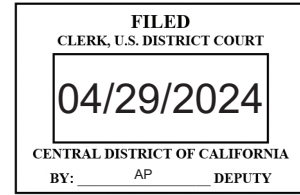


RELATED DDJ



Lynn Macy "In Pro Per"
P.O. Box #103
Twin Peaks, Ca. 92391
Telephone: (909) 744 -8480
Email: macybuilders@yahoo.com
PLAINTIFF IN PRO PER

THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA EASTERN DIVISION
COMPLAINT

Lynn Macy, as an individual,
PLAINTIFF,
vs.
COUNTY OF SAN BERNARDINO PUBLIC
WORKS SOLID WASTE MANAGEMENT, a
public entity.
DEFENDANTS.

Case No.: 5:24-cv-00913-KK(DTB)
COMPLAINT FOR DAMAGES AND
DEMAND FOR JURY TRIAL FOR:
(1) Trespass.
(2) Municipal and Supervisorial Liability
(42 U.S.C. § 1983).
(3) Intentional Infliction of Emotional
Distress.
(4) Environmental Hazard
(5) Invasion of Privacy
(6) Extortion
(7) Failure to do Public Record's
Requests.

DEMAND FOR JURY TRIAL

PLAINTIFF LYNN MACY, through their undersigned counsel, hereby files this
Complaint against Defendants County of San Bernardino Public Works Solid
Waste Management Division, inclusive (collectively "Defendants"), alleges as
follows:

JURISDICTION AND VENUE

1. This Court has original jurisdiction pursuant to 28 U.S.C. §§ 1331 and
1343(a)(3-4) because Plaintiff assert claims arising under the laws of the
United States including 42 U.S.C. §§ 1983 & 1985, the Fourth & Fourteenth
Amendments of the United States Constitution. This court has
supplemental jurisdiction over state law claims pursuant to 28 USC § 1367
because those claims are so related to PLAINTIFF'S federal claims that the

1 claims form part of the same case and/or controversy pursuant to Article
2 III of the United States Constitution.

- 3
4 2. Venue is properly founded in this judicial district pursuant to 28 USC §§
5 1391 (b) and (c) in that a substantial part of the events giving rise to the
6 claims in this action occurred within this District and Defendants are
7 subject to personal jurisdiction in this district.

8 **PARTIES**

- 9 3. PLAINTIFF LYNN MACY, is a citizen of the State of California, and at all
10 relevant times herein was a resident in San Bernardino County in the State
11 of California.
12 4. Defendant County of San Bernardino Public Works Solid Waste
13 Management Division is and at all times relevant a public entity located in
14 the County of San Bernardino and existing under the laws of the State of
15 California.

16 **FACTS COMMON TO ALL CAUSES OF ACTION**

- 17 5. Each and every allegation set forth in each and every averment and
18 allegation of this pleading hereby is incorporated by this reference in
19 each and every averment and allegation of this pleading.
20 6. I am informed and believe that Defendants County of San Bernardino
21 Public Works Solid Waste Management Division have not provided any of
22 my public records requests.
23 7. There's an important legal principle that says "ignorance of the law is no
24 excuse." You can't defend your actions by arguing you didn't know they
25 were illegal, even if you honestly did not realize you were breaking the
26 law.
27

FIRST CAUSE OF ACTION

Trespassing

(By Plaintiff Against County of San Bernardino Public Works Solid Waste Management Division)

8. Plaintiff hereby re-alleges and incorporates by this reference, as though set forth in full, the allegations in paragraph 1 through 7, inclusive.
9. Defendants violated the law and interfered with Plaintiff's civil rights because Defendants County of San Bernardino Public Works Solid Waste Management Division (SWMD) allowed Burrtec trucks to travel, trespass, and drive up Augusta Way, a private road without owners consent. Weight damage has been caused to Augusta Way, a private road due to these heavy, environmental hazardous, unsafe pollution, unregulated, Burrtec trucks being allowed from Defendants.

