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*Exempt from Filing Fees
Pursuant to Gov. Code § 6103*

**ENDORSED
FILED
ALAMEDA COUNTY**

MAY 16 2019

**CLERK OF THE SUPERIOR COURT
By Carolyn Lemos, Deputy**

*Attorneys for Plaintiff
The People of the State of California
Additional Counsel on following page*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA**

RG19019395

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

**AUTOZONE, INC., a Nevada corporation,
AUTOZONE WEST, INC., a Delaware corporation
AUTOZONE WEST, LLC, a Nevada limited liability company,
AUTOZONE PARTS, INC., a Nevada corporation,**

Defendants.

Case No.
COMPLAINT FOR PERMANENT INJUNCTION, CIVIL PENALTIES AND OTHER EQUITABLE RELIEF

[Health & Saf. Code, Div. 20, Chapters 6.5 and 6.95; Civil Code, § 1798.80 et seq.; Bus. & Prof. Code, § 17200, et seq.; Gov. Code, § 12607; Veh. Code, § 27903]

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1 THE PEOPLE OF THE STATE OF CALIFORNIA (“Plaintiff”), based on information
2 and belief, alleges as follows:

3 **PLAINTIFF**

4 1. The Plaintiff brings this action, by and through Xavier Becerra, the California
5 Attorney General (“Attorney General”), together with Nancy E. O’Malley, District Attorney of
6 Alameda County; Jeannine Pacioni, District Attorney of Monterey County; Mike Hestrin, District
7 Attorney of Riverside County; Jason Anderson, District Attorney of San Bernardino County;
8 Summer Stephan, District Attorney of San Diego County; George Gascón, District Attorney of
9 San Francisco County; Tori Verber Salazar, District Attorney of San Joaquin County; Krishna A.
10 Abrams, District Attorney of Solano County; Gregory D. Totten, District Attorney of Ventura
11 County; and Jeff W. Reisig, District Attorney of Yolo County; and Michael Feuer, City Attorney
12 of Los Angeles, (together referred to hereinafter as “the Local Prosecutors”). The Attorney
13 General and the Local Prosecutors are referred to together as “the Government Prosecutors.”

14 2. The Plaintiff brings this action without prejudice to any other action or claim
15 which the Plaintiff may have based on separate, independent, and unrelated violations arising out
16 or matters or allegations that are not set forth in this complaint. The facilities which are the
17 subject of this litigation are collectively referred to as “California AutoZone Facilities.” The
18 specific list of the locations of the California AutoZone Facilities known to Plaintiff as of the
19 filing of this Complaint is attached as **Exhibit A**, and incorporated herein by reference.

20 **DEFENDANTS**

21 3. Defendant AutoZone, Inc., is a Nevada corporation with its headquarters in
22 Memphis, Tennessee. AutoZone, Inc., is a retailer and distributor of automotive replacement
23 parts and accessories with facilities throughout the United States, including California. Currently,
24 it is, or among, the largest retailer of automotive parts in North America and is a Fortune 500
25 company.

26 4. Defendant AutoZone West, Inc., was at all relevant times a Delaware corporation
27 with its headquarters in Memphis, Tennessee. It operated as a wholly-owned subsidiary of
28 AutoZone, Inc., and shared responsibility for and/or participated in the management,

1 implementation and/or oversight of the California AutoZone Facilities' Hazardous Waste and
2 Universal Waste compliance programs.

3 5. Defendant AutoZone West, LLC, is a California Foreign Limited-Liability
4 Company whose domestic state is Nevada. AutoZone West, LLC, is the successor to AutoZone
5 West, Inc., and currently shares responsibility for and/or participates in the management,
6 implementation and/or oversight of the California AutoZone Facilities' Hazardous Waste and
7 Universal Waste compliance programs.

8 6. Defendant AutoZone Parts, Inc., is a Nevada Corporation with its headquarters in
9 Memphis, Tennessee. Defendant AutoZone Parts, Inc., is a wholly-owned subsidiary of
10 AutoZone Inc., and shares responsibility for and/or participates in the management,
11 implementation and/or oversight of the California AutoZone Facilities' Hazardous Waste and
12 Universal Waste programs

13 7. Defendants AutoZone, Inc., AutoZone West, Inc., AutoZone West, LLC, and
14 AutoZone Parts, Inc., owned and/or operated one or more of the more than 600 facilities
15 identified as the California AutoZone Facilities. None of the California AutoZone Facilities are
16 franchised.

17 8. Each reference in this complaint to "the AutoZone Defendants" refers to the
18 named Defendants AutoZone, Inc., AutoZone West, Inc., AutoZone West, LLC, and AutoZone
19 Parts, Inc.

20 9. When reference is made herein to any act or omission of the AutoZone
21 Defendants, such allegation shall include the act or omission of the owners, officers, directors,
22 agents, employees, contractors, vendors, affiliates, and/or representatives of the AutoZone
23 Defendants, or each of them, engaged in said act or omission.

24 10. There has been a prior enforcement action initiated by the People of the State of
25 California against one or more of the AutoZone Defendants for violations of environmental
26 protection laws. On June 1, 2007, Defendants AutoZone, Inc., and AutoZone West, Inc., entered
27 into a Stipulated Final Judgment by Consent in *People of the State of California v. AutoZone, Inc.*
28 *et al.*, San Bernardino Sup. C., No. SCVSS127459. Under the terms of that consent judgment,

1 AutoZone, Inc., and AutoZone West, Inc., were required, inter alia, to maintain for a period of
2 five years a program to identify and correct discrepancies in every one of their stores in California
3 regarding the requirements of the Hazardous Waste Control Law and the Hazardous Materials
4 Release Response Plans Law. That program included written policies and procedures for the
5 handling of Hazardous Materials and Hazardous Wastes that may be encountered by employees
6 in the ordinary course of business at their stores in California, and training of employees on those
7 policies and procedures. In addition, AutoZone, Inc., and AutoZone West, Inc., were required to
8 conduct an environmental compliance audit of each of their California stores at least annually,
9 and to promptly correct areas of noncompliance identified by such audits. Despite the
10 requirement for such a program, the AutoZone Defendants engaged in environmental violations
11 found through subsequent investigations by the Government Prosecutors and regulatory agencies.

12 **DEFINITIONS**

13 11. The following terms used in this Complaint are defined as follows:

- 14 a. "Business" as that term is defined under Health and Safety Code
15 section 25501, subdivision (c).
- 16 b. "Business Plan" as that term is defined under Health and Safety
17 Code section 25501, subdivision (d).
- 18 c. "Corrosive" means a Waste that exhibits the characteristic of
19 corrosivity as set forth in California Code of Regulations, title 22, section 66261.22.
- 20 d. "Customer" as that term is defined in Civil Code section 1798.80,
21 subdivision (c).
- 22 e. "Department" means the California Department of Toxic
23 Substances Control.
- 24 f. "Disposal" as that term is defined in Health and Safety Code
25 section 25113.
- 26 g. "Generator" as that term is defined in California Code of
27 Regulations, title 22, section 66260.10.
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- h. "Handler" as that term is defined in Health and Safety Code section 25501, subdivision (m).
- i. "Hazardous Waste" as that term is defined in Health and Safety Code section 25117.
- j. "Hazardous Waste Aerosol Can" as that term is defined in Health and Safety Code section 25201.16.
- k. "Hazardous Waste Facility Permit" as that term is defined in California Code of Regulations, title 22, section 66260.10.
- l. "Hazardous Waste Management" or "Management" or "Manage" as those terms are defined in Health and Safety Code section 25117.2
- m. "Hazardous Material" as that term is defined Health and Safety Code section 25501, subdivision (n).
- n. "Ignitable" means a Waste that exhibits the characteristic of ignitability as set forth in California Code of Regulations, title 22, section 66261.21
- o. "Person" as that term is defined in Health and Safety Code section 25118.
- p. "Personal Information" as that term is defined in Civil Code section 1798.80, subdivision (e).
- q. "Reactive" means a Waste that exhibits the characteristic of reactivity as set forth in California Code of Regulations, title 22, section 66261.23.
- r. "Records" as that term is defined in Civil Code section 1798.80, subdivision (b).
- s. "Storage" as that term is defined in Health and Safety Code section 25123.
- t. "Storage Facility" as that term is defined in Health and Safety Code section 25123.3, subdivision (b).
- u. "Toxic" means a Waste that exhibits the characteristic of toxicity as set forth in California Code of Regulations, title 22, section 66261.24.

1 v. "Transportation" as that term is defined in California Code of
2 Regulations, title 22, section 66260.10.

3 w. "Transporter" as that term is defined in California Code of
4 Regulations, title 22, section 66260.10.

5 x. "Unfair Competition" as that term is used in Business and
6 Professions Code section 17200.

7 y. "Unified Program Agency" as that term is used in Health and
8 Safety Code section 25501, subdivision (e)(3).

9 z. "Uniform Hazardous Waste Manifest" means the shipping
10 document that is required by law to accompany shipments of Hazardous Waste from
11 the point of generation, through Transportation, to the final permitted treatment,
12 Storage, and disposal facility.

13 aa. "Universal Waste" means any of the Wastes that are listed in
14 California Code of Regulations, title 22, section 66261.9

15 bb. "Waste" as that term is defined in Health and Safety Code section
16 25124 and California Code of Regulations, title 22, section 66261.2.

17 JURISDICTION AND VENUE

18 12. Venue is proper in this County pursuant to Health and Safety Code sections 25183
19 and 25515.6, and Business and Professions Code section 17200 et seq., in that certain of the
20 violations alleged in this Complaint occurred in the County of Alameda and throughout the State
21 of California. This Court has jurisdiction pursuant to Article 6, section 10 of the California
22 Constitution, section 393 of the Code of Civil Procedure and section 25182 of the Health and
23 Safety Code.

24 13. Plaintiff and "AutoZone, Inc." entered into a series of agreements to toll any
25 applicable statutes of limitation. "AutoZone, Inc." entered into these agreements for itself and its
26 "parents, divisions, subsidiaries, affiliates, partnerships, and predecessors, and all officers." As a
27 result of those agreements, the period of time from July 23, 2014, through and including
28 September 21, 2018, (the "Tolling Period"), will not be included in computing the time limited by

1 any statutes of limitation applicable to the causes of action brought against the AutoZone
2 Defendants based on claims covered by the tolling agreements.

3 14. Each of the claims for civil penalties alleging violations of the HWCL and the
4 HMRRPIL, or their respective implementing regulations, is for a violation that occurred within
5 five (5) years after the discovery by the Plaintiff of the facts constituting the grounds for
6 commencing the action, excluding any amount of time associated with the Tolling Period
7 described in Paragraph 13, as authorized pursuant to Code of Civil Procedure section 338.1.

8 15. Each of the claims based on the UCL is for a violation that accrued within four (4)
9 years prior to the commencement of this action, excluding any amount of time associated with the
10 Tolling Period described in Paragraph 13, as authorized pursuant to Business and Professions
11 Code section 17208.

12 **STATUTORY AND REGULATORY BACKGROUND:**

13 **HAZARDOUS WASTE**

14 16. The State of California has enacted a comprehensive statutory and regulatory
15 framework governing the generation, handling, treatment, Storage, Transportation, and disposal
16 of Hazardous Waste. This framework mandates a “cradle to grave” system referred to as the
17 Hazardous Waste Control Law, Chapter 6.5 of Division 20 of the Health and Safety Code,
18 codified at Health and Safety Code section 25100 et seq. (“HWCL”). The HWCL regulates the
19 generation, registration, tracking, treatment, Storage, Transportation and disposal of Hazardous
20 Waste and provides for the protection of the public and the environment from the potential risks
21 posed by Hazardous Waste. The HWCL’s implementing regulations are set forth in California
22 Code of Regulations, title 22, section 66260.1 et seq. (“Title 22”). Except where otherwise
23 expressly defined in this Complaint, all terms pertaining to HWCL violations alleged herein shall
24 be interpreted consistent with the HWCL and Title 22.

25 **HAZARDOUS MATERIALS**

26 17. The State of California has enacted a statutory and regulatory framework
27 governing the establishment of business and area plans related to the handling and release or
28 threatened release of Hazardous Materials, referred to as “Hazardous Materials Release Response

1 Plans and Inventory Law,” Article 1 and Article 2 of Chapter 6.95 of Division 20 of the Health
2 and Safety Code, codified at Health and Safety Code section 25500 et seq. (“HMRRPIL”). Basic
3 information on the location, type, quantity and health risks of Hazardous Materials handled, used,
4 stored or disposed of, which could be accidentally released into the environment, is required to be
5 submitted pursuant to the provisions of the HMRRPIL. Such information is necessary to prevent
6 or mitigate harm to the health and safety of persons and the environment from the release or
7 threatened release of Hazardous Materials into the workplace and environment. All terms
8 pertaining to HMRRPIL violations alleged herein shall be interpreted consistently with the
9 HMRRPIL and its implementing regulations. The HMRRPIL’s implementing regulations are set
10 forth in California Code of Regulations, title 19, section 2620 et seq. (“Title 19”). Except where
11 otherwise expressly defined in this Complaint, all terms pertaining to HMRRPIL violations
12 alleged herein shall be interpreted consistent with the HMRRPIL and Title 19.

13 **CUSTOMER RECORDS CONTAINING PERSONAL INFORMATION**

14 18. The State of California has enacted a comprehensive statutory framework for
15 protecting customer privacy that includes requirements for the proper disposal of Customer
16 Records containing Personal Information by a business, such that Personal Information in those
17 Records is rendered unreadable or undecipherable. For the purposes of this complaint, the
18 framework is herein referred to as the “Customer Records Law”, Civil Code, Title 1.81 of Part 4
19 of Division 3, codified at Civil Code section 1798.80 et seq. (“CRL”).

20 **TRANSPORTATION OF HAZARDOUS MATERIALS**

21 19. The State of California has enacted legislation in the Vehicle Code to address the
22 Transportation of Hazardous Materials and avoid or mitigate harm to the general public and the
23 environment from potential releases of Hazardous Materials from vehicles traveling on public
24 roadways, pursuant to Vehicle Code section 27903, and Division 14.1 of the Vehicle Code,
25 codified at Vehicle Code sections 32000 - 32053.

26 **UNFAIR COMPETITION**

27 20. The State of California has enacted a statutory framework for protecting the public
28 from, *inter alia*, unfair competition referred to as the “Unfair Competition Law,” Chapter 5, Part

1 2 of Division 7 of the Business and Professions Code, codified at Business and Professions Code
2 section 17200 et seq. (“UCL”).

3 **AUTOZONE DEFENDANTS’ COMPLIANCE OBLIGATIONS**

4 21. The AutoZone Defendants are, and at all times relevant to the claims in this
5 Complaint were, legally responsible for compliance with the provisions of the HWCL, the
6 HMRRPIL, the CRL, the Vehicle Code, and the UCL, and any corresponding implementing
7 regulations, in connection with their ownership and/or operation of the California AutoZone
8 Facilities.

9 **ENFORCEMENT AUTHORITY UNDER THE HWCL**

10 22. Pursuant to Health and Safety Code section 25145.4, the Attorney General, upon
11 his or her own motion, may bring an action in the name of the People of the State of California to
12 enjoin violations of the HWCL and Title 22, and to seek civil penalties for such violations. In
13 this capacity, the Attorney General may be aided and assisted by the Local Prosecutors.

14 23. Pursuant to Health and Safety Code section 25182, the Local Prosecutors may
15 bring a civil action in the name of the People of the State of California to enjoin any violation of
16 the HWCL and Title 22 and to seek civil penalties for such violations.

17 24. Prior to January 1, 2018, pursuant to Health and Safety Code section 25189,
18 subdivision (c), a Person who intentionally disposes or causes the disposal of Hazardous Waste at
19 a point not authorized pursuant to the HWCL shall be subject to a civil penalty of not less than
20 one thousand dollars (\$1,000) nor more than twenty-five thousand dollars (\$25,000), under
21 Health and Safety Code section 25189, subdivision (c). Effective January 1, 2018, Health and
22 Safety Code section 25189, subdivision (c) was amended so that the applicable civil penalty is not
23 to exceed seventy thousand dollars (\$70,000) for each violation of a separate provision or, for
24 continuing violations, for each day that the violation continues.

25 25. Prior to January 1, 2018, pursuant to Health and Safety Code section 25189,
26 subdivision (d), a Person who negligently disposes or causes the disposal of a hazardous waste at
27 a point which is not authorized pursuant to the HWCL shall be subject to a civil penalty of not
28 more than twenty-five thousand dollars (\$25,000) for each violation. Each day on which the

1 deposit remains and the Person has knowledge of the deposit is a separate additional violation
2 unless the Person immediately files a report of the deposit with the Department and is complying
3 with any order concerning the deposit. Effective January 1, 2018, Health and Safety Code section
4 25189, subdivision (d) was amended so that the applicable civil penalty is not to exceed seventy
5 thousand dollars (\$70,000) for each violation of a separate provision or, for continuing violations,
6 for each day that the violation continues.

