

1 ROB BONTA
Attorney General of California
2 DENNIS L. BECK, JR., SBN 179492
Supervising Deputy Attorney General
3 AMY J. ANDERSON, SBN 301732
Deputy Attorney General
4 600 West Broadway, Suite 1800
P.O. Box 85266
5 San Diego, CA 92186-5266
Telephone: (619) 738-9725
6 Fax: (619) 645-2271
E-mail: Amy.Anderson@doj.ca.gov

7 RONALD J. FREITAS
8 District Attorney of the County of San Joaquin
CELESTE KAISCH, SBN 234174
9 Deputy District Attorney
Consumer and Environmental Protection Division
10 222 E Weber Avenue, Room 202
Stockton, CA 95202
11 Telephone: (209) 468-9614
Fax: (209) 468-0314
12 E-mail: Celeste.Kaisch@sjcda.org
Attorneys for The People of the State of California
13 *(Additional Counsel for Plaintiff on following page)*

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF SAN JOAQUIN

16 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

17 Plaintiff,

18 v.

19 **QUEST DIAGNOSTICS CLINICAL**
LABORATORIES, INC., a Delaware corporation;
20 **QUEST DIAGNOSTICS INCORPORATED, dba**
QUEST DIAGNOSTICS INCORPORATED OF
21 **NEVADA, a Nevada corporation;**
QUEST DIAGNOSTICS INFECTIOUS DISEASE,
22 **INC., a Delaware corporation;**
QUEST DIAGNOSTICS NICHOLS INSTITUTE,
23 **INC., a California corporation;**
QUEST DIAGNOSTICS HEALTH & WELLNESS,
24 **LLC, a Delaware limited liability company;**
QUEST DIAGNOSTICS TB, LLC, a Delaware
25 **limited liability company;**
QUEST DIAGNOSTICS INCORPORATED, a
26 **Delaware corporation;**
SPECIALTY LABORATORIES, INC., a California
27 **corporation; and**
UNILAB CORPORATION, a Delaware corporation,

28 Defendants.

FILED

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**EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT
CODE SECTION 6103**

STK-CV-105-2024-1093

**COMPLAINT FOR
INJUNCTION, CIVIL
PENALTIES, AND OTHER
RELIEF**

(Health & Saf. Code, §1280.15,
§1280.18, §25100 et seq., §117600
et seq.; Civil Code, §56 et seq.,
§1798.81; Bus. & Prof. Code,
§17200 et seq.; Gov. Code, §12607)

1 *ADDITIONAL COUNSEL FOR PLAINTIFF, THE PEOPLE OF THE STATE OF CALIFORNIA*

2 PAMELA Y. PRICE
District Attorney of the County of Alameda
3 SIMONA FARRISE BEST, SBN 171708
Sr. Asst. District Attorney
4 CARLOS J. GUZMAN, SBN 219185
Deputy District Attorney
5 Consumer Justice Bureau (formerly CEWPD)
7677 Oakport Street, Suite 650
6 Oakland, CA 94621
Telephone: (510) 383-8600
7 Fax: (510) 383-8615
E-mail: Carlos.Guzman@acgov.org

8 GEORGE GASCÓN
District Attorney of the County of Los Angeles
9 DANIEL WRIGHT, SBN 129309
Deputy District Attorney
10 Environmental and Consumer Protection Division
211 Temple St., Ste 1000
11 Los Angeles, CA 90012
Telephone: (213) 257-3001
12 Fax: (213) 974-1484
E-mail: DWright@da.lacounty.gov

14 JEANNINE M. PACIONI
District Attorney of the County of Monterey
15 EMILY HICKOK, SBN 247175
Chief Deputy District Attorney
16 Environmental and Consumer Protection Division
1200 Aguajito Rd., Rm. 301
17 Monterey, CA 93940
Telephone: (831) 647-7710
18 Fax: (831) 647-7762
E-mail: HickokED@co.monterey.ca.us

19 TODD SPITZER
District Attorney of the County of Orange
20 WILLIAM FALLON, SBN 190986
Senior Deputy District Attorney
21 ALICIA BERRY, SBN 228367
Deputy District Attorney
22 Environmental and Consumer Protection Division
300 North Flower St.
23 Santa Ana, CA 92703
Telephone: (714) 834-3600
24 Fax: (714) 834-6160
E-mail: Alicia.Berry@ocdapa.org

26
27
28

1 THIEN HO
District Attorney of the County of Sacramento
2 DOUGLAS WHALEY, SBN 144557
Supervising Deputy District Attorney
3 Consumer and Environmental Protection Division
901 G St.
4 Sacramento, CA 95814
Telephone: (916) 874-7000
5 Fax: (916) 874-7660
E-mail: WhaleyD@sacda.org
6

JASON ANDERSON
7 District Attorney of the County of San Bernardino
STEPHANIE B. WEISSMAN, SBN 155454
8 Deputy District Attorney
Consumer and Environmental Protection Division
9 303 West 3rd Street, Fifth Floor
San Bernardino, CA 92415
10 Telephone: (909) 382-3800
Fax: (909) 748-1376
11 E-mail: SWeissman@sbcda.org

12 STEPHEN M. WAGSTAFFE
District Attorney of the County of San Mateo
13 KENNETH MIFSUD, SBN 144000
Deputy District Attorney In-Charge
14 Consumer and Environmental Protection Division
400 County Center, 3rd Floor
15 Redwood City, CA 94063
Telephone: (650) 363-4636
16 Fax: (650) 363-4873
E-mail: KMifsud@smcgov.org
17

18 ERIK NASARENKO
District Attorney of the County of Ventura
SUSAN PARK, SBN 283062
19 Deputy District Attorney
5720 Ralston St., Ste. 300
20 Ventura, CA 93003
Telephone: (805) 654-2500
21 Fax: (805) 662-1770
E-mail: Susan.Park@ventura.org
22

23 JEFF W. REISIG
District Attorney of the County of Yolo
DAVID J. IREY, SBN 142864
24 Assistant Chief Deputy District Attorney
Consumer and Environmental Protection Division
25 301 Second Street
Woodland, CA 95695
26 Telephone: (530) 666-8428
Fax: (530) 666-8185
27 E-mail: David.Irey@yolocounty.org
28

1 Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA (“Plaintiff” or “the People”),
2 alleges on information and belief the following:

3 **PLAINTIFF**

4 1. The People are represented in this action by and through Rob Bonta, Attorney
5 General of the State of California (“Attorney General”); and Pamela Y. Price, District Attorney of
6 Alameda County; George Gascón, District Attorney of Los Angeles County; Jeannine M. Pacioni,
7 District Attorney of Monterey County; Todd Spitzer, District Attorney of Orange County; Thien
8 Ho, District Attorney of Sacramento County; Jason Anderson, District Attorney of San Bernardino
9 County; Ronald J. Freitas, District Attorney of San Joaquin County; Stephen M. Wagstaffe,
10 District Attorney of San Mateo County; Erik Nasarenko, District Attorney of Ventura County; and
11 Jeff W. Reisig, District Attorney of Yolo County (collectively, “District Attorneys”).

12 2. Under Government Code section 12511, the Attorney General has charge of all legal
13 matters in which the State is involved. The Attorney General also has the express power to protect
14 the environment and natural resources of the State of California pursuant to Government Code
15 section 12600. Pursuant to Government Code section 12607, the Attorney General may maintain
16 an action for equitable relief in the name of the People of the State of California against any person
17 for the protection of the natural resources of the state from pollution, impairment, or destruction.

18 3. Pursuant to Health and Safety Code sections 25145.4 and 25182, the Attorney
19 General, together with the District Attorneys named above, may bring a civil action in the name of
20 the People of the State of California to enjoin any violation of chapter 6.5 of Division 20 of the
21 Health and Safety Code (“Chapter 6.5”), and to seek civil penalties for violations thereof.

22 4. Pursuant to Health and Safety Code section 118325, the District Attorneys named
23 above may bring a civil action in the name of the People of the State of California to enjoin any
24 violation of Part 14 of Division 104 of the Health and Safety Code and to seek civil penalties for
25 violations thereof.

26 5. Pursuant to Health and Safety Code sections 25515.7 and 25515.6, the Attorney
27 General, together with the District Attorneys named above, may bring a civil action in the name of
28 the People of the State of California to enjoin any violation of chapter 6.95 of Division 20 of the

1 Health and Safety Code (“Chapter 6.95”), and to seek civil penalties for violations thereof.

2 6. Pursuant to Business and Professions Code sections 17203, 17204 and 17206, the
3 Attorney General and the District Attorneys named above may bring a civil action in the name of
4 the People of the State of California to enjoin any person who engages, has engaged, or proposes to
5 engage in unfair competition, as defined in Business and Professions Code section 17200, and for
6 civil penalties for each violation of Business and Professions Code section 17200 et seq.

7 7. The People bring this action without prejudice to any other actions or claims which
8 the People may have based upon separate, independent and unrelated violations arising out of
9 matters or allegations that are not set forth in this Complaint.