SECOND CAUSE OF ACTION

Municipal and Supervisory Liability (42. U.S.C. § 1983)

(By Plaintiff Against County of San Bernardino Public Works Solid Waste Management Division)

10. Plaintiff hereby re-alleges and incorporates by this reference, as though set forth in full, the allegations in paragraph 1 through 9, inclusive.
11. On and for some time prior to 2021 (and continuing to the present date) Defendants County of San Bernardino Public Works Solid Waste Management Division deprived Plaintiff Lynn Macy of the rights and liberties secured to them by the 4th and 14th Amendments to the United States Constitution, in that said Defendants and their supervising and managerial employees, agents, and representatives acting with gross negligence and with reckless and deliberate indifference to the safety,

1 rights, and liberties of the public in general and of Plaintiff Lynn Macy, and
2 of persons in their class, situation and comparable position, in particular,
3 knowingly maintained, enforced and applied an official recognized
4 custom, policy, and practice of:

5 (a) Employing and retaining as county officials and other personnel,
6 including County of San Bernardino Public Works Solid Waste
7 Management Division at all times material herein knew or
8 reasonably should have known had propensities for abusing their
9 authority and for mistreating citizens by failing to follow their
10 County Policies;

11 (b) Inadequately supervising, training, controlling, assigning and
12 disciplining County of San Bernardino Public Works Solid Waste
13 Management Division and other personnel, each knew or in the
14 exercise of reasonable care should have known the
15 aforementioned propensities and character traits;

16 (c) Maintaining grossly inadequate procedures for reporting,
17 supervising, investigating, reviewing, controlling and disciplining
18 the intentional conduct by County of San Bernardino Public
19 Works Solid Waste Management Division and other personnel.

20 (d) Failing to adequately train Defendants County of San Bernardino
21 Public Works Solid Waste Management Division and failing to
22 institute appropriate policies regarding constitutional procedures
23 and practices;

24 (e) Having and maintaining an unconstitutional policy, customs,
25 procedures of using excessive trespassing which is also
26 demonstrated by inadequate training regarding these subjects.
27

1 12. Defendants County of San Bernardino Public Works Solid Waste

2 Management Division had either actual or constructive knowledge of the
3 deficient policies, practices, and customs alleged in the paragraphs
4 above. Despite having knowledge as stated above these Defendants
5 condone, tolerated, and through actions and inactions thereby ratified
6 such policies. Said Defendants also acted with deliberate indifference to
7 the foreseeable effects and consequences of these policies with respect
8 to the constitutional rights of Plaintiff Lynn Macy and other individuals
9 similarly situated.
10

11 13. By perpetrating, sanctioning, tolerating and ratifying the outrageous
12 conduct and wrongful acts, Defendants County of San Bernardino Public
13 Works Solid Waste Management Division acted with intentional, reckless,
14 and callous disregard for the safety and constitutional rights of Plaintiff
15 Lynn Macy. Defendants County of San Bernardino Public Works Solid
16 Waste Management Division actions were willful, wanton, oppressive,
17 malicious, fraudulent, extremely offensive, and unconscionable to any
18 reasonable person of normal sensibilities.

19 14. By reason of the aforementioned policies and practices of Defendants
20 County of San Bernardino Public Works Solid Waste Management Division
21 acted with intentional, reckless and callous disregard for the safety and
22 constitutional rights of Plaintiff Lynn Macy. Defendants County of San
23 Bernardino Public Works Solid Waste Management Division caused Plaintiff
24 Lynn Macy incurred damages in the form of psychological and emotional
25 injuries, including, without limitation, pain and suffering, sleep deprivation,
26 humiliation, all of which are continuing and damaging to reputation.
27 Plaintiff's actual damages will be ascertained at trial.
28

1 15. The policies, practices, and customs implemented and maintained and
2 still tolerated by Defendants County of San Bernardino Public Works Solid
3 Waste Management Division acted with intentional, reckless and callous
4 disregard for the safety and constitutional rights of Lynn Macy. Defendants
5 County of San Bernardino Public Works Solid Waste Management Division
6 were affirmatively linked to and were significantly influential forces of
7 Plaintiff Lynn Macy.
8

9 **THIRD CAUSE OF ACTION**

10 **Intentional Infliction of Emotional Distress**

11 **(By Plaintiff Against County of San Bernardino Public Works Solid Waste**
12 **Management Division)**

13 16. Plaintiff hereby re-alleges and incorporates by this reference, as though
14 set forth in full, the allegations in paragraph 1 through 15, inclusive.

15 17. Plaintiff are informed and believe and thereon alleges that Defendants'
16 actions described in this Complaint were intentional, extreme, and
17 outrageous. Defendants allow unsafe pollution, environmental hazardous,
18 unregulated, heavy Burretec trucks to trespass and drive up private road
19 Augusta Way, causing weight damage, which caused Plaintiff a great
20 deal of emotional distress.