7 26. Prior to January 1, 2018, pursuant to Health and Safety Code section 25189.2,
8 subdivision (c), a Person who disposes or causes the disposal of Hazardous Waste at a point
9 which is not authorized pursuant to the HWCL shall be subject to a civil penalty of not more than
10 twenty-five thousand dollars (\$25,000) for each disposal. Each day on which the deposit remains
11 is a separate additional violation unless the Person immediately files a report of the deposit with
12 the Department and is complying with any order concerning the deposit. Effective January 1,
13 2018, Health and Safety Code section 25189.2, subdivision (c) was amended so that the
14 applicable civil penalty is not to exceed seventy thousand dollars (\$70,000) for each violation of a
15 separate provision or, for continuing violations, for each day that the violation continues.

16 27. Prior to January 1, 2018, pursuant to Health and Safety Code section 25189,
17 subdivision (b), a Person who intentionally or negligently violates a provision of the HWCL, or of
18 a permit, rule, regulation, standard, or requirement issued or promulgated pursuant to the HWCL,
19 shall be liable for a civil penalty of not more than twenty-five thousand dollars (\$25,000) for each
20 violation of a separate provision or, for continuing violations, for each day that the violation
21 continues. Effective January 1, 2018, Health and Safety Code section 25189, subdivision (b) was
22 amended so that the applicable civil penalty is not to exceed seventy thousand dollars (\$70,000)
23 for each violation of a separate provision or, for continuing violations, for each day that the
24 violation continues.

25 28. Prior to January 1, 2018, pursuant to Health and Safety Code section 25189.2,
26 subdivision (b), a Person who violates a provision of the HWCL, or a permit, rule, regulation,
27 standard, or requirement issued or promulgated pursuant to the HWCL, is liable for a civil penalty
28 of not more than twenty-five thousand dollars (\$25,000) for each violation of a separate provision

1 or, for continuing violations, for each day that the violation continues. Effective January 1, 2018,
2 Health and Safety Code section 25189.2, subdivision (b) was amended so that the applicable civil
3 penalty is not to exceed seventy thousand dollars (\$70,000) for each violation of a separate
4 provision or, for continuing violations, for each day that the violation continues.

5 29. Prior to January 1, 2018, pursuant to Health and Safety Code section 25189,
6 subdivision (e), a person who intentionally or negligently treated or stored, or caused the
7 treatment or Storage of Hazardous Waste at a point that is not authorized pursuant to the HWCL
8 is liable for a civil penalty of not more than twenty-five thousand dollars (\$25,000) for each
9 separate violation or, for continuing violations, for each day that the violation continues.

10 Effective January 1, 2018, Health and Safety Code section 25189, subdivision (e) was amended
11 so that the applicable civil penalty is not to exceed seventy thousand dollars (\$70,000) for each
12 separate violation or, for continuing violations, for each day that the violation continues.

13 30. Prior to January 1, 2018, pursuant to Health and Safety Code section 25189.2,
14 subdivision (d), a Person who treats or stores, or causes the treatment or Storage of, a Hazardous
15 Waste at a point that is not authorized pursuant to the HWCL, is liable for a civil penalty of not
16 more than twenty-five thousand dollars (\$25,000) for each violation of a separate provision or, for
17 continuing violations, for each day that the violation continues. Effective January 1, 2018, Health
18 and Safety Code section 25189.2, subdivision (e) was amended so that the applicable civil penalty
19 is not to exceed seventy thousand dollars (\$70,000) for each separate violation or, for continuing
20 violations, for each day that the violation continues.

21 31. Pursuant to Health and Safety Code section 25189, subdivision (f), each civil
22 penalty imposed for a separate violation pursuant to this section shall be separate and in addition
23 to any other civil penalty imposed pursuant to this section or any other provision of law. Pursuant
24 to Health and Safety Code sections 25189, subdivision (g) and 25189.2, subdivision (f), a Person
25 may not be held liable for a civil penalty under both sections for the same act.

26 32. The HWCL, pursuant to Health and Safety Code sections 25181 and 25184,
27 authorizes the Court to issue an order that enjoins any ongoing or potential violation of the
28

1 HWCL, or of any applicable rule, regulation, permit, standard, requirement, or order issued or
2 promulgated pursuant to the HWCL.

3 33. Health and Safety Code section 25184 provides that in civil actions brought
4 pursuant to the HWCL in which a temporary restraining order, preliminary injunction or
5 permanent injunction is sought, it shall not be necessary to allege or prove at any stage of the
6 proceeding that irreparable damage will occur should the temporary restraining order, preliminary
7 injunction, or permanent injunction not be issued; or that the remedy at law is inadequate, and the
8 temporary restraining order, preliminary injunction, or permanent injunction shall issue without
9 such allegations and without such proof.

10 34. Health and Safety Code section 25193 provides that the remedies afforded by the
11 HWCL are cumulative, and shall not be construed to limit any remedy provided by law, or
12 preclude any party from obtaining additional relief based on the same facts.

13 **ENFORCEMENT AUTHORITY UNDER THE HMRRPIL**

14 35. Pursuant to Health and Safety Code section 25515.7, every civil action brought
15 under the HMRRPIL shall be brought by the Attorney General, district attorney, or the city
16 attorney in the name of the People of the State of California. The Government Prosecutors have
17 the authority to bring a civil action to enjoin any violation of the HMRRPIL and to seek civil
18 penalties therefor

19 36. Pursuant to Health and Safety Code section 25515, subdivision (a), a Business that
20 violates Health and Safety Code sections 25504 to Section 25508.2, inclusive, or Section 25511,
21 shall be civilly liable in an amount of not more than two thousand dollars (\$2,000) for each day in
22 which the violation occurs. Pursuant to Health and Safety Code section 25515, subdivision (b), a
23 Business that knowingly violates Health and Safety Code sections 25504 to Section 25508.2,
24 inclusive, or Section 25510.1, after reasonable notice of the violation shall be civilly liable in an
25 amount not to exceed five thousand dollars (\$5,000) for each day in which the violation occurs.

26 37. The HMRRPIL, pursuant to Health and Safety Code section 25515.6, authorizes
27 the Court to issue an order that enjoins any practice that constitutes, or will constitute, a violation
28 of the HMRRPIL.

1 44. The UCL provides, pursuant to Business and Professions Code section 17205, that
2 the remedies or penalties provided by the UCL are cumulative to each other and to the remedies
3 or penalties available under all other laws of this State.

4 **GENERAL ALLEGATIONS**

5 45. In 2013, the California Attorney General along with several District Attorney's
6 offices throughout the state, and the City Attorney of Los Angeles, initiated an investigation of
7 the Hazardous Waste Management practices of the AutoZone Defendants at their facilities in
8 California. From 2013 to 2015, investigators from the District Attorney's offices, along with
9 environmental regulators statewide, conducted a series of undercover inspections of trash
10 dumpsters originating at retail stores and a distribution center which were and are owned and/or
11 operated by the AutoZone Defendants. The contents of a total of 56 dumpsters sent for disposal
12 to local landfills belonging to 48 stores, and one distribution center were inspected, and the
13 inspections revealed that all 56 dumpsters contained hazardous waste that was destined for local
14 landfills throughout California that were not permitted to receive those wastes. Many of the
15 dumpsters also contained discarded records containing sensitive customer information that had
16 not been shredded or rendered unreadable as required by state law. The unlawfully disposed of
17 hazardous wastes included used oil, used oil filters, automotive fluids, alkaline batteries,
18 electronic waste, aerosol cans and other toxic, ignitable and corrosive wastes. The discarded
19 records containing customer information included customer names, addresses, phone numbers
20 and email addresses.

21 46. The discovery of unauthorized Disposal of Hazardous Waste by the District
22 Attorney investigators led to a statewide review by prosecutors of Uniform Program Agency
23 compliance inspection reports. Those reports revealed systematic violations of provisions of the
24 HMRRPIL at AutoZone stores throughout the state that are set forth in this complaint.

25 47. At all times relevant hereto, the AutoZone Defendants stocked, stored, sold, and
26 handled Hazardous Materials at and from the California AutoZone Facilities. These Hazardous
27 Materials include, but are not limited to, automotive fluid products, acid-containing items,
28 alkaline batteries, lithium batteries, electronic devices, ignitable liquids, lubricants, mercury-

1 added lamps, automobile paint, fuel filters, propane canisters, metal shavings, aerosol products,
2 cleaning agents, degreasing agents, and other Ignitable, Reactive, Toxic, and Corrosive materials.
3 The AutoZone Defendants also generated regulated quantities of Hazardous Waste at each of the
4 California AutoZone Facilities by, inter alia, accepting customer returns of products initially sold
5 as Hazardous Materials, facility operation and maintenance, and the cleanup of spills of
6 Hazardous Materials.

7 48. At all times relevant hereto, the AutoZone Defendants' target market for the
8 California AutoZone Facilities was the do-it-yourself customer or mechanic. At all times relevant
9 hereto and continuing from and after the date of filing of this Complaint, at each of the California
10 AutoZone Facilities(excluding the distribution center), the AutoZone Defendants, encouraged and
11 permitted members of the public to use, while on the premises of the California AutoZone
12 Facilities, Hazardous Materials sold by the California AutoZone Facilities , and encouraged and
13 permitted members of the public to perform fluid-exchanges on vehicles and other vehicle-
14 servicing activities using those Hazardous Materials while on the premises of the California
15 AutoZone Facilities.

16 49. The AutoZone Defendants accepted and continue to accept used oil and related
17 Wastes from their customers for eventual recycling by third-parties. The AutoZone Defendants
18 attempted to Manage the used oil, used oil filters, lead-acid batteries, and other automotive-
19 related Wastes at the California AutoZone Facilities by storing such Hazardous Wastes in
20 containers.

21 50. The AutoZone Defendants arranged for the offsite Management of some of the
22 used oil, used oil filters, and other Hazardous Wastes using Uniform Hazardous Waste Manifests
23 and Transporters who were authorized to transport Hazardous Waste by the Department. This
24 demonstrates that the AutoZone Defendants were aware of the requirements for lawful transport
25 and disposal of Hazardous Wastes. However, the AutoZone Defendants did not Manage all of the
26 Hazardous Wastes generated at the California AutoZone Facilities in a lawful manner.

27 51. The AutoZone Defendants knew and should have known that members of the
28 public engaging in fluid-exchanges and vehicle-servicing activities at the California AutoZone

1 Facilities would and did leave behind non-empty aerosol cans and other non-empty containers of
2 Hazardous Materials, along with other regulated waste like used oil, used oil filters and other used
3 automotive-related products with ingredients or constituents rendering them as Hazardous Waste
4 when discarded, on the premises of each of the California AutoZone Facilities.

5 52. At all times relevant hereto, at each of the California AutoZone Facilities, the
6 AutoZone Defendants took custody of these Hazardous Materials and Hazardous Waste items
7 that were left on the premises of the California AutoZone Facilities, and deposited them into
8 onsite trash containers, rather than placing the Hazardous Waste into properly labeled containers
9 for disposal to an authorized facility. Hazardous Waste contained in trash containers used by the
10 AutoZone Defendants were then handed over to, and transported by, Transporters not authorized
11 to receive or transport Hazardous Waste, without Uniform Hazardous Waste Manifests, and
12 disposed of unlawfully at municipal landfills not authorized for the disposal of Hazardous Waste.

13 53. At all times relevant hereto, at each of the California AutoZone Facilities, the
14 AutoZone Defendants generated Hazardous Waste through, among other things, breakage,
15 spilling, damage and discarding, of Hazardous Material items stocked, or to be stocked, as store
16 merchandise, and which were determined to be Waste and discarded into onsite trash containers
17 rather than placing the Hazardous Waste into properly labeled containers for disposal to an
18 authorized facility. Hazardous Waste in trash containers used by the AutoZone Defendants was
19 handed over to, and transported by, Transporters not authorized to receive or transport Hazardous
20 Waste, without using Uniform Hazardous Waste Manifests, and disposed of at landfills not
21 authorized for the disposal of Hazardous Waste.

22 54. At all times relevant hereto, at each of the California AutoZone Facilities, the
23 AutoZone Defendants generated Hazardous Waste consisting of non-merchandise Hazardous
24 Material items used in store operations, including but not limited to containers with contents of
25 in-store housekeeping cleaners and surfactants, and spent and/or broken mercury-added lamps
26 and lead-acid batteries, and which were discarded into onsite trash containers rather than placing
27 the Hazardous Waste into properly labeled containers for disposal to an authorized facility. The
28 contents of the trash containers used by the AutoZone Defendants containing Hazardous Waste

1 were handed over to and transported by, Transporters not authorized to receive or transport
2 Hazardous Waste, without uniform hazardous waste manifests, and disposed of unlawfully at
3 municipal landfills not authorized for the disposal of Hazardous Waste.

4 55. The AutoZone Defendants Managed Hazardous Waste at their distribution center
5 located in San Bernardino County. Hazardous Waste was generated via the routine maintenance
6 of equipment and facility operations. In addition, Hazardous Materials that were damaged while
7 in storage or during Transportation were Managed as a Hazardous Waste and returns of products
8 from AutoZone Defendants' retail facilities nationwide including products that were damaged,
9 expired, defective, or recalled that contained Hazardous Materials, and products that were
10 unsaleable or unusable for their original intended purpose were also Managed at the distribution
11 center. The AutoZone Defendants Managed such Hazardous Waste and Hazardous Materials
12 improperly as alleged below.

13 56. At all times relevant hereto, the AutoZone Defendants were and are legally
14 responsible for compliance with the provisions of the Health and Safety Code, including Chapters
15 6.5 and 6.95 of Division 20, at the California AutoZone Facilities. The AutoZone Defendants
16 controlled and were responsible for the operations of the California AutoZone Facilities and/or
17 aided and abetted or acted in concert with persons who exercised control over those operations,
18 including but not limited to, all acts and omissions relating to the handling of Hazardous
19 Materials and Management of Hazardous Waste at and originating from the California AutoZone
20 Facilities, and/or that the AutoZone Defendants, failed to take appropriate steps to prevent and/or
21 correct the violations alleged herein despite having knowledge, power, authority and notice
22 sufficient to do so.

23 57. At all times relevant hereto and continuing from and after the date of filing of this
24 Complaint, the AutoZone Defendants owned, operated, licensed, or leased and continue to own,
25 operate, license, or lease, and are responsible for acts and/or omissions committed at, the
26 California AutoZone Facilities.

27 58. At all times relevant to this Complaint, the AutoZone Defendants are and were
28 responsible for the operation of the California AutoZone Facilities. At all times relevant to this

1 Complaint, the AutoZone Defendants are and were aware of and conducted, directed, approved
2 and/or controlled the handling of Hazardous Materials, Management of Hazardous Waste, and
3 disposal of Customer Records at the California AutoZone Facilities.

4 59. At all times relevant to this Complaint, the actions and/or omissions of AutoZone
5 Defendants and their predecessors and agents, as part of a continuing course of conduct, were the
6 legal cause of the violations alleged herein, and the AutoZone Defendants reasonably could and
7 should have taken action to prevent them.

8 60. At each of the California AutoZone Facilities, the AutoZone Defendants were and
9 are Generators of Hazardous Waste resulting from retail store operations including: a) retail store
10 maintenance and cleaning; b) spills and releases of Hazardous Materials; c), breakage of
11 containers of Hazardous Materials; d) generation of key shavings; e), customer return of items
12 containing Hazardous Materials and/or Hazardous Wastes, f) employee and customer disposal of
13 items containing Hazardous Materials and/or Hazardous Wastes into store trash containers and g)
14 disposal into trash containers or compactors at California AutoZone Facilities of Hazardous
15 Waste and/or items containing Hazardous Materials rendered unusable for their intended purpose
16 through usage, damage, expiration, or other causes.

17 61. The AutoZone Defendants, arranged for Disposal of Hazardous Waste that was
18 generated at the California AutoZone Facilities. The AutoZone Defendants caused the Hazardous
19 Waste generated at the California AutoZone Facilities to be transported to municipal landfills for
20 disposal, which were not permitted to accept Hazardous Waste.

21 62. The AutoZone Defendants Transported, or caused to be Transported, Hazardous
22 Waste from each of the California AutoZone Facilities to municipal landfills using businesses or
23 entities not authorized to transport Hazardous Waste in California.

24 63. The AutoZone Defendants Transported, or caused to be Transported, Hazardous
25 Waste from each of the California AutoZone Facilities to municipal landfills and other offsite
26 locations without using a Uniform Hazardous Waste Manifest.

27 64. When the Hazardous Materials that the AutoZone Defendants store and/or sell at
28 the California AutoZone Facilities becomes a Waste, they must be handled and Managed as

1 Hazardous Waste unless the AutoZone Defendants affirmatively determine that such a Waste is
2 not hazardous.

3 65. The AutoZone Defendants, at each of the California AutoZone facilities, had
4 custody of or controlled Customer Records from retail store operations.

5 66. The AutoZone Defendants, at all times relevant hereto, caused and/or performed
6 each of the acts and/or omissions in violation of California law alleged herein in the ownership
7 and/or operation of the California AutoZone Facilities as alleged below, up through December 12,
8 2018.

9 67. The allegations in this Complaint relate solely to the AutoZone Defendants' failure
10 to comply with the HWCL, the HMRRPIL, the CRL, the Vehicle Code, and the UCL, at, or in
11 connection with, the California AutoZone Facilities on the fact set forth in this Complaint, and
12 pertain only to the Management of Hazardous Waste, Handling of Hazardous Materials, and
13 mismanagement of Customer Records, as described below. Any violation of any of these laws or
14 applicable implementing regulations occurring after December 12, 2018, is not addressed by this
15 Complaint.