10 **DEFENDANTS**

11 8. Defendants QUEST DIAGNOSTICS CLINICAL LABORATORIES, INC.; QUEST
12 DIAGNOSTICS INFECTIOUS DISEASE, INC.; QUEST DIAGNOSTICS INCORPORATED;
13 and UNILAB CORPORATION are now, and at all times mentioned in this Complaint have been,
14 Delaware corporations. Defendant QUEST DIAGNOSTICS INCORPORATED, dba QUEST
15 DIAGNOSTICS INCORPORATED OF NEVADA, is now, and at all times mentioned in this
16 Complaint was, a Nevada corporation. Defendants QUEST DIAGNOSTICS NICHOLS
17 INSTITUTE, INC.; and SPECIALTY LABORATORIES, INC., are now, and at all times
18 mentioned in this Complaint have been, California corporations. Defendants QUEST
19 DIAGNOSTICS HEALTH & WELLNESS, LLC and QUEST DIAGNOSTICS TB, LLC, are now,
20 and at all times mentioned in this Complaint have been, Delaware limited liability companies.

21 9. Defendants QUEST DIAGNOSTICS CLINICAL LABORATORIES, INC., and
22 QUEST DIAGNOSTICS INCORPORATED, dba QUEST DIAGNOSTICS INCORPORATED
23 OF NEVADA; QUEST DIAGNOSTICS INFECTIOUS DISEASE, INC.; QUEST
24 DIAGNOSTICS NICHOLS INSTITUTE, INC.; QUEST DIAGNOSTICS HEALTH &
25 WELLNESS, LLC; QUEST DIAGNOSTICS TB, LLC; QUEST DIAGNOSTICS,
26 INCORPORATED; SPECIALTY LABORATORIES, INC.; and UNILAB CORPORATION,
27 hereinafter “Defendants,” provide clinical laboratory testing for use by the medical profession in
28 the state of California in the diagnosis, monitoring, and treatment of disease and other medical

1 conditions. Defendants currently conduct and have conducted business at 623 facilities in
2 California, including 619 patient service center locations and four (4) diagnostic labs. Defendants
3 generate and manage waste streams at these facilities, including medical waste, hazardous waste,
4 and universal waste, and also generate, manage, and/or dispose of documents and other items
5 containing protected health information of their patients.

6 10. In this Complaint, when reference is made to any act or omission of “Defendants,”
7 such allegations shall include the acts and omissions of owners, officers, directors, agents,
8 employees, contractors, vendors, affiliates, and/or representatives of Defendants while acting
9 within the course and scope of their employment or agency on behalf of the above referenced
10 entity.

11 11. Defendants are, and at all times relevant to the claims in this Complaint were, legally
12 responsible for compliance with state and federal laws and regulations governing the disposition of
13 the waste streams described above. These laws include:

- 14 • Hazardous Waste Control Law set forth in Chapter 6.5 of Division 20 of the Health
15 and Safety Code;
- 16 • Medical Waste Management Act, set forth in Part 14 of Division 104 of the Health
17 and Safety Code;
- 18 • Hazardous Materials Release Response Plans and Inventory Law, set forth in Health
19 and Safety Code section 25500 et seq.;
- 20 • Confidentiality of Medical Information Act, set forth in Civil Code section 56 et seq.;
- 21 • Customer Records Law, set forth in Civil Code section 1798.80 et seq.;
- 22 • Health and Safety Code sections 1280.15 and 1280.18;
- 23 • Health Insurance Portability and Accountability Act of 1996, Pub. L. No. 104-191,
24 110 Stat. 1936, as amended by the Health Information Technology for Economic and
25 Clinical Health Act, Pub. L. No. 111-5, 123 Stat. 226; and
- 26 • Unfair Competition Law, set forth in Business and Professions Code section 17200 et
27 seq.

28 12. Defendants are “persons” as defined in Health and Safety Code section 25118.

1 and hazards. (Health & Saf. Code, § 117690, subd. (a).)

2 17. **Hazardous Materials Business Plans:** The Hazardous Materials Release Response
3 Plans and Inventory Law (“HMRRPIL”), set forth in Health and Safety Code section 25500 et seq.,
4 requires businesses to implement and submit Hazardous Materials Business Plans, which are
5 required by law in order to prevent or mitigate danger to public health, public safety, and the
6 environment from the release of hazardous materials into the workplace and environment and to
7 protect fire-fighters and other first responders in the event of a fire or release of hazardous
8 materials.

9 18. **Protected Health Information:** The medical and personal identifying information of
10 healthcare patients (protected health information or “PHI”) are protected by various statutes and the
11 regulations promulgated thereunder. These include:

- 12 • Confidentiality of Medical Information Act (“CMIA”), codified at Civil Code section
13 56 et seq., a comprehensive statutory framework that governs the management of
14 medical information;
- 15 • Customer Records Law (“CRL”), Civil Code section 1798.81, which protects records
16 containing personal information and requires businesses to make such records
17 unreadable or undecipherable prior to disposal;
- 18 • Health and Safety Code sections 1280.15 and 1280.18, which require healthcare
19 facilities to safeguard and prevent the unauthorized access of patient medical
20 information; and
- 21 • The Health Insurance Portability and Accountability Act of 1996, Pub. L. No. 104-
22 191, 110 Stat. 1938, as amended by the Health Information Technology for
23 Economic and Clinical Health Act, Pub. L. No. 111-5, 123 Stat. 226, as well as the
24 Department of Health and Human Services Regulations, 45 C.F.R. §§ 160 et seq.
25 (collectively “HIPAA”), which sets forth requirements for the proper security and
26 disposal of patient records containing confidential protected health information.

27 19. **Unfair Competition:** The Unfair Competition Law (“UCL”), Business and
28 Professions Code section 17200 et seq., prohibits any unlawful, unfair, or fraudulent business act or

1 practice, including but not limited to violations of any of the laws set forth above. The violation of
2 any law—whether state or federal, statutory or regulatory—constitutes a violation of the UCL and
3 subjects the violator to equitable relief, including an injunction, civil penalties and restitution, as
4 applicable.

5 **ENFORCEMENT AUTHORITY**

6 20. The People’s authority to petition for relief from this Court derives from multiple
7 sources. Health and Safety Code section 25189 provides for civil liability for any negligent or
8 intentional violation of the HWCL, or for any violation of any permit, rule, regulation, standard, or
9 requirement issued or promulgated pursuant to the HWCL. Health and Safety Code section
10 25189.2 is an alternative strict liability provision, which provides for civil liability for any violation
11 of the HWCL, or for any violation of any permit, rule, regulation, standard, or requirement issued
12 or promulgated pursuant to the HWCL.

13 21. The HWCL also authorizes the Court to enjoin any ongoing or potential violation of
14 the HWCL or any applicable rule, regulation, permit, standard, requirement, or order issued or
15 promulgated pursuant to the HWCL. (See Health & Saf. Code, §§ 25182, 25145.4, 25181 and
16 25184.)

17 22. The MWMA authorizes an enforcement agency, including a district attorney, to bring
18 an action to enjoin any violation of threatened violation of the law or the regulations promulgated
19 thereunder. (See Health & Saf. Code, § 118325.)

20 23. The CMIA authorizes the Attorney General or a district attorney to bring an action in
21 the name of the People to obtain civil penalties for any violation of the CMIA. (Civ. Code, § 56.36,
22 subd. (f)(1).)

23 24. The UCL authorizes the Attorney General or a district attorney to bring a civil action
24 in the name of the People against any person who engages in unfair competition, including any
25 “unlawful...business act or practice.” (Bus. & Prof. Code, § 17204.) Business and Professions
26 Code section 17203 authorizes the Court to issue an order that enjoins any person who engages,
27 has engaged or proposes to engage in unfair competition. Under Business and Professions Code
28 section 17205, the remedies or penalties provided by the UCL are cumulative to each other and to

1 the remedies or penalties available under all other laws of this state.

2 **GENERAL ALLEGATIONS**

3 25. The allegations in this Complaint relate solely to Defendants' compliance with the
4 HWCL, the MWMA, the HMRRPIL, and, by operation of the UCL, the other statutes, listed above
5 and in paragraph 32 below, including patient privacy laws. The allegations further pertain only to
6 Defendants' Covered Facilities in California, as more fully described in paragraph 27 below, and to
7 the "Target Waste" generated at those Covered Facilities, described and defined in paragraph 32
8 below. Nothing in this Complaint relates to or pertains to any existing or potential claims or causes
9 of action arising out of Defendants' ownership or operation of any non-Covered Facility in
10 California. Such claims or causes of action, if any, are reserved by the People.

11 26. This Complaint has been filed within five (5) years of the People discovering the
12 HWCL violations alleged herein, plus any applicable tolling periods. The Complaint also has been
13 filed within four (4) years of the People discovering the MWMA violations alleged herein, plus any
14 applicable tolling periods. The Complaint also has been filed within four (4) years of the People
15 discovering the UCL violations alleged herein, plus any applicable tolling periods.

16 27. At all times relevant hereto and continuing from and after the date of filing of this
17 Complaint, Defendants owned and/or operated, and continue to own and/or operate, approximately
18 622 Covered Facilities throughout California. The term "**Covered Facilities**" as used herein shall
19 mean those facilities in California which are owned or operated by Defendants or were owned
20 and/or operated for a portion of the period covered by this Complaint as listed on the attached

21 **Exhibit A.**

22 28. In providing these services, Defendants, by and through the phlebotomists, nurses,
23 paramedics, lab associates, technicians, and administrative staff who work at the Covered
24 Facilities, generate and manage large volumes of waste items (hereinafter referred to as "Target
25 Waste"), including:

- 26 a. **Medical waste** within the meaning of Health and Safety Code section
27 117690, including: biohazardous waste (such as containers holding fluid human blood, specimen
28 tubes, microbiology waste, cytology specimens, blood or Other Potentially Infectious Materials

1 (“OPIM”), spill cleanup material, gloves and specimen bags, petri dishes containing specimens,
2 and other items contaminated with potentially infectious bodily fluids); pathology waste (such as
3 human specimens or tissues removed that are suspected of being contaminated with infectious
4 agents); pharmaceutical wastes (such as non-empty drug vials, prescription medications, including
5 inhalers, vaccines, and over-the-counter medications); and sharps (such as needles, glass slides,
6 glass tubes, broken glass, pipette tips, wooden applicator sticks, coverslips, scalpel and microtome
7 blades).