21 18. Plaintiff are further informed and believe and hereon alleges that such
22 actions were done with intent to cause serious emotional distress and
23 were done with reckless disregard of the probability of causing Plaintiff
24 serious emotional distress.

25 19. As a proximate result of the Defendants actions Plaintiff Lynn Macy
26 incurred damages in the form of psychological and emotional injuries,
27 including, without limitation, pain and suffering, sleep deprivation,
28

1 humiliation, all of which are continuing and damaging to reputation.
2 Plaintiff's actual damages will be ascertained at trial.

3 20. The conduct of the Defendants was despicable, malicious, wanton,
4 oppressive and accomplished with a conscious disregard for Plaintiff Lynn
5 Macy's rights, entitling Plaintiff Lynn Macy to an award of exemplary and
6 punitive damages. Defendants only goal against Plaintiff were for
7 monetary gain.
8

9 **FOURTH CAUSE OF ACTION**

10 **Environmental Hazard**

11 **(By Plaintiff Against County of San Bernardino Public Works Solid Waste**
12 **Management Division)**

13 21. Plaintiff hereby re-alleges and incorporates by this reference, as though
14 set forth in full, the allegations in paragraph 1 through 20, inclusive.

15 22. Burrtec causes environmental hazards most local citizens do not want
16 pollution. Most people move up to the mountain to avoid city pollution,
17 CO2 Carbon monoxide poisoning, unclean, smog (a cloud made heavier
18 and darker by smoke and chemical fumes. Smog is also a photochemical
19 cloud caused by the action of solar ultraviolet radiation on atmosphere
20 polluted with hydrocarbons and oxides of nitrogen especially from
21 automobile exhaust) filled air. **County of San Bernardino Public Works Solid**
22 **Waste Management Division has allowed Burrtec to cause Environmental**
23 **Hazards** by polluting our mountain air. You can factually die by carbon
24 monoxide poisoning. Accord to Eddie Munguia, "Southern California
25 leads the nation in air pollution deaths. Unfortunately, a recent study
26 paints a picture of just how bad the smog really is. Researchers have
27 found that more than a thousand people are actually dying each year as
28

1 a result of Southern California's infamously bad air quality. Pollution levels
2 constantly exceed what's considered safe by health professionals.
3 Nationally, air pollution related deaths were estimated to be at around
4 9,320 per year, a number large enough to account for the annual amount
5 of deaths caused by drunk driving.
6

7 23. Burrtec trucks disturb our peace and create a lot of noise. We always
8 know when it's trash pickup day because you can hear the garbage
9 truck down the block – from inside your house! Garbage trucks range from
10 85 to 100 decibels as they're compacting trash. Even for the workers who
11 work with garbage trucks, hearing protection is highly recommended. In
12 terms of occupational hearing hazards, exposure to sounds at 85 decibels
13 for more than 8 hours a day could seriously damage your hearing.

14 24. We're demanding that County of San Bernardino Public Works Solid Waste
15 Management Division and Burrtec disclose the weight of Burrtec trucks
16 with and without trash. We want to know all of the dump scale readings
17 Burrtec has been using to damage our roads. Burrtec nor County of San
18 Bernardino Public Works Solid Waste Management Division have offered
19 any compensation for the roads their trucks have damaged. We are
20 demanding County and/or Burrtec repair our private road that Burrtec
21 trucks have damaged over the years. The dogs start barking when the
22 trucks start squeaking. The garbage trucks' grinding, squeaking, booming,
23 jet engine-level noise is inescapably loud from the moment they turn onto
24 Plaintiffs private road street to the moment they turn onto the next.