16 68. The causes of action alleged herein against the AutoZone Defendants do not
17 include claims for restitution, performance of cleanup, corrective action, or response action,
18 including reimbursement of response costs, for any actual past or future releases, spills, or
19 disposals of Hazardous Waste or hazardous substances that were caused or contributed to by the
20 AutoZone Defendants, or each of them, at or from the California AutoZone Facilities or based on
21 ownership or operation of contaminated property by the AutoZone Defendants.

22 **FIRST CAUSE OF ACTION**

23 **(Disposal of Hazardous Waste at a Point Not Authorized-i.e. Municipal Landfills)**
24 **(Health & Saf. Code, § 25203)**

25 69. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
26 through 68, inclusive.

27 70. From one or more California AutoZone Facilities, the AutoZone Defendants
28 disposed of or caused the disposal of Hazardous Waste originating from the California AutoZone

1 Facilities at municipal landfills, which are not authorized to accept Hazardous Waste, in violation
2 of Health and Safety Code section 25203, and, unless enjoined by order of the Court, the
3 AutoZone Defendants may or will continue in the course of conduct as alleged herein.
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5 71. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
6 them, under Health and Safety Code sections 25181 and 25184, and for each act of disposal, civil
7 penalties against the AutoZone Defendants, and each of them, under Health and Safety Code
8 section 25189, subdivision (c), for each intentional violation, or subdivision (d), for each
9 negligent violation, or Health and Safety Code section 25189.2, subdivision (b), for each strict
10 liability violation, as set forth in Plaintiff's prayer for relief.
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12 SECOND CAUSE OF ACTION

13 (Violations of Hazardous Waste Determination Requirement) 14 (Cal. Code Regs., tit. 22, §§ 66262.11 and 66260.200(c))

15 72. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
16 through 68, inclusive.

17 73. At one or more California AutoZone Facilities, the AutoZone Defendants failed to
18 determine if the Waste generated and Managed through its operations at California AutoZone
19 Facilities was a Hazardous Waste, in violation of the Hazardous Waste determination
20 requirements of the HWCL, and its implementing regulations at Title 22, including California
21 Code of Regulations, title 22, sections 66262.11 and 66260.200(c), and unless enjoined by order
22 of the Court, the AutoZone Defendants may or will continue in the course of conduct as alleged
23 herein.

24 74. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
25 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
26 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for
27 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, and
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1 each of them, under Health and Safety Code section 25189.2, subdivision (b), for each strict
2 liability violation, as set forth in Plaintiff's prayer for relief.

3 **THIRD CAUSE OF ACTION**

4 **(Violation of Generator Accumulation Requirements)**
5 **(Cal. Code Regs., tit. 22, § 66262.34, subd. (a))**

6 75. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
7 through 68, inclusive.

8 76. At one or more of the California AutoZone Facilities, the AutoZone Defendants
9 violated California Code of Regulations, title 22, section 66262.34, subdivision (a), by
10 accumulating Hazardous Waste on-site for more than the authorized time of and unless enjoined
11 by order of the Court, the AutoZone Defendants may or will continue in the course of conduct as
12 alleged herein.

13 77. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
14 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
15 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for
16 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, and
17 each of them, under Health and Safety Code section 25189.2, subdivision (b), for each strict
18 liability violation, as set forth in Plaintiff's prayer for relief.

19 **FOURTH CAUSE OF ACTION**

20 **(Violations of Requirement To Submit Manifests to the Department)**
21 **(Cal. Code Regs., tit. 22, § 66262.23, subd. (a)(4))**

22 78. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
23 through 68, inclusive.

24 79. At one or more California AutoZone Facilities, the AutoZone Defendants violated
25 California Code of Regulation, title 22, section 66262.23, subdivision (a)(4) by failing to submit
26 to the Department within 30 days of each shipment of Hazardous Waste, Uniform Hazardous
27 Waste Manifests for Hazardous Wastes that the AutoZone Defendants transported, or caused to be
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1 transported, off-site from California AutoZone Facilities, and unless enjoined by order of the
2 Court, the AutoZone Defendants may or will continue in the course of conduct as alleged herein.

3 80. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
4 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
5 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for
6 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, and
7 each of them, under Health and Safety Code section 25189.2, subdivision (b), for each strict
8 liability violation, as set forth in Plaintiff's prayer for relief.

9 **FIFTH CAUSE OF ACTION**

10 **(Failure to Comply with Exception Reporting Requirements)**
11 **(Cal. Code Regs., tit. 22, § 66262.42, subd. (a))**

12 81. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
13 through 68, inclusive.

14 82. At one or more of the California AutoZone Facilities, the AutoZone Defendants,
15 as a Generator, violated Code of California Regulations, title 22, section 66262.42, subdivision (a)
16 by failing to determine the status of Hazardous Waste after failing to receive a copy of the
17 handwritten signature of the owner or operator of the designated facility to which the Hazardous
18 Waste was sent to, and unless enjoined by order of the Court, the AutoZone Defendants may or
19 will continue in the course of conduct as alleged herein.

20 83. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
21 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
22 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for
23 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, and
24 each of them, under Health and Safety Code section 25189.2, subdivision (b), for each strict
25 liability violation, as set forth in Plaintiff's prayer for relief.
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1 **SIXTH CAUSE OF ACTION**

2 **(Failure to Comply with Exception Reporting Requirements)**
3 **(Cal. Code Regs., tit. 22, § 66262.42, subd. (b))**

4 84. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
5 through 68, inclusive.

6 85. At one or more of the California AutoZone Facilities, the AutoZone Defendants,
7 as Generators, violated Code of California Regulations, title 22, section 66262.42, subdivision (b)
8 by failing to submit an Exception Report to the Department after the AutoZone Defendants did
9 not receive a copy of a Uniform Hazardous Waste Manifest within 45 days of the date the
10 Hazardous Waste was accepted by the initial Transporter, and unless enjoined by order of the
11 Court, the AutoZone Defendants may or will continue in the course of conduct as alleged herein.

12 86. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
13 them, under Health and Safety Code section 25181, and civil penalties against The AutoZone
14 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for
15 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, and
16 each of them, under Health and Safety Code section 25189.2, subdivision (b), for each strict
17 liability violation, as set forth in Plaintiff's prayer for relief.

18 **SEVENTH CAUSE OF ACTION**

19 **(Failure to Comply with Exception Reporting Requirements)**
20 **(Cal. Code Regs., tit. 22, § 66262.42, subd. (c))**

21 87. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
22 through 68, inclusive.

23 88. At California AutoZone Facilities, the AutoZone Defendants, as Generators of less
24 than 1,000 kilograms of Hazardous Waste in a calendar year at the facility, violated Code of
25 California Regulations, title 22, section 66262.42, subdivision (c) by failing to submit a legible
26 copy of the Uniform Hazardous Waste Manifest to the Department within 60 days of the date the
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1 Hazardous Waste was accepted by the initial Transporter, and unless enjoined by order of the
2 Court, the AutoZone Defendants may or will continue in the course of conduct as alleged herein.

3 89. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
4 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
5 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for
6 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, and
7 each of them, under Health and Safety Code section 25189.2, subdivision (b), for each strict
8 liability violation, as set forth in Plaintiff's prayer for relief.

9 **EIGHTH CAUSE OF ACTION**

10 **(Storage of Hazardous Wastes Without Authorization)**
11 **(Health & Saf. Code, § 25123.3, subd. (h)(1))**

12 90. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
13 through 68, inclusive.

14 91. At one or more of the California AutoZone Facilities, the AutoZone Defendants,
15 as a Generators of less than 1,000 kilograms of Hazardous Waste in any calendar month who
16 accumulated Hazardous Waste onsite for more than 180 days violated Health and Safety Code
17 section 25123.3, subdivision (h)(1) by failing to comply with the conditions set forth in therein,
18 and at those California AutoZone Facilities, the AutoZone Defendants operated a Storage Facility
19 without authorization by the Department, and unless enjoined by order of the Court, the AutoZone
20 Defendants may or will continue in the course of conduct as alleged herein.

21 92. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
22 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
23 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (e), for
24 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, and
25 each of them, under Health and Safety Code section 25189.2, subdivision (d), for each strict
26 liability violation, as set forth in Plaintiff's prayer for relief.

1 **NINTH CAUSE OF ACTION**

2 **(Violations of Hazardous Waste Transportation Requirements)**
3 **(Health & Safety Code, §§ 25163(a)(1))**

4 93. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
5 through 68, inclusive.

6 94. At one or more of the California AutoZone Facilities, the AutoZone Defendants
7 transferred custody of Hazardous Waste from the California AutoZone Facilities to Transporters
8 who did not have a valid registration from the Department, to Transport Hazardous Waste, in
9 violation of Health and Safety Code section 25163(a)(1). The AutoZone Defendants placed
10 Hazardous Waste in trash containers at the AutoZone stores and/or distribution centers and then
11 transported the contents of such trash containers, or caused the Transportation of the contents such
12 containers, off-site to municipal landfills, and unless enjoined by order of the Court, the AutoZone
13 Defendants may or will continue in the course of conduct as alleged herein.

14 95. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
15 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
16 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for
17 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, and
18 each of them, under Health and Safety Code section 25189.2, subdivision (b), for each strict
19 liability violation, as set forth in Plaintiff's prayer for relief.

20 **TENTH CAUSE OF ACTION**

21 **(Violations of Hazardous Waste Accumulation Requirements)**
22 **(Cal. Code Regs., tit. 22, § 66262.34, subd. (f))**

23 96. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
24 through 68, inclusive.

25 97. At one or more California AutoZone Facilities, the AutoZone Defendants
26 accumulated Hazardous Waste on-site without complying with the requirements of California
27 Code of Regulations, title 22, section 66262.34, subdivision (f), including the failure to label
28 containers as Hazardous Waste, failure to identify the name and address of the Generator of the

1 Hazardous Waste, failure to identify the physical and chemical characteristics of the Hazardous
2 Waste and the failure to identify the starting accumulation date, and unless enjoined by order of
3 the Court, the AutoZone Defendants may or will continue in the course of conduct as alleged
4 herein.

5 98. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
6 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
7 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for
8 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, and
9 each of them, under Health and Safety Code section 25189.2, subdivision (b), for each strict
10 liability violation, as set forth in Plaintiff's prayer for relief.

11 **ELEVENTH CAUSE OF ACTION**

12 **(Violations of Hazardous Waste Identification Number Requirements)** 13 **(Cal. Code Regs., tit. 22, § 66262.12)**

14 99. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
15 through 68, inclusive.

16 100. At one or more of the California AutoZone Facilities, the AutoZone Defendants
17 treated, stored, disposed of, or transported or offered for Transportation Hazardous Waste at the
18 California AutoZone Facilities without complying with the requirements of California Code of
19 Regulations, title 22, section 66262.12, to have an identification number for each facility, and
20 unless enjoined by order of the Court, the AutoZone Defendants may or will continue in the
21 course of conduct as alleged herein.

22 101. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
23 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
24 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for
25 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, and
26 each of them, under Health and Safety Code section 25189.2, subdivision (b), for each strict
27 liability violation, as set forth in Plaintiff's prayer for relief.

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1 **TWELFTH CAUSE OF ACTION**

2 **(Violations of Hazardous Waste Container Management)**
3 **(Cal. Code Regs., tit. 22, § 66265.173)**

4 102. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
5 through 68, inclusive.

6 103. At one or more California AutoZone Facilities, the AutoZone Defendants failed to
7 maintain in a closed condition, during Storage, containers holding Hazardous Waste in violation
8 of California Code of Regulations, title 22, section 66265.173, and unless enjoined by order of the
9 Court, the AutoZone Defendants may or will continue in the course of conduct as alleged herein.
10 Such violations, include but are not limited to, the use of totes by the AutoZone Defendants to
11 receive and store Hazardous Waste, such as used oil initially dropped off by the public, that are
12 left open during their Storage at an AutoZone California Facility.

13 104. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
14 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
15 Defendants under Health and Safety Code section 25189, subdivision (b), for each intentional or
16 negligent violation, or civil penalties against the AutoZone Defendants under Health and Safety
17 Code section 25189.2, subdivision (b), for each strict liability violation, as set forth in Plaintiff's
18 prayer for relief.

19 **THIRTEENTH CAUSE OF ACTION**

20 **(Violations of Hazardous Waste Control Law**
21 **Special Requirements for Management of Incompatible Wastes)**
22 **(Cal. Code Regs., tit. 22, § 66265.177, subd. (a))**

23 105. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
24 through 68, inclusive.

25 106. At one or more of the California AutoZone Facilities, the AutoZone Defendants
26 Managed Incompatible Wastes on-site without complying with the requirements of California
27 Code of Regulations, title 22, section 66265.177, subdivision (a), and unless enjoined by order of
28 the Court, the AutoZone Defendants may or will continue in the course of conduct as alleged
herein.

1 107. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
2 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
3 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for
4 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, and
5 each of them, under Health and Safety Code section 25189.2, subdivision (b), for each strict
6 liability violation, as set forth in Plaintiff's prayer for relief.

7 **FOURTEENTH CAUSE OF ACTION**
8 **(Violations of Hazardous Waste Management in Designated Storage Areas)**
9 **(Cal. Code Regs., tit. 22, § 66262.34 and 66265.174)**

10 108. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
11 through 68, inclusive.

12 109. At one or more of the California AutoZone Facilities, the AutoZone Defendants
13 stored Hazardous Wastes without complying with the requirements of California Code of
14 Regulations, title 22, sections 66262.34 and 66266.174, and unless enjoined by order of the Court,
15 the AutoZone Defendants may or will continue in the course of conduct as alleged herein.

16 110. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
17 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
18 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for
19 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, under
20 Health and Safety Code section 25189.2, subdivision (b), for each strict liability violation, as set
21 forth in Plaintiff's prayer for relief.

22 **FIFTEENTH CAUSE OF ACTION**
23 **(Violation of Hazardous Waste Training Requirements)**
24 **(Cal. Code Regs., tit. 22, § 66265.16)**

25 111. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
26 through 68, inclusive.
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1 112. At one or more of the California AutoZone Facilities, the AutoZone Defendants
2 generated Hazardous Waste and failed to annually train employees who Managed Hazardous
3 Waste and/or failed to maintain training documentation in violation of the training requirements
4 of California Code of Regulations, title 22, section 66265.16, and unless enjoined by order of the
5 Court, the AutoZone Defendants may or will continue in the course of conduct as alleged herein.

6 113. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
7 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
8 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for
9 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, and
10 each of them, under Health and Safety Code section 25189.2, subdivision (b), for each strict
11 liability violation, as set forth in Plaintiff's prayer for relief.

12 **SIXTEENTH CAUSE OF ACTION**

13 **(Violations of Used Oil Filter Requirements)** 14 **(Cal. Code Regs., tit. 22, § 66266.130, subd. (c))**

15 114. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66
16 through 68, inclusive.

17 115. At one or more California AutoZone Facilities, the AutoZone Defendants failed to
18 Manage used oil filters as Hazardous Waste in violation of California Code of Regulations, title
19 22, section 66266.130, subdivision (c), and unless enjoined by order of the Court, the AutoZone
20 Defendants may or will continue in the course of conduct as alleged herein.

21 116. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
22 them, under Health and Safety Code section 25181, and civil penalties against the AutoZone
23 Defendants, and each of them, under Health and Safety Code section 25189, subdivision (b), for
24 each intentional or negligent violation, or civil penalties against the AutoZone Defendants, and
25 each of them, under Health and Safety Code section 25189.2, subdivision (b), for each strict
26 liability violation, as set forth in Plaintiff's prayer for relief.

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SEVENTEENTH CAUSE OF ACTION

**(Failure to Properly Manage Aerosol Cans)
(Health & Saf. Code, § 25201.16)**

117. Plaintiff realleges paragraphs 1 through 14, 16, 21 through 34, 45 through 64, 66 through 68, inclusive.

118. If a non-empty waste aerosol can contains pressurized contents that are hazardous, if the propellant is Ignitable or Toxic, or the product in the aerosol can itself is Ignitable, Corrosive or Toxic, then a non-empty aerosol waste can is a Hazardous Waste Aerosol Can.

119. At one or more California AutoZone facilities, the AutoZone Defendants failed to Manage their non-empty waste aerosol cans, which are Hazardous Waste Aerosol Cans, in violation of Health and Safety Code section 25201.16. The AutoZone Defendants disposed of Hazardous Waste Aerosol Cans in trash receptacles at the California AutoZone Facilities and caused the Hazardous Waste Aerosol Cans to be transported to municipal landfills, which are not authorized points for the disposal of Hazardous Waste. Unless enjoined by order of the Court, AutoZone may or will continue in the course of conduct as alleged herein.

120. Plaintiff requests injunctive relief against AutoZone under Health and Safety Code section 25181, and civil penalties against AutoZone under Health and Safety Code section 25189, subdivision (b), for each intentional or negligent violation, or civil penalties against AutoZone under Health and Safety Code section 25189.2, subdivision (b), for each strict liability violation, as set forth in Plaintiff's prayer for relief.

