

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

Jazmin Aguilar; Blanca Aguirre; Fernando Aguirre; Abilene Alejandro; Alba Alejandro; Jill Alfonso; Jose Amaya; Teresa A. Amaya; Maria Lopez Andrus and Stephen Matthew Andrus, individually and as trustees of Andrus Family Trust; Maria Antonia Garcia; Jose M. Barroso; Loreto Barroso; Gracie Bazaldua Gumbel; Anselmo Bringas Prudencio; Rosa Bush, individually and as representative of the estate of Amstead Jim Bush; Maria Cisneros; Rosa Cisneros, individually and as owner and member of CISA, LLC; Robbie Coffman; Martha Cooney; Michael Cooney; Pablo Cruz; Santiago Fierro; Brunilda Galvan; Jaime Galvan; Hector H Garcia; Javier Garcia Silibosque; Martha Garcia; Dustin Garza; Sylvia Garza, individually and as representative of the estate of Fernando Garza, Jr.; Richard Gaviria; Ana Gonzalez; Anna Maria Gonzalez; David Gonzalez; Delilah Gonzalez; Esthela Gonzalez; Fidel Gonzalez; Gualberto Gonzalez; Guadalupe Gonzalez; Oscar Gonzalez; Ema Grajales; Francis M. Gumbel; Ruben Gutierrez; Arthur Hayes; Martha Hayes; Veronica E. Hayes; Maria Hernandez; Oscar Benavides Huesca; Ellie Kloak; Mary Leal; Armando Lee Lopez; Casimiro Martinez; Omar Martinez; Carlos Medina; Maria Antonia Medina; James Moore; Jorge L. Moreno; Josefina B. Moreno; Janet Ochoa; Dionicio Ortiz; Margaret Ortiz; Thelma Pena; Aracely Perez Romero; Wendy Perez-Romero; Luis Ramirez; Maria Reyes; Jeffrey Robertson; Linda Rodriguez; Emma Ruiz; Martha Salinas; Laura Samaniego; Michael Samaniego; Timothy Tillman; Vanessa Tillman; Virginia K. Villarreal; Charlotte Walters; Michele Walters-Sandoval; Richard Walters, II; Stella Wisner, individually and as trustee of Stella Wisner Family Trust; and Betina Zamora,

**Civil Action No.
1:26-cv-00485**

**JURY TRIAL
DEMANDED**

Plaintiffs,

v.

Space Exploration Technologies, Corp.,
Serve at: Corporation Service Company
d/b/a CSC-Lawyers Incorporating
Service Company
211 East 7th Street, Suite 620
Austin, Texas 78701-3218

Defendant.

COMPLAINT

Plaintiffs Jazmin Aguilar; Blanca Aguirre; Fernando Aguirre; Abilene Alejandro; Alba Alejandro; Jill Alfonso; Jose Amaya; Teresa A. Amaya; Maria Lopez Andrus and Stephen Matthew Andrus, individually and as trustees of Andrus Family Trust; Maria Antonia Garcia; Jose M. Barroso; Loreto Barroso; Gracie Bazaldua Gumbel; Anselmo Bringas Prudencio; Rosa Bush, individually and as representative of the estate of Amstead Jim Bush; Maria Cisneros; Rosa Cisneros, individually and as owner and member of CISA, LLC; Robbie Coffman; Martha Cooney; Michael Cooney; Pablo Cruz; Santiago Fierro; Brunilda Galvan; Jaime Galvan; Hector H Garcia; Javier Garcia Silibosque; Martha Garcia; Dustin Garza; Sylvia Garza, individually and as representative of the estate of Fernando Garza, Jr.; Richard Gaviria; Ana Gonzalez; Anna Maria Gonzalez; David Gonzalez; Delilah Gonzalez; Esthela Gonzalez; Fidel Gonzalez; Gualberto Gonzalez; Guadalupe Gonzalez; Oscar Gonzalez; Ema Grajales; Francis M. Gumbel; Ruben Gutierrez; Arthur Hayes; Martha Hayes; Veronica E. Hayes; Maria Hernandez; Oscar Benavides Huesca;

Ellie Kloak; Mary Leal; Armando Lee Lopez; Casimiro Martinez; Omar Martinez; Carlos Medina; Maria Antonia Medina; James Moore; Jorge L. Moreno; Josefina B. Moreno; Janet Ochoa; Dionicio Ortiz; Margaret Ortiz; Thelma Pena; Aracely Perez Romero; Wendy Perez-Romero; Luis Ramirez; Maria Reyes; Jeffrey Robertson; Linda Rodriguez; Emma Ruiz; Martha Salinas; Laura Samaniego; Michael Samaniego; Timothy Tillman; Vanessa Tillman; Virginia K. Villarreal; Charlotte Walters; Michele Walters-Sandoval; Richard Walters, II; Stella Wisner, individually and as trustee of Stella Wisner Family Trust; Betina Zamora, file this Complaint against defendant Space Exploration Technologies Corp. (“SpaceX”) and allege as follows:

INTRODUCTION

1. SpaceX manufactures, tests, launches, and lands its Starship space vehicle and Super Heavy rocket booster (collectively “Starship”) at its Starbase facility in Cameron County, Texas. Starship is unprecedented in power, generating over 16 million pounds of thrust during launches. In executing its Starship testing, launching, and landing operations, SpaceX has repeatedly subjected the surrounding areas to extraordinary amounts of acoustic energy including noise, vibrations, and sonic booms.

2. Plaintiffs are innocent bystanders whose homes in the areas surrounding SpaceX’s Starbase launch site are being repeatedly damaged by noise, vibrations, and sonic booms from SpaceX’s Starship operations.

3. Between April 2023 and October 2025, SpaceX completed eleven fully integrated

Starship/Super Heavy test flights. Additionally, between August 2020 and May 2021, the company completed six non-full-stack test flights. Further, at various times the company has completed static Starship engine tests at the Starbase facility.

4. As a result of SpaceX's Starship operations, Plaintiffs' homes have been subjected to repeated intense and damaging acoustic events.

PARTIES

5. Plaintiff Jazmin Aguilar is an individual citizen of Texas residing in Cameron County, Texas.

6. Plaintiffs Fernando and Blanca Aguirre are citizens of Texas residing in Cameron County, Texas.

7. Plaintiffs Alba and Abilene Alejandro are citizens of Texas residing in Cameron County, Texas.

8. Plaintiff Jill Alfonso is an individual citizen of Texas residing in Cameron County, Texas.

9. Plaintiffs Jose and Teresa A. Amaya are citizens of Texas residing in Cameron County, Texas.

10. Plaintiffs Stephen Matthew Andrus and Maria Lopez Andrus, individually and as trustees of Andrus Family Trust, are citizens of Texas residing in Cameron County, Texas.

11. Plaintiffs Loreto and Jose M. Barroso are citizens of Texas residing in Cameron County, Texas.

12. Plaintiffs Gracie Bazaldua and Francis M. Gumbel are citizens of Texas residing in Cameron County, Texas.

13. Plaintiff Anselmo Bringas Prudencio is an individual citizen of Texas residing in Cameron County, Texas.

14. Plaintiff Rosa Bush, individually and as representative of the estate of Amstead Jim Bush, deceased, is an individual citizen of Texas residing in Cameron County, Texas.

15. Plaintiff Maria Cisneros is an individual citizen of Texas residing in Cameron County, Texas.

16. Plaintiff Rosa Cisneros, individually and as owner and member of CISA, LLC, is an individual citizen of Texas residing in Cameron County, Texas.

17. Plaintiff Robbie Coffman is an individual citizen of Texas residing in Cameron County, Texas.

18. Plaintiffs Michael and Martha Cooney are citizens of Texas residing in Cameron County, Texas.

19. Plaintiff Maria Hernandez and Pablo Cruz are citizens of Texas residing in Cameron County, Texas.

20. Plaintiff Santiago Fierro is an individual citizen of Texas residing in Cameron County, Texas.

21. Plaintiffs Jaime and Brunilda Galvan are citizens of Texas residing in Cameron

County, Texas.

22. Plaintiffs Hector H. Garcia and Maria Antonia Garcia are citizens of Texas residing in Cameron County, Texas.

23. Plaintiffs Javier Garcia Silibosque and Martha Garcia are individual citizens of Texas residing in Cameron County, Texas.

24. Plaintiff Dustin Garza is an individual citizen of Texas residing in Cameron County, Texas.

25. Plaintiff Sylvia Garza, individually and as representative of the estate of Fernando Garza, Jr., deceased, is an individual citizen of Texas residing in Cameron County, Texas.

26. Plaintiffs Richard Gaviria and Linda Rodriguez are citizens of Texas residing in Cameron County, Texas.

27. Plaintiff Ana Gonzalez is an individual citizen of Texas residing in Cameron County, Texas.

28. Plaintiff David Gonzalez is an individual citizen of Texas residing in Cameron County, Texas.

29. Plaintiffs Fidel and Esthela Gonzalez are citizens of Texas residing in Cameron County, Texas.

30. Plaintiffs Gualberto and Anna Maria Gonzalez are citizens of Texas residing in Cameron County, Texas.

31. Plaintiff Guadalupe Gonzalez is an individual citizen of Texas residing in

Cameron County, Texas.