25 25. Burrtec is a money grab (an undignified or unprincipled acquisition of a
26 large sum of money with little effort) with no regards for people's
27 individual rights. Burrtec gets paid even when it snows and they can't pick
28

1 up trash. Burrtec has big, heavy, noisy, and loud trucks that crush the
2 roads they drive on, cracking the black top, pollute the air, and disturb
3 the peace. Lumbering through neighborhoods, stopping and starting,
4 turning and backing. Burrtec's garbage trucks stress the pavement more
5 than 9,300 times as much as an SUV does, according to The Press
6 Democrat. Santa Rosa City Councilman of California Gary Wysocky said,
7 "In general, it's acknowledged that garbage trucks beat the crap out of
8 streets. They [streets] get the most wear and tear from garbage trucks."
9 Engineering analysis cited by the Bay Area Metropolitan Transportation
10 Commission of California John Goodwin, an MTC (Metropolitan
11 Transportation Commission of California) spokesman said, "Garbage
12 trucks put more strain on a street than just about anything else, including a
13 fully loaded transit bus, a semi-truck hauling a single trailer, or a UPS
14 delivery truck." According to Titan Recycle and Trash, "An average large
15 garbage truck weighs about 64,000 pounds or 32 tons. Smaller garbage
16 trucks weigh about 20 tons, making even the smaller garbage trucks wear
17 on the quality of the roads their routes follow. Commercial garbage trucks
18 are very heavy machines that pick up, store, and dump garbage that
19 they are made to carry."
20

21 26. The **California Air Resources Board** (800) 242-4450 (CARB is the lead
22 agency for climate change programs and oversees all air pollution
23 control efforts in California to attain and maintain health-based air quality
24 standards.) **fined** Burrtec Waste Industries, Inc. **\$307,200** in November for
25 **emissions violations** during 2005 and 2006. An ARB investigation showed
26 **Burrtec Waste Industries, Inc.** located in Fontana, Calif., failed to properly
27 inspect their diesel vehicles. The company also **failed to comply** with the
28

1 solid waste collection vehicle rule by neglecting to retrofit (an act of
2 adding a component or accessory to something that did not have it
3 when manufactured.) some of their diesel vehicles with the required
4 emission-reduction devices. Diesel exhaust contains a variety of harmful
5 gases and over 40 other known cancer-causing substances. In 1998,
6 California identified diesel exhaust as a toxic air contaminant (a polluting
7 or poisonous substance that makes something impure.) based on its
8 potential to cause cancer, premature death and other health problems.
9 New research links vehicle exhaust and lung cancer mortality (the state of
10 being subject to death.) in trucking industry workers exposed to diesel and
11 other types of vehicle emissions with increasing years of work.
12

13 27. The **California Air Resources Board (CARB)** reached a settlement
14 agreement with one of the largest, privately held, solid waste companies
15 in California, Burrtec Waste Industries Inc. and its sister company EDCO
16 Disposal Corp., for **\$305,000** for **violations** of CARB's Truck and Bus
17 Regulation. ([https://ww2.arb.ca.gov/news/san-bernardino-county-waste-](https://ww2.arb.ca.gov/news/san-bernardino-county-waste-hauler-fined-307200-emissions-violations)
18 **hauler-fined-307200-emissions-violations**)

19 28. In 2021, a **CARB investigation** revealed that EDCO and Burrtec were in
20 **violation** of the Truck and Bus Regulation as codified in California Code of
21 Regulations, title 13, section 2025. CARB's Enforcement Division
22 documented that Burrtec and EDCO had **failed to meet** the applicable
23 regulation requirements for multiple heavy-duty diesel vehicles in their
24 fleet, and as a result paid fines in the amounts of **\$67,500** and **\$12,500**,
25 respectively, to settle the case. ([https://ww2.arb.ca.gov/news/carb-](https://ww2.arb.ca.gov/news/carb-settles-major-california-solid-waste-company-305000-over-air-quality-regulation)
26 **settles-major-california-solid-waste-company-305000-over-air-quality-**
27 **regulation**)
28

1 29. Burrtec Waste Industries, Inc. and its Affiliates Settle For **\$67,500**

2 In December 2022, the **California Air Resources Board (CARB)** reached a
3 settlement with Burrtec Waste Industries, Inc. and its Affiliates (Burrtec),
4 with its principal location in Fontana, California, for the company's
5 **violation** of CARB's **air quality regulations**. An investigation conducted by
6 CARB staff showed that **Burrtec failed** to meet the applicable Truck and
7 Bus (TB) Regulation requirements for multiple heavy-duty diesel vehicles in
8 their fleet. CARB documented **violations** as they related to the
9 TB Regulation (Cal. Code Regs., tit. 13, § 2025).

10 To settle the case, Burrtec agreed to the penalty of **\$1,250** per **violation** for
11 a total of **\$67,500**. The **\$67,500** will go to CARB's Air Pollution Control Fund,
12 which provides funding for projects and research to improve California's
13 air quality.