EIGHTEENTH CAUSE OF ACTION

**(Violations of the HMRRPIL - Failure to Submit a Site Map with the Business Plan)
(Health & Saf. Code, § 25505, subd. (a)(2))**

121. Plaintiff realleges paragraphs 1 through 14, 17, 21, 35 through 38, 45 through 59, 66 through 68, inclusive.

122. The AutoZone Defendants are each a Person and a Business and a Handler.

1 123. At one or more of the California AutoZone Facilities, the AutoZone Defendants,
2 as a Business, violated Health and Safety Code section 25505, subdivision (a)(2) by failing to
3 provide and submit electronically, in the Business Plan for each AutoZone Facility, a site map
4 with all required content, and unless enjoined by order of the Court, the AutoZone Defendants
5 may or will continue in the course of conduct alleged herein.

6 124. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
7 them, under Health and Safety Code sections 25515.6 and 25515.8, and civil penalties against the
8 AutoZone Defendants, and each of them, under Health and Safety Code section 25515,
9 subdivision (b), for each knowing violation, and civil penalties against the AutoZone Defendants,
10 and each of them, under Health and Safety Code section 25515, subdivision (a), for each violation
11 of the applicable requirements of the HMRRPIL.

12 **NINETEENTH CAUSE OF ACTION**

13 **(Violations of the HMRRPIL- Failure to Submit a Hazardous Materials Inventory)**
14 **(Health & Saf. Code, § 25506)**

15 125. Plaintiff realleges paragraphs 1 through 14, 17, 21, 35 through 38, 45 through 59,
16 66 through 68, inclusive.

17 126. At one or more California AutoZone Facilities, the AutoZone Defendants, as a
18 Business, violated Health and Safety Code section 25506, which requires the submission of the
19 Hazardous Materials inventory by Handlers. Unless enjoined by order of the Court, the AutoZone
20 Defendants may or will continue in the course of conduct alleged herein.

21 127. Plaintiff requests injunctive relief against the AutoZone Defendants under Health
22 and Safety Code sections 25515.6 and 25515.8, and civil penalties against the AutoZone
23 Defendants under Health and Safety Code section 25515, subdivision (b), for each knowing
24 violation, and civil penalties against the AutoZone Defendants under Health and Safety Code
25 section 25515, subdivision (a), for each violation of the applicable requirements of the
26 HMRRPIL.

1 **TWENTIETH CAUSE OF ACTION**

2 **(Violations of the HMRRPIL - Failure to Have a Business Plan)**
3 **(Health & Saf. Code, § 25507)**

4 128. Plaintiff realleges paragraphs 1 through 14, 17, 21, 35 through 38, 45 through 59,
5 66 through 68, inclusive.

6 129. Health and Safety Code section 25507 requires that a Business shall establish and
7 implement a Business Plan for emergency response to a release or threatened release of a
8 Hazardous Material in accordance with the standard prescribed in the regulations adopted
9 pursuant to Health and Safety Code Section 25503. A Business Plan must contain all of the
10 information set forth in Health and Safety Code section 25505, including, inter alia, emergency
11 response plans and procedures in the event of a release or threatened release of a Hazardous
12 Material, and training for all new employees and annual training, including refresher courses, for
13 all employees in safety procedures in the event of a release or threatened release of a Hazardous
14 Material.

15 130. At one or more of the California AutoZone Facilities, the AutoZone Defendants,
16 as a Business, violated Health and Safety Code section 25507 by failing to have a Business Plan
17 with all of the required information, and unless enjoined by order of the Court, the AutoZone
18 Defendants may or will continue in the course of conduct alleged herein.

19 131. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
20 them, under Health and Safety Code sections 25515.6 and 25515.8, and civil penalties against the
21 AutoZone Defendants, and each of them, under Health and Safety Code section 25515,
22 subdivision (b), for each knowing violation, and civil penalties against the AutoZone Defendants,
23 and each of them, under Health and Safety Code section 25515, subdivision (a), for each violation
24 of the applicable requirements of the HMRRPIL.

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TWENTY FIRST CAUSE OF ACTION

**(Violations of the HMRRPIL – Failure to Electronically Submit a Business Plan)
(Health & Saf. Code, § 25508)**

132. Plaintiff realleges paragraphs 1 through 14, 17, 21, 35 through 38, 45 through 59, 66 through 68, inclusive.

133. At California AutoZone Facilities, the AutoZone Defendants, as a Handler, violated Health and Safety Code section 25508, by failing to electronically submit its Business Plan annually to the statewide information management system and to certify that the Business Plan meets the requirements of Article 1, Chapter 6.95, Division 20 of the Health and Safety Code, and unless enjoined by order of the Court, the AutoZone Defendants may or will continue in the course of illegal conduct alleged herein.

134. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of them, under Health and Safety Code sections 25515.6 and 25515.8., and civil penalties against the AutoZone Defendants, and each of them, under Health and Safety Code section 25515, subdivision (b) for each knowing violation, and civil penalties against the AutoZone Defendants, and each of them, under Health and Safety Code section 25515, subdivision (a) for each violation of Health and Safety Code section 25508, as set forth in Plaintiff's prayer for relief.

TWENTY SECOND CAUSE OF ACTION

**(Violations of the HMRRPIL)
(Health & Saf. Code, § 25508.2)**

135. Plaintiff realleges paragraphs 1 through 14, 17, 21, 35 through 38, 45 through 59, 66 through 68, inclusive.

136. At one or more California AutoZone Facilities, the AutoZone Defendants have violated Health and Safety Code section 25508.2. Section 25508.2 provides that on or before an annual due date established by Health and Safety Code section 25508, subdivision (a)(1)(B), a business owner, business operator or official designated representative of a business shall review and certify that the information in the statewide information management system is complete,

1 accurate, and in compliance with section 11022 of Title 42 of the United States Code. Unless
2 enjoined by order of the Court, the AutoZone Defendants may or will continue in the course of
3 conduct alleged herein.

4 137. Plaintiff requests injunctive relief against the AutoZone Defendants under Health
5 and Safety Code sections 25515.6 and 25515.8, and civil penalties against the AutoZone
6 Defendants under Health and Safety Code section 25515, subdivision (b), for each knowing
7 violation, and civil penalties against the AutoZone Defendants under Health and Safety Code
8 section 25515, subdivision (a), for each violation of the applicable requirements of the
9 HMRRPIL.

10 **TWENTY THIRD CAUSE OF ACTION**

11 **(Violations of the HMRRPIL - Failure to Report a Release or Threatened**
12 **Release of a Hazardous Material)**
13 **(Health & Saf. Code, § 25510)**

14 138. Plaintiff realleges paragraphs 1 through 14, 17, 21, 35 through 38, 45 through 59,
15 66 through 68, inclusive.

16 139. At one or more of the California AutoZone Facilities, the AutoZone Defendants
17 violated Health and Safety Code section 25510 by failing to report a release or threatened release
18 of a Hazardous Material to the appropriate Unified Program Agency, and unless enjoined by order
19 of the Court, the AutoZone Defendants may or will continue in the course of conduct alleged
20 herein.

21 140. Plaintiff requests injunctive relief against the AutoZone Defendants under Health
22 and Safety Code sections 25515.6 and 25515.8, and civil penalties against the AutoZone
23 Defendants under Health and Safety Code section 25515, subdivision (b), for each knowing
24 violation, and civil penalties against the AutoZone Defendants under Health and Safety Code
25 section 25515, subdivision (a), for each violation of the applicable requirements of the
26 HMRRPIL.
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TWENTY FOURTH CAUSE OF ACTION
(Violations of the Vehicle Code – Failure to Placard)
(Veh. Code, § 27903)

141. Plaintiff realleges paragraphs 1 through 14, 19, 21, 40, 45 through 59, inclusive.

142. From one or more California AutoZone Facilities, the AutoZone Defendants used vehicles to Transport Hazardous Materials without the display of placards or markings on the vehicle exterior required by the United States Department of Transportation pursuant to Parts 172, 173, and 177 of Title 49 of the Code of Federal Regulations, and which were permitted or required by Subparts D and F or Part 172 of Title 49 of the Code of Federal Regulations, in violation of Vehicle Code section 27903, and unless enjoined by order of the Court, the AutoZone Defendants may or will continue in the course of conduct as alleged herein.

143. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of them, under the Court’s equitable powers to enjoin the violations of Vehicle Code section 27903 as set forth in Plaintiff’s prayer for relief

TWENTY FIFTH CAUSE OF ACTION
(Violations of Customer Records and Privacy)
(Civil Code, § 1798.81)

144. Plaintiff realleges paragraphs 1 through 14, 18, 21, 45, 58, 65, 67, inclusive.

145. Each of the AutoZone Defendants is a “business” as a defined in Civil Code section 1798.80, subdivision (a).

146. At one or more of the California AutoZone Facilities, the AutoZone Defendants, and each of them, engaged in acts or practices that violated Civil Code section 1798.81 by disposing of Customer Records into trash receptacles at those facilities without shredding, erasing, or otherwise modifying the Personal Information in those records to make it unreadable or undecipherable through any means, and unless enjoined by order of the Court, the AutoZone Defendants may or will continue in the course of conduct as alleged herein.

1 147. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
2 them, under the Court's equitable powers to enjoin the violations of the CRL as set forth in
3 Plaintiff's prayer for relief.

4 **TWENTY SIXTH CAUSE OF ACTION**

5 **(Violations of Unfair Competition Laws – Violations of the**
6 **HWCL as Predicate Acts or Practices)**
7 **(Bus. & Prof. Code, §§ 17200 - 17208)**

8 148. Plaintiff realleges paragraphs 1 through 14, 15, 16, 21 through 34, 45 through 64,
9 66 through 120, inclusive.

10 149. Each of the AutoZone Defendants is a "person" under Business and Professions
11 Code section 17201.

12 150. The AutoZone Defendants, and each of them, have engaged in, and continue to
13 engage in, acts or practices that constitute Unfair Competition within the meaning of Business and
14 Professions Code sections 17200 through 17208.

15 151. Specifically, the AutoZone Defendants, and each of them, engaged in the acts or
16 practices alleged in the First through Seventeenth Causes of Action, above.

17 152. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
18 them, under Business and Professions Code section 17203, from engaging in acts or practices that
19 constitute Unfair Competition within the meaning of Business and Professions Code section
20 17200, and requests civil penalties against the AutoZone Defendants, and each of them, under
21 Business and Professions Code section 17206, as set forth in Plaintiff's prayer for relief.

22 **TWENTY SEVENTH CAUSE OF ACTION**

23 **(Violations of Unfair Competition Laws – Violations of the HMRRPIL**
24 **as Predicate Acts or Practices)**
25 **(Bus. & Prof. Code, §§ 17200 - 17208)**

26 153. Plaintiff realleges paragraphs 1 through 14, 15, 17, 21, 35 through 38, 45 through
27 59, 66 through 68, 121 through 140, inclusive.

28 154. Each of the AutoZone Defendants is a "person" under Business and Professions
Code section 17201.

1 155. The AutoZone Defendants, and each of them, have engaged in, and continue to
2 engage in, acts or practices that constitute Unfair Competition within the meaning of Business and
3 Professions Code sections 17200 through 17208.

4 156. Specifically, the AutoZone Defendants, and each of them, engaged in the acts or
5 practices alleged in the Eighteenth through Twenty Third Causes of Action.

6 157. Plaintiff requests injunctive relief against the AutoZone Defendants, and each of
7 them, under Business and Professions Code section 17203, from engaging in acts or practices that
8 constitute Unfair Competition within the meaning of Business and Professions Code section
9 17200, and requests civil penalties against the AutoZone Defendants, and each of them, under
10 Business and Professions Code section 17206, as set forth in Plaintiff's prayer for relief.

11 **TWENTY EIGHTH CAUSE OF ACTION**

12 **(Violations of Unfair Competition Laws – Vehicle Code Violations
as Predicate Acts or Practices)**

13 **(Bus. & Prof. Code, §§ 17200 - 17208)**

14 158. Plaintiff realleges paragraphs 1 through 14, 15, 19, 21, 40, 45 through 59, 141
15 through 143, inclusive.

16 159. Each of the AutoZone Defendants is a "person" under Business and Professions
17 Code section 17201.

18 160. The AutoZone Defendants have engaged in, and continue to engage in, acts or
19 practices that constitute Unfair Competition within the meaning of Business and Professions Code
20 sections 17200 through 17208.

21 161. From one or more of the California AutoZone Facilities, the AutoZone Defendants
22 used vehicles to Transport Hazardous Materials without the display of placards or markings on the
23 vehicle exterior required by the United States Department of Transportation pursuant to Parts 172,
24 173, and 177 of Title 49 of the Code of Federal Regulations, and which were permitted or
25 required by Subparts D and F or Part 172 of Title 49 of the Code of Federal Regulations, in
26 violation of Vehicle Code section 27903, and unless enjoined by order of the Court, the AutoZone
27 Defendants may or will continue in the course of conduct as alleged herein.

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1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiff prays for the following relief as to the AutoZone Defendants:

3 1. A preliminary and permanent injunction requiring the AutoZone Defendants, and
4 each of them, to comply with those provisions of the HWCL and Title 22 that the AutoZone
5 Defendants have been shown to have violated;

6 2. A preliminary and permanent injunction requiring the AutoZone Defendants, and
7 each of them, to comply with those provisions of the HMRRPIL and Title 19 which the AutoZone
8 Defendants have been shown to have violated;

9 3. A preliminary and permanent injunction requiring the AutoZone Defendants, and
10 each of them, to comply with provisions of the CRL that the AutoZone Defendants have been
11 shown to have violated;

12 4. A preliminary and permanent injunction requiring the AutoZone Defendants, and
13 each of them, to comply with the provisions of the Vehicle Code that the AutoZone Defendants
14 have been shown to have violated;

15 5. A preliminary and permanent injunction prohibiting the AutoZone Defendants, and
16 each of them, from engaging in acts or practices that violate the provisions of the HWCL, the
17 HMRRPL, the CRL, and the Vehicle Code which the AutoZone Defendants have been shown to
18 have violated, which thereby constitute Unfair Competition within the meaning of Business and
19 Professions Code section 17200;

20 6. A preliminary and permanent injunction to prevent the use or employment by the
21 AutoZone Defendants, and each of them, of any practice which constitutes unfair competition;

22 7. Subject to the provisions of Health and Safety Code section 25189.2, subdivision (f),
23 civil penalties against the AutoZone Defendants, and each of them, pursuant to Health and Safety
24 Code section 25189, subdivisions (b), (c) (d) and (e) for each violation of the HWCL and Title
25 22, in an amount according to proof.

26 8. Subject to the provisions of Health and Safety Code section 25189.2, subdivision (f),
27 civil penalties against the AutoZone Defendants, and each of them, pursuant to Health and Safety
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1 Code section 25189.2, subdivisions (b), (c), (d) and (e) for each violation of the HWCL and Title
2 22, in an amount according to proof;

3 9. Civil penalties against the AutoZone Defendants, and each of them, pursuant to
4 Health and Safety Code section 25515, subdivision (a) for each violation of the HMRRPIL and
5 Title 19, in an amount according to proof;

6 10. Civil penalties against the AutoZone Defendants, and each of them, pursuant to
7 Health and Safety Code section 25515, subdivision (b) for each violation of the HMRRPIL and
8 Title 19, of in an amount according to proof;

9 11. Civil penalties against the AutoZone Defendants, and each of them, pursuant to
10 Business and Professions Code section 17206, for each violation of the unfair competition laws
11 engaged in by the AutoZone Defendants, and each of them, in an amount according to proof;

12 12. For the Plaintiff costs of inspection, investigation, enforcement, prosecution, and suit
13 herein, including but not limited to such attorneys' fees and costs as are authorized to be
14 recovered pursuant to Code of Civil Procedure section 1021.8;

15 13. Such other and further relief as the Court deems just and proper.
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1 Dated: May 15, 2019

Respectfully Submitted,

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OK2014510942

EXHIBIT "A"

[California AutoZone Facilities]