32. Plaintiffs Oscar and Delilah Gonzalez are citizens of Texas residing in Cameron County, Texas.

33. Plaintiff Ema Grajales is an individual citizen of Texas residing in Cameron County, Texas.

34. Plaintiff Ruben Gutierrez is an individual citizen of Texas residing in Cameron County, Texas.

35. Plaintiffs Arthur and Veronica E. Hayes are citizens of Texas residing in Cameron County, Texas.

36. Plaintiff Martha Hayes is an individual citizen of Texas residing in Cameron County, Texas.

37. Plaintiffs Oscar Benavides Huesca and Aracely Perez Romero are citizens of Texas residing in Cameron County, Texas.

38. Plaintiff Ellie Kloak, Jorge L. Moreno, and Josefina B. Moreno are citizens of Texas residing in Cameron County, Texas.

39. Plaintiff Mary Leal is an individual citizen of Texas residing in Cameron County, Texas.

40. Plaintiffs Armando Lee Lopez and Janet Ochoa are citizens of Texas residing in Cameron County, Texas.

41. Plaintiff Casimiro Martinez and Virginia K. Villarreal are individual citizens of

Texas residing in Cameron County, Texas.

42. Plaintiff Omar Martinez is an individual citizen of Texas residing in Cameron County, Texas.

43. Plaintiffs Carlos and Maria Antonia Medina are citizens of Texas residing in Cameron County, Texas.

44. Plaintiff James Moore is an individual citizen of Texas residing in Cameron County, Texas.

45. Plaintiffs Dionicio and Margaret Ortiz are citizens of Texas residing in Cameron County, Texas.

46. Plaintiff Thelma Pena is an individual citizen of Texas residing in Cameron County, Texas.

47. Plaintiff Wendy Perez-Romero is an individual citizen of Texas residing in Cameron County, Texas.

48. Plaintiff Luis Ramirez is an individual citizen of Texas residing in Cameron County, Texas.

49. Plaintiff Maria Reyes is an individual citizen of Texas residing in Cameron County, Texas.

50. Plaintiff Jeffrey Robertson is an individual citizen of Texas residing in Cameron County, Texas.

51. Plaintiff Emma Ruiz is an individual citizen of Texas residing in Cameron County,

Texas.

52. Plaintiff Martha Salinas is an individual citizen of Texas residing in Cameron County, Texas.

53. Plaintiffs Michael and Laura Samaniego are citizens of Texas residing in Cameron County, Texas.

54. Plaintiffs Vanessa and Timothy Tillman are citizens of Texas residing in Cameron County, Texas.

55. Plaintiffs Charlotte Walters and Michele Walters-Sandoval are individual citizens of Texas residing in Cameron County, Texas.

56. Plaintiff Richard Walters, II is an individual citizen of Washington residing in King County, Washington.

57. Plaintiff Stella Wisner, individually and as trustee of Stella Wisner Family Trust, dated June 29, 2022, is an individual citizen of Texas residing in Cameron County, Texas.

58. Plaintiff Betina Zamora is an individual citizen of Texas residing in Cameron County, Texas.

59. Defendant Space Exploration Technologies Corp. is a Texas for-profit corporation. It is incorporated under the laws of Delaware and is domiciled in Texas. Its principal place of business and corporate headquarters is at its Starbase facility in Cameron County, Texas. SpaceX is a corporate citizen of the State of Texas with its principal place of business at 1 Rocket Road, Brownsville, Texas 78521.

JURISDICTION AND VENUE

60. This Court has exclusive subject matter jurisdiction over this action under 28 U.S.C. § 1331 and the Commercial Space Launch Act (CSLA), 51 U.S.C. § 50914(g).

61. This Court has general personal jurisdiction over SpaceX because its Starbase facility is located within the Brownsville Division of the Southern District of Texas.

62. This venue is proper under 28 U.S.C. § 1391(b)(1) because SpaceX's principal place of business is within this District and under 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to Plaintiffs' claims—the unprecedented acoustic energy, noise, vibrations, and sonic booms that damaged Plaintiffs' homes—occurred in Cameron County, Texas, which is situated within this District and Division.

FACTUAL ALLEGATIONS

I. SpaceX Manufactures Starship for Its Multiplanetary Mission

63. Founded in 2002 with the stated mission of revolutionizing space technology to enable multi-planetary life, SpaceX has steadily expanded into a heavily capitalized aerospace enterprise.¹ It employs over 13,000 individuals and conducts more orbital launches annually than any other commercial or national provider.² In early 2026, the company initiated preparations for an initial public offering targeting a valuation

¹ See *Mission*, SpaceX (accessed Mar. 31, 2026), <https://www.spacex.com/mission>.

² See *Global Launch Services Market Analysis 2026*, New Space Econ. (March 30, 2026), <https://newspaceeconomy.ca/2026/03/30/global-launch-services-market-analysis-2026/>; Jeff Foust, *SpaceX, China drive new record for orbital launches in 2025*, SpaceNews (Jan. 2, 2026), <https://spacenews.com/spacex-china-drive-new-record-for-orbital-launches-in-2025/>.

exceeding \$1.75 trillion.³ It is a highly sophisticated, deeply capitalized enterprise.

64. SpaceX's Boca Chica facility, now known as Starbase, Texas, underwent a massive transformation to support the company's multiplanetary ambitions with its Starship initiative in the vanguard. The South Texas site was initially intended to serve as a commercial spaceport for the company's existing Falcon 9 and Falcon Heavy rockets.⁴ In 2018, however, SpaceX dedicated the site exclusively to the development and launch of its next-generation Starship vehicle.⁵ To accommodate this program, SpaceX acquired hundreds of acres of coastal land, transforming a quiet beach community into a sprawling industrial spaceport and manufacturing complex.⁶ Starbase is now the exclusive testing, launching, and landing site for the largest rockets in human history.

II. Starship Produces Unprecedented Power and Acoustic Energy

65. At the center of Spaceport's sprawling Vertical Launch Area are the Orbital Launch Pad A and Orbital Launch Pad B, structures whose sheer scale illustrate the

³ See *SpaceX Prepares for Record-Breaking \$1.75 Trillion Confidential IPO Filing in March*, SatNews (Mar. 1, 2026), <https://satnews.com/2026/03/01/spacex-prepares-for-record-breaking-1-75-trillion-confidential-ipo-filing-in-march/>; see also *SpaceX IPO Could Make Elon Musk a Trillionaire*, Bloomberg (Mar. 30, 2026), <https://www.bloomberg.com/news/articles/2026-03-30/spacex-ipo-could-make-elon-musk-a-trillionaire-big-take-podcast>; *US Space Stocks Soar in Premarket Trading*, Investing.com (Mar. 31, 2026), <https://www.investing.com/news/stock-market-news/us-space-stocks-soar-in-premarket-trading-93CH-4580277>.

⁴ See *History of the SpaceX Starship Super Heavy Project*, Fed. Aviation Admin. (July 24, 2025), https://www.faa.gov/space/stakeholder_engagement/spacex_starship/history.

⁵ See *SpaceX Starbase*, Wikipedia (accessed March 31, 2026), https://en.wikipedia.org/wiki/SpaceX_Starbase.

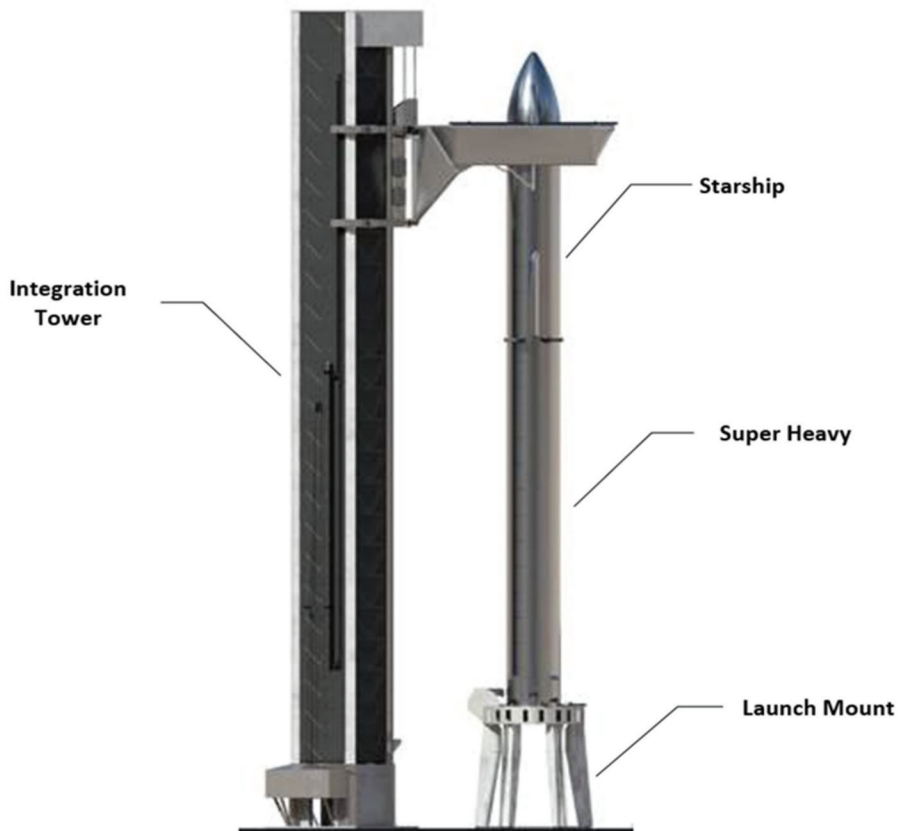
⁶ See *id.*

unprecedented acoustic threat they hold. Each pad centers on a massive Orbital Launch Mount built to withstand the simultaneous ignition of thirty-three Raptor engines.⁷ Looming above these mounts are the site's integration and catch towers. Standing approximately 480 feet high and equipped with massive mechanical arms that SpaceX calls the "chopsticks" designed to catch returning boosters out of the sky, they are the tallest launch towers in the world.⁸ SpaceX deliberately constructed this colossal, skyscraper-sized infrastructure mere miles from coastal residential communities. In doing so, SpaceX explicitly engineered the site to support the most energetically violent and acoustically severe rocket launches in human history.