8 b. **Hazardous waste** within the meaning of Health and Safety Code sections
9 25117 and 25124, and corresponding regulations set forth in title 22, California Code of
10 Regulations, including: batteries (such as alkaline, lithium-ion, lead-acid, nickel-cadmium, and
11 button cell batteries); electronic devices containing printed circuit boards (such as office electronic
12 devices, electronic communication devices, electronic diagnostic equipment, and computer
13 peripheral devices); non-empty aerosol cans (such as foam hand sanitizers, air fresheners, surface
14 cleaners, and compressed air dusters); and liquids and semi-solids (such as isopropyl alcohol,
15 hydrogen peroxide, acids, stains, specimen container preservatives, lab diagnostic reagents, sample
16 diluents, wash buffers, DNA binding solutions, system fluid preservatives, lab equipment cleaning
17 solutions, and other lab waste chemicals, hand sanitizer, and surface cleaning solutions such as
18 non-empty disinfecting wipe containers, bleach, floor cleaners).

19 c. **PHI** including specimen collection containers, chain of custody lab specimen
20 labels and documents, lab specimen request and routing documents, lab results, prescription drug
21 labels, and prescription drug refill authorization request documents.

22 29. Defendants, at each of the Covered Facilities, generated Target Waste that constituted
23 hazardous waste during every 90-day period at large quantity generator locations and during every
24 180-day period at small quantity generator locations.

25 30. Defendants disposed of solid waste through municipal waste haulers to local landfills
26 and waste transfer stations.

27 31. At all times relevant to this Complaint, Defendants are or were responsible for the
28 operation of Defendants’ Covered Facilities in California. At all times relevant to this Complaint,

1 Defendants were aware of and did or do conduct, approve and/or control activities at the Covered
2 Facilities related to hazardous waste management, medical waste management, and management of
3 PHI. At all times relevant to this Complaint, Defendants' actions and/or omissions, as part of a
4 continuing course of conduct, are or were the legal cause of the violations alleged herein, and
5 Defendants reasonably could have taken action to prevent the unlawful actions and/or omissions.

6 32. All times relevant hereto, Defendants caused and/or performed each of the following
7 acts and/or omissions in violation of the HWCL, MWMA, HMRRPIL, and the UCL in the
8 ownership and/or operation of their Covered Facilities:

9 ***Hazardous Waste Disposal***

10 a. Defendants disposed, or caused the disposal of, Target Waste that constitutes
11 hazardous waste at a point not authorized or permitted by law, in violation of Health and Safety
12 Code sections 25189, 25189.2, and 25203;

13 ***Hazardous Waste Determination***

14 b. Defendants failed to determine if Target Waste generated, accumulated,
15 stored, transferred, treated, received, and/or otherwise managed at any Covered Facilities was
16 "hazardous waste" as required by California Code of Regulations, title 22, section 66260.200;

17 c. Defendants failed to determine whether each item for disposal from a
18 Covered Facility was a waste, and if so, whether it was a "hazardous waste," as required by
19 California Code of Regulations, title 22, section 66262.11.

20 ***Hazardous Waste Management (General)***

21 d. Defendants failed to manage Target Waste that constitutes hazardous waste,
22 generated at any Covered Facility, as required by Chapter 6.5 of Division 20 of the Health and
23 Safety Code and its implementing regulations in Title 22 of the California Code of Regulations.

24 e. Defendants failed to manage and dispose of Target Waste that constitutes
25 universal waste, at (or from) any Covered Facility in compliance with all applicable requirements
26 contained in California Code of Regulations, title 22, section 66273.1 et seq.

27 f. Defendants failed to comply with the recordkeeping requirements of
28 California Code of Regulations, title 22, section 66262.40, subdivision (a) or, for items that may be

1 lawfully managed as universal waste, failed to comply with California Code of Regulation, title 22,
2 section 66273.39.

3 g. Defendants failed to properly empty a container, manage a non-empty
4 container, or an inner liner removed from a container, which previously held a hazardous material,
5 including hazardous waste, at Covered Facilities, as required by California Code of Regulations,
6 title 22, section 66261.7.

7 ***Hazardous Waste Management (Labeling and Storage)***

8 h. Defendants failed to properly mark, label, and store containers of Target
9 Waste that constitute hazardous waste at Covered Facilities and failed to maintain all written
10 documents relating to Target Waste that constitutes hazardous waste, as required by California
11 Code of Regulations, title 22, section 66262.34 including, without limitation, failing to identify in
12 writing, by composition, physical state, and approximate weight, all hazardous waste generated,
13 accumulated, stored, transferred, treated, and/or otherwise managed at each of the Covered
14 Facilities.

15 i. Defendants failed to store and label Target Waste that constitutes universal
16 waste, including waste items that are accumulated or stored for recycling, in accordance with
17 California Code of Regulations, title 22, sections 66273.33 through 66273.35.

18 ***Hazardous Waste Management (Accumulation Time)***

19 j. Defendants failed to lawfully and timely dispose of all accumulated Target
20 Waste that constitutes hazardous waste, at each Covered Facility, as required by California Code
21 of Regulations, title 22, section 66262.34.

22 k. Defendants failed to properly categorize each Covered Facility as a small or
23 large quantity generator, as required by California Code of Regulations, title 22, section 66262.34.

24 l. Defendants stored Target Waste the constitutes hazardous waste longer than
25 allowed by law and failed to arrange for proper disposal every 90-day period for large quantity
26 generator Covered Facilities and every one hundred and 180-day period for small quantity
27 generator Covered Facilities, as required by California Code of Regulations, title 22, section
28 66262.34.

1 obligations set forth in California Code of Regulations, title 22, section 66273.36 (pertaining to the
2 management of universal waste) for each Covered Facility.

3 ***Hazardous Material Release Response Plan and Inventory Law***

4 t. Failing to train employees as required by Health and Safety Code section
5 25505(a)(4).

6 u. Failing to implement, maintain, and comply with an employee training
7 program regarding hazardous materials as required by Health and Safety Code section 25505,
8 subdivision (a)(4), and California Code of Regulations, title 19, section 2659.

9 v. Failing to immediately report the release of hazardous materials in violation
10 of Health and Safety Code section 25510.

11 ***Medical Waste Disposal***

12 w. Defendants caused the disposal of Target Waste that constitutes
13 medical waste, at a facility not permitted to receive such waste, in violation of Health and Safety
14 Code section 118340, subdivision (a).

15 ***Medical Waste Management***

16 x. Defendants failed to implement and maintain a medical waste management
17 plan for each Covered Facility that generates Target Waste that constitutes medical waste, pursuant
18 to Health and Safety Code sections 117710, 117935, 117943, 117960, and related regulatory
19 references.

20 y. Defendants failed to separate Target Waste that constitutes medical waste at
21 the point of origin, as required by Health and Safety Code section 118275, subdivision (a).

22 z. Defendants failed to properly containerize and store Target Waste that
23 constitutes medical waste, as required by Health and Safety Code sections 118280 (biohazard
24 bags) and 118285 (sharps waste).

25 aa. Defendants failed to ensure that Target Waste that constitutes medical waste
26 is treated prior to disposal, as required by Health and Safety Code section 118215, subdivision (a).

27 bb. Defendants failed to manage Target Waste that constitutes mixed waste in
28 accordance with Health and Safety Code section 117730.

1 physical and chemical characteristics of the hazardous waste, failing to identify the starting
2 accumulation date, failing to identify in writing, composition, physical state, and approximate
3 weight all hazardous waste generated, accumulated, stored, transferred, treated, and/or by failing to
4 determine whether each Covered Facility is a large or small quantity generator, in violation of
5 California Code of Regulations, title 22, section 66262.34. Unless enjoined by order of the Court,
6 the Defendants may or will continue in the course of conduct as alleged herein.

7 42. The People request injunctive relief against each Defendant under Health and Safety
8 Code section 25181 and civil penalties against each Defendant under Health and Safety Code
9 section 25189, subdivision (c), for each intentional violation, or subdivision (d), for each negligent
10 violation, or Health and Safety Code section 25189.2, subdivision (b), for each strict liability
11 violation, as set forth in Plaintiff's Prayer for Relief.

12
13 **FOURTH CAUSE OF ACTION**
14 **(Storage of Hazardous Wastes Without Authorization)**
15 **(Health & Saf. Code §§ 25123.3, subd. (h)(1), 25181, 25189, 25189.2;**
16 **Cal. Code Regs., tit. 22, 66262.34)**

17 43. The People reallege all previous paragraphs.

18 44. Defendants, at one or more of the Covered Facilities, failed to maintain a program for
19 the lawful storage, handling, and accumulation of Target Waste that constitutes hazardous waste,
20 and for the lawful segregation of hazardous waste items that are in leaking containers, in violation
21 of Health and Safety Code section 25123.3, subdivision (d), and California Code of Regulations,
22 title 22, sections 66262.34 and 66265.171-177.

