite this, Irvine Scientific failed to properly inspect and/or test its oil, including  
28 the Recalled Oil Lots. Defendant knowingly put its oil into the market when it knew or should have

1 known that the Recalled Oil Lots posed a substantial and unacceptable risk to human embryos,  
2 including Plaintiffs' embryos.

3 43. As a manufacturer of numerous products for use in ART, Irvine Scientific knew that  
4 people go to extraordinary lengths to obtain and use viable human embryos. Defendant knew that  
5 people place extreme value on their viable embryos, make substantial emotional and financial  
6 investments for their embryos, and that such people expect that great care will be taken to preserve  
7 and protect the embryos to avoid the irreparable harm of the death of their embryos.

8 44. Defendant's conduct was despicable and was carried on by Defendant with a willful  
9 and conscious disregard of the rights and/or safety of others. Defendant's conduct subjected  
10 Plaintiffs to cruel and unjust hardship in conscious disregard of Plaintiffs' rights. Moreover, as  
11 discussed herein, Defendant's conduct amounted to a deceit and/or concealment of material fact(s)  
12 known to Defendant with the intention on the part of Defendant to deprive individuals of property  
13 and/or legal rights and/or otherwise cause injury.

14 **FIRST CAUSE OF ACTION**

15 **STRICT PRODUCTS LIABILITY—MANUFACTURING DEFECT**

16 45. Plaintiffs re-allege and incorporate by reference herein each and every allegation  
17 contained in all other paragraphs in this Complaint as though fully set forth in this cause of action.

18 46. At all times relevant herein, Irvine Scientific manufactured, distributed, and/or sold  
19 oil to be used with human embryos, including the Recalled Embryo Oil Lots.

20 47. At the time the Recalled Embryo Lots left Irvine Scientific's possession, the  
21 Recalled Embryo Lots contained a manufacturing defect such that they differed from Irvine  
22 Scientific's intended result. This deviation included, but was not necessarily limited to, toxicity in  
23 the Recalled Embryo Oil Lots, such that the Recalled Embryo Lots posed a fatal harm to human  
24 embryos upon their contact with human embryos.

25 48. Oil from the Recalled Embryo Oil Lots was used (as intended), and it came into  
26 contact with Plaintiffs' embryos, which resulted in the tragic destruction of Plaintiffs' embryos.

27 49. The defect in the oil in the Recalled Embryo Oil Lots was a substantial factor in  
28 causing Plaintiffs' harm.

1 50. Irvine Scientific acted with a conscious disregard for the safety of consumers and/or  
 2 users of its Embryo Oil, including Plaintiffs, because, without limitation, Irvine Scientific was  
 3 aware of the dangerous consequences of not properly or adequately testing its Embryo Oil Lots  
 4 (including specifically the Recalled Embryo Oil Lots), when it knew or should have known the oil  
 5 (specifically, the Recalled Embryo Oil Lots) was not safe and posed a serious, toxic risk to  
 6 irreplaceable human embryos, and failing to recall the Recalled Embryo Oil Lots before the oil  
 7 came into contact with Plaintiffs’ embryos.

8 **SECOND CAUSE OF ACTION**

9 **STRICT PRODUCTS LIABILITY—DESIGN DEFECT**

10 51. Plaintiffs re-allege and incorporate by reference herein each and every allegation  
 11 contained in all other paragraphs in this Complaint as though fully set forth in this cause of action.

12 52. Irvine Scientific designed, manufactured, distributed, and/or sold oil, including the  
 13 Recalled Embryo Oil Lots, or caused such oil to be designed, manufactured, and/or sold.

14 53. The Recalled Embryo Oil Lots did not perform as safely or as effectively as an  
 15 ordinary consumer would have expected it to perform when used or misused in a reasonably  
 16 foreseeable manner.

17 54. Irvine Scientific had actual or constructive notice and knew, or in the exercise of  
 18 reasonable care and diligence should have known, that the Recalled Embryo Oil Lots were  
 19 defective in their design as discussed herein, including but not limited to their composite materials,  
 20 resulting in the irreversible damage and destruction of Plaintiffs’ embryos.