⁷ See Fed. Aviation Admin., Final Programmatic Environmental Assessment for the SpaceX Starship/Super Heavy Launch Vehicle Program at the SpaceX Boca Chica Launch Site in Cameron County, Texas, at 2.1.4.3 (p. 34) and Figure 2-8 (p. 35), reproduced below (2022) (detailing the construction of the Orbital Launch Mounts and integration towers to support the Starship spacecraft and Super Heavy booster).

⁸ See *Tallest launch tower*, Guinness World Records (accessed March 31, 2026), <https://www.guinnessworldrecords.com/world-records/694843-tallest-launch-tower> (confirming the Starbase Integration Tower stands 146 meters, or 479 feet, tall).

Figure 2-8. Launch Mount, Launch Vehicle, and Integration Tower



66. The colossal infrastructure of the Orbital Launch Mount serves a singular purpose: to anchor a vehicle of equally unmatched magnitude. When fully integrated for flight, the Starship spacecraft and its Super Heavy booster stand 403 ft. tall—as tall as a thirty-story building—and 29.5 ft. wide.⁹

67. To lift this massive structure, the Super Heavy booster relies on a densely packed configuration of thirty-three Raptor 2 engines that burn liquid oxygen and methane

⁹ See SpaceX, *Starship*, <https://www.spacex.com/vehicles/starship> (last visited April 2, 2026); Eric Lipton, *SpaceX Starship's Sonic Boom Creates Risk of Structural Damage, Test Finds*, N.Y. Times (Nov. 18, 2024), <https://www.nytimes.com/2024/11/18/us/politics/spacex-starship-sonic-boom-damage.html>.

(methalox) propellants. Upon ignition, this novel propulsion system collectively generates 16.7 million pounds of thrust,¹⁰ producing a combined-plume mechanical power of 127 gigawatts. The unprecedented power and close spacing of these next-generation engines force early plume interaction and coalescence, creating violent aeroacoustic phenomena—such as vehicle-width shock-cell diamonds—that generate unique and highly intense acoustic shockwaves.¹¹

68. To place this immense power in context, the Apollo-era Saturn V rocket that took humanity to the moon produced just 7.6 million pounds of thrust and NASA's modern Space Launch System (SLS) generates 8.8 million pounds.¹² By comparison, Starship generates nearly twice the thrust of NASA's SLS and nearly ten times the thrust of SpaceX's own Falcon 9 rocket. Yet, SpaceX's Starship operations rely on decades-old acoustic prediction model theories. The sheer scale and novel configuration of the Raptor

¹⁰ See *SpaceX - Starship*, SpaceX, <https://www.spacex.com/vehicles/starship> (last visited Apr. 7, 2026) (the Super Heavy booster has a thrust capacity of 7,590 tf or 16.7 Mlbf); see also SpaceX (@SpaceX), X (Aug. 3, 2024), <https://x.com/SpaceX/status/1819795288116330594> (a single Raptor 2 (sea level variant) engine's thrust capacity is 230tf); Elon Musk (@elonmusk), X (Apr. 26, 2022, 3:09 PM), <https://x.com/elonmusk/status/1519046094461702145> (photo of SpaceX's new "Raptor 2 rocket engines at Starbase, each producing over half a million pounds (230 tons) of force.").

¹¹ See Kent L. Gee et al., *Starship Super Heavy Acoustics: Comparing Launch Noise from Flights 5 and 6*, 5 JASA Express Lett. 023602, 1 (2025); see also Kent L. Gee et al., *Starship Super Heavy Acoustics: Far-Field Noise Measurements During Launch and the First-Ever Booster Catch*, 4 JASA Express Lett. 113601, 2-3 (2024) (detailing the early plume interaction and intense crackle caused by the 33 closely spaced Raptor 2 engines).

¹² See *What Was the Saturn V?*, NASA (Sept. 17, 2010), <https://www.nasa.gov/learning-resources/for-kids-and-students/what-was-the-saturn-v-grades-5-8/>; see also *Space Launch System*, NASA, <https://www.nasa.gov/reference/space-launch-system/> (last visited March 31, 2026).

2 engines produce an acoustic profile that confounds these traditional modeling formulas, which fail to properly account for the frequency-dependent source levels, extreme low-frequency rumble, and intense transitory crackle unique to Starship. By unleashing unprecedented mechanical power that outstrips the bounds of historical acoustic science, SpaceX knowingly subjects the surrounding communities to a foreseeable, yet inadequately modeled, peril.¹³

69. SpaceX has publicly acknowledged a scientific and regulatory knowledge deficit surrounding its novel Starship propulsion system. In an official update regarding its vision for a “Multiuser Spaceport,” SpaceX admitted that because next-generation rockets like Starship utilize liquid oxygen and methane (methalox) propellants—as opposed to the hydrogen or kerosene fuels used historically—there is a lack of “data to make refined, accurate clear zones” for blast and acoustic impacts.¹⁴ By its own admission, SpaceX is “making significant investments in scientific research on blast and acoustics” specifically to address this “gap in data.”¹⁵ This statement serves as a formal admission that, throughout its Starship orbital campaign, SpaceX has been launching the most powerful

¹³ Gee et al., *Flights 5 and 6*, *supra* note 11, at 4 (noting that the sheer scale and frequency of Starship’s acoustic profile confounds the traditional RNoise prediction model originally developed in the 1990s, as it “does not treat the frequency-dependent source levels or directivity appropriately”); *see also* Gee et al., *Booster Catch*, *supra* note 11, at 4 (finding a shortcoming in the EA model’s ability to handle changes in spectrum and level that occur during launch).

¹⁴ *A Multiuser Spaceport*, SpaceX (Sept. 12, 2024), <https://www.spacex.com/updates#multiuser-spaceport>.

¹⁵ *Id.*

rocket in history while simultaneously acknowledging that the scientific community lacks the comprehensive data necessary to accurately predict and mitigate the resulting acoustic and blast-related harms to the surrounding public. SpaceX's Starship operations are therefore experimental and iterative by nature. Each launch generates new acoustic data for SpaceX and its regulators.

70. SpaceX's inaugural Starship test flight on April 20, 2023, violently illustrated both the unprecedented power of Starship's Raptor engines and the scientific and regulatory "gap in data." SpaceX so vastly underestimated the explosive, acoustic energy of its own thirty-three-engine booster that the Starship's liftoff completely shattered the facility's reinforced concrete launch pad.¹⁶ The sheer force of the ignition and its resulting concrete rock tornado carved a crater into the ground and generated a massive debris cloud of pulverized concrete and metal shrapnel that rained down over 385 acres, reaching tidal flats and residential areas up to six and a half miles away.¹⁷ SpaceX's CEO, Elon Musk, later admitted the company did not anticipate the destruction of the pad, stating, "If we had expected to dig a hole, we would not have flown."¹⁸ Following this catastrophe, the

¹⁶ See De La Rosa, *SpaceX Is Grounded After Rocket Explosion Caused Extensive Environmental Damage*, Tex. Pub. Radio (Apr. 27, 2023), <https://www.tpr.org/environment/2023-04-27/photos-spacex-is-grounded-after-rocket-explosion-caused-extensive-environmental-damage>.

¹⁷ See *id.* (documenting U.S. Fish and Wildlife Service findings that the debris cloud of pulverized concrete deposited material as far as 6.5 miles from the launch pad).

¹⁸ See Jeff Foust, *Starship After the Dust Settles*, Space Rev. (May 1, 2023), <https://www.thespacereview.com/article/4574/1> (quoting Elon Musk regarding the unanticipated "rock tornado" and pad destruction).

FAA grounded the Starship program for months, citing the need for sixty-three corrective actions to address the unplanned debris and public safety risks.¹⁹ From the very beginning of its Starship orbital campaign, SpaceX had actual, subjective knowledge that it was navigating uncharted, highly dangerous, and destructive acoustic territory.

III. Two Kinds of Rocket Acoustic Energy Can Cause Structural Damage

71. Inquiring into the relationship between rocket launch acoustic energy and structural damage is fact intensive by nature — especially when analyzing the acoustic effects of Starship’s unprecedented thrust output and novel propellant. How repeated blasts of acoustic energy from rocket launches at the scale of 16.7 million pounds of thrust and booster landings with sonic booms at Super Heavy’s colossal size might impact surrounding structures presents new scientific questions.²⁰ Hence, SpaceX’s self-admitted “gap.” Nevertheless, two historical and widely used metrics provide structural damage thresholds for the two types of acoustic energy generated by rocket launches: “continuous, shock-containing noise during launch that could excite structural

¹⁹ See *FAA Closes SpaceX Starship Mishap Investigation*, Fed. Aviation Admin. (Sept. 8, 2023), <https://www.faa.gov/newsroom/faa-closes-spacex-starship-mishap-investigation> (detailing the 63 corrective actions including pad redesign and safety critical system analysis).