23 45. At one or more Covered Facilities, Defendants, as a generator of less than 1,000
24 kilograms of hazardous waste in any calendar month, which accumulated hazardous waste onsite
25 for more than 180 days, violated Health and Safety Code section 25123.3, subdivision (h)(1), by
26 failing to comply with the conditions set forth in therein. Further, at one or more Covered
27 Facilities, Defendants operated a storage facility without authorization by the Department. Unless
28 enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged
herein.

46. Plaintiff requests injunctive relief against each Defendant under Health and Safety

1 Code section 25181 and civil penalties against each Defendant under Health and Safety Code
2 section 25189, subdivision (e), for each intentional or negligent violation or Health and Safety
3 Code section 25189.2, subdivision (d), for each strict liability violation, as set forth in Plaintiff's
4 prayer for relief.

5 **FIFTH CAUSE OF ACTION**
6 **(Unauthorized Transportation of Hazardous Waste)**
7 **(Health & Saf. Code, §§ 25163, 25181, 25189, 25189.2, 25189.5;**
8 **Cal. Code Regs., tit. 22, § 66263.23, et seq.)**

9 47. The People reallege all previous paragraphs.

10 48. At one or more Covered Facilities, Defendants transferred custody of Target Waste
11 that constitutes hazardous waste from one or more Facilities to transporters who did not have a
12 valid registration from the Department to transport hazardous waste, in violation of Health and
13 Safety Code section 25163, subdivision (a)(1). At one or more Covered Facilities, the Defendants
14 placed Target Waste that constitutes hazardous waste in trash containers at the Facility or Facilities
15 and then transported, or caused to be transported, the contents of such trash containers off-site to
16 locations not permitted or otherwise authorized by the Department to receive the waste, including
17 to municipal landfills, in violation of Health and Safety Code sections 25189.5, 25163 and
18 California Code of Regulations, title 22, section 66263.23. Unless enjoined by order of the Court,
19 Defendants may or will continue in the course of conduct as alleged herein.

20 49. The People request injunctive relief against each Defendant under Health and Safety
21 Code section 25181 and civil penalties against each Defendant under Health and Safety Code
22 section 25189, subdivision (b), for each intentional or negligent violation or Health and Safety
23 Code section 25189.2, subdivision (b), for each strict liability violation, as set forth in the People's
24 Prayer for Relief.

25 **SIXTH CAUSE OF ACTION**
26 **(Violations of Requirement to Submit Manifests to the Department)**
27 **(Health & Saf. Code § 25160; 25181, 25189, 25189.2;**
28 **Cal. Code Regs., tit. 22, §§ 66262.20, 66262.23, subd. (a)(4))**

50. The People reallege all previous paragraphs.

51. At one or more Covered Facilities, the Defendants violated Health and Safety Code
section 25160, subdivision (b)(1)-(3), and California Code of Regulation, title 22, section 66262.23
by: failing to timely prepare and file with the Department hazardous waste manifest(s) for all

1 Target Waste that constitutes hazardous waste, that was transported, or submitted for
2 transportation, for offsite handling, treatment, storage, disposal, or any combination thereof; by
3 failing to submit to the Department within 30 days of each shipment of hazardous waste, uniform
4 hazardous waste manifests for hazardous wastes that were transported, or caused to be transported,
5 for off-site handling, treatment, storage, disposal, or any combination thereof; California Code of
6 Regulations, title 22, section 66262.20 by failing to prepare a uniform hazardous waste manifest
7 for expired pharmaceuticals or non-RCRA hazardous waste; and California Code of Regulations,
8 title 22, sections 66262.40 and 66273.39 by failing to maintain copies of hazardous waste
9 manifests at the Covered Facilities for three (3) years and failing to keep a record of each shipment
10 of universal waste at the Covered Facilities for three (3) years

11 52. The People request injunctive relief against each Defendant under Health and Safety
12 Code section 25181 and civil penalties against each Defendant under Health and Safety Code
13 section 25189, subdivision (b), for each intentional or negligent violation or Health and Safety
14 Code section 25189.2, subdivision (b), for each strict liability violation, as set forth in the People's
15 Prayer for Relief.

16
17 **SEVENTH CAUSE OF ACTION**
18 **(Violation of Hazardous Waste Handling and Storage Requirements)**
19 **(Health & Saf. Code, § 25181, 25189, 25189.2;**
20 **Cal. Code Regs., tit. 22, § 66260.1 et seq.)**

21 53. The People reallege all previous paragraphs.

22 54. Health and Safety Code sections 25189 and 25189.2 prohibit improper hazardous
23 waste handling and storage in violation of Chapter 6.5 of Division 20 of the Code.

24 55. With respect to Covered Facilities, Defendants violated the requirements of Chapter
25 6.5 and its implementing regulations, to wit, California Code of Regulations, title 22, section
26 66260.1 et seq., by failing to comply with employee training obligations pertaining to the
27 management of Target Waste that constitutes hazardous waste at the Covered Facilities, in
28 violation of California Code of Regulations, sections 66265.16 and 66265.56, and failing to
properly manage and label each individual container of hazardous waste as "Hazardous Waste,"
and by failing to identify the accumulation start date, the composition and physical state of the

1 waste, the properties of the waste, and the name and address of the generator at the Covered
2 Facilities, in violation of California Code of Regulations, title 22, section 66262.34. Unless
3 enjoined by order of the Court, Defendants may or will continue committing these acts and
4 omissions.

5 56. The People request injunctive relief against each Defendant under Health and Safety
6 Code section 25181 and civil penalties against each Defendant under Health and Safety Code
7 section 25189, subdivision (b), for each intentional or negligent violation or Health and Safety
8 Code section 25189.2, subdivision (b), for each strict liability violation, as set forth in the People's
9 Prayer for Relief.

10 **EIGHTH CAUSE OF ACTION**
11 **(Disposal of Untreated Medical Waste)**
12 **(Health & Saf. Code §§ 118215, 118225, 118280, 118258, 118325, 118345)**

13 57. The People reallege all previous paragraphs.

14 58. Health and Safety Code sections 118215, 118225, 118280, and 118285 prohibit the
15 disposal of medical waste, including biohazard bags and sharps waste, without first treating such
16 waste by a method specified in the MWMA.

17 59. At one or more Covered Facilities, Defendants disposed of Target Waste that
18 constitutes medical waste, originating from the Facility or Facilities without first properly treating
19 it, in violation of Health and Safety Code sections 118215 and 118225. Unless enjoined by order of
20 the Court, Defendants, and each of them, may or will continue in the course of conduct as alleged
21 herein.

22 60. Based on the above, the People request injunctive relief against each Defendant under
23 Health and Safety Code section 118325, and civil penalties under Health and Safety Code section
24 118345, subdivision (b), as described in the People's Prayer for Relief.

25 **NINTH CAUSE OF ACTION**
26 **(Failure to Separate Medical Waste)**
27 **(Health & Saf. Code, § 118275, 118325, 118345)**

28 61. The People reallege all previous paragraphs.

62. Health and Safety Code sections 118275 requires that medical waste be separated
from other waste at the point of origin in the producing facility.

1 25515, as described in the People’s Prayer for Relief.

2 **THIRTEENTH CAUSE OF ACTION**
3 **(Violations of Confidentiality of Medical Information Act)**
4 **(Civil Code, § 56 et seq.)**

5 77. The People reallege all previous paragraphs.

6 78. California Civil Code sections 56 et seq., prohibits the failure to maintain, preserve,
7 store, destroy, or dispose of medical information in a manner that preserves the confidentiality of
8 the medical information.

9 79. As “providers of health care” (Civ. Code, § 56.05, subds. (p)), Defendants are
10 obligated to preserve the confidentiality of medical information they create, maintain, preserve,
11 store, abandon, destroy, or dispose.

12 80. Defendants have abandoned and disposed and continue to abandon and dispose of
13 Target Waste that constitutes medical information and records originating from their Covered
14 Facilities without doing so in a manner that preserves the confidentiality of the information
15 contained therein, in violation of California Civil Code section 56.101. Unless enjoined by order of
16 the Court, Defendants, and each of them, may or will continue in the course of conduct as alleged
17 herein.

18 81. Because of Defendants’ failures, Defendants negligently maintained, preserved, and
19 stored Target Waste that constitutes medical information in violation of Civil Code section 56.101,
20 subdivision (a). Defendants have also negligently disclosed medical information in violation of
21 Civil Code section 56.36.

22 82. Based on the above, the People request civil penalties against each Defendant under
23 Civil Code section 56.36, for each act of disposal of medical records without proper precautions.

24 **FOURTEENTH CAUSE OF ACTION**
25 **(Violations of Unfair Competition Law)**
26 **(Bus. & Prof. Code § 17200 et seq.)**

27 83. The People reallege all previous paragraphs.

28 84. Defendants have engaged in and continue to engage in, have aided and abetted and
continue to aid and abet, and have conspired to and continue to conspire to engage in unlawful,
unfair or fraudulent acts or practices that constitute unfair competition as defined in Business and

1 Professions Code section 17200. These acts or practices include, but are not limited to, the
2 statutory and regulatory violations alleged in paragraph 32 above, and in the First through
3 Thirteenth Causes of Action.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiff prays for the following relief as to all Defendants:

6 1. A permanent injunction requiring Defendants to comply with those provisions of the
7 Hazardous Waste Control Law and its implementing regulations which Defendants are alleged to
8 have violated as set forth in this Complaint;

9 2. A permanent injunction requiring Defendants to comply with those provisions of the
10 Medical Waste Management Act which Defendants are alleged to have violated as set forth in this
11 Complaint;

12 3. A permanent injunction requiring Defendants to comply with those provisions of the
13 Hazardous Materials Release Response Plans and Inventory Laws which Defendants are alleged to
14 have violated as set forth in this Complaint;

15 4. A permanent injunction requiring Defendants to comply with those sections of the
16 Confidentiality of Medical Information Act which Defendants are alleged to have violated as set
17 forth in this Complaint;

18 5. Such orders or judgments as may be necessary to prevent the use or employment by
19 any Defendant of any practice that constitutes unfair competition or false advertising, under the
20 authority of Business and Professions Code section 17203;

21 6. Civil penalties against Defendants pursuant to Health and Safety Code section 25189,
22 subdivisions (b), (c), and (d), in an amount according to proof.

