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16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **IN AND FOR THE COUNTY OF SAN JOAQUIN**

18 **SENTHIL VELU**, an individual,

19 Plaintiff,

20 v.

21 **MEDLINE INDUSTRIES, INC.**, a
22 Corporation; **PROLOGIS, INC.**, a
23 Corporation; and **DOES 1-50**, inclusive,

24 Defendants.

CASE NO.

**COMPLAINT FOR DAMAGES BASED
UPON:**

- 25 (1) **NEGLIGENCE**
- 26 (2) **PUBLIC AND PRIVATE
NUISANCE**
- 27 (3) **TRESPASS**

28 **JURY TRIAL DEMANDED**

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1 Plaintiff brings this action against Medline Industries, Inc., a Corporation, Prologis, Inc., a
2 Corporation with its headquarters and principal place of business in San Francisco, California,
3 and Does 1–50. Plaintiff’s allegations are based upon personal knowledge as to Plaintiff’s own
4 experiences and on information and belief as to all other matters based on an investigation by
5 counsel, such that each allegation has evidentiary support or is likely to have evidentiary support
6 upon further investigation and discovery.

7 **I. INTRODUCTION**

8 1. Plaintiff alleges herein that he was exposed to elevated levels of toxic chemicals in
9 his home and community for an extended period of time, causing him harm, as a direct and legal
10 result of Defendants’ conduct as follows: (i) Defendant Medline Industries, Inc. (“Medline”),
11 dangerously stockpiled, and/or permitted the stockpiling of millions of pounds of highly
12 flammable and toxic materials in a warehouse located at 5701 Promontory Parkway in Tracy,
13 California (the “Warehouse”). The warehouse was filled with several hundred autonomous robots
14 powered by lithium ion battery packs, resulting in a massive fire and firefighting effort in and
15 around the Warehouse starting on June 11, 2026. Defendant Medline acting together with
16 Defendant Prologis, Inc. (“Prologis”), dangerously allowed and/or failed to prevent the failure of
16 the Warehouse’s fire-suppression system during this event. Defendants’ collective wrongful
18 conduct created a dangerous environment fostering the release of toxic and dangerous chemicals
19 into the atmosphere starting June 11, 2026, and continuing for several days after as the ruins of
20 the warehouse continued to smolder. Each Defendant’s wrongful conduct was a significant
21 contributing factor to the release of toxic and dangerous chemicals into the atmosphere.

22 2. The fire resulted in the release of smoke containing respiratory irritants, toxic
23 gases, carcinogens and at least one neurotoxin which could and did impact people living in the
24 communities nearby, including Plaintiff.

25 3. Plaintiff brings this action to recover damages associated with his exposure to
26 noxious chemicals from the fire, for property damage caused by fire debris and ash, and for such
27 further relief as provided by law.

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1 **II. JURISDICTION AND VENUE**

2 4. This Court has subject matter jurisdiction over all claims in this action because this
3 Court is a court of general jurisdiction and the amount in controversy exceeds the jurisdictional
4 minimum of this Court.

5 5. This Court has personal jurisdiction over all parties to this action because all
6 parties are either domiciled in or have sufficient minimum contacts with the State of California
7 which arise out of or related to the claims alleged herein such that the exercise of jurisdiction
8 comports with the traditional notions of fair play and substantial justice.

9 6. Venue is proper in the County of San Joaquin pursuant to California Code of Civil
10 Procedure § 395 because all of the events, acts, omissions, and/or transactions complained of
11 herein occurred in/or originated from San Joaquin County, State of California.

12 **III. PARTIES**

13 **A. Plaintiff**

14 7. Senthil Velu (“Senthil”) is, and at all times relevant was, a natural person and
15 resident of the County of San Joaquin, California.