²⁰ FAA, Final Programmatic Environmental Assessment for the SpaceX Starship/Super Heavy Launch Vehicle Program at the SpaceX Boca Chica Launch Site in Cameron County, Texas, at 59 (2022), [hereinafter 2022 PEA] https://www.faa.gov/sites/faa.gov/files/2022-06/PEA_for_SpaceX_Starship_Super_Heavy_at_Boca_Chica_FINAL.pdf (“Few studies are available which provide relationships between launch noise and actual building vibrational response.”).

resonances”²¹ and impulsive “sonic boom overpressures” that pose an additional acoustic threat of “increasing structural damage claims.”²²

1. L_{max} Quantifies Continuous Acoustic Energy for Structural Damage Thresholds During Starship Launches and Landings

72. Starship operations produce intense continuous acoustic energy events during two distinct phases of flight. First, every launch generates massive continuous noise during the vehicle’s ascent. Second, these maximum continuous noise levels are replicated during the landing burn of the Super Heavy booster. As researchers from BYU found: “It is surprising that the maximum noise during the landing burn . . . which involves igniting the inner 13 booster engines before shutting off all but three for the booster catch, is on par with the maximum liftoff noise when all 33 engines are firing.”²³ Thus, Plaintiffs’ properties receive two blasts of maximum continuous launch noise: one during Starship’s launch burn with 33 engines lit, and another, surprisingly, during Super Heavy’s landing burn with only 13 engines lit.²⁴

73. The Maximum Unweighted Sound Level (L_{max}) metric expressed in decibels (dB) measures this continuous acoustic energy from Starship launches and landings. L_{max} , also

²¹ Gee et al., *Flights 5 and 6*, *supra* note 11, at 6.

²² Gee et al., *Booster Catch*, *supra* note 11, at 6.

²³ Gee et al., *Booster Catch*, *supra* note 11, at 4.

²⁴ See Fig. 3 in Gee et al., *Booster Catch*, *supra* note 11, at 3 and accompanying text (detailing the “shocklike” pressure waveform recorded at Station 3 and explaining the equal amplitudes of the launch and landing burns).

denoted in scientific literature as $L_{Z,max}$, is an unfiltered metric that measures the raw physical force of these events including the extreme low-frequency infrasound that is primarily responsible for structural vibrations and damage.²⁵ The scientific literature supports a range of potential structural damage at L_{max} thresholds.

74. First, according to SpaceX's 2021 Noise Assessment submitted to the FAA for licensing before the first Starship Flight Test, the "potential for structural damage due to Starship orbital launch events is assessed using the potential for structural damage claims."²⁶ According to one study on static rocket test fires, continues SpaceX, "based on Maximum Unweighted Sound Level (L_{max}), approximately one damage claim will result per 100 households exposed at 120 dB and one damage claim per 1,000 households exposed at 111 dB."²⁷

75. Second, according to the FAA's 2022 response to SpaceX's Noise Assessment, the

²⁵ See FAA, Revised Draft Tiered Environmental Assessment for SpaceX Starship/Super Heavy Vehicle Increased Cadence at the SpaceX Boca Chica Launch Site in Cameron County, Texas, app. B at 4 (2024) [hereinafter 2024 Noise Analysis], <https://www.faa.gov/media/94366> (distinguishing A-weighted $L_{A,max}$ for measuring human noise exposure from unweighted L_{max} for assessing "potential damage to structures"); see also Gee et al., *Booster Catch*, *supra* note 11, at 3–4 (defining $L_{Z,max}$ as identifying "the one-second period with the most acoustical energy" and noting it is "dominated by infrasound").

²⁶ FAA, Final Programmatic Environmental Assessment for the SpaceX Starship/Super Heavy Launch Vehicle Program at the SpaceX Boca Chica Launch Site, app. B, 3.1.2 (p.5) (2022) [hereinafter 2021 Noise Assessment], <https://www.faa.gov/stakeholderengagement/spacexstarship/appendix-b-starship-rocket-noise-assessment-boca-chica-launch>.

²⁷ *Id.*

scientific literature supports additional L_{\max} thresholds such as:

- a. “that one may conservatively consider all sound lasting more than one second with levels exceeding 130 dB (unweighted) as potentially damaging to structures”; and
- b. that “the L_{\max} values of 111 dB and 120 dB may be used as a very conservative threshold for potential risk of structural damage claims”.²⁸

76. Third, according to SpaceX’s August 2024 Noise Assessment, a revision of its 2021 Assessment in light of data from SpaceX’s Starship Flight Tests 1 (4/20/2023), 2 (11/18/2023), 3 (3/14/2024), and 4 (6/3/2024), SpaceX omitted its 2021 data on L_{\max} thresholds beginning at the 111 dB level and instead cited only to an obscure reference to another study from 2021 with 140 dB (improbable below) and 135 (no damage expected) dB thresholds.²⁹

77. Fourth, according to past rocket environmental assessments by the U.S. Department of the Air Force, NASA, and the FAA, a “1 claim for 1,000 households for $L_{Z,\max} > 110$ dB was adopted as a significance threshold” regarding potential structural damage.³⁰

78. Therefore, according to relevant scientific literature, including materials cited by

²⁸ 2022 PEA, at 59, 60, <https://www.faa.gov/stakeholderengagement/spacexstarship/assessment-spacex-starshipsuper-heavy-launch-vehicle-program>.

²⁹ See 2024 Noise Analysis, app. B at 5, <https://www.faa.gov/media/94366>.

³⁰ Gee et al., *Flights 5 and 6*, *supra* note 11, at 6 (recommending this metric as better suited for gauging structural damage due to continuous noise than metrics aimed at measuring impulse noise).

SpaceX, and utilized by the FAA in licensing SpaceX's Starship operations, the acoustic energy thresholds for potential structural damages during rocket launches begin at L_{max} values of > 110 dB.

2. PSF Quantifies Impulsive Sonic Boom Overpressure for Structural Damage Thresholds During Starship Landings

79. Starship test flight operations can produce up to three sonic boom events, depending on the mission profile.³¹ First, each Starship launch generates a sonic boom during the Starship vehicle and Super Heavy booster's joint ascent. Second, Starship vehicle's hot-staging ring produces a sonic boom when it falls into the ocean after being jettisoned at high altitude. Third, Starship landings at Starbase's Orbital Launchpads produce two sonic booms. Each directly impacts surrounding areas: one when the Super Heavy booster lands following its launch, and another when the Starship vehicle lands following completion of its mission. Although all three sonic booms are relevant to a holistic scientific acoustic picture, the sonic booms produced by Super Heavy booster landings produce by far the greatest magnitudes of acoustic energy during Starship operations.

80. The scientific analysis of potential structural damage from sonic booms utilizes a threshold metric designed for the impulsive, high-impact nature of a Starship sonic

³¹ See 2022 PEA at 65; Gee et al., *Booster Catch*, *supra* note 11, at 1 ("The hot-staging ring is a removable, vented heat shield that prevents the booster from being damaged by upper-stage ignition."); see also *Starship's Sonic Boom*, SpaceX: Updates (July 29, 2024), <https://www.spacex.com/updates#starship-sonic-boom>.

boom's air overpressure event that "lasts for less than 300 milliseconds": peak air overpressure ordinarily expressed in pounds per square foot (psf).³² Similar to L_{max} , there is a range of psf thresholds for potential structural damage asserted in relevant scientific materials including those relied upon by SpaceX and the FAA.

81. First, in SpaceX's original Noise Assessment, after asserting that due to no data being available yet on sonic booms during Starship and Super Heavy returns, "SpaceX is leveraging generic analysis" with its sonic boom modeling software "to predict bounding ground overpressures," SpaceX presents the following Table B-1 listing potential structural damage thresholds and types of damages to be expected in psf ranges:³³

³² Introduction to Sonic Boom Analysis Memorandum in 2024 Noise Analysis.

³³ See Sonic Boom Analysis Memorandum in 2021 Noise Assessment.

Table B-1. Possible Building Damage Due to Sonic Booms of Increasing Magnitude

Sonic Boom Peak Overpressure (pounds per square foot)	Item Affected	Type of Damage
0.5 – 2	Cracks in Plaster	Fine; extension of existing; more in ceilings; over door frames; between some plaster boards.
	Cracks in Glass	Rarely shattered; either partial or extension of existing.
	Damage to Roof	Slippage of existing loose tiles/slates; sometimes new cracking of old slates at nail hole.
	Damage to Outside Walls	Existing cracks in stucco extended.
	Bric-a-brac	Those carefully balanced or on edges can fall; fine glass (e.g., large goblets).
	Other	Dust falls in chimneys.
2 – 4	Glass, plaster, roof, ceilings	Failures show that would have been difficult to forecast; nominally in good condition.
4 – 10	Glass	Regular failures within a population of well-installed glass; industrial as well as domestic; greenhouses; ships; oil rigs.
	Plaster	Partial ceiling collapse of good plaster; complete collapse of very new, incompletely cured, or very old plaster.
	Roofs	High-probability rate of failure in nominally good slate, slurry-wash; some chance of failures in tiles on modern roofs; light roofs (bungalow) or large area can bodily move.
	Walls (outside)	Old, free-standing walls in fairly good condition can collapse.
	Walls (inside)	“Party” walls known to move at 10 pounds per square foot.
Greater than 10	Glass	Some good glass will fail regularly to sonic booms from the same direction; glass with existing faults could shatter and fly; large window frames move.
	Plaster	Most plaster affected.
	Ceilings	Plaster boards displaced by nail popping.
	Roofs	Most slate/slurry roofs affected, some badly; large roofs having good tile can be affected; some roofs bodily displaced causing gable-end and wall-plate cracks; chimneys damaged if not in good condition.
	Walls	Internal party walls can move even if carrying fittings such as hand basins or taps; secondary damage due to water leakage.
	Bric-a-brac	Some nominally secure items can fall (e.g., large pictures; especially if fixed to party walls).