Exhibit A-- California AutoZone Facilities

	Store	Address	City	County	State	Date Opened
1	4489	1125 PARK ST	ALAMEDA	ALAMEDA	CA	8/12/2017
2	3368	41094 FREMONT BLVD	FREMONT	ALAMEDA	CA	Pre-7/23/09
3	2847	24060 MISSION BLVD	HAYWARD	ALAMEDA	CA	Pre-7/23/09
4	4170	28150 MISSION BLVD	HAYWARD	ALAMEDA	CA	6/15/2013
5	4399	3455 ARDEN RD	HAYWARD	ALAMEDA	CA	8/25/2018
6	3718	1511 FIRST STREET	LIVERMORE	ALAMEDA	CA	10/16/2009
7	4091	35060 NEWARK BLVD	NEWARK	ALAMEDA	CA	5/5/2012
8	5230	10111 INTERNATIONAL STREET	OAKLAND	ALAMEDA	CA	Pre-7/23/09
9	5229	3050 EAST 9TH STREET	OAKLAND	ALAMEDA	CA	Pre-7/23/09
10	3357	3533 MACARTHUR AVENUE	OAKLAND	ALAMEDA	CA	Pre-7/23/09
11	3371	7200 BANCROFT AVENUE	OAKLAND	ALAMEDA	CA	Pre-7/23/09
12	4151	807 27TH STREET	OAKLAND	ALAMEDA	CA	4/18/2013
13	4090	3901 SANTA RITA ROAD	PLEASANTON	ALAMEDA	CA	8/8/2011
14	4071	14850 EAST 14TH STREET	SAN LEANDRO	ALAMEDA	CA	8/24/2012
15	3331	17750 HESPERIAN BLVD	SAN LORENZO	ALAMEDA	CA	Pre-7/23/09
16	3338	32100 ALVARADO BLVD	UNION CITY	ALAMEDA	CA	Pre-7/23/09
17	4099	34529 ALVARADO-NILES ROAD	UNION CITY	ALAMEDA	CA	4/12/2016
18	6228	11201 PROSPECT DRIVE	JACKSON	AMADOR	CA	4/23/2014
19	5306	136 WEST EAST AVENUE	CHICO	BUTTE	CA	Pre-7/23/09
20	3321	1843 PARK AVENUE	CHICO	BUTTE	CA	Pre-7/23/09
21	4093	1636 HWY 99	GRIDLEY	BUTTE	CA	8/22/2012
22	5307	1970 OROVILLE DAM BLVD EAST	OROVILLE	BUTTE	CA	Pre-7/23/09
23	5308	7542 SKYWAY ROAD	PARADISE	BUTTE	CA	Pre-7/23/09
24	6205	117 RILEY WAY	VALLEY SPRINGS	CALAVERAS	CA	3/16/2018
25	3710	1015 BRIDGE STREET	COLUSA	COLUSA	CA	7/18/2011
26	3366	1623 A STREET	ANTIOCH	CONTRA COSTA	CA	Pre-7/23/09
27	4029	2009 SOMERSVILLE ROAD	ANTIOCH	CONTRA COSTA	CA	8/25/2012
28	5124	4036 LONE TREE WAY	ANTIOCH	CONTRA COSTA	CA	2/6/2018
29	4166	5369 FAIR SIDE WAY	ANTIOCH	CONTRA COSTA	CA	4/3/2015
30	5310	652 BAILEY ROAD	BAY POINT	CONTRA COSTA	CA	Pre-7/23/09
31	4136	7609 BRENTWOOD BLVD	BRENTWOOD	CONTRA COSTA	CA	5/8/2013
32	4128	2051 MONUMENT BLVD	CONCORD	CONTRA COSTA	CA	12/7/2013
33	3334	5267 CLAYTON ROAD	CONCORD	CONTRA COSTA	CA	Pre-7/23/09
34	5309	2595 MAIN STREET	OAKLEY	CONTRA COSTA	CA	Pre-7/23/09
35	3349	5747 PACHECO BLVD	PACHECO	CONTRA COSTA	CA	Pre-7/23/09
36	3312	1475 FITZGERALD DRIVE	PINOLE	CONTRA COSTA	CA	Pre-7/23/09
37	3343	401 EAST LELAND ROAD	PITTSBURG	CONTRA COSTA	CA	Pre-7/23/09
38	5937	13102 SAN PABLO AVENUE	RICHMOND	CONTRA COSTA	CA	Pre-7/23/09
39	5311	1350 MACDONALD AVENUE	RICHMOND	CONTRA COSTA	CA	Pre-7/23/09
40	4023	14270 SAN PABLO AVENUE	SAN PABLO	CONTRA COSTA	CA	12/18/2010
41	4164	500 HWY 101 NORTH	CRESCENT CITY	DEL NORTE	CA	7/24/2013
42	5312	3480 PALMER DRIVE	CAMERON PARK	EL DORADO	CA	Pre-7/23/09
43	3361	4350 GOLDEN CENTER DRIVE #1	PLACERVILLE	EL DORADO	CA	Pre-7/23/09
44	6201	2605 LAKE TAHOE BLVD SOUTH	SOUTH LAKE TAHOE	EL DORADO	CA	12/24/2014
45	4034	3150 FOWLER AVENUE	CLOVIS	FRESNO	CA	6/30/2010
46	5322	343 WEST SHAW AVENUE	CLOVIS	FRESNO	CA	Pre-7/23/09
47	6257	390 N SUNNYSIDE	CLOVIS	FRESNO	CA	4/11/2016
48	5919	45 WEST POLK STREET	COALINGA	FRESNO	CA	Pre-7/23/09
49	4042	900 NORTH STREET	FIREBAUGH	FRESNO	CA	5/6/2011
50	5315	2612 NORTH BLACKSTONE AVENUE	FRESNO	FRESNO	CA	Pre-7/23/09
51	4001	2615 SOUTH CHESTNUT AVENUE	FRESNO	FRESNO	CA	Pre-7/23/09
52	3695	3089 E TULARE ST	FRESNO	FRESNO	CA	7/21/2017
53	5321	3102 GETTYSBURG AVENUE	FRESNO	FRESNO	CA	Pre-7/23/09
54	3342	3785 WEST SHIELDS AVENUE	FRESNO	FRESNO	CA	Pre-7/23/09
55	5317	4031 NORTH MARKS AVENUE	FRESNO	FRESNO	CA	Pre-7/23/09
56	5316	4210 EAST BELMONT AVENUE	FRESNO	FRESNO	CA	Pre-7/23/09
57	5319	4266 EAST CLINTON AVENUE	FRESNO	FRESNO	CA	Pre-7/23/09
58	2892	4674 EAST KINGS CANYON ROAD	FRESNO	FRESNO	CA	Pre-7/23/09
59	2889	5384 NORTH BLACKSTONE AVENUE	FRESNO	FRESNO	CA	Pre-7/23/09
60	3712	6340 NORTH FIGARDEN DRIVE	FRESNO	FRESNO	CA	Pre-7/23/09
61	2876	820 EAST CALIFORNIA AVENUE	FRESNO	FRESNO	CA	Pre-7/23/09
62	3306	927 SOUTH CLOVIS AVENUE	FRESNO	FRESNO	CA	Pre-7/23/09
63	5324	14923 WEST WHITEBRIDGE ROAD	KERMAN	FRESNO	CA	Pre-7/23/09
64	5939	959 SIERRA STREET	KINGSBURG	FRESNO	CA	Pre-7/23/09
65	3708	700 DERRICK AVE	MENDOTA	FRESNO	CA	5/7/2016

Exhibit A-- California AutoZone Facilities

	Store	Address	City	County	State	Date Opened
66	4464	1350 PARK BLVD	ORANGE COVE	FRESNO	CA	6/12/2018
67	3758	865 EAST MANNING AVENUE	PARLIER	FRESNO	CA	Pre-7/23/09
68	5325	1060 EAST MANNING AVENUE	REEDLEY	FRESNO	CA	Pre-7/23/09
69	2862	1111 ACADEMY AVENUE	SANGER	FRESNO	CA	Pre-7/23/09
70	2815	2101 WHITSON STREET	SELMA	FRESNO	CA	Pre-7/23/09
71	4094	711 6TH STREET	ORLAND	GLENN	CA	6/16/2012
72	6282	930 WEST HARRIS STREET	EUREKA	HUMBOLDT	CA	2/14/2015
73	4142	300 SOUTH FORTUNA BLVD	FORTUNA	HUMBOLDT	CA	5/4/2013
74	6187	1585 CENTRAL AVE	MCKINLEYVILLE	HUMBOLDT	CA	3/21/2018
75	2804	953 EAST MAIN STREET	BRAWLEY	IMPERIAL	CA	Pre-7/23/09
76	5329	927 IMPERIAL AVENUE	CALEXICO	IMPERIAL	CA	Pre-7/23/09
77	2803	1263 WEST ADAMS AVENUE	EL CENTRO	IMPERIAL	CA	Pre-7/23/09
78	3362	2403 SOUTH 4TH STREET	EL CENTRO	IMPERIAL	CA	Pre-7/23/09
79	5648	390 EAST 5TH STREET	HOLTVILLE	IMPERIAL	CA	10/2/2015
80	4187	500 SOUTH J STREET	IMPERIAL	IMPERIAL	CA	3/18/2016
81	3760	900 BEAR MOUNTAIN	ARVIN	KERN	CA	Pre-7/23/09
82	4009	11050 OLIVE DRIVE	BAKERSFIELD	KERN	CA	Pre-7/23/09
83	5332	1615 BRUNDAGE LANE	BAKERSFIELD	KERN	CA	Pre-7/23/09
84	5335	1701 WHITE LANE	BAKERSFIELD	KERN	CA	Pre-7/23/09
85	3364	2461 NORTH CHESTER AVENUE	BAKERSFIELD	KERN	CA	Pre-7/23/09
86	2801	3324 NILES STREET	BAKERSFIELD	KERN	CA	Pre-7/23/09
87	4004	3325 PANAMA LANE	BAKERSFIELD	KERN	CA	Pre-7/23/09
88	5337	3408 UNION AVENUE	BAKERSFIELD	KERN	CA	Pre-7/23/09
89	3311	6615 MING AVENUE	BAKERSFIELD	KERN	CA	Pre-7/23/09
90	5336	8430 ROSEDALE HIGHWAY	BAKERSFIELD	KERN	CA	Pre-7/23/09
91	4174	9711 CALIFORNIA CITY BLVD	CALIFORNIA CITY	KERN	CA	8/17/2013
92	2829	1434 HIGH STREET	DELANO	KERN	CA	Pre-7/23/09
93	2813	10315 MAIN STREET	LAMONT	KERN	CA	Pre-7/23/09
94	6270	524 WEST PERKINS AVENUE	MCFARLAND	KERN	CA	7/31/2015
95	5342	940 NORTH CHINA LAKE BLVD	RIDGECREST	KERN	CA	Pre-7/23/09
96	5341	2674 ROSAMOND BLVD	ROSAMOND	KERN	CA	Pre-7/23/09
97	5343	112 EAST MARENGO AVENUE	SHAFTER	KERN	CA	Pre-7/23/09
98	5943	1002 KERN STREET	TAFT	KERN	CA	Pre-7/23/09
99	5345	842 TUCKER ROAD	TEHACHAPI	KERN	CA	Pre-7/23/09
100	5346	2301 HWY 46	WASCO	KERN	CA	Pre-7/23/09
101	2878	2009 WHITLEY AVENUE	CORCORAN	KINGS	CA	Pre-7/23/09
102	2807	336 NORTH 11TH AVENUE	HANFORD	KINGS	CA	Pre-7/23/09
103	5348	844 NORTH LEMOORE AVENUE	LEMOORE	KINGS	CA	Pre-7/23/09
104	4176	15125 LAKE SHORE DRIVE #D	CLEARLAKE	LAKE	CA	7/24/2013
105	4015	103 LAUREL STREET	SUSANVILLE	LASSEN	CA	3/12/2015
106	5349	1100 WEST COMMONWEALTH AVENUE	ALHAMBRA	LOS ANGELES	CA	Pre-7/23/09
107	4035	8638 WOODMAN AVENUE	ARLETA	LOS ANGELES	CA	7/16/2011
108	5352	9700 WOODMAN AVENUE	ARLETA	LOS ANGELES	CA	Pre-7/23/09
109	6293	736 E ALOSTA AVE.	AZUSA	LOS ANGELES	CA	8/27/2016
110	5357	14031 FRANCISQUITO AVENUE	BALDWIN PARK	LOS ANGELES	CA	Pre-7/23/09
111	5356	14103 RAMONA BLVD	BALDWIN PARK	LOS ANGELES	CA	Pre-7/23/09
112	5358	6107 FLORENCE AVENUE	BELL GARDENS	LOS ANGELES	CA	Pre-7/23/09
113	6237	10239 ROSECRANS AVENUE	BELLFLOWER	LOS ANGELES	CA	8/3/2015
114	5462	9031 ALONDRA BLVD	BELLFLOWER	LOS ANGELES	CA	Pre-7/23/09
115	5362	2502 BURBANK BLVD	BURBANK	LOS ANGELES	CA	Pre-7/23/09
116	5364	21129 SHERMAN WAY	CANOGA PARK	LOS ANGELES	CA	Pre-7/23/09
117	3345	444 EAST CARSON STREET	CARSON	LOS ANGELES	CA	Pre-7/23/09
118	6171	10216 MASON AVE	CHATSWORTH	LOS ANGELES	CA	5/6/2017
119	5393	15215 EAST GALE AVENUE	CITY OF INDUSTRY	LOS ANGELES	CA	Pre-7/23/09
120	5367	1440 EAST COMPTON BLVD	COMPTON	LOS ANGELES	CA	Pre-7/23/09
121	5368	2610 NORTH WILMINGTON AVENUE	COMPTON	LOS ANGELES	CA	Pre-7/23/09
122	2850	741 WEST COMPTON BLVD	COMPTON	LOS ANGELES	CA	Pre-7/23/09
123	5370	1445 CITRUS AVENUE NORTH	COVINA	LOS ANGELES	CA	Pre-7/23/09
124	5477	21356 EAST ARROW HIGHWAY	COVINA	LOS ANGELES	CA	Pre-7/23/09
125	5371	7210 ATLANTIC AVENUE	CUDAHY	LOS ANGELES	CA	Pre-7/23/09
126	5373	303 DIAMOND BAR BLVD	DIAMOND BAR	LOS ANGELES	CA	Pre-7/23/09
127	5374	13028 PARAMOUNT BLVD	DOWNEY	LOS ANGELES	CA	Pre-7/23/09
128	3346	9920 PARAMOUNT BLVD	DOWNEY	LOS ANGELES	CA	Pre-7/23/09
129	2814	1346 EAST HUNTINGTON	DUARTE	LOS ANGELES	CA	Pre-7/23/09
130	5377	1131 ATLANTIC AVENUE	E LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09

Exhibit A-- California AutoZone Facilities

	Store	Address	City	County	State	Date Opened
131	2863	11104 RAMONA BLVD	EL MONTE	LOS ANGELES	CA	Pre-7/23/09
132	5224	1116 REDONDO BEACH	GARDENA	LOS ANGELES	CA	Pre-7/23/09
133	6249	1361 WEST 190TH STREET	GARDENA	LOS ANGELES	CA	4/17/2015
134	4175	14742 CRENSHAW BLV	GARDENA	LOS ANGELES	CA	8/23/2016
135	5381	800 SOUTH GLENDALE AVENUE	GLENDALE	LOS ANGELES	CA	Pre-7/23/09
136	3674	220 W ROUTE 66	GLENDORA	LOS ANGELES	CA	8/4/2017
137	5384	16922 DEVONSHIRE	GRANADA HILLS	LOS ANGELES	CA	Pre-7/23/09
138	5945	21418 NORWALK BLVD	HAWAIIAN GARDENS	LOS ANGELES	CA	Pre-7/23/09
139	5388	11804 HAWTHORNE BLVD	HAWTHORNE	LOS ANGELES	CA	Pre-7/23/09
140	5387	13765 HAWTHORNE BLVD	HAWTHORNE	LOS ANGELES	CA	Pre-7/23/09
141	4157	5516 NORTH FIGUEROA STREET	HIGHLAND PARK	LOS ANGELES	CA	4/27/2013
142	4075	2901 EAST FLORENCE AVENUE	HUNTINGTON PARK	LOS ANGELES	CA	4/16/2011
143	5396	10110 SOUTH HAWTHORNE BLVD	INGLEWOOD	LOS ANGELES	CA	Pre-7/23/09
144	4172	2600 WEST MANCHESTER BLVD	INGLEWOOD	LOS ANGELES	CA	11/22/2014
145	5438	2876 WEST IMPERIAL HIGHWAY	INGLEWOOD	LOS ANGELES	CA	Pre-7/23/09
146	5395	433 NORTH LA BREA AVENUE	INGLEWOOD	LOS ANGELES	CA	Pre-7/23/09
147	5499	12320 LA MIRADA BLVD	LA MIRADA	LOS ANGELES	CA	Pre-7/23/09
148	5228	1411 NORTH HACIENDA BLVD	LA PUENTE	LOS ANGELES	CA	Pre-7/23/09
149	5398	1410 FOOTHILL BLVD	LA VERNE	LOS ANGELES	CA	Pre-7/23/09
150	5399	11930 FOOTHILL BLVD	LAKE VIEW TERRACE	LOS ANGELES	CA	Pre-7/23/09
151	5400	4945 WOODRUFF AVENUE	LAKEWOOD	LOS ANGELES	CA	Pre-7/23/09
152	4150	1240 WEST AVENUE K	LANCASTER	LOS ANGELES	CA	8/23/2012
153	5403	4065 WEST AVENUE L	LANCASTER	LOS ANGELES	CA	Pre-7/23/09
154	5402	44259 CHALLENGR WAY	LANCASTER	LOS ANGELES	CA	Pre-7/23/09
155	5404	865 WEST AVENUE I	LANCASTER	LOS ANGELES	CA	Pre-7/23/09
156	2859	1973 LOMITA BLVD	LOMITA	LOS ANGELES	CA	Pre-7/23/09
157	5408	1900 NORTH LAKEWOOD BLVD	LONG BEACH	LOS ANGELES	CA	Pre-7/23/09
158	5405	240 WEST ANAHEIM STREET	LONG BEACH	LOS ANGELES	CA	Pre-7/23/09
159	5406	2401 LONG BEACH BLVD	LONG BEACH	LOS ANGELES	CA	Pre-7/23/09
160	5409	2594 SANTA FE AVENUE	LONG BEACH	LOS ANGELES	CA	Pre-7/23/09
161	3359	2923 EAST ANAHEIM STREET	LONG BEACH	LOS ANGELES	CA	Pre-7/23/09
162	6394	3605 SOUTH STREET	LONG BEACH	LOS ANGELES	CA	6/13/2017
163	5455	5800 ATLANTIC BLVD	LONG BEACH	LOS ANGELES	CA	Pre-7/23/09
164	3372	6500 EAST SPRING STREET	LONG BEACH	LOS ANGELES	CA	Pre-7/23/09
165	3313	11282 LOS ALAMITOS BLVD	LOS ALAMITOS	LOS ANGELES	CA	Pre-7/23/09
166	5417	1000 EAST WASHINGTON BLVD	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
167	5431	10013-1 CENTRAL AVENUE	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
168	6234	1200 EAST IMPERIAL	LOS ANGELES	LOS ANGELES	CA	8/18/2017
169	5442	1250 SOUTH VERMONT #1	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
170	4092	1262 FIRESTONE BLVD	LOS ANGELES	LOS ANGELES	CA	8/29/2013
171	5502	12726 SOUTH SAN PEDRO	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
172	5372	12778 WASHINGTON BLVD	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
173	5434	1306-13 HIGHLAND AVENUE	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
174	5439	1325 WEST WASHINGTON	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
175	5221	1401 WEST FLORENCE AVENUE	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
176	5425	1457 EAST FLORENCE AVENUE	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
177	5413	1515 NORTH ALVARADO BLVD	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
178	5220	162 SOUTH VERMONT AVENUE	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
179	5419	1905 SOUTH WESTERN AVENUE	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
180	5222	200 WEST MANCHESTER	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
181	5414	2001 EAST CESAR CHAVEZ	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
182	3671	2800 E OLYMPIC BVD	LOS ANGELES	LOS ANGELES	CA	7/28/2016
183	5430	2907 SOUTH VERMONT AVENUE	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
184	5427	3011 NORTH BROADWAY	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
185	5424	3071 NORTH SAN FERNANDO ROAD	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
186	5361	3801 WHITTIER BLVD	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
187	5444	4003 WESTERN AVENUE SOUTH	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
188	5443	4301 CESAR CHAVEZ	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
189	5216	4349 SOUTH CENTRAL AVENUE	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
190	5423	4355 SOUTH MAIN STREET	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
191	5415	4851 WEST PICO BLVD	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
192	5376	4891 EAGLE ROCK BLVD	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
193	5920	4900 HUNTINGTON DRIVE	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
194	5420	5057 WEST ADAMS BLVD	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
195	5390	5110 WEST SUNSET BLVD	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09