16 **B. Defendants**

16 8. Medline Industries, Inc. (“Medline”) is a Delaware Corporation with its principal
18 place of business in Northfield, Illinois. Medline, Inc. is a large, publicly traded company that
19 provides medical surgical products and medical supply chain solutions. The company is the
20 largest manufacturer and distributor of medical-surgical products in the United States, serving
21 hospitals, extended care facilities, surgery centers, physician offices, and home care providers.
22 Medline employs more than 35,000 people globally and operates over 50 distribution centers
23 across North America.¹ On information and belief, Medline leases, manages, and/or exercises
24 control over the Warehouse and its operations.

25 9. Prologis, Inc. (“Prologis”) is a Maryland Corporation with its principal place of
26 business in San Francisco, California. Prologis is a real estate investment trust (REIT) that
27 operates as a fully integrated real estate company that owns, invests in, and leases logistics
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¹ <https://lodi411.com/lodi-eye/medline-tracy-warehouse-fire-in-depth-report>, accessed June 25 2026

1 facilities. On information and belief, Prologis owns, manages, and/or exercises control over the
2 Warehouse and its operations.

3 **C. Unnamed and Doe Defendants**

4 10. The true names and capacities, whether individual, corporate, associate or
5 otherwise of Defendant Does 1 through 50, inclusive, are unknown to Plaintiff at this time.
6 Therefore, Plaintiff sues said Doe Defendants by such fictitious names pursuant to C.C.P. § 474.
7 Plaintiff further alleges that each of said fictitious Defendants is in some manner responsible for
8 the acts and occurrences hereinafter set forth. Plaintiff will amend this complaint to show their
9 true names and capacities when the same are ascertained, as well as the manner in which each
10 Doe Defendant is responsible for the harm Plaintiff suffered.

11 **D. Agency, Concert of Action, and Conspiracy**

12 11. At all times herein mentioned, Defendants Medline, Prologis, and/or Does 1-50,
13 (collectively “Defendants”), and each of them, were the agents, servants, employees, partners,
14 aiders and abettors, co-conspirators, and/or joint venturers of each of the other Defendants named
15 herein and were at all times operating and acting within the purpose and scope of said agency,
16 service, employment, partnership, enterprise, conspiracy, and/or joint venture, and each
16 Defendant has ratified and approved the acts of each of the remaining Defendants. Each of the
18 Defendants aided and abetted, encouraged, and rendered substantial assistance to the other
19 Defendants in breaching their obligations to Plaintiff, as alleged herein. In taking action to aid and
20 abet and substantially assist the commission of these wrongful acts and other wrongdoings
21 complained of, as alleged herein, each of the Defendants acted with conscious awareness of their
22 primary wrongdoing and realized and appreciated that their conduct would substantially assist the
23 accomplishment of the wrongful conduct, wrongful goals, and wrongdoing.

24 **IV. FACTUAL ALLEGATIONS**

25 12. This case arises from the fire that started at Defendants’ 1-million-square foot
26 warehouse located at 5701 Promontory Parkway in Tracy, California (the “Warehouse”), on June
27 11, 2026, due to Defendants’ collective wrongful conduct as hereafter alleged.

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1 13. Medline manufactures, stores and distributes critical medical and surgical supplies
2 for hospitals, nursing homes and clinics at the Warehouse, including chemicals and hazardous
3 materials. Upon information and belief, Medline leases the Warehouse from Prologis, which
4 originally designed and/or built the facility and surrounding master-planned business park and
5 infrastructure, including private utility lines, water supplies and/or infrastructure for the fire
6 suppression systems at the Warehouse

7 14. On or about 1:00 PM on June 11, 2026, the Warehouse caught fire and was quickly
8 engulfed in flames. Upon information and belief, respiratory irritants, toxic gases, carcinogens,
9 and at least one neurotoxin were present in the smoke.²

10 15. Firefighters responding to the scene discovered that the fire sprinkler system inside
11 the Warehouse and the private hydrants outside the Warehouse did not work. In fact, the private
12 fire pump that was supposed to be sending water to the hydrants and the sprinkler system
13 indicated that zero water was flowing.³ There was no indication the sprinklers had activated and
14 no water was flowing. Firefighters were forced to connect to the municipal water system outside
15 the property and lay hose lines as long as 1,600 feet to battle the flames.⁴

