

1 HOGAN LOVELLS US LLP  
2 Trenton H. Norris (CA Bar No. 164781)  
3 David M. Barnes (CA Bar No. 318547)  
4 Four Embarcadero Center, 35th Floor  
5 San Francisco, CA 94111-4024  
6 Telephone: 415.374.2300  
7 Facsimile: 415.374.2499  
8 trent.norris@hoganlovells.com  
9 david.barnes@hoganlovells.com

10 Attorneys for Settling Defendants

**ELECTRONICALLY FILED**

Superior Court of California,  
County of Alameda  
**02/18/2025 at 06:33:15 PM**  
By: Milagros Cortez,  
Deputy Clerk

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

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF ALAMEDA**

CENTER FOR ENVIRONMENTAL  
HEALTH,

Plaintiff,

v.

AERODYNAMIC AVIATION, *et al.*,

Defendants.

Case No. RG-11-600721

Hon. Somnath Raj Chatterjee

**SUPPLEMENTAL DECLARATION OF  
PATRICK WADDICK IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO  
MOTION TO ENFORCE AND MODIFY  
CONSENT JUDGMENT**

Date: February 25, 2025

Time: 2:30 p.m.

Reservation Number: 690015831804

Complaint Filed: October 20, 2011

1 **SUPPLEMENTAL DECLARATION OF PATRICK WADDICK**

2 I, Patrick Waddick, declare:

3 1. I am President, Innovation & Operations, for Cirrus Design Corp. ("Cirrus"). I  
4 submit this declaration to supplement the January 30, 2025, declaration I submitted in support of  
5 Defendants' opposition to Plaintiff Center for Environmental Health's ("CEH") Motion to Enforce  
6 and Modify Consent Judgment in the above-captioned matter. I have personal knowledge of the  
7 matters set forth herein. If called and sworn as a witness, I could and would testify competently  
8 thereto.

9 2. For reference on January 27, 2025, Cirrus dispatched technical representatives,  
10 Nicole Linder (Director, Engineering, Mechanical Systems & Propulsion) and Josh Hoskins  
11 (Manager, Field Services) to Reid-Hillview Municipal Airport of Santa Clara County, CA to  
12 investigate a report from Cirrus customer, Kristen McIntyre, who owns and operates aircraft  
13 SR22T-0027, registration number N155KM ("N155KM").

14 3. On February 7, 2025, Matthew Steere (Manager – Field Sustaining Engineering,  
15 Cirrus Aircraft) provided Mr. Hoskins with a memorandum that contained the repair  
16 recommendations, by Cirrus engineering, to return N155KM to service following its exposure to  
17 the General Aviation Modifications, Inc., G100UL unleaded aviation gasoline ("avgas"). Of note,  
18 *number 13* requires the "[r]efuel the aircraft with [100 Low Lead avgas]." The memorandum is  
19 attached hereto as **Exhibit A**, which I can affirm is a true and correct copy.

20 I declare under penalty of perjury under the laws of the State of California that the  
21 foregoing is true and correct. Executed this 18th day of February, at Duluth, MN.

22  
23 By: Patrick Waddick  
Patrick Waddick  
24 Cirrus Design Corp.

# **EXHIBIT A**

2025.02.07

Josh Hoskins  
Manager – Field Service  
Cirrus Aircraft

Dear Mr. Hoskins,

Cirrus Aircraft Field Sustaining Engineering recommends the following actions be taken before returning SR22T-0027 (N155KM) to service following exposure to G100UL:

1. Fully de-fuel the aircraft.
2. Disconnect and cap the fuel lines inboard of the strainers (17332-001).
3. Thoroughly flush the fuel bays with water.
  - a. Completely fill the fuel bays with tap water. The water must not be treated or purified. Do not use detergents/cleaners  
\*\*Note: Toluene will react with minerals in the water resulting in the water turning yellow.\*\*
  - b. Allow water to dwell in fuel bays for 10 minutes.
  - c. Drain water from fuel bays.
  - d. Repeat steps 3.a through 3.c until the water being drained is clear (free of toluene).
4. Remove all fuel bay access covers per AMM 57-30 and allow wing bays to fully air-dry.
5. Inspect all sealant in fuel bays for loss of adhesion. Remove and replace any suspect sealant per AMM 28-10.
6. As required, replace any access panel nutplates per AMM/IPC 57-30. Overseal all replaced nutplates per AMM 28-10.
7. As required, replace and install access panels per AMM/IPC 57-30.
8. Clean or replace gascolator screen per AMM/IPC 28-20.
9. Replace gascolator o-ring per AMM/IPC 28-20.
10. Uncap and reconnect fuel lines.
11. Perform fuel tank pressure test per AMM 28-10.
12. Restore bodywork and paint per AMM 51-20.
  - a. Report any/all laminate damage to Cirrus Aircraft Field Service and Field Sustaining engineering.
13. Refuel the aircraft with 100LL.

Sincerely,



Matthew Steere  
Manager – Field Sustaining Engineering  
Cirrus Aircraft