23 7. Civil penalties against Defendants pursuant to Health and Safety Code section
24 25189.2, subdivision (b), in an amount according to proof;

25 8. Civil penalties against Defendants pursuant to Health & Safety Code section 118345,
26 subdivision (b) in an amount according to proof;

27 9. Civil penalties against Defendants pursuant to Health and Safety Code section 25515,
28 in an amount according to proof.

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10. Civil penalties against Defendants for each violation of Civil Code section 56.36(c)(1), in an amount according to proof;

11. Civil penalties of \$2,500 against each Defendant for each violation of Business and Professions Code section 17200, pursuant to Business and Professions Code section 17206, in an amount according to proof;

12. Disgorgement in an amount according to proof, pursuant to Government Code section 12527.6;


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

14. Such other and further relief as the Court deems just and proper.

Respectfully submitted,

Dated: Feb. 7, 2024

ROB BONTA
Attorney General of California
DENNIS L. BECK, JR.
Supervising Deputy Attorney General



AMY J. ANDERSON
Deputy Attorney General

Dated: _____, 2024

PAMELA Y. PRICE
District Attorney of Alameda County

CARLOS J. GUZMAN
Assistant District Attorney

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11. Civil penalties of \$2,500 against each Defendant for each violation of Business and Professions Code section 17200, pursuant to Business and Professions Code section 17206, in an amount according to proof;

12. Disgorgement in an amount according to proof, pursuant to Government Code section 12527.6;

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

14. Such other and further relief as the Court deems just and proper.

Respectfully submitted,

Dated: _____, 2024

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Attorney General of California
DENNIS L. BECK, JR.
Supervising Deputy Attorney General

AMY J. ANDERSON
Deputy Attorney General

Dated February 7, 2024

PAMELA Y. PRICE
District Attorney of Alameda County



CARLOS J. GUZMAN
Assistant District Attorney

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Dated: February 7, 2024

GEORGE GASCÓN
District Attorney of Los Angeles County

Daniel Wright
DANIEL WRIGHT
Deputy District Attorney

Dated: _____, 2024

JEANINE M. PACIONI
District Attorney of Monterey County

EMILY HICKOK
Chief Deputy District Attorney

Dated: _____, 2024

TODD SPITZER
District Attorney of Orange County

ALICIA BERRY
Deputy District Attorney

Dated: _____, 2024

THIEN HO
District Attorney of Sacramento

DOUGLAS WHALEY
Supervising Deputy District Attorney

Dated: _____, 2024

JASON ANDERSON
District Attorney of San Bernardino County

STEPHANIE B. WEISSMAN
Deputy District Attorney

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GEORGE GASCÓN
District Attorney of Los Angeles County

DANIEL WRIGHT
Deputy District Attorney

Dated: Feb. 7, 2024

JEANINE M. PACIONI
District Attorney of Monterey County



EMILY HICKOK
Chief Deputy District Attorney

Dated: _____, 2024

TODD SPITZER
District Attorney of Orange County

ALICIA BERRY
Deputy District Attorney

Dated: _____, 2024

THIEN HO
District Attorney of Sacramento

DOUGLAS WHALEY
Supervising Deputy District Attorney

Dated: _____, 2024

JASON ANDERSON
District Attorney of San Bernardino County

STEPHANIE B. WEISSMAN
Deputy District Attorney

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District Attorney of Los Angeles County

DANIEL WRIGHT
Deputy District Attorney


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JEANINE M. PACIONI
District Attorney of Monterey County

EMILY HICKOK
Chief Deputy District Attorney

Dated: Feb. 7, 2024

TODD SPITZER
District Attorney of Orange County



ALICIA BERRY
Deputy District Attorney

Dated: _____, 2024

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District Attorney of Sacramento

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Supervising Deputy District Attorney

Dated: _____, 2024

JASON ANDERSON
District Attorney of San Bernardino County

STEPHANIE B. WEISSMAN
Deputy District Attorney

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DANIEL WRIGHT
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JEANINE M. PACIONI
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EMILY HICKOK
Chief Deputy District Attorney

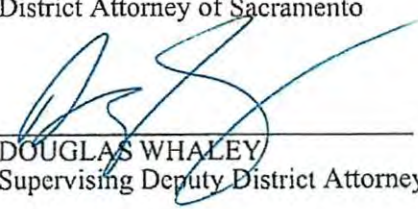
Dated: _____, 2024

TODD SPITZER
District Attorney of Orange County

ALICIA BERRY
Deputy District Attorney

Dated: 2/6, 2024

THIEN HO
District Attorney of Sacramento



DOUGLAS WHALEY
Supervising Deputy District Attorney

Dated: _____, 2024

JASON ANDERSON
District Attorney of San Bernardino County

STEPHANIE B. WEISSMAN
Deputy District Attorney

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Dated: _____, 2024

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DANIEL WRIGHT
Deputy District Attorney

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JEANINE M. PACIONI
District Attorney of Monterey County

EMILY HICKOK
Chief Deputy District Attorney

Dated: _____, 2024

TODD SPITZER
District Attorney of Orange County

ALICIA BERRY
Deputy District Attorney

Dated: _____, 2024

THIEN HO
District Attorney of Sacramento

DOUGLAS WHALEY
Supervising Deputy District Attorney

Dated: February 7, 2024

JASON ANDERSON
District Attorney of San Bernardino County



STEPHANIE B. WEISSMAN
Deputy District Attorney

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RONALD J. FREITAS
District Attorney of San Joaquin County

Dated: 2/13, 2024


CELESTE KAISCH
Deputy District Attorney

Dated: 2/8, 2024

STEPHEN M. WAGSTAFFE
District Attorney of San Mateo County


KENNETH MIFSUD
Deputy District Attorney in Charge

Dated: _____, 2024

ERIK NASARENKO
District Attorney of Ventura County

SUSAN PARK
Deputy District Attorney

Dated: _____, 2024

JEFF W. REISIG
District Attorney of Yolo County

DAVID J. IREY
Assistant Chief Deputy District Attorney

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RONALD J. FREITAS
District Attorney of San Joaquin County

Dated: _____, 2024

CELESTE KAISCH
Deputy District Attorney

Dated: _____, 2024

STEPHEN M. WAGSTAFFE
District Attorney of San Mateo County

KENNETH MIFSUD
Deputy District Attorney in Charge

Dated: February 7, 2024

ERIK NASARENKO
District Attorney of Ventura County



SUSAN PARK
Deputy District Attorney

Dated: _____, 2024

JEFF W. REISIG
District Attorney of Yolo County

DAVID J. IREY
Assistant Chief Deputy District Attorney

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RONALD J. FREITAS
District Attorney of San Joaquin County

Dated: _____, 2024

CELESTE KAISCH
Deputy District Attorney

Dated: _____, 2024

STEPHEN M. WAGSTAFFE
District Attorney of San Mateo County

KENNETH MIFSUD
Deputy District Attorney in Charge


Dated: _____, 2024

ERIK NASARENKO
District Attorney of Ventura County

SUSAN PARK
Deputy District Attorney

Dated: February 8, 2024

JEFF W. REISIG
District Attorney of Yolo County



DAVID J. IREY
Assistant Chief Deputy District Attorney

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EXHIBIT A
COVERED FACILITIES