16 16. In spite of the strenuous efforts of the fire crews, the warehouse was fully engulfed
16 within 30 to 40 minutes, forcing crews into a defensive firefighting strategy. Crews were using
18 4,000 gallons of water a minute; in the first 10 hours they used a million gallons of water.⁵
19 Although fire crews were able to achieve main containment after 24 hours, deep-seated hotspots
20 and smoldering debris buried under the collapsed building required a massive, multi-day effort to
21 fully put out. The fire was not fully extinguished until Wednesday, June 17, 2026

22 17. The firefighting effort was an extensive multi-agency disaster, requiring over 200
23 firefighters and numerous support personnel from Tracy Fire (IC), Stockton Fire, Mountain
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26 ² <https://www.kcra.com/article/tracy-medical-warehouse-fire-toxic-smoke-air-quality-map/71570682>, accessed June
27 24, 2026

³ <https://www.kcra.com/article/sprinkler-system-tracy-warehouse-fire/71575628>, accessed June 24, 2026

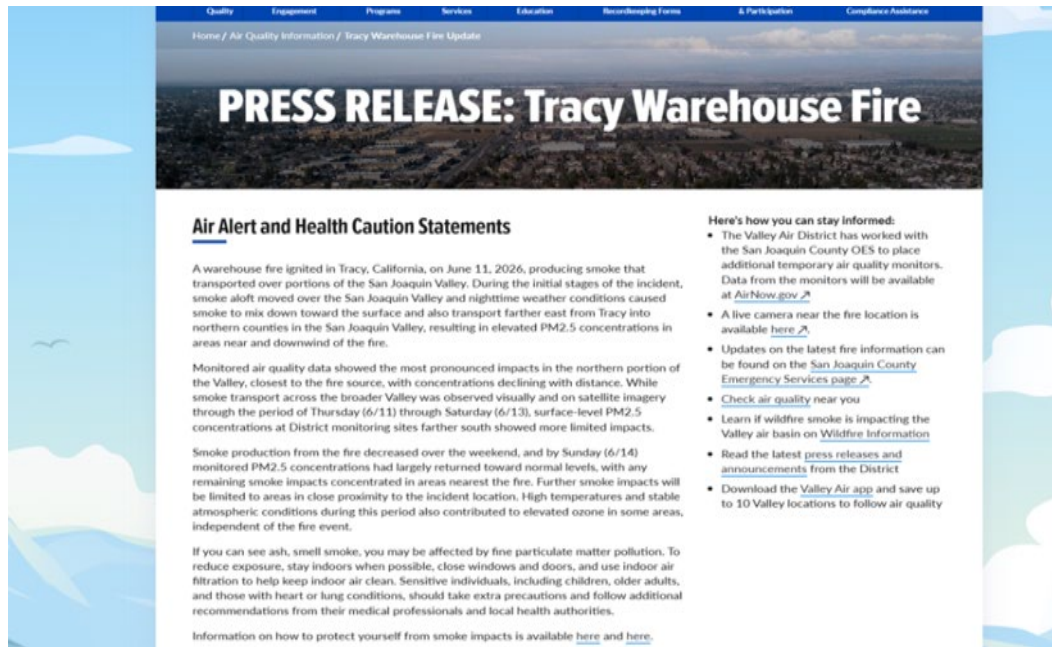
⁴ <https://www.nbcbayarea.com/news/local/sprinkler-system-failed-to-activate-during-tracy-warehouse-fire-officials-say/4098372/> accessed June 25, 2026

⁵ <https://www.ktvu.com/news/tracy-fire-destroys-medline-medical-supply-warehouse> accessed June 25, 2026

1 House, Lathrop-Manteca, Manteca, Alameda County, Cal Fire, California Highway Patrol, and
2 the Bureau of Alcohol Tobacco and Firearms at its peak.⁶

3 18. Fire officials stated unequivocally that had the sprinkler systems been activated,
4 the fire would not have spread as quickly as it did.⁷ The sprinkler system had been inspected and
5 passed inspection in January 2026: it was tested and signed off by both an alarm and a sprinkler
6 company.⁸

7 19. Throughout the afternoon and evening of the June 11th, and continuing for days
8 afterwards, the San Joaquin Valley Air Pollution Control District and San Joaquin County Office
9 of Emergency Services issued public health advisories urging residents to stay indoors, close
10 windows, and bring pets inside.