Exhibit A-- California AutoZone Facilities

	Store	Address	City	County	State	Date Opened
196	5432	5852 SANTA MONICA	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
197	3717	5858 SOUTH CENTRAL AVENUE	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
198	3614	5870 CRENSHAW BLVD	LOS ANGELES	LOS ANGELES	CA	3/3/2018
199	5433	6141 WEST PICO BLVD	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
200	5389	6326 NORTH FIGUEROA STREET	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
201	5437	648 WEST CENTURY BLVD	LOS ANGELES	LOS ANGELES	CA	Pre-7/23/09
202	5447	10721 ATLANTIC AVENUE	LYNWOOD	LOS ANGELES	CA	Pre-7/23/09
203	5446	10917 LONG BEACH BLVD	LYNWOOD	LOS ANGELES	CA	Pre-7/23/09
204	4147	11833 ATLANTIC AVENUE	LYNWOOD	LOS ANGELES	CA	8/29/2013
205	5448	3250 TWEEDY BLVD	LYNWOOD	LOS ANGELES	CA	Pre-7/23/09
206	2893	3751 SLAUSON AVENUE	MAYWOOD	LOS ANGELES	CA	Pre-7/23/09
207	4141	10359 SEPULVEDA BLVD	MISSION HILLS	LOS ANGELES	CA	6/15/2013
208	5450	2301 WEST WHITTER BLVD	MONTEBELLO	LOS ANGELES	CA	Pre-7/23/09
209	5483	16102 NORDHOFF STREET	N HILLS	LOS ANGELES	CA	Pre-7/23/09
210	5445	12755 SHERMAN WAY	N HOLLYWOOD	LOS ANGELES	CA	Pre-7/23/09
211	5391	5160 VINELAND AVENUE	N HOLLYWOOD	LOS ANGELES	CA	Pre-7/23/09
212	4018	6030 LANKERSHIM	N HOLLYWOOD	LOS ANGELES	CA	12/19/2009
213	5454	7601 LAUREL CANYON	N HOLLYWOOD	LOS ANGELES	CA	Pre-7/23/09
214	5472	8655 RESEDA BLVD	NORTHRIDGE	LOS ANGELES	CA	Pre-7/23/09
215	6395	12124 S STUDEBAKER	NORWALK	LOS ANGELES	CA	6/20/2017
216	5456	13927 PIONEER BLVD	NORWALK	LOS ANGELES	CA	Pre-7/23/09
217	5459	10817 SUTTER AVENUE	PACOIMA	LOS ANGELES	CA	Pre-7/23/09
218	4030	13200 WEST OSBORNE STREET	PACOIMA	LOS ANGELES	CA	7/13/2010
219	5460	1138 EAST PALMDALE BLVD	PALMDALE	LOS ANGELES	CA	Pre-7/23/09
220	5461	3081 EAST PALMDALE BLVD	PALMDALE	LOS ANGELES	CA	Pre-7/23/09
221	2839	37251 47TH STREET EAST	PALMDALE	LOS ANGELES	CA	Pre-7/23/09
222	4097	5022 WEST AVENUE N	PALMDALE	LOS ANGELES	CA	1/6/2012
223	3715	16249 PARAMOUNT BLVD	PARAMOUNT	LOS ANGELES	CA	1/16/2016
224	5465	550 NORTH LAKE AVENUE	PASADENA	LOS ANGELES	CA	Pre-7/23/09
225	3713	9234 SLAUSON AVENUE	PICO RIVERA	LOS ANGELES	CA	Pre-7/23/09
226	5219	9350 WHITTIER BLVD	PICO RIVERA	LOS ANGELES	CA	Pre-7/23/09
227	2846	1886 SOUTH GAREY AVENUE	POMONA	LOS ANGELES	CA	Pre-7/23/09
228	2883	2555 NORTH TOWNE AVENUE	POMONA	LOS ANGELES	CA	Pre-7/23/09
229	5469	501 EAST HOLT AVENUE	POMONA	LOS ANGELES	CA	Pre-7/23/09
230	5473	18824 SHERMAN WAY	RESEDA	LOS ANGELES	CA	Pre-7/23/09
231	5476	8350 GARVEY AVENUE	ROSEMEAD	LOS ANGELES	CA	Pre-7/23/09
232	5475	9712 EAST VALLEY BLVD	ROSEMEAD	LOS ANGELES	CA	Pre-7/23/09
233	5486	1957 DURFEE ROAD	S EL MONTE	LOS ANGELES	CA	Pre-7/23/09
234	6055	702 W ARROW HWY	SAN DIMAS	LOS ANGELES	CA	1/5/2019
235	5681	55 MACLAY AVENUE NORTH	SAN FERNANDO	LOS ANGELES	CA	Pre-7/23/09
236	5480	535 SOUTH PACIFIC AVENUE SOUTH	SAN PEDRO	LOS ANGELES	CA	Pre-7/23/09
237	2861	19327 SOLEDAD CANYON ROAD	SANTA CLARITA	LOS ANGELES	CA	Pre-7/23/09
238	4070	23046 SOLEDAD ROAD	SANTA CLARITA	LOS ANGELES	CA	4/4/2012
239	4135	24820 ORCHARD VILLAGE ROAD	SANTA CLARITA	LOS ANGELES	CA	5/5/2012
240	4173	11560 TELEGRAPH RD	SANTA FE SPRINGS	LOS ANGELES	CA	2/13/2014
241	5498	8344 SEPULVEDA BLVD	SEPULVEDA	LOS ANGELES	CA	Pre-7/23/09
242	5485	5150 VAN NUYS BLVD	SHERMAN OAKS	LOS ANGELES	CA	Pre-7/23/09
243	5488	4060 FIRESTONE BLVD	SOUTH GATE	LOS ANGELES	CA	Pre-7/23/09
244	5487	8215 LONG BEACH BLVD	SOUTH GATE	LOS ANGELES	CA	Pre-7/23/09
245	5489	8003 VINELAND AVENUE	SUN VALLEY	LOS ANGELES	CA	Pre-7/23/09
246	5491	13480 WEST HUBBARD STREET	SYLMAR	LOS ANGELES	CA	Pre-7/23/09
247	5463	6300 ROSEMEAD BLVD	TEMPLE CITY	LOS ANGELES	CA	Pre-7/23/09
248	5493	1433 WEST CARSON STREET	TORRANCE	LOS ANGELES	CA	Pre-7/23/09
249	5944	17490 HAWTHORNE BLVD	TORRANCE	LOS ANGELES	CA	Pre-7/23/09
250	5494	7448 FOOTHILL BLVD	TUJUNGA	LOS ANGELES	CA	Pre-7/23/09
251	5495	14058 VICTORY BLVD	VAN NUYS	LOS ANGELES	CA	Pre-7/23/09
252	5496	16500 SHERMAN WAY	VAN NUYS	LOS ANGELES	CA	Pre-7/23/09
253	4006	1035 EAST AMAR ROAD	WEST COVINA	LOS ANGELES	CA	Pre-7/23/09
254	5369	730 NORTH AZUSA AVENUE	WEST COVINA	LOS ANGELES	CA	Pre-7/23/09
255	5482	11855 WHITTIER BLVD	WHITTIER	LOS ANGELES	CA	Pre-7/23/09
256	5887	13541 FLORENCE	WHITTIER	LOS ANGELES	CA	Pre-7/23/09
257	6721	14153 WHITTIER BLV	WHITTIER	LOS ANGELES	CA	8/22/2018
258	5503	404W PACIFIC COAST	WILMINGTON	LOS ANGELES	CA	Pre-7/23/09
259	3709	1633 WEST ROBERTSON BLVD	CHOWCHILLA	MADERA	CA	10/10/2009
260	3759	1520 COUNTRY CLUB DRIVE	MADERA	MADERA	CA	Pre-7/23/09

Exhibit A-- California AutoZone Facilities

	Store	Address	City	County	State	Date Opened
261	2874	211 NORTH GATEWAY DRIVE	MADERA	MADERA	CA	Pre-7/23/09
262	3698	40059 HWY 41	OAKHURST	MADERA	CA	8/7/2018
263	3355	975 NORTH STATE STREET	UKIAH	MENDOCINO	CA	Pre-7/23/09
264	5506	470 BELLEVUE ROAD	ATWATER	MERCED	CA	Pre-7/23/09
265	6254	1249 ELGIN AVENUE	DOS PALOS	MERCED	CA	6/3/2015
266	6219	456 WINTON PARKWAY	LIVINGSTON	MERCED	CA	1/17/2015
267	5507	665 PACHECO BLVD	LOS BANOS	MERCED	CA	Pre-7/23/09
268	5508	1635 R STREET	MERCED	MERCED	CA	Pre-7/23/09
269	4188	3095 G STREET	MERCED	MERCED	CA	11/21/2014
270	5509	851-R 5TH STREET	GONZALES	MONTEREY	CA	Pre-7/23/09
271	3691	722 WALNUT AVE	GREENFIELD	MONTEREY	CA	11/16/2016
272	5510	510-A CANAL STREET	KING CITY	MONTEREY	CA	Pre-7/23/09
273	6218	262 RESERVATION ROAD	MARINA	MONTEREY	CA	8/22/2013
274	5512	1011 EAST ALISAL STREET	SALINAS	MONTEREY	CA	Pre-7/23/09
275	5514	1488 NORTH MAIN STREET	SALINAS	MONTEREY	CA	Pre-7/23/09
276	3744	1541 NORTH SANBORN ROAD	SALINAS	MONTEREY	CA	Pre-7/23/09
277	5513	17643 VIERRA CANYON ROAD	SALINAS	MONTEREY	CA	Pre-7/23/09
278	6281	531 S MAIN ST	SALINAS	MONTEREY	CA	5/5/2017
279	2852	1433 FREMONT BLVD	SEASIDE	MONTEREY	CA	Pre-7/23/09
280	6290	2092 HECTOR DEL RO	SOLEDAD	MONTEREY	CA	7/2/2016
281	4028	7021 MAIN STREET	AMERICAN CANYON	NAPA	CA	11/8/2010
282	5515	698 LINCOLN AVENUE	NAPA	NAPA	CA	Pre-7/23/09
283	5516	412 BRUNSWICK ROAD	GRASS VALLEY	NEVADA	CA	Pre-7/23/09
284	3308	10842 KATELLA AVENUE	ANAHEIM	ORANGE	CA	Pre-7/23/09
285	5226	2145 WEST LINCOLN AVENUE	ANAHEIM	ORANGE	CA	Pre-7/23/09
286	3317	423 NORTH ANAHEIM BLVD	ANAHEIM	ORANGE	CA	Pre-7/23/09
287	5519	105 WEST LAMBERT ROAD	BREA	ORANGE	CA	Pre-7/23/09
288	4087	3105 HARBOR BLVD	COSTA MESA	ORANGE	CA	8/25/2012
289	5520	744 WEST 19TH STREET	COSTA MESA	ORANGE	CA	Pre-7/23/09
290	5521	5471 LINCOLN AVENUE	CYPRESS	ORANGE	CA	Pre-7/23/09
291	5905	34061 DOHENY PARK	DANA POINT	ORANGE	CA	8/25/2017
292	4037	18533 BROOKHURST STREET	FOUNTAIN VALLEY	ORANGE	CA	7/10/2010
293	5523	102 NORTH EUCLID STREET	FULLERTON	ORANGE	CA	Pre-7/23/09
294	2898	146 NORTH RAYMOND AVENUE	FULLERTON	ORANGE	CA	Pre-7/23/09
295	5522	1801 WEST ORANGETHORPE AVENUE	FULLERTON	ORANGE	CA	Pre-7/23/09
296	4044	3260 EAST YORBA LINDA BLVD	FULLERTON	ORANGE	CA	8/13/2010
297	2872	12056 BROOKHURST STREET	GARDEN GROVE	ORANGE	CA	Pre-7/23/09
298	5526	12951 NELSON STREET	GARDEN GROVE	ORANGE	CA	Pre-7/23/09
299	5527	13190 HARBOR BLVD	GARDEN GROVE	ORANGE	CA	Pre-7/23/09
300	5528	6800 WARNER AVENUE	HUNTINGTON BEACH	ORANGE	CA	Pre-7/23/09
301	5532	1200 WEST IMPERIAL AVENUE	LA HABRA	ORANGE	CA	Pre-7/23/09
302	6202	1781 W WHITTIER B	LA HABRA	ORANGE	CA	4/27/2018
303	2888	24361 MUIRLAND BLVD	LAKE FOREST	ORANGE	CA	Pre-7/23/09
304	5533	22942 LOS ALISOS BLVD	MISSION VIEJO	ORANGE	CA	Pre-7/23/09
305	5942	1330 NORTH GLASSELL STREET #A	ORANGE	ORANGE	CA	Pre-7/23/09
306	5536	4437 EAST CHAPMAN AVENUE	ORANGE	ORANGE	CA	Pre-7/23/09
307	4154	655 NORTH TUSTIN STREET	ORANGE	ORANGE	CA	7/26/2013
308	3301	717 NORTH EL CAMINO REAL	SAN CLEMENTE	ORANGE	CA	Pre-7/23/09
309	5538	1101 SOUTH BRISTOL STREET	SANTA ANA	ORANGE	CA	Pre-7/23/09
310	5537	1201 SOUTH STANDARD AVENUE	SANTA ANA	ORANGE	CA	Pre-7/23/09
311	4089	1735 NORTH GRAND AVENUE	SANTA ANA	ORANGE	CA	8/20/2014
312	3320	2007 SOUTH MAIN STREET	SANTA ANA	ORANGE	CA	Pre-7/23/09
313	4129	2413 WEST 17TH STREET	SANTA ANA	ORANGE	CA	8/23/2012
314	3370	2603 SOUTH BRISTOL STREET	SANTA ANA	ORANGE	CA	Pre-7/23/09
315	5232	430 WEST 17TH STREET	SANTA ANA	ORANGE	CA	Pre-7/23/09
316	5540	810 SOUTH HARBOR BLVD	SANTA ANA	ORANGE	CA	Pre-7/23/09
317	4072	11792 BEACH BLVD	STANTON	ORANGE	CA	12/29/2011
318	5001	13721 NEWPORT AVE	TUSTIN	ORANGE	CA	3/9/2018
319	5541	14460 NEWPORT AVENUE	TUSTIN	ORANGE	CA	Pre-7/23/09
320	5543	6611 WESTMINSTER AVENUE	WESTMINSTER	ORANGE	CA	Pre-7/23/09
321	5544	8481 WESTMINSTER BLVD	WESTMINSTER	ORANGE	CA	Pre-7/23/09
322	5545	18528 YORBA LINDA BLVD	YORBA LINDA	ORANGE	CA	Pre-7/23/09
323	3874	2580 BELL ROAD	AUBURN	PLACER	CA	8/24/2018
324	4043	130 GATEWAY DRIVE	LINCOLN	PLACER	CA	8/26/2010
325	5546	6651 STANFORD RANCH ROAD	ROCKLIN	PLACER	CA	Pre-7/23/09