EXHIBIT A - Quest Covered Facilities

	ADDRESS	CITY	COUNTY	OPEN DATE	CLOSE DATE
1	2111 Whitehall Pl, Ste D	Alameda	Alameda	10/29/03	
2	2999 Regent St, Stes 100 & 102	Berkeley	Alameda	8/1/15	
3	20400 Lake Chabot Rd, Ste 101	Castro Valley	Alameda	7/21/03	
4	4440 Tassajara Rd	Dublin	Alameda	4/29/19	
5	7499 Dublin Blvd	Dublin	Alameda	10/6/17	11/5/19
6	2191 Mowry Ave, Ste 500B	Fremont	Alameda	11/4/03	
7	39273 Liberty St	Fremont	Alameda	2/11/13	
8	556 Mowry Ave, Ste 103	Fremont	Alameda	11/4/03	7/24/20
9	1 Southland Mall Dr, Ste 718	Hayward	Alameda	11/4/03	
10	1090 E Stanley Blvd	Livermore	Alameda	11/4/03	
11	2700 International Blvd, Ste 15	Oakland	Alameda	11/4/03	9/10/20
12	3300 Webster St, Ste 103	Oakland	Alameda	3/20/14	2/12/21
13	3300 Webster St, Ste 109	Oakland	Alameda	12/1/20	
14	3300 Webster St, Ste 1110	Oakland	Alameda	7/3/03	2/21/20
15	3300 Webster St, Ste 601	Oakland	Alameda	9/28/20	2/1/21
16	388 9th St, Ste 218A	Oakland	Alameda	11/4/03	
17	6955 Foothill Blvd, Ste 230	Oakland	Alameda	11/5/03	5/30/17
18	7200 Bancroft Ave, Ste 2686	Oakland	Alameda	5/31/17	
19	5720 Stoneridge Mall Rd, Ste 110	Pleasanton	Alameda	11/4/03	
20	13847 E 14th St, Ste 111	San Leandro	Alameda	7/21/03	
21	12110 Industry Blvd	Jackson	Amador	11/8/17	
22	223 Clinton Rd, Ste 203	Jackson	Amador	1/1/00	
23	101 Raley Blvd, Ste 100	Chico	Butte	4/4/05	
24	250 Cohasset Rd, Ste 20	Chico	Butte	7/21/03	2/25/22
25	670 Rio Lindo Ave, Ste 500	Chico	Butte	8/1/15	
26	2451 Oro Dam Blvd E	Oroville	Butte	9/20/04	8/11/17
27	670 Oro Dam Blvd E, Ste 103	Oroville	Butte	8/15/17	
28	6460 Pentz Rd, Ste B	Paradise	Butte	9/26/22	
29	6573 Clark Rd, Ste A	Paradise	Butte	7/31/03	11/23/20
30	1025 Bridge St	Colusa	Colusa	7/20/09	
31	4049 Lone Tree Wy, Ste F	Antioch	Contra Costa	4/28/97	
32	1181 Central Blvd, Ste C	Brentwood	Contra Costa	10/29/03	
33	2425 East St, Ste 6	Concord	Contra Costa	1/1/00	9/16/22
34	2600 Willow Pass Rd	Concord	Contra Costa	10/27/17	8/31/18
35	4383 Clayton Rd, Ste 20	Concord	Contra Costa	11/1/21	
36	3496 Camino Tassajara	Danville	Contra Costa	10/2/17	
37	913 San Ramon Valley Blvd, Ste 184	Danville	Contra Costa	10/31/03	9/30/17
38	500 Alfred Nobel Dr, Ste 115	Hercules	Contra Costa	7/5/05	
39	3540 Mt Diablo Blvd	Lafayette	Contra Costa	10/25/17	10/20/20
40	3800 Mt Diablo Blvd, Ste 104	Lafayette	Contra Costa	7/3/03	
41	15 Altarinda Rd, Ste 200	Orinda	Contra Costa	7/3/03	9/13/16
42	2250 Gladstone Dr, Ste 5	Pittsburg	Contra Costa	11/4/03	
43	401 Gregory Ln, Ste 146	Pleasant Hill	Contra Costa	1/1/00	
44	2101 Vale Rd, Ste 102	San Pablo	Contra Costa	7/3/03	
45	11050 Bollinger Canyon Rd	San Ramon	Contra Costa	2/1/17	
46	12901 Alcosta Blvd, Ste A	San Ramon	Contra Costa	11/5/03	2/27/17
47	2505 San Ramon Valley Blvd	San Ramon	Contra Costa	2/1/17	
48	108 La Casa Via, Ste 105	Walnut Creek	Contra Costa	8/1/15	
49	3450 Palmer Dr, Ste 7B-7	Cameron Park	El Dorado	10/23/03	
50	4987 Golden Foothill Pkwy, Ste 200	El Dorado Hills	El Dorado	6/24/13	
51	3105 Cedar Ravine Rd, Ste 101	Placerville	El Dorado	10/24/03	
52	1650 Herndon Ave	Clovis	Fresno	7/31/17	
53	2187 Herndon Ave	Clovis	Fresno	10/1/19	
54	255 W Bullard Ave, Ste 107	Clovis	Fresno	1/1/00	7/31/17
55	275 W Herndon Ave	Clovis	Fresno	9/26/16	
56	684 Medical Center Dr E, Ste 101	Clovis	Fresno	10/30/03	4/30/19
57	1165 Phelps Ave, Ste 107	Coalinga	Fresno	10/30/03	12/24/21
58	155 S 5th St	Coalinga	Fresno	8/30/21	
59	1275 E Spruce Ave, Ste 102	Fresno	Fresno	1/24/05	

EXHIBIT A - Quest Covered Facilities

	ADDRESS	CITY	COUNTY	OPEN DATE	CLOSE DATE
60	2210 E Illinois Ave, Ste 504	Fresno	Fresno	11/10/03	3/4/14
61	2841 Tulare St	Fresno	Fresno	10/30/03	
62	2841 Tulare St	Fresno	Fresno	7/1/14	1/6/17
63	3741 W Shaw Ave	Fresno	Fresno	3/1/17	
64	4182 N 1st St, Ste 103	Fresno	Fresno	10/31/03	
65	4739 W Shaw Ave, Ste 104	Fresno	Fresno	9/30/12	9/16/17
66	6307 N Fresno St, Ste 101	Fresno	Fresno	10/30/03	
67	7035 N West Ave, Ste 107	Fresno	Fresno	5/31/05	
68	7050 N Recreation Ave, Ste 104	Fresno	Fresno	10/10/05	
69	7075 N Maple Ave, Ste 104	Fresno	Fresno	11/12/07	
70	7355 N Palm Ave, Ste 106	Fresno	Fresno	2/1/17	
71	8949 N Cedar Ave	Fresno	Fresno	10/20/17	11/1/22
72	177 S Madera Ave	Kerman	Fresno	10/30/03	
73	789 N Reed Ave	Reedley	Fresno	5/12/14	
74	2570 Jensen Ave, Ste 101	Sanger	Fresno	10/31/03	1/14/17
75	2675 Jensen, Ste B	Sanger	Fresno	12/1/16	
76	1122 Rose Ave, Ste 2	Selma	Fresno	9/1/09	1/11/22
77	2256 Dockery Ave, Ste B	Selma	Fresno	8/16/21	
78	1361 Cortina Dr	Orland	Glenn	10/2/16	
79	756 E Walker St	Orland	Glenn	10/29/07	10/6/16
80	2460 Buhne St	Eureka	Humboldt	7/21/03	4/28/15
81	751 W Legion Rd, Ste 202	Brawley	Imperial	1/5/04	
82	1635 W Main St	El Centro	Imperial	1/5/04	
83	10764 San Pablo Ave	El Cerrito	Imperial	3/23/09	6/2/21
84	2001 17th St	Bakersfield	Kern	12/1/03	
85	2323 16th St, Ste 201	Bakersfield	Kern	6/24/13	9/27/14
86	2731 H St, Ste B	Bakersfield	Kern	6/24/13	5/24/14
87	3535 San Dimas St, Ste 18	Bakersfield	Kern	12/1/03	
88	4500 Coffee Rd	Bakersfield	Kern	4/27/17	4/27/17
89	500 Old River Rd, Ste 100	Bakersfield	Kern	8/2/14	9/6/14
90	6001 Truxtun Ave, Ste 120	Bakersfield	Kern	6/24/13	3/31/14
91	9500 Stockdale Hwy, Ste 102	Bakersfield	Kern	7/16/09	
92	9900 Stockdale Hwy, Ste 108	Bakersfield	Kern	6/24/13	
93	9908 Brimhall, Ste 103	Bakersfield	Kern	9/20/17	
94	15580 O St	Mojave	Kern	4/27/20	5/10/23
95	121 E Ridgecrest Blvd	Ridgecrest	Kern	11/2/20	3/25/21
96	1535 N China Lake Blvd, Ste C	Ridgecrest	Kern	1/15/15	11/19/20
97	1539 N China Lake Blvd, #B	Ridgecrest	Kern	3/1/21	
98	807d Tucker Rd, Ste D	Tehachapi	Kern	4/5/05	
99	1120 N Irwin St	Hanford	Kings	10/30/03	8/25/21
100	325 Mall Dr	Hanford	Kings	8/20/21	
101	450 Kings County Dr, Ste 103	Hanford	Kings	8/16/04	9/7/21
102	1071 11th St	Lakeport	Lake	9/20/17	9/20/17
103	5124 Hill Rd E	Lakeport	Lake	10/27/03	
104	29525 Canwood St, Ste 101	Agoura Hills	Los Angeles	10/29/17	
105	29525 Canwood St, Ste 203	Agoura Hills	Los Angeles	2/26/04	10/16/18
106	1411 S Garfield Ave, Ste 100	Alhambra	Los Angeles	12/3/18	
107	723 S Garfield Ave, Ste 301	Alhambra	Los Angeles	4/21/04	11/28/18
108	301 W Huntington Dr, Ste 413	Arcadia	Los Angeles	2/27/04	
109	612 W Duarte Rd, Ste 104	Arcadia	Los Angeles	5/31/15	
110	10230 Artesia Blvd, Ste 305	Bellflower	Los Angeles	2/27/04	
111	150 N Robertson Blvd, Ste 260	Beverly Hills	Los Angeles	5/1/02	
112	435 N Bedford Dr, Ste 112	Beverly Hills	Los Angeles	6/30/03	
113	8501 Wilshire Blvd, Ste 305	Beverly Hills	Los Angeles	6/21/12	
114	191 S Buena Vista, Ste 175	Burbank	Los Angeles	7/26/19	7/26/19
115	201 S Buena Vista St, Ste 125	Burbank	Los Angeles	10/29/17	4/1/21
116	201 S Buena Vista St, Ste 225	Burbank	Los Angeles	8/3/20	
117	2601 W Alameda Ave, Ste 114	Burbank	Los Angeles	2/27/04	
118	2701 W Alameda Ave, Ste 200	Burbank	Los Angeles	11/1/17	5/22/18