Source: Haber and Nakaki 1989.

82. Second, taking note of Table B-1, the FAA comments that “windows and plaster are the most sensitive parts of a structure to overpressure.”³⁴ The FAA adds that,

³⁴ 2022 PEA at 67.

generally, “the threshold for building damage due to sonic booms is 2 psf. . . . At 10 psf, the probability of glass breakage is between one in 100 and one in 1,000.”³⁵ Finally, the FAA reassured the public that “SpaceX would be responsible for resolving any structural damages caused by a sonic boom” by reiterating that “SpaceX is required to carry insurance to cover claims by third parties ... including any structural damage.”³⁶

83. Third, SpaceX’s 2024 revised Noise Analysis omits Table B-1 and does not reference the study on which it was based. SpaceX made the following threshold assertions instead:³⁷

- a. “Numerous studies have determined that no credible damage to structures or windows is expected at 2.0 psf.”
- b. “For sonic booms, at approximately 2 psf, there is a 1/10,000 probability of breakage for a large window, and at approximately 4 psf, there is a 1/10,000 probability of breakage for a small window.”
- c. At 6 psf, “a survey of the most recent literature indicates this magnitude is still extremely unlikely to cause damage.” However, “[l]aboratory and field testing shows that pre-damaged or poor condition windows could possibly exhibit progress of damage (e.g., pre-existing crack growth) over multiple exposure to this magnitude of boom.”
- d. At 10 psf, “the likelihood of superficial (plaster, brick a brac) damage and window damage becomes more plausible but is generally still expected to be very low probability and predominantly due to poor existing conditions such as pre-cracked, pre-stressed, older and weakened, or poorly mounted windows.”

³⁵ *Id.*

³⁶ *Id.* at 68.

³⁷ See Sonic Boom Analysis Memorandum at heading “Sonic Boom Overpressure Interpretation and Thresholds” in 2024 Noise Assessment.

- e. At 21 psf—the maximum sonic boom exposure SpaceX expects from its Starship operations—the scientific literature supports that “window breakage becomes possible for standard condition windows.”

84. Fourth, an independent federal hazard standard by the National Oceanic and Atmospheric Administration (NOAA) maintains an “Overpressure Levels of Concern” for blast waves of 0.04 psi—which converts to 5.76 psf—as the established threshold for “sonic boom glass failure.”³⁸

IV. Starship Launches and Landings Exceed L_{\max} and psf Thresholds

85. Plaintiffs are ordinary citizens, not acoustic scientists equipped with seismographs or other acoustic energy measuring devices. Nevertheless, because SpaceX’s Starship operations, including the launch noise, landing sonic booms, and related property damage, has become a matter of public interest, scientists have begun to measure Starship’s acoustic energy in Plaintiffs’ communities, and they are publishing their findings to serve the public interest in ensuring safe rocket operations. The findings show that Starship’s launches and landings exceed L_{\max} and psi potential structural damage thresholds in the areas surrounding Starbase including in Plaintiffs’ communities.

86. For example, independent acoustic researchers from BYU monitored Starship’s Test Flight 5 on October 13, 2024.³⁹ They placed acoustic measuring devices at eight

³⁸ *Overpressure Levels of Concern*, NOAA, <https://response.restoration.noaa.gov/oil-and-chemical-spills/chemical-spills/resources/overpressure-levels-concern.html> (last visited Apr. 3, 2026) (converting psig to psf by multiplying by 144).

³⁹ See Gee et al., *Booster Catch*, *supra* note 11; see also SpaceX, *Starship’s Fifth Flight Test*, <https://www.spacex.com/launches/starship-flight-5> (last visited April 3, 2026).

locations spread across varying distances from Starbase's Orbital Launch Pad A, including in locations where Plaintiffs live, such as South Padre Island, Port Isabel, and Laguna Vista. Their findings regarding Starship's maximum continuous launch noise (L_{\max}) and impulsive air overpressure levels from Super Heavy's return landing sonic boom (psi) are summarized below, arranged by distance from Launch Pad A:⁴⁰

Station	KM	MI	Lz,max	psf
1	9.7	6.0	124.1	11
2	10.1	6.3	125	9
3	10.5	6.5	124.5	6.8
5	14.5	9.0	121.1	5
4	16.6	10.3	117.5	4.8
6	20.0	12.4	118	3
7	21.3	13.2	120	3
8	35.5	22.1	118.1	0.5

87. Regarding the continuous launch noise from Test Flight 5, all the L_{\max} readings exceed the > 110 dB minimum, recognized potential structural damage thresholds noted above. Given the counterintuitive, "surprising" phenomenon noted above regarding the 33- and 13-engine burns generating equally maximum continuous noise, it is likely that they do so at two points in time: once during launch and again during landing. The researchers further noted "intense crackle during liftoff and landing can be tied to shocklike waveform characteristics." (*Id.* at 6). And they concluded that, by comparison, "one Starship launch is equivalent to around 4–6 SLS launches and at least 10 Falcon 9 launches." (*Id.*).

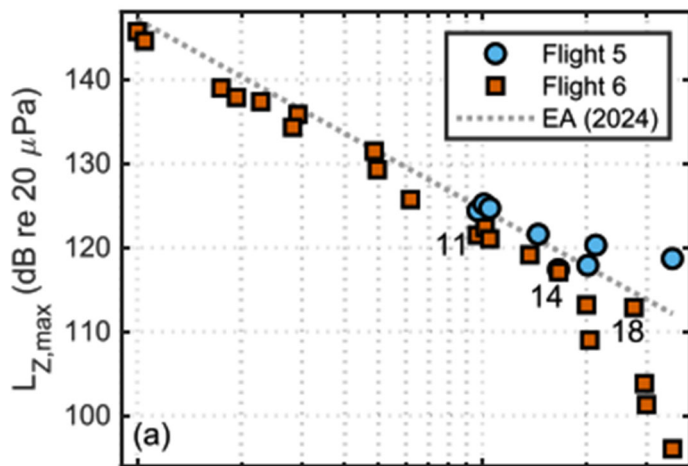
⁴⁰ See Fig. 4 in Gee et al., *Booster Catch*, *supra* note 11, at 5 (km to mi conversion added).

88. Regarding the impulsive sonic boom from Test Flight 5, all eight sonic boom psf readings hit across every structural damage threshold range provided on Table B-1. Further, the psf readings at Stations 1–3 exceed both NOAA’s 5.76 psf threshold and SpaceX’s 6 psf threshold in its 2024 Noise Assessment. Station 1’s reading exceeds SpaceX’s stringent 10 psf threshold in the same. Further, the researchers noted the sonic boom generated “greater risk of structural damage, such as glass breaking and falling bric-a-brac” at Port Isabel and the south end of South Padre Island due to “overpressures near and exceeding 10 psf” in those areas. (*Id.* at 5). They compared Starship’s sonic boom to that of the Concorde: at a distance of 20 km, the Starship’s sonic boom is 50% louder than a Concorde’s. (*Id.* at 6).

89. The sheer violence of these recorded metrics is difficult to overstate. Noah Pulsipher, one of the BYU acoustic scientists who recorded the Starship flight data, described the sonic boom as sounding like a gunshot at close range: “It truly was one of the loudest things I’ve ever heard or experienced.”⁴¹ Further, Dr. Victor Sparrow, the director of the graduate acoustics program at Penn State University, warned that the acoustic energy generated by Starship “has to be carefully watched,” noting the launches pose a serious problem for sensitive populations. (*Id.*).

⁴¹ Jackie Wattles, *Why sonic booms from the most powerful rocket ever built have some scientists worried*, CNN (Dec. 24, 2024), <https://www.cnn.com/2024/12/24/science/spacex-starship-sonic-boom/index.html>.

90. The same group of BYU researchers also studied Starship's Test Flight 6 on November 19, 2024.⁴² Although they had planned to capture the same launch noise (L_{\max}) and landing sonic boom (psi) metrics as they did in Test Flight 5; in Flight 6 the Super Heavy booster suffered a mechanical failure and splashed down at sea instead of landing in the chopsticks of the Orbital Launch Pad at Starbase. Therefore, no sonic boom psi data appears in the study. Although the researchers covered the same geographic areas for Flight 6 as they did for Flight 5, for Flight 6 they increased the number and nearness of recording stations to 21 ranging between 1 km to 35.5 km away from Starbase's Orbital Launch Pads. They published their launch noise (L_{\max}) findings as follows:⁴³



91. Starting at Station 11, at the same or similar distance ranges as the locations measured in Flight 5, the Flight 6 L_{\max} readings exceed 120 dB at 6–6.5 miles from the

⁴² See Gee et al., *Flights 5 and 6*, supra note 11; see also *Starship's Sixth Flight Test*, SpaceX, <https://www.spacex.com/launches/starship-flight-6> (last visited April 3, 2026).

⁴³ Gee et al., *Flights 5 and 6*, supra note 11, at 3.

launch site. At just under 9 miles away, the reading falls just under 120 dB. At ~10.3 miles, the reading is ~117.5 dB. And at ~12.6 miles and beyond, two readings exceed 111 dB. These L_{\max} readings exceed the > 110 dB minimum potential structural damage threshold.