21 55. The benefits of the Recalled Embryo Oil Lots are not outweighed by their risks,  
 22 particularly considering the potential harm resulting from their use on reproductive materials,  
 23 including embryos; the likelihood of harm occurring; the feasibility of an alternative safer design at  
 24 the time of manufacture; and the feasibility of more reliable testing methods and procedures.

25 56. Irvine Scientific had actual or constructive notice and knew, or in the exercise of  
 26 reasonable care should have known, that the Recalled Embryo Oil Lots had significant risks, were  
 27 defective in design, as discussed herein, and had an unreasonable increased risk of damage or  
 28 destruction to stored reproductive materials, including embryos.



1 57. Plaintiffs were irreparably harmed because the Recalled Embryo Oil Lots were toxic  
2 and/or contained materials that were toxic when coming into contact with stored embryos, such as  
3 those belonging to Plaintiffs.

4 58. As a direct and proximate result of the defective designs of the Recalled Embryo Oil  
5 Lots, Plaintiffs were harmed as described herein, including but not limited to the destruction of their  
6 embryos.

7 59. The failure of the Recalled Embryo Oil Lots to perform safely and effectively was a  
8 substantial factor in causing Plaintiffs' harm and damages.

9 60. Irvine Scientific acted with a conscious disregard for the safety of consumers and/or  
10 users of its Embryo Oil, including Plaintiffs, because, without limitation, Irvine Scientific was  
11 aware of the dangerous consequences of not properly or adequately testing its Embryo Oil Lots  
12 (including specifically the Recalled Embryo Oil Lots), when it knew or should have known the oil  
13 (specifically, the Recalled Embryo Oil Lots) was not safe and posed a serious, toxic risk to  
14 irreplaceable human embryos, and failing to recall the Recalled Embryo Oil Lots before the oil  
15 came into contact with Plaintiffs' embryos.

16 **THIRD CAUSE OF ACTION**

17 **STRICT PRODUCTS LIABILITY—FAILURE TO WARN**

18 61. Plaintiffs re-allege and incorporate by reference herein each and every allegation  
19 contained in all other paragraphs in this Complaint as though fully set forth in this cause of action.

20 62. Irvine Scientific designed, manufactured, distributed, and/or sold oil to be used with  
21 human embryos, including the Recalled Embryo Oil, and/or caused such oil to be designed,  
22 manufactured, distributed, and/or sold.

23 63. The Recalled Embryo Oil Lots had risks, including but not limited to  
24 embryotoxicity, that were known and/or knowable in light of the generally accepted scientific  
25 knowledge at the time of manufacture, distribution and/or sale.

26 64. The risks of contaminated oil, including the Recalled Oil Lots, presented a  
27 substantial danger, including but not limited to embryotoxicity and destruction of viable embryos,  
28 when such oil was used as intended and/or in a reasonably foreseeable manner.

1 65. Despite its awareness that its oil, including the Recalled Oil Lots, was defective and  
2 contained an unacceptably increased danger to embryos, Irvine Scientific failed to warn consumers,  
3 including but not limited to Plaintiffs and Plaintiffs' fertility providers who purchased the oil, that  
4 the oil had not been properly and/or sufficiently tested, contained toxic raw materials, and/or had an  
5 increased risk of embryotoxicity.

6 66. Neither Plaintiffs nor their fertility providers knew or would have known or  
7 recognized the risks of the Recalled Embryo Oil Lots.

8 67. As a direct and proximate result of Irvine Scientific's failure to adequately warn of  
9 the dangerous and embryotoxic effects of the Recalled Embryo Oil Lots, Plaintiffs were harmed as  
10 described herein, including but not limited to the destruction of their embryos.

11 68. The lack of sufficient warnings was a substantial factor in causing Plaintiffs' harm  
12 and damages. Contaminated and harmful oil would not have been used with Plaintiffs' embryos if  
13 Defendant had provided sufficient warning in advance.