Exhibit A-- California AutoZone Facilities

	Store	Address	City	County	State	Date Opened
326	4145	361 ROSEVILLE SQUARE	ROSEVILLE	PLACER	CA	5/3/2013
327	3716	5170 FOOTHILLS BLVD	ROSEVILLE	PLACER	CA	Pre-7/23/09
328	2816	3453A WEST RAMSEY STREET	BANNING	RIVERSIDE	CA	Pre-7/23/09
329	2882	1151 EAST 6TH STREET	BEAUMONT	RIVERSIDE	CA	Pre-7/23/09
330	5549	812 EAST HOBSON WAY	BLYTHE	RIVERSIDE	CA	Pre-7/23/09
331	5550	32375 DATE PALM DRIVE	CATHEDRAL CITY	RIVERSIDE	CA	Pre-7/23/09
332	5552	50-700 HARRISON STREET	COACHELLA	RIVERSIDE	CA	Pre-7/23/09
333	5554	1014 WEST 6TH STREET	CORONA	RIVERSIDE	CA	Pre-7/23/09
334	4038	1280 EAST ONTARIO AVENUE	CORONA	RIVERSIDE	CA	5/30/2010
335	4146	14228 SCHLEISMAN ROAD	CORONA	RIVERSIDE	CA	3/28/2014
336	4017	501 NORTH MCKINLE STREET	CORONA	RIVERSIDE	CA	8/5/2009
337	2877	12660 PALM DRIVE	DESERT HOT SPRINGS	RIVERSIDE	CA	Pre-7/23/09
338	2820	1550 WEST FLORIDA AVENUE	HEMET	RIVERSIDE	CA	Pre-7/23/09
339	5556	3100 EAST FLORIDA AVENUE	HEMET	RIVERSIDE	CA	Pre-7/23/09
340	3363	41850 JACKSON STREET	INDIO	RIVERSIDE	CA	5/4/2012
341	5557	82220 HIGHWAY 111	INDIO	RIVERSIDE	CA	Pre-7/23/09
342	5560	78792 HIGHWAY 111	LA QUINTA	RIVERSIDE	CA	Pre-7/23/09
343	5558	30870 RIVERSIDE DRIVE	LAKE ELSINORE	RIVERSIDE	CA	Pre-7/23/09
344	5559	32231 MISSION TRAIL	LAKE ELSINORE	RIVERSIDE	CA	Pre-7/23/09
345	4153	26100 NEWPORT ROAD	MENIFEE	RIVERSIDE	CA	3/7/2014
346	5561	30121 ANTELOPE ROAD	MENIFEE	RIVERSIDE	CA	Pre-7/23/09
347	5562	11020 LIMONITE AVENUE	MIRA LOMA	RIVERSIDE	CA	Pre-7/23/09
348	5564	12601 PERRIS BLVD	MORENO VALLEY	RIVERSIDE	CA	Pre-7/23/09
349	3714	16210 PERRIS BLVD	MORENO VALLEY	RIVERSIDE	CA	Pre-7/23/09
350	5565	23510 SUNNYMEAD BLVD	MORENO VALLEY	RIVERSIDE	CA	Pre-7/23/09
351	5563	24570 ALESSANDRO BLVD	MORENO VALLEY	RIVERSIDE	CA	Pre-7/23/09
352	6206	27660 EUCALYPTUS AVENUE	MORENO VALLEY	RIVERSIDE	CA	6/17/2014
353	5566	40950 CALIF OAKS ROAD	MURRIETA	RIVERSIDE	CA	Pre-7/23/09
354	3340	1404 HAMNER AVENUE	NORCO	RIVERSIDE	CA	Pre-7/23/09
355	6227	34860 MONTEREY AVENUE	PALM DESERT	RIVERSIDE	CA	7/31/2014
356	5567	73605 HIGHWAY 111	PALM DESERT	RIVERSIDE	CA	Pre-7/23/09
357	5568	1717 EAST VISTA CHINO	PALM SPRINGS	RIVERSIDE	CA	Pre-7/23/09
358	5571	1675 NORTH PERRIS BLVD	PERRIS	RIVERSIDE	CA	Pre-7/23/09
359	6163	3150 CASE RD BLD A	PERRIS	RIVERSIDE	CA	1/4/2019
360	5570	401 EAST 4TH STREET	PERRIS	RIVERSIDE	CA	Pre-7/23/09
361	5575	10249 ARLINGTON AVENUE	RIVERSIDE	RIVERSIDE	CA	Pre-7/23/09
362	5547	1947 UNIVERSITY AVENUE	RIVERSIDE	RIVERSIDE	CA	Pre-7/23/09
363	5574	19486 VAN BUREN BLVD	RIVERSIDE	RIVERSIDE	CA	Pre-7/23/09
364	5578	3400 LA SIERRA AVENUE #E	RIVERSIDE	RIVERSIDE	CA	Pre-7/23/09
365	5573	4195 VAN BUREN BLVD	RIVERSIDE	RIVERSIDE	CA	Pre-7/23/09
366	6284	4980 LA SIERRA AV	RIVERSIDE	RIVERSIDE	CA	4/29/2016
367	5576	6047-A MAGNOLIA AVENUE	RIVERSIDE	RIVERSIDE	CA	Pre-7/23/09
368	3322	7315 INDIANA AVENUE	RIVERSIDE	RIVERSIDE	CA	Pre-7/23/09
369	5580	3782 RIVERVIEW DRIVE	RUBIDOUX	RIVERSIDE	CA	Pre-7/23/09
370	5581	1540 SOUTH SAN JACINTO	SAN JACINTO	RIVERSIDE	CA	Pre-7/23/09
371	5582	31837 TEMECULA PARKWAY	TEMECULA	RIVERSIDE	CA	Pre-7/23/09
372	5936	40345 WINCHESTER ROAD	TEMECULA	RIVERSIDE	CA	Pre-7/23/09
373	4024	4408 ELVERTA ROAD	ANTELOPE	SACRAMENTO	CA	2/12/2010
374	4045	6525 FAIR OAKS BLVD	CARMICHAEL	SACRAMENTO	CA	8/7/2012
375	5585	6920 SUNRISE BLVD	CITRUS HEIGHTS	SACRAMENTO	CA	Pre-7/23/09
376	5587	8129 AUBURN BLVD	CITRUS HEIGHTS	SACRAMENTO	CA	Pre-7/23/09
377	6289	10047 BRUCEVILLE R	ELK GROVE	SACRAMENTO	CA	5/20/2018
378	4159	5011 LAGUNA BLVD	ELK GROVE	SACRAMENTO	CA	8/23/2013
379	2842	9240 ELK GROVE FLORIN ROAD	ELK GROVE	SACRAMENTO	CA	Pre-7/23/09
380	5916	429 BLUE RAVINE ROAD	FOLSOM	SACRAMENTO	CA	Pre-7/23/09
381	5588	1018 C STREET	GALT	SACRAMENTO	CA	Pre-7/23/09
382	5590	3675 ELKHORN BLVD	N HIGHLANDS	SACRAMENTO	CA	Pre-7/23/09
383	3675	8895 GREENBACK LN	ORANGEVALE	SACRAMENTO	CA	7/6/2016
384	6258	10121 FOLSOM BLVD	RANCHO CORDOVA	SACRAMENTO	CA	2/13/2015
385	3336	10791 FOLSOM BLVD	RANCHO CORDOVA	SACRAMENTO	CA	Pre-7/23/09
386	5595	3609 BRADSHAW RD	RANCHO CORDOVA	SACRAMENTO	CA	Pre-7/23/09
387	5593	1900 BROADWAY	SACRAMENTO	SACRAMENTO	CA	Pre-7/23/09
388	5602	2223 FULTON AVENUE	SACRAMENTO	SACRAMENTO	CA	Pre-7/23/09
389	5599	2720 FLORIN ROAD	SACRAMENTO	SACRAMENTO	CA	Pre-7/23/09
390	4007	3000 NORTHGATE BLVD	SACRAMENTO	SACRAMENTO	CA	Pre-7/23/09

Exhibit A-- California AutoZone Facilities

	Store	Address	City	County	State	Date Opened
391	5594	3121 MARYSVILLE BLVD	SACRAMENTO	SACRAMENTO	CA	Pre-7/23/09
392	5596	3333 FRUITRIDGE ROAD	SACRAMENTO	SACRAMENTO	CA	Pre-7/23/09
393	5603	3455 WATT AVENUE	SACRAMENTO	SACRAMENTO	CA	Pre-7/23/09
394	5601	5305 FRUITRIDGE ROAD	SACRAMENTO	SACRAMENTO	CA	Pre-7/23/09
395	5597	5501 FOLSOM BLVD	SACRAMENTO	SACRAMENTO	CA	Pre-7/23/09
396	2895	5820 AUBURN BLVD	SACRAMENTO	SACRAMENTO	CA	Pre-7/23/09
397	5598	6100 MACK ROAD #500A	SACRAMENTO	SACRAMENTO	CA	Pre-7/23/09
398	2867	8135 FLORIN ROAD	SACRAMENTO	SACRAMENTO	CA	Pre-7/23/09
399	4020	8312 ELK GROVE FLORIN ROAD	SACRAMENTO	SACRAMENTO	CA	8/24/2011
400	4488	779 E MONTE VISTA	VACAVILLE	SALANO	CA	7/1/2017
401	5604	271 MCCRAY STREET	HOLLISTER	SAN BENITO	CA	Pre-7/23/09
402	3699	1008 E BROADWAY	NEEDLES	SAN BERNADINO	CA	8/25/2017
403	2844	20158 OUTER HWY 18	APPLE VALLEY	SAN BERNARDINO	CA	Pre-7/23/09
404	5605	20878 BEAR VALLEY	APPLE VALLEY	SAN BERNARDINO	CA	Pre-7/23/09
405	5606	1050 EAST MAIN STREET	BARSTOW	SAN BERNARDINO	CA	Pre-7/23/09
406	5608	1035 SOUTH BLOOMINGTON	BLOOMINGTON	SAN BERNARDINO	CA	Pre-7/23/09
407	4022	12160 CENTRAL AVENUE	CHINO	SAN BERNARDINO	CA	12/19/2009
408	5609	5780 RIVERSIDE DRIVE	CHINO	SAN BERNARDINO	CA	Pre-7/23/09
409	5611	4080 CHINO HILLS PARKWAY	CHINO HILLS	SAN BERNARDINO	CA	Pre-7/23/09
410	3327	11617 CHERRY AVENUE	FONTANA	SAN BERNARDINO	CA	Pre-7/23/09
411	2891	14343 BASELINE AVENUE	FONTANA	SAN BERNARDINO	CA	Pre-7/23/09
412	4032	16075 SIERRA LAKES PARKWAY	FONTANA	SAN BERNARDINO	CA	2/11/2012
413	4008	17012 SLOVER AVENUE	FONTANA	SAN BERNARDINO	CA	Pre-7/23/09
414	2835	17140 FOOTHILL BLVD	FONTANA	SAN BERNARDINO	CA	Pre-7/23/09
415	5613	9535 SIERRA AVENUE	FONTANA	SAN BERNARDINO	CA	Pre-7/23/09
416	5614	22203 BARTON ROAD	GRAND TERRACE	SAN BERNARDINO	CA	Pre-7/23/09
417	4077	14466 MAIN STREET - BLDG A	HESPERIA	SAN BERNARDINO	CA	3/23/2012
418	2836	15273 BEAR VALLEY ROAD	HESPERIA	SAN BERNARDINO	CA	Pre-7/23/09
419	5615	17115 MAIN STREET	HESPERIA	SAN BERNARDINO	CA	Pre-7/23/09
420	2851	27292 BASELINE AVENUE	HIGHLAND	SAN BERNARDINO	CA	Pre-7/23/09
421	5616	5183 HOLT AVENUE	MONTCLAIR	SAN BERNARDINO	CA	Pre-7/23/09
422	4002	8780 CENTRAL AVENUE	MONTCLAIR	SAN BERNARDINO	CA	Pre-7/23/09
423	3328	1060 NORTH MOUNTAIN AVENUE	ONTARIO	SAN BERNARDINO	CA	Pre-7/23/09
424	DC 10	1800 SOUTH WINEVILLE AVENUE	ONTARIO	SAN BERNARDINO	CA	Pre-7/23/09
425	5617	1860 SOUTH EUCLID AVENUE	ONTARIO	SAN BERNARDINO	CA	Pre-7/23/09
426	5619	1881 EAST 4TH STREET	ONTARIO	SAN BERNARDINO	CA	Pre-7/23/09
427	3350	3030 SOUTH ARCHIBALD	ONTARIO	SAN BERNARDINO	CA	Pre-7/23/09
428	5618	570 EAST HOLT BLVD	ONTARIO	SAN BERNARDINO	CA	Pre-7/23/09
429	5621	4071 PHELAN ROAD	PHELAN	SAN BERNARDINO	CA	Pre-7/23/09
430	5623	11898 FOOTHILL BVD	RANCHO CUCAMONGA	SAN BERNARDINO	CA	Pre-7/23/09
431	5622	9457 FOOTHILL BLVD	RANCHO CUCAMONGA	SAN BERNARDINO	CA	Pre-7/23/09
432	6274	1785 EAST LUGONIA AVENUE #106	REDLANDS	SAN BERNARDINO	CA	8/28/2014
433	4049	2052 WEST REDLANDS BLVD	REDLANDS	SAN BERNARDINO	CA	11/11/2010
434	2822	745 EAST CITRUS AVENUE	REDLANDS	SAN BERNARDINO	CA	Pre-7/23/09
435	5060	2016 N RIVERSIDE	RIALTO	SAN BERNARDINO	CA	1/6/2018
436	5627	241 WEST BASE LINE ROAD	RIALTO	SAN BERNARDINO	CA	Pre-7/23/09
437	5626	702 EAST FOOTHILL BLVD	RIALTO	SAN BERNARDINO	CA	Pre-7/23/09
438	5642	1050 KENDALL AVENUE	SAN BERNARDINO	SAN BERNARDINO	CA	Pre-7/23/09
439	2830	1280 W BASELINE STREET	SAN BERNARDINO	SAN BERNARDINO	CA	Pre-7/23/09
440	2823	233 EAST 40TH STREET	SAN BERNARDINO	SAN BERNARDINO	CA	Pre-7/23/09
441	4003	566 INLAND CENTER DRIVE	SAN BERNARDINO	SAN BERNARDINO	CA	Pre-7/23/09
442	2831	660 EAST BASE LINE STREET	SAN BERNARDINO	SAN BERNARDINO	CA	Pre-7/23/09
443	2875	789 SOUTH MT. VERNON AVENUE	SAN BERNARDINO	SAN BERNARDINO	CA	Pre-7/23/09
444	5632	798 HIGHLAND AVENUE	SAN BERNARDINO	SAN BERNARDINO	CA	Pre-7/23/09
445	5634	6401 ADOBE ROAD	TWENTYNINE PALMS	SAN BERNARDINO	CA	Pre-7/23/09
446	5635	234 EAST FOOTHILL BLVD	UPLAND	SAN BERNARDINO	CA	Pre-7/23/09
447	3780	14289 US HIGHWAY 395	VICTORVILLE	SAN BERNARDINO	CA	5/9/2014
448	5636	14403 7TH STREET	VICTORVILLE	SAN BERNARDINO	CA	Pre-7/23/09
449	2838	14675 PALMDALE ROAD	VICTORVILLE	SAN BERNARDINO	CA	Pre-7/23/09
450	2812	34635 YUCAIPA BLVD	YUCAIPA	SAN BERNARDINO	CA	Pre-7/23/09
451	2811	56505 29 PALMS HIGHWAY	YUCCA VALLEY	SAN BERNARDINO	CA	Pre-7/23/09
452	2810	1315 3RD AVENUE	CHULA VISTA	SAN DIEGO	CA	Pre-7/23/09
453	2817	225 BROADWAY	CHULA VISTA	SAN DIEGO	CA	Pre-7/23/09
454	5643	685 BROADWAY	CHULA VISTA	SAN DIEGO	CA	Pre-7/23/09
455	5644	885 EAST H STREET	CHULA VISTA	SAN DIEGO	CA	Pre-7/23/09