92. While these independent acoustic scientists successfully recorded actionable acoustic data during Test Flights 5 and 6, SpaceX's orbital test campaign spans far beyond these two isolated events. Between April 2023 and October 2025, SpaceX launched a total of eleven fully integrated Starship/Super Heavy vehicles from the Starbase facility.⁴⁴ During each of these eleven orbital test flights, SpaceX utilized the massive Super Heavy booster, configured with 33 Raptor engines intended to collectively generate up to 16.7 million pounds of thrust. Because this fundamental acoustic source remained consistent throughout the orbital campaign, upon information and belief, the ascent of all eleven Starship test flights generated continuous launch noise (L_{\max}) exceeding the minimum > 110 dB structural damage threshold in the communities where Plaintiffs reside.

⁴⁴ See *Starship Flight Test*, SpaceX (Apr. 20, 2023), <https://www.spacex.com/launches/starship-flight-test>; *Starship's Second Flight Test*, SpaceX (Nov. 18, 2023), <https://www.spacex.com/launches/starship-flight-2>; *Starship's Third Flight Test*, SpaceX (March 14, 2024), <https://www.spacex.com/launches/starship-flight-3>; *Starship's Fourth Flight Test*, SpaceX (June 6, 2024), <https://www.spacex.com/launches/starship-flight-4>; *Starship's Fifth Flight Test*, SpaceX (Oct. 13, 2024), <https://www.spacex.com/launches/starship-flight-5>; *Starship's Sixth Flight Test*, SpaceX (Nov. 19, 2024), <https://www.spacex.com/launches/starship-flight-6>; *Starship's Seventh Flight Test*, SpaceX (Jan. 16, 2025), <https://www.spacex.com/launches/starship-flight-7>; *Starship's Eighth Flight Test*, SpaceX (Mar. 6, 2025), <https://www.spacex.com/launches/starship-flight-8>; *Starship's Ninth Flight Test*, SpaceX (May 27, 2025), <https://www.spacex.com/launches/starship-flight-9>; *Starship's Tenth Flight Test*, SpaceX (Aug. 26, 2025), <https://www.spacex.com/launches/starship-flight-10>; *Starship's Eleventh Flight Test*, SpaceX (Oct. 13, 2025), <https://www.spacex.com/launches/starship-flight-11>. Publication date coincides with mission date for all 11 test flights.

93. Test Flights 5, 7, and 8 inflicted even greater acoustic trauma on Plaintiffs' homes. Because these flights involved the return and catch of the Super Heavy booster at Starbase, they subjected the surrounding areas to a severe triple exposure acoustic event. First, Plaintiffs' properties endured the initial continuous noise of the 33-engine liftoff. Second, minutes later, the homes were struck by a localized, structural-damage-inducing sonic boom as the colossal booster broke the sound barrier on its return. Third, following the sonic boom, the properties were bombarded by a secondary maximum continuous noise event during Super Heavy's landing burn. As independent BYU researchers noted regarding Test Flight 5, even though the landing burn used only 13 engines throttling down to three, it produced continuous maximum noise levels on par with the 33-engine liftoff. That "surprising" acoustic phenomenon effectively generated a second wave of maximal continuous noise on Super Heavy's landing burn in Test Flights 5, 7, and 8.

V. Starship's Acoustic Energy Caused Actual Structural Damages

Jazmin Aguilar

94. At all times relevant, plaintiff Jazmin Aguilar owned a home at 201 W. Jefferson Street, Port Isabel, Texas 78578-4221.

95. Plaintiff Aguilar's home was damaged by the SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

96. As a result of SpaceX's launches, Plaintiff Aguilar has suffered economic and non-economic damages in an amount to be determined at trial.

Fernando and Blanca Aguirre

97. At all times relevant, Plaintiffs Fernando and Blanca Aguirre owned a home at 626 Tarpon Fields Drive, Port Isabel, Texas 78578.

98. Plaintiffs Fernando and Blanca Aguirre's home was damaged by the SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

99. As a result of SpaceX's launches, Plaintiffs Fernando and Blanca Aguirre have suffered economic and non-economic damages in an amount to be determined at trial.

Alba and Abilene Alejandro

100. At all times relevant, Plaintiffs Alba and Abilene Alejandro owned a home at 225 Old Stadium Drive, Port Isabel, Texas 78578-5201.

101. Plaintiffs Alba and Abilene Alejandro's home was damaged by the SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

102. As a result of SpaceX's launches, Plaintiffs Alba and Abilene Alejandro have suffered economic and non-economic damages in an amount to be determined at trial.

Jill Alfonso

103. At all times relevant, Plaintiff Jill Alfonso owned a home at 1405 Harbor Island Drive, Port Isabel, Texas 78578-2526.

104. Plaintiff Alfonso's home was damaged by the SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

105. As a result of SpaceX's launches, Plaintiff Alfonso has suffered economic and non-economic damages in an amount to be determined at trial.

Jose and Teresa A. Amaya

106. At all times relevant, Plaintiffs Jose and Teresa A. Amaya owned a home at 102 Sea Grape Lane, Laguna Vista, Texas 78578.

107. Plaintiffs Jose and Teresa A. Amaya's home was damaged by the SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

108. As a result of SpaceX's launches, Plaintiffs Jose and Teresa A. Amaya have suffered economic and non-economic damages in an amount to be determined at trial.

Stephen Matthew Andrus and Maria Lopez Andrus

109. At all times relevant, Plaintiffs Stephen Matthew Andrus and Maria Lopez

Andrus owned a home at 106 W. Dolphin, South Padre Island, Texas 78597.

110. Plaintiffs Stephen and Maria Andrus's home was damaged by the SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

111. As a result of SpaceX's launches, Plaintiffs Stephen and Maria Andrus have suffered economic and non-economic damages in an amount to be determined at trial.

Carlos and Maria Antonia Medina

112. At all times relevant, Plaintiffs Carlos and Maria Antonia Medina owned a home at 1624 Michigan Avenue, Port Isabel, Texas 78578.

113. Plaintiffs Carlos and Maria Antonia Medina's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

114. As a result of SpaceX's launches, Plaintiffs Carlos and Maria Medina have suffered economic and non-economic damages in an amount to be determined at trial.

Loreto and Jose M. Barroso

115. At all times relevant, Plaintiffs Loreto and Jose M. Barroso owned a home at 117 W. Madison Street, Port Isabel, Texas 78578.

116. Plaintiffs Loreto and Jose M. Barroso's home was damaged by the SpaceX

launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

117. As a result of SpaceX's launches, Plaintiffs Loreto and Jose M. Barroso have suffered economic and non-economic damages in an amount to be determined at trial.

Gracie Bazaldua and Francis M. Gumbel

118. At all times relevant, Plaintiffs Gracie Bazaldua and Francis M. Gumbel owned a home at 218 W. Sunset Drive, South Padre Island, Texas 78597-7612.

119. Plaintiffs Gracie Bazaldua and Francis M. Gumbel's home was damaged by the SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

120. As a result of SpaceX's launches, Plaintiffs Gracie Bazaldua and Francis M. Gumbel have suffered economic and non-economic damages in an amount to be determined at trial.

Anselmo Bringas Prudencio

121. At all times relevant, Plaintiff Anselmo Bringas Prudencio owned a home at 118 Jefferson Avnue, Laguna Heights, Texas 78578.

122. Plaintiff Anselmo Bringas Prudencio's home was damaged by the SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024;

June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

123. As a result of SpaceX's launches, Plaintiff Anselmo Bringas Prudencio has suffered economic and non-economic damages in an amount to be determined at trial.

Rosa Bush

124. At all times relevant, Plaintiff Rosa Bush owned a home at 1121 Roosevelt Street, Port Isabel, Texas 78578.

125. Plaintiff Rosa Bush's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

126. As a result of SpaceX's launches, Plaintiff Rosa Bush has suffered economic and non-economic damages in an amount to be determined at trial.

Maria Cisneros

127. At all times relevant, Plaintiff Maria Cisneros owned a home at 209 E. Railroad Avenue, Port Isabel, Texas 78578.

128. Plaintiff Maria Cisneros's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

129. As a result of SpaceX's launches, Plaintiff Maria Cisneros has suffered economic and non-economic damages in an amount to be determined at trial.

Rosa Cisneros

130. At all times relevant, Plaintiff Rosa Cisneros owned a home at 616 Sand Dollar Drive, Port Isabel, Texas 78578.

131. Plaintiff Rosa Cisneros's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

132. As a result of SpaceX's launches, Plaintiff Rosa Cisneros has suffered economic and non-economic damages in an amount to be determined at trial.

Robbie Coffman

133. At all times relevant, Plaintiff Robbie Coffman owned a home at 340 Sand Dollar Drive, Port Isabel, Texas 78578.

134. Plaintiff Coffman's home was damaged by the SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

135. As a result of SpaceX's launches, Plaintiff Coffman has suffered economic and non-economic damages in an amount to be determined at trial.

Michael and Martha Cooney

136. At all times relevant, Plaintiffs Michael and Martha Cooney owned homes at: 114 Oleander Drive, Laguna Vista and 221 E. Adam Street, Port Isabel, Texas 78578.

137. Plaintiffs Michael and Martha Cooney's home was damaged by the SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

138. As a result of SpaceX's launches, Plaintiffs Michael and Martha Cooney have suffered economic and non-economic damages in an amount to be determined at trial.

Maria Hernandez and Pablo Cruz

139. At all times relevant, Plaintiffs Maria Hernandez and Pablo Cruz owned a home at 422 Old Stadium Drive, Port Isabel, Texas 78578-5204.

140. Plaintiffs Maria Hernandez and Pablo Cruz's home was damaged by the SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

141. As a result of SpaceX's launches, plaintiffs Hernandez and Cruz have suffered economic and non-economic damages in an amount to be determined at trial.