21 20. The fire scattered toxic debris into neighborhoods around Tracy. Residents were
22 advised to avoid direct contact with this debris. The deputy chief of the Tracy Fire Department
23 recommended residents wear medical gloves, an N-95 mask, and long sleeves and long pants
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27 ⁶ <https://lodi411.com/lodi-eye/medline-tracy-warehouse-fire-in-depth-report> , accessed June 25, 2026

28 ⁷ <https://www.abc10.com/article/news/local/sprinkler-system-tracy-warehouse-fire/103-08a0587d-ec79-4a50-bc21-32da124f33f5> , accessed June 25, 2026

⁸ <https://www.nbcbayarea.com/news/local/sprinkler-system-failed-to-activate-during-tracy-warehouse-fire-officials-say/4098372/> , accessed June 25, 2026

1 when cleaning up the debris. Residents were further advised to double bag the debris before it
2 could be placed with regular household garbage.⁹

3 21. Plaintiff's home on Avalon Street in Tracy is approximately 3.4 miles from the
4 Warehouse as the crow flies. Smoke and ash from the fire reached the neighborhood relatively
5 quickly once the fire began. He was able to see the plume of smoke from the fire from his back
6 yard.

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⁹ <https://www.kcra.com/article/tracy-air-quality-debris-concerns-fire-medline-warehouse/71596161> accessed June 24, 2026

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22. On the day of the fire, there was a layer of ash on his patio furniture and also on his car. In order to remove the ash, he was forced to pressure wash his backyard. There were piles of debris in Plaintiff's yard, as well as soot and light ash.

1 23. Thereafter and over the following days, Plaintiff felt sick, suffering from a
2 persistent cough, vomiting, difficulty breathing, throat irritation, significant nasal congestion and
3 many other symptoms due to exposure to the smoke. He sought medical treatment as a result.

4 24. In the days that followed, Plaintiff continued to experience these distressing
5 symptoms. He continued to keep his windows closed and minimized his time outside, heeding the
6 warnings from local authorities but with scant information regarding the nature of the
7 contamination to which they were being exposed.

8 25. Throughout this time, local authorities continued to advise residents, including
9 Plaintiff, to avoid contact with the ash and debris from the fire. Plaintiff attempted to do this, but
10 it was pervasive throughout the home. Scattered debris had fallen across the city, further exposing
11 residents, including Plaintiff, to whatever contaminants were in the noxious smoke from the
12 Warehouse

13 26. Due to his exposure to the high levels of toxic air pollutants during the fire,
14 Plaintiff seeks damages for physical injury, worry, fear, emotional distress and harm to real and
15 personal property, medical expenses, and other economic damages related to the clean-up and
16 removal of contaminants on his property according to proof at trial.

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1 30. At all relevant times prior to this incident, the Defendants had the duty to exercise
2 the utmost care and diligence in the ownership, design, operation, management, supervision,
3 inspection, maintenance, repair, and/or control of the Warehouse and appurtenant fire control and
4 suppression systems in compliance with relevant regulations and industry standards, so as not to
5 cause harm to individual persons, private and public property, the environment, public resources,
6 public health, and/or the comfortable use and enjoyment of property and life by the public.

7 31. At all relevant times, the Defendants negligently, carelessly, recklessly, and/or
8 unlawfully used, owned, operated, managed, supervised, maintained, repaired, and/or controlled
9 the Warehouse and appurtenant fire control and suppression systems, including but not limited to
10 allowing the fire to start in the Warehouse while fire control and suppression systems were
11 inoperative thereby causing the release of toxic and dangerous smoke, ash, and debris into the
12 atmosphere from the Warehouse fire.