14 69. Irvine Scientific acted with a conscious disregard for the safety of consumers and/or  
15 users of its Embryo Oil, including Plaintiffs, because, without limitation, Irvine Scientific was  
16 aware of the dangerous consequences of not properly or adequately testing its Embryo Oil Lots  
17 (including specifically the Recalled Embryo Oil Lots), when it knew or should have known the oil  
18 (specifically, the Recalled Embryo Oil Lots) was not safe and posed a serious, toxic risk to  
19 irreplaceable human embryos, and failing to recall the Recalled Embryo Oil Lots before the oil  
20 came into contact with Plaintiffs' embryos.

21 **FOURTH CAUSE OF ACTION**

22 **NEGLIGENCE**

23 70. Plaintiffs re-allege and incorporate by reference herein each and every allegation  
24 contained in all other paragraphs in this Complaint as though fully set forth in this cause of action.

25 71. Irvine Scientific designed, manufactured, distributed, and/or sold oil for use with  
26 human embryos, including the Recalled Embryo Oil Lots, or caused such oil to be designed,  
27 manufactured, and/or sold.

1 72. As a manufacturer of oil for use with human embryos, Irvine Scientific owed a duty,  
2 including but not limited to Plaintiffs, to design, manufacture, inspect, and/or test its oil, including  
3 the Recalled Embryo Oil Lots, such that its oil was not toxic or hazardous when used on human  
4 embryos and/or did not contain toxic or contaminated materials.

5 73. Irvine Scientific breached this duty and was negligent in its design, manufacture,  
6 inspection, and/or testing of its oil, including the Recalled Embryo Oil Lots.

7 74. As a direct and proximate result of Irvine Scientific's negligent acts and/or  
8 omissions, including but not limited to its failure to properly or adequately test its oil (including the  
9 Recalled Embryo Oil Lots), promoting and marketing its oil as properly tested and safe for use on  
10 human embryos despite its knowledge of its contamination, defective design of its oil, defective  
11 manufacture of its oil, and/or failure to adequately warn of the dangerous and embryotoxic effects  
12 of the Recalled Embryo Oil Lots, Plaintiffs were harmed as described herein, including but not  
13 limited to the destruction of their embryos.

14 75. These negligent acts and/or omissions were a substantial factor in causing Plaintiffs'  
15 harm and damages.

16 76. Irvine Scientific acted with a conscious disregard for the safety of consumers and/or  
17 users of its Embryo Oil, including Plaintiffs, because, without limitation, Irvine Scientific was  
18 aware of the dangerous consequences of not properly or adequately testing its Embryo Oil Lots  
19 (including specifically the Recalled Embryo Oil Lots), when it knew or should have known the oil  
20 (specifically, the Recalled Embryo Oil Lots) was not safe and posed a serious, toxic risk to  
21 irreplaceable human embryos, and failing to recall the Recalled Embryo Oil Lots before the oil  
22 came into contact with Plaintiffs' embryos.

### 23 **FIFTH CAUSE OF ACTION**

#### 24 **NEGLIGENT FAILURE TO RECALL**

25 77. Plaintiffs re-allege and incorporate by reference herein each and every allegation  
26 contained in all other paragraphs in this Complaint as though fully set forth in this cause of action.

27 78. At all times relevant herein, Irvine Scientific manufactured, distributed, and/or sold  
28 oil for use with human embryos, including the Recalled Embryo Oil Lots.

1           79.     As a manufacturer of oil for use with human embryos, Irvine Scientific owed a duty,  
2 including but not limited to Plaintiffs, to design, manufacture, inspect, and/or test its oil, including  
3 the Recalled Embryo Oil Lots, such that its oil was not toxic or hazardous when used on human  
4 embryos and/or did not contain toxic or contaminated materials. Further, Irvine Scientific had an  
5 ongoing duty following its manufacture, distribution, and/or sale of its oil, including the Recalled  
6 Embryo Oil Lots, to inform purchasers, consumers, and/or others who used its oil that the oil was  
7 toxic and/or hazardous and/or contained toxic or contaminated materials harmful to human  
8 embryos, and to immediately recall and/or remove such oil from the market to prevent harm.

9           80.     Irvine Scientific breached these duties and acted negligently by failing to recall its  
10 Recalled Embryo Oil Lots earlier, including before such oil came into contact with Plaintiffs’  
11 embryos.