Santiago Fierro

142. At all times relevant, Plaintiff Santiago Fierro owned a home at 1850 Illinois

Street, Port Isabel, Texas 78578.

143. Plaintiff Fierro's home was damaged by the SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

144. As a result of SpaceX's launches, Plaintiff Fierro has suffered economic and non-economic damages in an amount to be determined at trial.

Jaime and Brunilda Galvan

145. At all times relevant, plaintiffs Jaime and Brunilda Galvan owned a home at 1641 Oklahoma Street, Port Isabel, Texas 78578.

146. Plaintiffs Jaime and Brunilda Galvan's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

147. As a result of SpaceX's launches, Plaintiffs Jaime and Brunilda Galvan have suffered economic and non-economic damages in an amount to be determined at trial.

Hector H. Garcia and Maria Antonia Garcia

148. At all times relevant, Plaintiffs Hector H. Garcia and Maria Antonia Garcia owned a home at 125 E. Cora Lee Drive, Unit 102, South Wind 2, South Padre Island, Texas 76561.

149. Plaintiffs Hector H. Garcia and Maria Antonia's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

150. As a result of SpaceX's launches, plaintiffs Hector Garcia and Maria Antonia Garcia have suffered economic and non-economic damages in an amount to be determined at trial.

Martha Garcia and Javier Garcia Silibosque

151. At all times relevant, Plaintiffs Martha Garcia and Javier Garcia Silibosque owned a home at 32958 Coolidge Street, Port Isabel, Texas 78578.

152. Plaintiffs Martha Garcia and Javier Garcia Silibosque's home was damaged by the SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

153. As a result of SpaceX's launches, plaintiffs Martha Garcia and Javier Garcia Silibosque have suffered economic and non-economic damages in an amount to be determined at trial.

Dustin Garza

154. At all times relevant, Plaintiff Dustin Garza owned a home at 47975 Michigan Street, Lot 23, Port Isabel, Texas 78578.

155. Plaintiff Garza's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

156. As a result of SpaceX's launches, Plaintiff Garza has suffered economic and non-economic damages in an amount to be determined at trial.

Sylvia Garza

157. At all times relevant, Plaintiff Sylvia Garza owned a home at 33100 Adams Avenue, Port Isabel, Texas 78578.

158. Plaintiff Sylvia Garza's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

159. As a result of SpaceX's launches, Plaintiff Sylvia Garza has suffered economic and non-economic damages in an amount to be determined at trial.

Richard Gavia and Linda Rodriguez

160. At all times relevant, Plaintiffs Richard Gavia and Linda Rodriguez owned homes at:

- a. 110 East Coronado Drive, #104, South Padre Island, Texas 78597.
- b. 6403 Padre Boulevard, #76, South Padre Island, Texas 78597.

161. Plaintiffs Richard Gaviria and Linda Rodriguez's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

162. As a result of SpaceX's launches, Plaintiffs Richard Gaviria and Linda Rodriguez have suffered economic and non-economic damages in an amount to be determined at trial.

Ana Gonzalez

163. At all times relevant, Plaintiff Ana Gonzalez owned a home at 127 State Highway 100, Laguna Heights, Texas 78578.

164. Plaintiff Ana Gonzalez's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

165. As a result of SpaceX's launches, Plaintiff Ana Gonzalez has suffered economic and non-economic damages in an amount to be determined at trial.

Gualberto and Anna Maria Gonzalez

166. At all times relevant, Plaintiffs Gualberto and Anna Maria Gonzalez owned a home at 1633 Oklahoma Drive, Port Isabel, Texas 78578.

167. Plaintiffs Gualberto and Anna Maria Gonzalez's home was damaged by the

SpaceX launches that occurred on, at least, April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

168. As a result of SpaceX's launches, Plaintiffs Gualberto and Anna Maria Gonzalez have suffered economic and non-economic damages in an amount to be determined at trial.

David Gonzalez

169. At all times relevant, Plaintiff David Gonzalez owned a home at 206 W Red Snapper Street, Unit 120, South Padre Island, Texas 78597-7012.

170. Plaintiff David Gonzalez's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

171. As a result of SpaceX's launches, Plaintiff David Gonzalez has suffered economic and non-economic damages in an amount to be determined at trial.

Oscar and Delilah Gonzalez

172. At all times relevant, Plaintiffs Oscar and Delilah Gonzalez owned a home at 117 Abalone Circle, Port Isabel, Texas 78578.

173. Plaintiffs Oscar and Delilah Gonzalez's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024;

June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

174. As a result of SpaceX's launches, Plaintiffs Oscar and Delilah Gonzalez have suffered economic and non-economic damages in an amount to be determined at trial.

Fidel and Esthela Gonzalez

175. At all times relevant, Plaintiffs Fidel and Esthela Gonzalez owned a home at 409 S. Cisneros Street, Port Isabel, Texas 78578.

176. Plaintiffs Fidel and Esthela Gonzalez's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

177. As a result of SpaceX's launches, Plaintiffs Fidel and Esthela Gonzalez have suffered economic and non-economic damages in an amount to be determined at trial.

Guadalupe Gonzalez

178. At all times relevant, Plaintiff Guadalupe Gonzalez owned a home at 1634 North Shore Drive, Port Isabel, Texas 78578.

179. Plaintiff Guadalupe Gonzalez's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

180. As a result of SpaceX's launches, Plaintiff Guadalupe Gonzalez has suffered economic and non-economic damages in an amount to be determined at trial.

Emma Grajales

181. At all times relevant, Plaintiff Emma Grajales owned a home at 1746 Illinois Street, Port Isabel, Texas 78578.

182. Plaintiff Emma Grajales's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

183. As a result of SpaceX's launches, Plaintiff Emma Grajales has suffered economic and non-economic damages in an amount to be determined at trial.

Ruben Gutierrez

184. At all times relevant, Plaintiff Ruben Gutierrez owned a home at 33840 S Garcia Street, Unit 361, Port Isabel, Texas 78578-4313.

185. Plaintiff Ruben Gutierrez's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

186. As a result of SpaceX's launches, Plaintiff Ruben Gutierrez has suffered economic and non-economic damages in an amount to be determined at trial.

Martha Hayes

187. At all times relevant, Plaintiff Martha Hayes owned a home at 1221 Bass Avenue, Port Isabel, Texas 78578.

188. Plaintiff Martha Hayes's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

189. As a result of SpaceX's launches, Plaintiff Martha Hayes has suffered economic and non-economic damages in an amount to be determined at trial.

Arthur and Veronica E. Hayes

190. At all times relevant, Plaintiffs Arthur and Veronica E. Hayes owned a home at 1217 Bass Avenue, Port Isabel, Texas 78578.

191. Plaintiffs Arthur and Veronica E. Hayes's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

192. As a result of SpaceX's launches, Plaintiffs Arthur and Veronica E. Hayes have suffered economic and non-economic damages in an amount to be determined at trial.

Oscar Benavides Huesca and Aracely Perez Romero

193. At all times relevant, Plaintiffs Oscar Benavides Huesca and Aracely Perez

Romero owned a home at 405 Martinez Street, Port Isabel, Texas 78578.

194. Plaintiffs Oscar Benavides Huesca and Aracely Perez Romero's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

195. As a result of SpaceX's launches, Plaintiffs Oscar Benavides Huesca and Aracely Perez Romero has suffered economic and non-economic damages in an amount to be determined at trial.

Ellie Kloak, Jorge L. Moreno, and Josefina B. Moreno

196. At all times relevant, Plaintiffs Ellie Kloak, Jorge L. Moreno, and Josefina B. Moreno owned a home at 416 W. Madison Street, Port Isabel, Texas 78578.

197. Plaintiffs Ellie Kloak, Jorge L. Moreno, and Josefina B. Moreno's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

198. As a result of SpaceX's launches, Plaintiffs Ellie Kloak, Jorge L. Moreno, and Josefina B. Moreno have suffered economic and non-economic damages in an amount to be determined at trial.

Mary Leal

199. At all times relevant, Plaintiff Mary Leal owned a home at 173 Isabella Point

Drive, Port Isabel, Texas 78578-4215.

200. Plaintiff Mary Leal's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

201. As a result of SpaceX's launches, Plaintiff Mary Leal has suffered economic and non-economic damages in an amount to be determined at trial.

Armando Lee Lopez and Janet Ochoa

202. At all times relevant, Plaintiffs Armando Lee Lopez and Janet Ochoa owned a home at 313 Old Stadium Drive, Port Isabel, Texas 78578.

203. Plaintiffs Armando Lee Lopez and Janet Ochoa's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

204. As a result of SpaceX's launches, Plaintiffs Armando Lee Lopez and Janet Ochoa have suffered economic and non-economic damages in an amount to be determined at trial.

Casimiro Martinez and Virginia K. Villarreal

205. At all times relevant, Plaintiffs Casimiro Martinez and Virginia K. Villarreal owned a home at 33840 South Garcia Street, Unit 125, Port Isabel, Texas 78578.

206. Plaintiffs Casimiro Martinez and Virginia K. Villarreal's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

207. As a result of SpaceX's launches, Plaintiffs Casimiro Martinez and Virginia K. Villarreal have suffered economic and non-economic damages in an amount to be determined at trial.

Omar Martinez

208. At all times relevant, Plaintiff Omar Martinez owned a home at 1818 Illinois Avenue, Port Isabel, Texas 78578.

209. Plaintiff Omar Martinez's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

210. As a result of SpaceX's launches, Plaintiff Omar Martinez has suffered economic and non-economic damages in an amount to be determined at trial.