EXHIBIT A - Quest Covered Facilities

	ADDRESS	CITY	COUNTY	OPEN DATE	CLOSE DATE
119	2701 W Alameda Ave, Ste 304	Burbank	Los Angeles	10/29/17	1/5/19
120	2701 W Alameda Ave, Ste 406	Burbank	Los Angeles	6/1/18	
121	554 E San Bernardino Rd, Ste 103	Covina	Los Angeles	2/27/04	
122	3831 Hughes Ave, Ste 503	Culver City	Los Angeles	11/21/00	12/6/17
123	750 N Diamond Bar Blvd, Ste 110	Diamond Bar	Los Angeles	7/13/04	
124	10800 Paramount Blvd, Ste 103	Downey	Los Angeles	2/27/04	
125	11525 Brookshire Ave, Ste 401	Downey	Los Angeles	2/27/04	
126	1500 S Central Ave, Ste 102	Glendale	Los Angeles	6/24/13	9/13/17
127	1500 S Central Ave, Ste 326	Glendale	Los Angeles	8/23/17	
128	3600 N Verdugo Rd, Ste 303	Glendale	Los Angeles	2/28/04	
129	800 S Central Ave, Ste 205	Glendale	Los Angeles	2/27/04	
130	801 S Chevy Chase Dr, Ste 50	Glendale	Los Angeles	9/20/04	
131	210 S Grand Ave, Ste 124	Glendora	Los Angeles	2/27/04	
132	17138 Colima Rd, Ste A	Hacienda Heights	Los Angeles	2/27/04	
133	4477 W 118th St, Ste 102	Hawthorne	Los Angeles	2/27/04	
134	323 N Prairie Ave, Ste 117	Inglewood	Los Angeles	2/27/04	
135	3233 Foothill Blvd	La Crescenta	Los Angeles	11/6/17	10/22/22
136	1600 Foothill Blvd	La Verne	Los Angeles	10/27/17	9/18/17
137	1629 W Avenue J, Ste 102	Lancaster	Los Angeles	5/1/02	
138	1043 Elm Ave, Ste 410	Long Beach	Los Angeles	2/29/04	
139	1760 Termino Ave, Ste 200	Long Beach	Los Angeles	7/28/15	
140	2650 Elm Ave, Stes 101 & 102	Long Beach	Los Angeles	7/22/15	
141	2865 Atlantic Ave, Ste 103	Long Beach	Los Angeles	7/28/15	1/29/16
142	2880 Atlantic Ave, Ste 270	Long Beach	Los Angeles	2/28/04	
143	3816 Woodruff Ave, Ste 306	Long Beach	Los Angeles	2/28/04	
144	5830 Downey Ave	Long Beach	Los Angeles	2/27/04	
145	701 E 28th St, Ste 310	Long Beach	Los Angeles	7/28/15	7/6/21
146	1127 Wilshire Blvd, Ste 1512	Los Angeles	Los Angeles	2/28/04	
147	1414 S Grand Ave, Ste 180	Los Angeles	Los Angeles	2/28/04	
148	1632 E Cesar Chavez Ave	Los Angeles	Los Angeles	2/27/04	
149	2080 Century Park E, Ste 1201	Los Angeles	Los Angeles	2/27/04	
150	2105 Beverly Blvd, Ste 105	Los Angeles	Los Angeles	2/28/04	
151	4036 S Centinela Ave	Los Angeles	Los Angeles	3/1/17	
152	420 E 3rd St, Ste 802	Los Angeles	Los Angeles	2/27/04	
153	4520 W Sunset Blvd	Los Angeles	Los Angeles	11/8/17	1/30/23
154	500 S Virgil Ave, Ste 202	Los Angeles	Los Angeles	11/29/12	
155	8600 W 3rd St	Los Angeles	Los Angeles	12/1/03	10/20/17
156	8631 W 3rd St, Ste 530E	Los Angeles	Los Angeles	7/29/14	1/6/17
157	10747 Long Beach Blvd, Unit 1	Lynwood	Los Angeles	8/1/17	
158	3737 Martin Luther King Jr Blvd, Ste 333	Lynwood	Los Angeles	2/28/04	12/15/17
159	855 Manhattan Beach Blvd, Ste 206	Manhattan Beach	Los Angeles	2/28/04	4/2/14
160	11550 Indian Hills Rd, Ste 230	Mission Hills	Los Angeles	10/29/17	6/28/19
161	14901 Rinaldi St, Ste 314	Mission Hills	Los Angeles	2/28/04	
162	2527 Via Campo	Montebello	Los Angeles	2/9/19	
163	433 N 4th St, Ste 212	Montebello	Los Angeles	2/28/04	2/9/19
164	24160 Lyons Ave	Newhall	Los Angeles	7/3/17	
165	12626 Riverside Dr, Ste 511	North Hollywood	Los Angeles	2/28/04	
166	18250 Roscoe Blvd, Ste 120	Northridge	Los Angeles	2/28/04	8/7/18
167	18350 Roscoe Blvd, Ste 603	Northridge	Los Angeles	5/10/18	
168	18350 Roscoe Blvd, Ste 712	Northridge	Los Angeles	6/24/13	8/3/18
169	18433 Roscoe Blvd, Ste 105	Northridge	Los Angeles	6/24/13	6/30/14
170	41230 11th St W, Ste D	Palmdale	Los Angeles	12/31/14	
171	843 Auto Center Dr, Ste A	Palmdale	Los Angeles	12/1/03	
172	1845 N Fair Oaks Ave, Ste P301	Pasadena	Los Angeles	12/1/04	
173	50 Bellefontaine St, Ste 101	Pasadena	Los Angeles	2/29/04	
174	65 N Madison Ave, Ste 305	Pasadena	Los Angeles	2/28/04	
175	960 E Green St, Ste 164	Pasadena	Los Angeles	2/29/04	
176	12746 W Jefferson Blvd, Ste 3150	Playa Vista	Los Angeles	10/11/19	
177	250 W Bonita Ave Bldg A, Ste 130	Pomona	Los Angeles	11/1/04	

EXHIBIT A - Quest Covered Facilities

	ADDRESS	CITY	COUNTY	OPEN DATE	CLOSE DATE
178	520 N Prospect Ave, Ste 305	Redondo Beach	Los Angeles	2/29/04	
179	883 Silver Spur Rd	Rolling Hills Estates	Los Angeles	6/28/17	
180	1330 W Covina Blvd, Ste 205	San Dimas	Los Angeles	2/29/04	
181	416 W Las Tunas Dr, Ste 204	San Gabriel	Los Angeles	2/29/04	
182	1221 Gaffey St	San Pedro	Los Angeles	2/21/17	9/22/17
183	1294 W 6th St, Ste 206	San Pedro	Los Angeles	2/29/04	
184	16550 Soledad Canyon Rd	Santa Clarita	Los Angeles	10/20/17	
185	24305 Town Center Dr, Ste 140	Santa Clarita	Los Angeles	2/29/04	
186	1260 15th St, Ste 901	Santa Monica	Los Angeles	2/29/04	
187	4849 Van Nuys Blvd, Ste 208	Sherman Oaks	Los Angeles	7/7/97	
188	4955 Van Nuys Blvd, Ste 611	Sherman Oaks	Los Angeles	11/11/17	
189	12660 Riverside Dr, Ste 230	Studio City	Los Angeles	10/29/17	12/6/19
190	18370 Burbank Blvd, Ste 108	Tarzana	Los Angeles	2/29/04	
191	5525 Etiwanda Ave, Ste 201	Tarzana	Los Angeles	10/29/17	6/28/19
192	5525 Etiwanda Ave, Ste 211	Tarzana	Los Angeles	9/10/18	6/14/19
193	5525 Etiwanda Ave, Ste 307	Tarzana	Los Angeles	1/1/00	
194	23441 Madison St, Ste 300	Torrance	Los Angeles	2/29/04	
195	3500 Lomita Blvd, Ste 104	Torrance	Los Angeles	2/29/04	
196	4201 Torrance Blvd, Ste 300	Torrance	Los Angeles	2/29/04	
197	6540 Foothill Blvd	Tujunga	Los Angeles	2/28/23	5/8/23
198	7789 Foothill Blvd	Tujunga	Los Angeles	11/3/17	9/27/22
199	25850 The Old Rd	Valencia	Los Angeles	7/3/17	
200	27875 Smyth Dr, Ste 102	Valencia	Los Angeles	10/25/17	10/25/17
201	14624 Sherman Wy, Ste 101	Van Nuys	Los Angeles	6/24/13	
202	15243 Vanowen St, Ste 506	Van Nuys	Los Angeles	2/29/04	1/9/15
203	1135 S Sunset Ave, Ste 400	West Covina	Los Angeles	11/15/04	
204	7230 Medical Center Dr, Ste 605	West Hills	Los Angeles	1/1/00	
205	7345 Medical Center Dr, Ste 500	West Hills	Los Angeles	10/30/17	
206	1220 La Venta Dr, Ste 201	Westlake Village	Los Angeles	12/1/03	
207	15141 Whittier Blvd, Ste 125	Whittier	Los Angeles	7/13/99	
208	8135 Painter Ave, Ste 104	Whittier	Los Angeles	2/29/04	5/27/17
209	8135 Painter Ave, Ste 301	Whittier	Los Angeles	5/15/17	
210	341 Trinity Ave	Chowchilla	Madera	10/30/03	
211	363 E Almond Ave, Ste 107	Madera	Madera	6/28/99	
212	48677 Victoria Ln	Oakhurst	Madera	6/1/15	5/29/15
213	48677 Victoria Ln	Oakhurst	Madera	6/16/15	
214	1000 S Eliseo Dr, Ste 100	Greenbrae	Marin	12/1/16	
215	100A Drakes Landing Rd, Ste 225	Greenbrae	Marin	11/14/18	11/26/20
216	1300 S Eliseo Dr, Ste 101	Greenbrae	Marin	4/7/11	9/30/16
217	5 Bon Air Rd, Ste 119	Larkspur	Marin	11/14/18	
218	23 Reed Blvd, Ste 110	Mill Valley	Marin	11/14/18	11/18/22
219	447 Miller Ave	Mill Valley	Marin	10/28/03	
220	750 Redwood Hwy, Ste 1206	Mill Valley	Marin	1/3/22	6/22/22
221	5720 Nave Dr	Novato	Marin	2/4/22	
222	75 Rowland Wy, Ste 101	Novato	Marin	11/14/18	2/24/22
223	938 Diablo Ave	Novato	Marin	5/13/22	10/10/22
224	4000 Civic Center Dr, Ste 206	San Rafael	Marin	4/21/21	7/23/21
225	711 D St, Ste 103	San Rafael	Marin	10/28/03	
226	750 Las Gallinas Ave, Ste 101	San Rafael	Marin	10/28/03	7/3/17
227	950 Las Gallinas Ave	San Rafael	Marin	8/12/16	
228	5300 Hwy 49 N	Mariposa	Mariposa	10/30/03	
229	653 S State St	Ukiah	Mendocino	10/14/19	8/12/21
230	1271 Commerce Ave, Shops 5	Atwater	Merced	4/1/21	
231	730 W 1st St	Los Banos	Merced	10/31/03	
232	1390 E Yosemite Ave	Merced	Merced	6/24/13	11/25/15
233	240 E 13th St, Ste A	Merced	Merced	10/30/03	
234	3377 G St, Ste A	Merced	Merced	6/24/13	
235	780 W Olive Ave	Merced	Merced	10/30/03	12/19/15
236	857 W Childs Ave	Merced	Merced	8/1/15	