Exhibit A-- California AutoZone Facilities

	Store	Address	City	County	State	Date Opened
456	3365	1080 E MAIN STREET	EL CAJON	SAN DIEGO	CA	Pre-7/23/09
457	5646	1795 EAST MAIN STREET	EL CAJON	SAN DIEGO	CA	Pre-7/23/09
458	6288	966 BALLANTYNE ST	EL CAJON	SAN DIEGO	CA	1/20/2018
459	5657	120 LEUCADIA BLVD	ENCINITAS	SAN DIEGO	CA	Pre-7/23/09
460	5650	1495 EAST VALLEY PARKWAY	ESCONDIDO	SAN DIEGO	CA	Pre-7/23/09
461	5651	440 WEST FELICITA AVENUE #1	ESCONDIDO	SAN DIEGO	CA	Pre-7/23/09
462	5649	642 NORTH ESCONDIDO BLVD	ESCONDIDO	SAN DIEGO	CA	Pre-7/23/09
463	5652	1081 SOUTH MISSION ROAD	FALLBROOK	SAN DIEGO	CA	Pre-7/23/09
464	2809	7791 EL CAJON BLVD	LA MESA	SAN DIEGO	CA	Pre-7/23/09
465	3341	12421 WOODSIDE AVENUE	LAKESIDE	SAN DIEGO	CA	Pre-7/23/09
466	5656	7281 BROADWAY	LEMON GROVE	SAN DIEGO	CA	Pre-7/23/09
467	5658	2140 HIGHLAND AVENUE	NATIONAL CITY	SAN DIEGO	CA	Pre-7/23/09
468	5659	2500 EAST PLAZA BLVD	NATIONAL CITY	SAN DIEGO	CA	Pre-7/23/09
469	5661	1040 MISSION AVENUE	OCEANSIDE	SAN DIEGO	CA	Pre-7/23/09
470	6166	2253 EL CAMINO #2	OCEANSIDE	SAN DIEGO	CA	3/16/2018
471	4041	3513 CANNON ROAD	OCEANSIDE	SAN DIEGO	CA	8/27/2010
472	5660	3975 MISSION AVENUE	OCEANSIDE	SAN DIEGO	CA	Pre-7/23/09
473	4139	4231 OCEANSIDE BLVD	OCEANSIDE	SAN DIEGO	CA	8/24/2012
474	5664	13397 POWAY ROAD	POWAY	SAN DIEGO	CA	Pre-7/23/09
475	2845	370 PALA STREET	RAMONA	SAN DIEGO	CA	Pre-7/23/09
476	4138	10645 TIERRANSANTA BLVD	SAN DIEGO	SAN DIEGO	CA	6/28/2012
477	5231	1304 SOUTH 43RD STREET	SAN DIEGO	SAN DIEGO	CA	Pre-7/23/09
478	2808	1344 PALM AVENUE	SAN DIEGO	SAN DIEGO	CA	Pre-7/23/09
479	5665	1950 CABLE STREET	SAN DIEGO	SAN DIEGO	CA	Pre-7/23/09
480	5672	2211 IMPERIAL AVENUE	SAN DIEGO	SAN DIEGO	CA	Pre-7/23/09
481	5662	2445 OTAY CENTER DRIVE #101	SAN DIEGO	SAN DIEGO	CA	Pre-7/23/09
482	5674	2865 NATIONAL AVENUE	SAN DIEGO	SAN DIEGO	CA	Pre-7/23/09
483	5886	3321 PALM AVENUE	SAN DIEGO	SAN DIEGO	CA	Pre-7/23/09
484	6120	3717 ROSECRANS ST	SAN DIEGO	SAN DIEGO	CA	2/21/2019
485	5673	3842 UNIVERSITY AVENUE	SAN DIEGO	SAN DIEGO	CA	Pre-7/23/09
486	5668	4005 30TH STREET	SAN DIEGO	SAN DIEGO	CA	Pre-7/23/09
487	5669	5006 EL CAJON BLVD	SAN DIEGO	SAN DIEGO	CA	Pre-7/23/09
488	5671	5090 FEDERAL BLVD	SAN DIEGO	SAN DIEGO	CA	Pre-7/23/09
489	4027	5921 UNIVERSITY AVENUE	SAN DIEGO	SAN DIEGO	CA	1/30/2012
490	5667	6085 BALBOA AVENUE	SAN DIEGO	SAN DIEGO	CA	Pre-7/23/09
491	4040	6424 MISSION GORGE ROAD	SAN DIEGO	SAN DIEGO	CA	10/20/2012
492	4080	6905 PARADISE VALLEY ROAD	SAN DIEGO	SAN DIEGO	CA	7/13/2011
493	3351	9152 MIRA MESA BLVD	SAN DIEGO	SAN DIEGO	CA	Pre-7/23/09
494	5723	195 RANCHO SANTA FE ROAD	SAN MARCOS	SAN DIEGO	CA	Pre-7/23/09
495	5676	636 SAN YSIDRO BLVD	SAN YSIDRO	SAN DIEGO	CA	Pre-7/23/09
496	3347	285 TOWN CENTER PARKWAY	SANTEE	SAN DIEGO	CA	Pre-7/23/09
497	5678	699 SWEETWATER ROAD	SPRING VALLEY	SAN DIEGO	CA	Pre-7/23/09
498	4155	9710 CAMPO ROAD	SPRING VALLEY	SAN DIEGO	CA	2/9/2013
499	2819	1410 NORTH SANTA FE AVENUE	VISTA	SAN DIEGO	CA	Pre-7/23/09
500	5679	573 WEST VISTA WAY	VISTA	SAN DIEGO	CA	Pre-7/23/09
501	4078	950 SOUTH SANTA FE AVENUE	VISTA	SAN DIEGO	CA	2/15/2014
502	4084	1575 SOUTH VAN NESS AVENUE	SAN FRANCISCO	SAN FRANCISCO	CA	4/7/2012
503	5682	1300 WEST KETTLEMAN	LODI	SAN JOAQUIN	CA	Pre-7/23/09
504	3335	147 SOUTH MAIN STREET	MANTECA	SAN JOAQUIN	CA	Pre-7/23/09
505	2858	1100 NORTH WILSON WAY	STOCKTON	SAN JOAQUIN	CA	Pre-7/23/09
506	5684	1339 SUTTER SREET	STOCKTON	SAN JOAQUIN	CA	Pre-7/23/09
507	5686	1448 NORTH EL DORADO	STOCKTON	SAN JOAQUIN	CA	Pre-7/23/09
508	3326	2309 WEST HAMMER LANE	STOCKTON	SAN JOAQUIN	CA	Pre-7/23/09
509	3779	3512 MANTHEY ROAD	STOCKTON	SAN JOAQUIN	CA	1/29/2012
510	4036	3828 EAST MAIN STREET	STOCKTON	SAN JOAQUIN	CA	7/16/2011
511	5685	8228 WEST LANE	STOCKTON	SAN JOAQUIN	CA	Pre-7/23/09
512	6217	941 WEST MARCH LANE	STOCKTON	SAN JOAQUIN	CA	5/10/2014
513	3315	1122 WEST 11TH STREET	TRACY	SAN JOAQUIN	CA	Pre-7/23/09
514	4079	8195 EL CAMINO REAL	ATASCADERO	SAN LUIS OBISPO	CA	4/25/2011
515	4021	1401 GRAND AVENUE	GROVER BEACH	SAN LUIS OBISPO	CA	6/22/2010
516	2805	450 QUINTANA ROAD	MORRO BAY	SAN LUIS OBISPO	CA	Pre-7/23/09
517	4025	2123 SPRING STREET	PASO ROBLES	SAN LUIS OBISPO	CA	5/9/2014
518	3358	239 HIGUERA STREET	SAN LUIS OBISPO	SAN LUIS OBISPO	CA	Pre-7/23/09
519	4073	6212 MISSION STREET	DALY CITY	SAN MATEO	CA	5/7/2011
520	3302	2160 UNIVERSITY AVENUE	EAST PALO ALTO	SAN MATEO	CA	Pre-7/23/09

Exhibit A-- California AutoZone Facilities

	Store	Address	City	County	State	Date Opened
521	3307	320 EL CAMINO REAL	MILLBRAE	SAN MATEO	CA	Pre-7/23/09
522	4026	901 EL CAMINO REAL	REDWOOD CITY	SAN MATEO	CA	6/1/2010
523	2854	3880 SOUTH EL CAMINO REAL	SAN MATEO	SAN MATEO	CA	Pre-7/23/09
524	4486	5799 HOLLISTER AVE	GOLETA	SANTA BARBARA	CA	8/11/2017
525	5687	538 NORTH H STREET	LOMPOC	SANTA BARBARA	CA	Pre-7/23/09
526	5688	305 NORTH MILPAS STREET	SANTA BARBARA	SANTA BARBARA	CA	Pre-7/23/09
527	5689	1793 NORTH BROADWAY	SANTA MARIA	SANTA BARBARA	CA	Pre-7/23/09
528	3353	2020 SOUTH BROADWAY	SANTA MARIA	SANTA BARBARA	CA	Pre-7/23/09
529	4796	4869 S BRADLEY 101	SANTA MARIA	SANTA BARBARA	CA	3/9/2019
530	2885	94 NORTH SAN TOMAS AQUINO ROAD	CAMPBELL	SANTA CLARA	CA	Pre-7/23/09
531	5690	6900 CHESTNUT STREET	GILROY	SANTA CLARA	CA	Pre-7/23/09
532	4048	16025 MONTEREY ROAD	MORGAN HILL	SANTA CLARA	CA	8/19/2011
533	3354	1204 NORTH CAPITOL AVENUE	SAN JOSE	SANTA CLARA	CA	Pre-7/23/09
534	6243	1717 WEST SAN CARLOS	SAN JOSE	SANTA CLARA	CA	10/17/2014
535	4169	1812 HILLSDALE AVE	SAN JOSE	SANTA CLARA	CA	1/5/2018
536	4012	189 CURTNER AVENUE - SUITE 90	SAN JOSE	SANTA CLARA	CA	8/16/2009
537	4046	2277 ALUM ROCK AVENUE	SAN JOSE	SANTA CLARA	CA	1/3/2012
538	5924	2690 STORY ROAD	SAN JOSE	SANTA CLARA	CA	Pre-7/23/09
539	3369	4580 ALMADEN EXPRESSWAY	SAN JOSE	SANTA CLARA	CA	Pre-7/23/09
540	3367	5272 MONTEREY HWY	SAN JOSE	SANTA CLARA	CA	Pre-7/23/09
541	6299	5566 COTTLE ROAD	SAN JOSE	SANTA CLARA	CA	12/17/2017
542	4096	769 NORTH 13TH STREET	SAN JOSE	SANTA CLARA	CA	1/3/2014
543	3337	2355 EL CAMINO REAL	SANTA CLARA	SANTA CLARA	CA	Pre-7/23/09
544	4031	1114 WATER STREET	SANTA CRUZ	SANTA CRUZ	CA	8/26/2011
545	3324	1502 FREEDOM BLVD	WATSONVILLE	SANTA CRUZ	CA	Pre-7/23/09
546	6260	33 WEST LAKE AVENUE	WATSONVILLE	SANTA CRUZ	CA	8/21/2015
547	3339	2601 CHURN CREEK ROAD	REDDING	SHASTA	CA	Pre-7/23/09
548	3330	323 LAKE BLVD	REDDING	SHASTA	CA	Pre-7/23/09
549	3325	3251 SOUTH MARKET STREET	REDDING	SHASTA	CA	Pre-7/23/09
550	6277	1809 FORT JONES ROAD	YREKA	SISKIYOU	CA	9/19/2015
551	3668	1650 N FIRST ST	DIXON	SOLANO	CA	10/23/2016
552	3303	1706 NORTH TEXAS STREET	FAIRFIELD	SOLANO	CA	Pre-7/23/09
553	5693	288 SUNSET AVENUE	SUISUN CITY	SOLANO	CA	Pre-7/23/09
554	5694	2480 NUT TREE ROAD	VACAVILLE	SOLANO	CA	Pre-7/23/09
555	4011	3020 SOUTH SONOMA	VALLEJO	SOLANO	CA	11/10/2012
556	5696	730 ADMIRAL CALLAGHAN LANE	VALLEJO	SOLANO	CA	Pre-7/23/09
557	4013	101 EAST WASHINGTON STREET	PETALUMA	SONOMA	CA	5/8/2010
558	4014	6595 COMMERCE DRIVE	ROHNERT PARK	SONOMA	CA	8/15/2009
559	3352	1820 GUERNEVILLE ROAD	SANTA ROSA	SONOMA	CA	Pre-7/23/09
560	3333	1991 SEBASTOPOL ROAD	SANTA ROSA	SONOMA	CA	Pre-7/23/09
561	4082	2510 SANTA ROSA AVENUE	SANTA ROSA	SONOMA	CA	12/21/2013
562	3719	1765 MITCHELL ROAD	CERES	STANISLAUS	CA	Pre-7/23/09
563	6164	2600 CROWS LAND #A	CERES	STANISLAUS	CA	2/13/2017
564	5699	1032 OAKDALE ROAD #B	MODESTO	STANISLAUS	CA	Pre-7/23/09
565	5225	1500 EAST HATCH ROAD	MODESTO	STANISLAUS	CA	Pre-7/23/09
566	2868	1901 PRESCOTT ROAD	MODESTO	STANISLAUS	CA	Pre-7/23/09
567	4005	3401 YOSEMITE BLVD	MODESTO	STANISLAUS	CA	Pre-7/23/09
568	4033	3601 PELANDALE AVENUE - SUITE F	MODESTO	STANISLAUS	CA	4/27/2010
569	5698	401 PARADISE ROAD	MODESTO	STANISLAUS	CA	Pre-7/23/09
570	4074	1641 NORTH STREET	NEWMAN	STANISLAUS	CA	7/5/2012
571	5700	1474 EAST F STREET	OAKDALE	STANISLAUS	CA	Pre-7/23/09
572	3323	400 SOUTH 2ND STREET	PATTERSON	STANISLAUS	CA	Pre-7/23/09
573	4019	2225 PATTERSON ROAD	RIVERBANK	STANISLAUS	CA	4/10/2010
574	5701	1272 GEER ROAD	TURLOCK	STANISLAUS	CA	Pre-7/23/09
575	3683	11950 YOSEMITE BLV	WATERFORD	STANISLAUS	CA	8/22/2016
576	2826	1211 STABLER LANE	YUBA CITY	SUTTER	CA	Pre-7/23/09
577	4095	2123 SOLANO STREET	CORNING	TEHAMA	CA	8/11/2012
578	4148	555 SOUTH MAIN STREET	RED BLUFF	TEHAMA	CA	11/8/2013
579	2833	1741 EAST EL MONTE WAY	DINUBA	TULARE	CA	Pre-7/23/09
580	4083	550 SIERRA AVENUE	EARLIMART	TULARE	CA	12/10/2013
581	5706	1123 VISALIA ROAD WEST	EXETER	TULARE	CA	Pre-7/23/09
582	3711	1555 NORTH FARMERSVILLE ROAD	FARMERSVILLE	TULARE	CA	Pre-7/23/09
583	3329	230 NORTH HIGHWAY 65	LINDSAY	TULARE	CA	Pre-7/23/09
584	6222	41339 ROAD 128	OROSI	TULARE	CA	2/18/2015
585	2840	1132 WEST OLIVE	PORTERVILLE	TULARE	CA	Pre-7/23/09

Exhibit A-- California AutoZone Facilities

	Store	Address	City	County	State	Date Opened
586	5708	1245 WEST HENDERSON	PORTERVILLE	TULARE	CA	Pre-7/23/09
587	4160	303 EAST OLIVE AVENUE #A	PORTERVILLE	TULARE	CA	6/14/2013
588	2834	1150 EAST TULARE AVENUE	TULARE	TULARE	CA	Pre-7/23/09
589	3360	1221 SOUTH MOONEY BLVD	VISALIA	TULARE	CA	Pre-7/23/09
590	5710	428 WEST HOUSTON AVENUE	VISALIA	TULARE	CA	Pre-7/23/09
591	5711	1091 SANGUINETTI ROAD	SONORA	TUOLUMNE	CA	Pre-7/23/09
592	6211	2291-B PICKWICK DRIVE	CAMARILLO	VENTURA	CA	7/27/2015
593	5712	658 VENTURA ROAD	FILLMORE	VENTURA	CA	Pre-7/23/09
594	5713	455 LOS ANGELES AVENUE	MOORPARK	VENTURA	CA	Pre-7/23/09
595	6391	2051 NORTH OXNARD BLVD	OXNARD	VENTURA	CA	10/9/2015
596	5714	2411 SAVIERS ROAD	OXNARD	VENTURA	CA	Pre-7/23/09
597	5715	600 NORTH VENTURA ROAD	OXNARD	VENTURA	CA	Pre-7/23/09
598	5716	159 EAST HARVARD	SANTA PAULA	VENTURA	CA	Pre-7/23/09
599	5718	2288 TAPO STREET	SIMI VALLEY	VENTURA	CA	Pre-7/23/09
600	5717	2375 SYCAMORE DRIVE	SIMI VALLEY	VENTURA	CA	Pre-7/23/09
601	2240	501 E LOS ANGELES	SIMI VALLEY	VENTURA	CA	1/29/2018
602	4167	1774 EAST THOUSAND OAKS BLVD	THOUSAND OAKS	VENTURA	CA	3/10/2014
603	5719	2610 EAST MAIN STREET	VENTURA	VENTURA	CA	Pre-7/23/09
604	2832	9459 TELEPHONE ROAD	VENTURA	VENTURA	CA	Pre-7/23/09
605	5720	1400 WEST CAPITOL AVENUE	WEST SACRAMENTO	YOLO	CA	Pre-7/23/09
606	5721	90 WEST MAIN STREET	WOODLAND	YOLO	CA	Pre-7/23/09
607	5722	420 9TH STREET	MARYSVILLE	YUBA	CA	Pre-7/23/09