James Moore

211. At all times relevant, Plaintiff James Moore owned a home at 109 S Shore Drive, Port Isabel, Texas 78578-2410.

212. Plaintiff James Moore's home was damaged by the SpaceX launches that

occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

213. As a result of SpaceX's launches, Plaintiff James Moore has suffered economic and non-economic damages in an amount to be determined at trial.

Dionicio and Margaret Ortiz

214. At all times relevant, Plaintiffs Dionicio and Margaret Ortiz owned homes at 391 Sand Dollar, Port Isabel, Texas 78578 and 505 E Adams Street, Port Isabel, Texas 78578.

215. Plaintiffs Dionicio and Margaret Ortiz's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

216. As a result of SpaceX's launches, Plaintiffs Dionicio and Margaret Ortiz have suffered economic and non-economic damages in an amount to be determined at trial.

Thelma Pena

217. At all times relevant, Plaintiff Thelma Pena owned homes at 125 E Cora Lee Drive, Apts. 101 and 301, South Padre Island, Texas 78597.

218. Plaintiff Thelma Pena's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024;

October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

219. As a result of SpaceX's launches, Plaintiff Thelma Pena has suffered economic and non-economic damages in an amount to be determined at trial.

Wendy Perez-Romero

220. At all times relevant, Plaintiff Wendy Perez-Romero owned a home at 218 Old Stadium Drive, Port Isabel, Texas 78578.

221. Plaintiff Wendy Perez-Romero's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

222. As a result of SpaceX's launches, Plaintiff Wendy Perez-Romero has suffered economic and non-economic damages in an amount to be determined at trial.

Luis Ramirez

223. At all times relevant, Plaintiff Luis Ramirez owned a home at 309 Beach Boulevard, Port Isabel, Texas 78578-2631.

224. Plaintiff Luis Ramirez's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

225. As a result of SpaceX's launches, Plaintiff Luis Ramirez has suffered economic and non-economic damages in an amount to be determined at trial.

Maria Reyes

226. At all times relevant, Plaintiff Maria Reyes owned a home at 326 West Madison Street, Port Isabel, Texas 78578.

227. Plaintiff Maria Reyes's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

228. As a result of SpaceX's launches, Plaintiff Maria Reyes has suffered economic and non-economic damages in an amount to be determined at trial.

Jeffrey Robertson

229. At all times relevant, Plaintiff Robertson owned homes at 105 W. Houston Street, Port Isabel, Texas 78578-2507 and 1506 TX-100, #306, Port Isabel, Texas 78578.

230. Plaintiff Jeffrey Robertson's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

231. As a result of SpaceX's launches, Plaintiff Jeffrey Robertson has suffered economic and non-economic damages in an amount to be determined at trial.

Emma Ruiz

232. At all times relevant, Plaintiff Emma Ruiz owned a home at 1650 Oklahoma Avenue, Port Isabel, Texas 78578.

233. Plaintiff Emma Ruiz's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

234. As a result of SpaceX's launches, Plaintiff Emma Ruiz has suffered economic and non-economic damages in an amount to be determined at trial.

Martha Salinas

235. At all times relevant, Plaintiff Martha Salinas owned a home at 33772 S. Garcia Street, Lot J, Port Isabel, Texas 78578.

236. Plaintiff Martha Salinas's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

237. As a result of SpaceX's launches, Plaintiff Martha Salinas has suffered economic and non-economic damages in an amount to be determined at trial.

Michael and Laura Samaniego

238. At all times relevant, Plaintiffs Michael and Laura Samaniego owned a home

at 3511 Pennsylvania Avenue, Port Isabel, Texas 78578.

239. Plaintiffs Michael and Laura Samaniego's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

240. As a result of SpaceX's launches, Plaintiffs Michael and Laura Samaniego have suffered economic and non-economic damages in an amount to be determined at trial.

Vanessa and Timothy Tillman

241. At all times relevant, Plaintiffs Vanessa and Timothy Tillman owned homes at:

- a. 1323 Harbor Island Drive, #138, Port Isabel, Texas 78578.
- b. 1440 Harbor Island Drive, Port Isabel, Texas 78578.

242. Plaintiffs Vanessa and Timothy Tillman's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

243. As a result of SpaceX's launches, Plaintiffs Vanessa and Timothy Tillman have suffered economic and non-economic damages in an amount to be determined at trial.

Charlotte Walters, Michele Walters-Sandoval, and Richard Walters, II

244. At all times relevant, Plaintiffs Charlotte Walters, Michele Walters-Sandoval, and Richard Walters, II owned a home at 208 W Kingfish Street, South Padre Island, Texas

78597.

245. Plaintiffs Charlotte Walters, Michele Walters-Sandoval, and Richard Walters, II's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

246. As a result of SpaceX's launches, Plaintiffs Charlotte Walters, Michele Walters-Sandoval, and Richard Walters, II have suffered economic and non-economic damages in an amount to be determined at trial.

Stella Wisner

247. At all times relevant, Plaintiff Stella Wisner owned a home at 2615 Gulf Boulevard, South Padre Island, Texas 78597-6941.

248. Plaintiff Stella Wisner's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

249. As a result of SpaceX's launches, Plaintiff Stella Wisner has suffered economic and non-economic damages in an amount to be determined at trial.

Betina Zamora

250. At all times relevant, Plaintiff Betina Zamora owned a home at 218 E. Adams Street, Port Isabel, Texas 78578-4219.

251. Plaintiff Betina Zamora's home was damaged by the SpaceX launches that occurred on, at least April 20, 2023; November 18, 2023; March 14, 2024; June 6, 2024; October 13, 2024; November 19, 2024; January 16, 2025; March 6, 2025; May 27, 2025; August 26, 2025; October 13, 2025.

252. As a result of SpaceX's launches, Plaintiff Betina Zamora has suffered economic and non-economic damages in an amount to be determined at trial.

CAUSES OF ACTION

Count I: Negligence

253. Plaintiffs incorporate the above paragraphs as if fully set forth herein.

254. SpaceX had a duty to exercise the degree of care to avoid harm and/or damage to others under circumstances similar to those described herein.

255. SpaceX breached its duty of ordinary care owed to Plaintiffs and wholly failed to exercise reasonable or ordinary care in conducting the Flight Tests, including, but not limited to:

- a. failing to conduct tests and/or studies before the Flight Tests in a manner sufficient to estimate and/or predict the Flight Tests' impact on residences in surrounding areas;
- b. failing to conduct tests and/or studies after each Flight Test, or failing to conduct such tests in a manner sufficient to assess the Flight Tests' negative impact on residences in surrounding areas;
- c. conducting the Flight Tests despite a high likelihood that the Sonic Booms would cause property damage in the surrounding areas; and/or
- d. failing to implement measures to limit and/or reduce the risk of the Flight

Tests' causing property damage in the surrounding areas.

256. As a result of SpaceX breaching its duty, Plaintiffs sustained damage to their Properties.

257. The negligent acts, omissions, and conduct of SpaceX described herein by which SpaceX breached such duty constituted a proximate cause of Plaintiffs' damages for which SpaceX is liable to Plaintiffs.

Count II: Gross Negligence and Exemplary Damages

258. Plaintiffs incorporate the above paragraphs as if fully set forth herein.

259. Plaintiffs' harm and damages resulted from an act or omission of SpaceX, which, when viewed objectively from the standpoint of SpaceX at the time of its occurrence, involved an extreme degree of risk in light of the probability and magnitude of the potential harm to others.

260. SpaceX had actual, subjective awareness of the risk involved in the acts or omissions that caused harm and damages to Plaintiffs, but nevertheless proceeded with conscious indifference to the rights, safety, or welfare of others, including Plaintiffs.

261. More specifically, SpaceX's original testing and/or studies significantly underestimated the impact of Flight Tests on residences in the surrounding areas.

262. On information and belief, SpaceX subsequently obtained data showing a high likelihood that the Sonic Booms would cause damage to property in the surrounding areas and, despite that knowledge, SpaceX proceeded with the Flight Tests.

263. SpaceX's acts and omissions were more than momentary thoughtlessness, inadvertence, or error of judgment, and constituted such an entire want of care to establish actual conscious indifference to the rights, welfare, or safety of the persons affected by them in the future. Such gross negligence resulted in the damages to Plaintiffs set out herein, and it is on the basis of such gross negligence that Plaintiffs hereby seek an award of exemplary damages in excess of the minimum jurisdiction limits of the court.

Count III: Trespass

264. Plaintiffs incorporate the above paragraphs as if fully set forth herein.

265. Plaintiffs own their respective Properties.

266. During its Flight Tests, SpaceX physically, intentionally, and voluntarily caused rocket-generated acoustic energy including Sonic Booms (collectively Rocket Noise) to enter the Properties.

267. Plaintiffs did not authorize or consent to the Rocket Noise entering their respective Properties.

268. The Rocket Noise caused property damage to Plaintiffs' homes.

DEMAND FOR JURY TRIAL

269. Plaintiffs hereby demand trial by jury as to all issues.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request that the Court issue citation for defendant SpaceX to appear and answer, and that Plaintiffs be awarded a judgment against defendant SpaceX

for the following:

- a. actual damages;
- b. exemplary damages;
- c. pre-judgment and post-judgment interest at the maximum rate allowed by law;
- d. court costs;
- e. attorneys' fees; and
- f. all other relief to which Plaintiffs are entitled.

Dated: April 30, 2026.

Respectfully submitted,

MARTINEZ & TIJERINA P.L.L.C

/s/ Benigno Martinez

Benigno (Trey) Martinez

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