13 32. The Defendants were negligent per se based on their violations of the following
14 rules, regulations, and statutes, among others:

- 15 a. Title 22 of the California Code of Regulations (“CCR”) § 66262.34(d)(2) (failure
16 to maintain and operate a facility to minimize the possibility of fire.

16 33. As a direct and legal result of the wrongful acts and/or omissions of the
18 Defendants, Plaintiff has suffered damages, including but not limited to inhalation of toxic gases,
19 chemicals, and/or fumes resulting in personal injuries including, but not limited to, headaches, eye
20 irritation, skin irritation, vomiting, nausea, dizziness, difficulty breathing, and other harms known
21 that are as yet unknown. Upon information and belief, some or all the health effects may result in
22 permanent impairments and/or disabilities, all to their general damage in a sum according to
23 proof.

24 34. As a direct and legal result of the wrongful acts and/or omissions of the
25 Defendants, Plaintiff has suffered damages, including but not limited to pain, suffering, emotional
26 distress and worry, which is ongoing.

27 35. As a direct and legal result of the wrongful acts and/or omissions of the
28 Defendants, Plaintiff is required to, and continues to, employ physicians and/or other health care

1 providers to examine, treat, and care for their injuries. Plaintiff has incurred, and will continue to
2 incur, medical and incidental expenses for such examination, treatment, rehabilitation, and care,
3 all in an amount according to proof.

4 36. As a direct and legal result of the wrongful acts and/or omissions of the
5 Defendants, Plaintiff has incurred, and will continue to incur, a loss of income and/or a loss of
6 earning capacity, all in an amount according to proof.

7 37. As a direct and legal result of the wrongful acts and/or omissions of the
8 Defendants, Plaintiff has suffered and will continue to suffer the loss of the quiet use and
9 enjoyment of their property, as well as public properties located in the area, has suffered and will
10 continue to suffer the diminution of the value of their property, and/or have been or will be
11 required to expend monies to repair and/or restore the property to its prior condition, all in an
12 amount according to proof. Further, impaired air quality negatively impacts property, rental, and
13 resale value.

14 **Second Cause of Action**
15 **Public and Private Nuisance**
16 **(Against All Defendants)**

16 38. Plaintiff incorporates by reference each and every allegation contained in the
16 preceding paragraphs as though fully stated herein.

18 39. Plaintiff incorporates by reference all allegations of the preceding paragraphs as
19 though fully set forth herein.

20 40. Plaintiff owns and/or occupies property at or near the exposed area. At all relevant
21 times, Plaintiff had a right to occupy, enjoy, and/or use that property without interference by
22 Defendants.

23 41. Defendants by reason of their wrongful acts and/or omissions created a condition
24 that (a) was harmful to Plaintiff's health; (b) was indecent and/or offensive to Plaintiff's senses;
25 (c) was an obstruction of Plaintiff's free use and enjoyment of their property, so as to interfere
26 with their comfortable enjoyment of life and/or property; and/or (d) unlawfully obstructed
27 Plaintiff's free passage or use, in the customary manner, of public parks, squares, streets, and/or
28 highways in the exposed area. The Defendants' use, ownership, operation, management,

1 supervision, maintenance, repair, and/or control of the Warehouse and appurtenant fire control
2 and suppression systems in a manner that failed to mitigate the risk of fire created a condition that
3 was harmful to health and interfered with the comfortable enjoyment of life and property.
4 Plaintiff did not consent to Defendants' conduct, which was a substantial factor in causing
5 Plaintiff's harm. The Defendants' use, ownership, operation, management, supervision,
6 maintenance, repair, and/or control of the Warehouse and appurtenant fire control and suppression
7 systems in a manner that failed to mitigate the risk of fire created a condition that was harmful to
8 health and interfered with the comfortable enjoyment of life and property. Plaintiff did not
9 consent to Defendants' conduct, which was a substantial factor in causing Plaintiff's harm.