14 Burrtec has elected to utilize the low-use vehicle exemption (Cal. Code
15 Regs., tit. 13, § 2025(p)(4)); credit provision (Cal. Code Regs., tit. 13, §
16 2025(j)); and phase-in option (Cal. Code Regs., tit. 13, § 2025(i)) in the TB
17 Regulation to come into compliance. (See also, EDCO Disposal
18 Corporation separate Case Summary entry and link to Settlement
19 Agreement below.)

20 (<https://ww2.arb.ca.gov/burrtec-waste-industries-inc-settlement-2022>)

21 **FIFTH CAUSE OF ACTION**

22 **Invasion of Privacy**

23 **(By Plaintiff Against County of San Bernardino Public Works Solid Waste**
24 **Management Division)**

25 30. Plaintiff hereby re-alleges and incorporates by this reference, as though
26 set forth in full, the allegations in paragraph 1 through 29, inclusive.

1 31. **Electronic right to privacy, California Government Code section 11015.5.**

2 **(b)**

3 A state agency shall not **distribute or sell any electronically collected**
4 **personal information about users to any third party without prior written**
5 **permission from the user,** except as required to investigate possible
6 violations of Section 502 of the Penal Code or as authorized under the
7 Information Practices Act of 1977 (Title 1.8 (commencing with Section
8 1798) of Part 4 of Division 3 of the Civil Code). Nothing in this subdivision
9 shall be construed to prohibit a state agency from distributing
10 electronically collected personal information to another state agency or
11 to a public law enforcement organization in any case where the security
12 of a network operated by a state agency and exposed directly to the
13 internet has been, or is suspected of having been, breached.

14 32. **California Government Code section 11015.5. (d)**

15 For purposes of this section:

16 (1) “**Electronically collected personal information**” means any information
17 that is maintained by an agency that identifies or describes an individual
18 user, including, but **not limited to, the user’s name, social security number,**
19 **physical description, home address, home telephone number, education,**
20 **financial matters, medical or employment history, password, electronic**
21 **mail address,** and information that reveals any network location or
22 identity, but excludes any information manually submitted to a state
23

1 agency by a user, whether electronically or in written form, and
2 information on or relating to individuals who are users serving in a business
3 capacity, including, but not limited to, business owners, officers, or
4 principals of that business.
5

6 33. The Privacy Act of 1974, as amended, 5 U.S.C. § 552a

7 (b) CONDITIONS OF DISCLOSURE.—**No agency shall disclose any record**
8 **which is contained in a system of records by any means of**
9 **communication to any person, or to another agency, except pursuant to**
10 **a written request by, or with the prior written consent of, the individual to**
11 **whom the record pertains, unless disclosure of the record would be.**

12
13
14 ← *County of San Bernardino Public Works Solid Waste Management*
15 *Division cannot put the address in a public record in regards to these*
16 *cases without prior written consent. **County of San Bernardino Public Works***
17 ***Solid Waste Management Division has volunteered to collect people's***
18 ***private information to enrich Burrtec a privately held solid waste***
19 ***company.** We believe someone has been bribed. Why would County of*
20 *San Bernardino Public Works Solid Waste Management Division want to*
21 *spend a lot of effort to give private information to a private public*
22 *company? County of San Bernardino Public Works Solid Waste*
23 *Management Division **cannot disclose private information to Burrtec***
24 ***without a written approval or any other third party.***
25
26
27
28

1 34. The **Fourth Amendment** to the United States Constitution, made
2 applicable to the states through the due process clause of the Fourteenth
3 Amendment, *Mapp v. Ohio*, 367 U.S. 643, *rehearing denied*, 368 U.S. 871
4 (1961), **guarantees to all persons the right of privacy free from**
5 **unreasonable state intrusion**. In addition, s. 12, Art. I, State Const., provides
6 protection from unreasonable searches and seizures:

7 **"The right of the people to be secure in their persons, houses, papers and**
8 **effects against unreasonable searches and seizures, and against the**
9 **unreasonable interception of private communications by any means, shall**
10 **not be violated. No warrant shall be issued except upon probable cause,**
11 **supported by affidavit, particularly describing the place or places to be**
12 **searched, the person or persons, thing or things to be seized, the**
13 **communication to be intercepted, and the nature of evidence to be**
14 **obtained.** This right shall be construed in conformity with the 4th
15 Amendment to the United States Constitution, as interpreted by the
16 United States Supreme Court. . . ."