12           81.     For a significant period of time before it issued the recall of its Recalled Embryo Oil  
13 Lots, Irvine Scientific knew and/or should have known that, when used as intended, its Recalled  
14 Embryo Oil Lots were not properly or adequately tested for, among other things, toxicity, and posed  
15 an unreasonable increased risk in toxicity to embryos.

16           82.     Irvine Scientific knew, and/or reasonably should have known that the defects in its  
17 oil, including the Recalled Embryo Oil Lots, posed a substantial risk of serious injury to the  
18 embryos with which the oil came into contact and/or was used.

19           83.     Irvine Scientific knew and/or reasonably should have known that it had failed to  
20 properly or adequately test its Recalled Embryo Oil Lots before distributing and/or selling and/or  
21 causing such oil from entering the market.

22           84.     A reasonable manufacturer, distributor, and/or seller in the same or similar  
23 circumstances would have recalled the oil and issued a notice to purchasers, consumers, and/or  
24 users—prior to the oil coming into contact with Plaintiffs’ embryos—rather than continuing to  
25 allow the oil to be used, sold, distributed, and/or manufactured, thereby obfuscating the true risks of  
26 the oil to human embryos.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

85. Despite the fact that it knew or should have known that the Recalled Embryo Oil Lots were defective, toxic, and posed an unacceptable risk of toxicity to embryos, Irvine Scientific failed to recall the oil.

86. Irvine Scientific acted with a conscious disregard for the safety of consumers and/or users of its Embryo Oil, including Plaintiffs, because, without limitation, Irvine Scientific was aware of the dangerous consequences of not properly or adequately testing its Embryo Oil Lots (including specifically the Recalled Embryo Oil Lots), when it knew or should have known the oil (specifically, the Recalled Embryo Oil Lots) was not safe and posed a serious, toxic risk to irreplaceable human embryos, and failing to recall the Recalled Embryo Oil Lots before the oil came into contact with Plaintiffs' embryos.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiffs pray for judgment against Defendants, and each of them, as follows:

- 1) For past, present, and future non-economic damages in an amount to be determined at the time of trial;
- 2) For past, present, and future economic damages in an amount to be determined at the time of trial;
- 3) For exemplary damages, in an amount to be determined at trial;
- 4) For costs of suit herein;
- 5) For pre- and post-judgement interest as allowed by law;
- 6) For injunctive relief, in order to ensure that Plaintiffs' biological material does not come into contact with any more contaminated oil manufactured by Defendant; and
- 7) For such other and further relief as the Court may deem just and proper.

1 Date: February 16, 2023

Respectfully submitted,

2 

3 Adam B. Wolf (CA Bar No. 245914)  
4 Melisa A. Rosadini-Knott (CA Bar No. 316369)  
5 PEIFFER WOLF CARR KANE  
6 CONWAY & WISE, LLP  
7 5042 Wilshire Blvd., No. 304  
8 Los Angeles, CA 90036  
9 T (415) 766-3545  
F (415) 402-0058  
awolf@peifferwolf.com  
mrosadini@peifferwolf.com

*Attorneys for Plaintiffs*

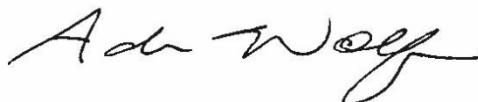
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **DEMAND FOR JURY TRIAL**

2 Plaintiffs hereby demand a trial by jury on all claims so triable.

3  
4 Date: February 16, 2023

Respectfully submitted,

5 

6 Adam B. Wolf (CA Bar No. 215914)  
7 Melisa A. Rosadini-Knott (CA Bar No. 316369)  
8 PEIFFER WOLF CARR KANE  
9 CONWAY & WISE, LLP  
10 5042 Wilshire Blvd., No. 304  
11 Los Angeles, CA 90036  
12 T (415) 766-3545  
13 F (415) 402-0058  
14 awolf@peifferwolf.com  
15 mrosadini@peifferwolf.com

16 *Attorneys for Plaintiffs*