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Superior Court of California,
County of Alameda

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9 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF ALAMEDA**

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12 CENTER FOR ENVIRONMENTAL
13 HEALTH,

14 Plaintiff,

15 v.

16 AERODYNAMIC AVIATION, *et al.*,

17 Defendants.
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Case No. RG-11-600721

Hon. Somnath Raj Chatterjee

**DECLARATION OF STEVE ANDERSON
IN SUPPORT OF DEFENDANTS'
OPPOSITION TO MOTION TO
ENFORCE AND MODIFY CONSENT
JUDGMENT**

Date: February 4, 2025

Time: 1:30 p.m.

Reservation Number: 690015831804

Complaint Filed: October 20, 2011
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DECLARATION OF STEVE ANDERSON

I, Steve Anderson, declare:

1. I am the President at Aviat Aircraft (“Aviat”). I submit this declaration in support of Settling Defendant’s Opposition to Plaintiff Center for Environmental Health’s (“CEH”) Motion to Enforce and Modify Consent Judgment in the above-captioned matter. I have personal knowledge of the matters set forth herein. If called and sworn as a witness, I could and would testify competently thereto.

2. Aviat fully supports the development of unleaded aviation gasoline (“avgas”) by all fuel companies in their pursuit to bring alternative high-octane fuels to the General Aviation market. Aviat fully supports ongoing partnership efforts between aviation original equipment manufacturers (OEMs), the petroleum industry, and the U.S. Federal Aviation Administration (FAA) through the EAGLE initiative (Eliminate Aviation Gasoline Lead Emissions), and the Piston Engine Aviation Fuels Initiative (PAFI) program, which have worked and are continuing to work to bring a viable unleaded avgas to General Aviation in a safe manner—if practicable—by 2031.

3. However, Aviat Aircraft does not currently approve the use of any unleaded aviation gasoline (“avgas”) variants in our Husky, Pitts, or Eagle brand aircraft—including the General Aviation Modifications, Inc. (GAMI)’s “G100UL” unleaded fuel.

4. Aviat Aircraft has not reviewed any technical data provided by any unleaded avgas manufacturer, including G100UL. GAMI has not provided Aviat with any technical data to review, nor provided any means by which Aviat can conduct any laboratory or on-aircraft testing to ensure it does not present any material incompatibility or engine performance issues with our aircraft. Aviat understands that GAMI has not developed or released an ASTM standard for the G100UL fuel and declined to participate in the PAFI process; the company instead pursued direct FAA approval through a Supplemental Type Certificate (STC). Because GAMI submitted the data supporting its STC application directly—and only to—the FAA, no other stakeholders (i.e., Aviat, other aircraft and/or engine OEMs, etc.) had any involvement in the testing or certification of the fuel. Because the FAA does not publicly share any proprietary technical data with other

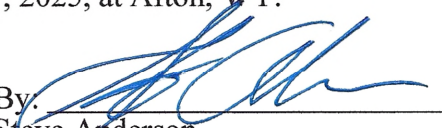
1 stakeholders, there is no means by which Aviat or any other OEM can obtain the technical
2 information from, and used by, the FAA in its evaluation of the G100UL fuel.

3 5. As a result, Aviat has not been able to evaluate the G100UL fuel's chemical
4 properties, how it interacts with any airframe surface and/or structures, aircraft fuel tanks
5 (materials, sealants, bladders, gaskets, etc.), the fuel quantity gauging components, fuel lines,
6 other fuel system components (pumps, valves, sensors, etc.), etc.

7 6. Furthermore, Aviat uses Lycoming piston engines in its aircraft. Lycoming has
8 stated that G100UL is a non-approved fuel and any use would result in the engine no longer
9 conforming to its original type design. According to Federal Aviation Administration regulations,
10 if an aircraft no longer conforms to its type design, it is considered to not be in an airworthy
11 condition and therefore cannot fly. Because the GAMI G100UL fuel is a non-approved fuel per
12 Lycoming, engines that use it will not be covered by the Lycoming engine warranty.

13 7. Therefore, G100UL is not authorized for use in any Aviat Aircraft and/or engines.
14 Any such use shall be considered non-conformance with the aircraft's type design.

15 I declare under penalty of perjury of the laws of the state of California that the foregoing is true
16 and correct. Executed this 8th day of January, 2025, at Afton, WY.

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18 By:  (Pres)
19 Steve Anderson
20 Aviat Aircraft
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