17 **Administrative searches or inspections such as those under consideration**
18 **in the instant inquiry, which are conducted outside the judicial process**
19 **without consent and without prior approval (as evidenced by an**
20 **administrative search warrant) are not reasonable**, unless a showing can
21 be made that the administrative search or inspection falls within one of
22 the well-established exceptions to this rule. See, e.g., *See v. City of Seattle*,
23 387 U.S. 541 (1967); *United States v. Sokolow*, 450 F.2d 324 (5th Cir. 1971);
24 *Benton v. State*, 329 So.2d 385 (1 D.C.A. Fla., 1976); *Parsons v. State*, 334
25 So.2d 308 (1 D.C.A. Fla., 1976); and *AGO 82-7*. Cf. *Colonnade Catering*
26 *Corp. v. United States*, 397 U.S. 72 (1970), and *Michigan v. Tyler*, 436 U.S.
27 499 (1978).

28 Both business or commercial premises and **private residences are afforded**
29 **protection from unreasonable searches by s. 12, Art. I, State Const., and**
30 **the Fourth Amendment to the U.S. Constitution**. See *See v. City of Seattle*,
31 *supra*, in which the U.S. Supreme Court held that administrative
32 inspections of commercial structures as well as private residences are
33 forbidden by the Fourth Amendment when conducted without a warrant;
34 and *Jones v. City of Longwood, Florida*, 404 So.2d 1083 (5 D.C.A. Fla.,
35 1981), in which the court, in a wrongful death action, stated that an
36 ordinance requiring the building inspector and fire chief to periodically
37 inspect all buildings and structures within the city was qualified by the
38 Fourth Amendment and could not authorize inspection of private property
39 without a warrant.

40 A **municipal code inspector is without authority** to enter onto any **private**,
41 commercial, or **residential** property to assure compliance with or to
42 enforce the various technical codes of the municipality or to conduct any

1 administrative inspections or searches without the consent of the owner or
2 the operator or occupant of such premises or **without a duly issued search
3 or administrative inspection warrant.** The procurement and issuance of
4 administrative inspection warrants is governed by the provisions of ss.
5 933.20-933.30, F.S. However, owner-occupied family residences are
6 exempt from the provisions of ss. 933.20-933.30, F.S., and as to those
7 **residences a search warrant or the prior consent and approval of the
8 owner is required.**

9 **SIXTH CAUSE OF ACTION**

10 **Extortion**

11 **(By Plaintiff Against County of San Bernardino Public Works Solid Waste
12 Management Division)**

13 35. Plaintiff hereby re-alleges and incorporates by this reference, as though
14 set forth in full, the allegations in paragraph 1 through 34, inclusive.

15 36. Defendants San Bernardino Public Works Solid Waste Management
16 Division allowed Legalized Extortion Service of Burrtec. Burrtec is the only
17 private utility company that charges you 3 months in advance. (Edison,
18 Crestline Lake Arrowhead Water Agency, SoCal gas, Charter
19 Communications do not do this.)

20 **SEVENTH CAUSE OF ACTION**

21 **Failure to do Public Record's Requests**

22 **(By Plaintiff Against County of San Bernardino Public Works Solid Waste
23 Management Division)**

24 37. Plaintiff hereby re-alleges and incorporates by this reference, as though
25 set forth in full, the allegations in paragraph 1 through 36, inclusive.

26 38. Defendants failed to fulfill public records requests from Plaintiff for what
27 regulations Defendants have and who made the regulations; for
28 Defendants to not follow the laws.

1
2 39. California Public Records Act Information (CPRA) The Act provides for two
3 types of access. One is a right to inspect public records: "Public records
4 are open to inspection at all times during the office hours of the state or
5 local agency and every person has a right to inspect any public record,
6 except as hereafter provided."
7

8
9 **WHEREFORE**, Plaintiff's pray judgment against Defendants as follows:

- 10 1. For compensatory damages in an amount to be proven at trial;
11 2. For treble damages pursuant to the Bane Act;
12 3. For punitive damages on those claims where it is available pursuant to law
13 in an amount sufficient to punish, deter and make an example of the
14 Defendants;
15 4. For interest on those claims where it is available under law;
16 5. For cost of suit; and
17 6. For such other and further relief as this Court may deem to be just and
18 proper.
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