10 42. The conditions described herein were continuing from approximately June 11,
11 2026 (when the Medline Fire broke out) and remain ongoing, as the fire debris remains on site
12 where winds can carry it to adjacent neighborhoods. Plaintiff experienced symptoms from acute
13 exposure beginning June 11th and continues to suffer from symptoms caused by the exposure.

14 43. The condition affected a substantial number of people in and around the
15 community of Tracy at the same time. An ordinary person of reasonable sensibilities would
16 reasonably be annoyed and/or disturbed by the conduct of the Defendants as described herein.

16 44. The seriousness of Plaintiff's injuries outweighs any public benefit from the
18 Defendants' conduct as described herein.

19 45. As a direct and legal result of the wrongful acts and/or omissions of Defendants,
20 Plaintiff has suffered, and will continue to suffer, discomfort, annoyance, anxiety, fear, worries,
21 and stress attendant to the interference with Plaintiff's occupancy, possession, use, and/or
22 enjoyment of their property, as alleged above.

23 46. As a direct and proximate result of the wrongful acts and/or omissions of
24 Defendants, Plaintiff suffered and continues to suffer damages as herein above set forth.

25 47. The conduct of each Defendant was a substantial factor in causing harm to Plaintiff
26 who has suffered and continues to suffer economic harm, injury, and losses, including injury to
27 property. Plaintiff is entitled to damages for all such past and present harm.

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1 57. The exposure entered, invaded, and intruded upon the real property of Plaintiff and
2 caused harm to Plaintiff's property and Plaintiff personally without Plaintiff's privilege,
3 permission, consent, authorization, invitation, or justification.

4 58. Defendants had a duty to use reasonable care not to enter, invade, or intrude upon
5 the real property of Plaintiff. Defendants also owed a duty to Plaintiff to exercise reasonable care
6 in the construction, maintenance, and operation of the Warehouse and appurtenant fire control and
7 suppression systems because of their close proximity to the neighboring communities.

8 59. Defendants breached the duty they owed to Plaintiff when they failed to exercise
9 reasonable care in the construction, maintenance, and operation of the Warehouse and appurtenant
10 fire control and suppression systems as described herein, which conduct resulted in entry,
11 intrusion, or invasion of Plaintiff's properties.

12 60. Defendants knew or should have known that their conduct and the ongoing
13 operation and maintenance of the Warehouse and appurtenant fire control and suppression
14 systems would foreseeably result in causing damage to the real properties and economic interests
15 of persons in the area affected by the exposure.

16 61. As a direct and legal result of Defendants' trespass, Plaintiff has suffered and
16 continues to suffer damages, losses, and injuries described above in amounts according to proof at
18 trial.

19 **VI. PRAYER FOR RELIEF**

20 Accordingly, Plaintiff prays that this Court enters judgment in their favor on every claim
21 for relief set forth above as follows:

- 22 1. For a judgment in favor of Plaintiff on all claims;
- 23 2. For compensatory and general damages according to proof;
- 24 3. For an award to Plaintiff for the amount of damages, including personal injuries,
25 property damage, and diminution in property value, according to proof;
- 26 4. For the loss of the use and benefit of Plaintiff's real and/or personal property;
- 27 5. For past and future medical expenses and incidental expenses according to proof;

- 1 6. For general damages for fear, worry, annoyance, discomfort, disturbance,
- 2 inconvenience, mental anguish, emotional distress, and loss of quiet enjoyment of
- 3 property;
- 4 7. For economic losses according to proof at trial;
- 5 8. For all costs of suit, including attorneys' fees where appropriate;
- 6 9. For reasonable attorneys' fees pursuant to California Code of Civil Procedure,
- 7 section 1021.5;
- 8 10. For pre- and post-judgment interest at the legal rate on all amounts awarded; and
- 9 11. For all other relief as this Court may deem just and proper.


10 **VII. JURY DEMAND**

11 Plaintiff demands a trial by jury as to all claims in this action.

13 Dated: June 30, 2026

COTCHETT, PITRE & McCARTHY, LLP

14 By:



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