EXHIBIT A - Quest Covered Facilities

	ADDRESS	CITY	COUNTY	OPEN DATE	CLOSE DATE
237	104 Mid Valley Ctr	Carmel	Monterey	9/18/17	9/18/17
238	815 Canyon Del Rey Blvd	Del Rey Oaks	Monterey	4/3/17	
239	294 Reservation Rd	Marina	Monterey	4/5/10	
240	757 Pacific St, Ste B1	Monterey	Monterey	11/4/03	
241	1212 Forest Ave	Pacific Grove	Monterey	8/22/16	7/2/22
242	193 Country Club Gate Ctr	Pacific Grove	Monterey	10/17/11	8/20/16
243	212 San Jose St, Ste 101	Salinas	Monterey	8/1/15	
244	323 N Sanborn Rd, Ste D	Salinas	Monterey	11/4/03	5/19/17
245	631 E Alvin Dr, Ste G1	Salinas	Monterey	6/3/15	
246	1100 Trancas St, First Floor	Napa	Napa	6/1/17	9/7/17
247	1141 Pear Tree Ln	Napa	Napa	10/28/03	3/17/21
248	3260 Beard Rd, Ste A	Napa	Napa	10/28/03	10/7/22
249	673 Trancas St	Napa	Napa	8/2/21	
250	155 Glasson Wy, Bldg 4	Grass Valley	Nevada	7/1/17	
251	300 Sierra College Dr, Ste 210	Grass Valley	Nevada	10/23/03	
252	10126 Commercial Ave	Penn Valley	Nevada	11/4/13	5/1/14
253	11366 Pleasant Valley Rd	Penn Valley	Nevada	7/1/17	
254	26671 Aliso Creek Rd, Ste 102	Aliso Viejo	Orange	11/1/14	
255	1120 W La Palma Ave, Ste 7	Anaheim	Orange	3/19/04	
256	2229 W Ball Rd, Ste C	Anaheim	Orange	3/19/04	
257	3010 W Orange Ave, Ste 410	Anaheim	Orange	6/24/13	8/21/15
258	500 S Anaheim Hills Rd, Ste 121	Anaheim	Orange	7/13/04	
259	1190 Baker St, Ste 104	Costa Mesa	Orange	12/1/03	
260	1640 Newport Blvd, Ste 310	Costa Mesa	Orange	2/20/12	
261	3 Monarch Bay Plz, Ste 108	Dana Point	Orange	8/1/05	
262	26672 Portola Pkwy	Foothill Ranch	Orange	9/2/19	
263	11180 E Warner Ave, Ste 159	Fountain Valley	Orange	9/9/02	
264	18111 Brookhurst St, Ste 2100	Fountain Valley	Orange	7/28/15	3/1/22
265	18785 Brookhurst St, Ste 103	Fountain Valley	Orange	8/14/15	
266	9900 Talbert Ave, Ste 203	Fountain Valley	Orange	4/1/04	
267	100 E Valencia Mesa Dr, Ste 301	Fullerton	Orange	3/19/04	3/17/21
268	2720 N Harbor Blvd, Ste 100	Fullerton	Orange	4/27/20	
269	2720 N Harbor Blvd, Ste 120	Fullerton	Orange	7/13/04	3/17/21
270	12665 Garden Grove Blvd, Ste 714	Garden Grove	Orange	3/19/04	
271	17742 Beach Blvd, Ste 228	Huntington Beach	Orange	3/19/04	
272	18800 Main St, Ste 111	Huntington Beach	Orange	10/18/06	8/9/17
273	18800 Main St, Ste 206	Huntington Beach	Orange	6/26/17	
274	19582 Beach Blvd, Ste 300	Huntington Beach	Orange	3/19/04	
275	7677 Center Ave, Ste 101	Huntington Beach	Orange	7/28/15	8/8/17
276	8891 Atlanta Ave	Huntington Beach	Orange	10/9/17	
277	15825 Laguna Canyon Rd, Ste 108	Irvine	Orange	9/12/11	
278	16300 Sand Canyon, Ste 704A	Irvine	Orange	6/24/13	9/29/14
279	4050 Barranca Pkwy, Ste 120	Irvine	Orange	7/13/04	
280	4950 Barranca Pkwy, Ste 209	Irvine	Orange	3/19/04	
281	2101 W Imperial Hwy	La Habra	Orange	5/1/17	5/11/17
282	5418 La Palma Ave	La Palma	Orange	6/1/18	
283	7872 Walker St, Ste 102	La Palma	Orange	3/19/04	9/17/18
284	47647 Caleo Bay Dr, Ste 140	La Quinta	Orange	12/17/07	8/29/16
285	78-271 State Hwy 111	La Quinta	Orange	8/28/16	
286	23521 Paseo De Valencia, Ste 302C	Laguna Hills	Orange	8/29/05	
287	25411 Cabot Rd, Ste 109	Laguna Hills	Orange	6/24/13	
288	30131 Town Center Dr, Ste 140	Laguna Niguel	Orange	6/24/13	
289	10861 Cherry St, Ste 201	Los Alamitos	Orange	3/19/04	
290	3771 Katella Ave, Ste 201	Los Alamitos	Orange	2/11/97	9/24/19
291	26732 Crown Valley Pkwy, Ste 521	Mission Viejo	Orange	3/1/05	
292	26800 Crown Valley Pkwy, Ste 480	Mission Viejo	Orange	3/25/07	
293	1401 Avocado Ave, Ste 103	Newport Beach	Orange	12/1/03	
294	355 Placentia Ave, Ste 204	Newport Beach	Orange	3/19/04	
295	1010 W La Veta Ave, Ste 140	Orange	Orange	5/21/09	

EXHIBIT A - Quest Covered Facilities

	ADDRESS	CITY	COUNTY	OPEN DATE	CLOSE DATE
296	1140 W La Veta Ave, Ste 570	Orange	Orange	3/19/04	
297	1310 W Stewart Dr, Ste 304	Orange	Orange	3/19/04	
298	230 S Main St, Ste 220	Orange	Orange	3/19/04	
299	2684 N Tustin St	Orange	Orange	10/11/17	
300	1041 E Yorba Linda Blvd, Ste 208	Placentia	Orange	12/27/11	12/5/22
301	1206 E Yorba Linda Blvd	Placentia	Orange	1/7/22	
302	22312 El Paseo, Ste H	Rancho Santa Margarita	Orange	3/19/04	
303	1300 Avenida Vista Hermosa, Ste 160	San Clemente	Orange	7/28/15	
304	675 Camino De Los Mares, Ste 300	San Clemente	Orange	1/1/00	
305	1220 Hemlock Wy, Ste 101	Santa Ana	Orange	10/11/10	
306	3650 S Bristol St	Santa Ana	Orange	9/6/22	
307	3950 S Bristol St	Santa Ana	Orange	3/20/23	6/20/23
308	801 N Tustin Ave, Ste 102	Santa Ana	Orange	1/17/96	
309	2928 Westminster Ave	Seal Beach	Orange	7/28/15	
310	12791 Newport Ave, Ste 106	Tustin	Orange	3/19/04	7/6/18
311	15000 Kensington Park Ave, Ste 190	Tustin	Orange	4/16/18	
312	10362 Bolsa Ave	Westminster	Orange	3/15/10	9/8/14
313	15355 Brookhurst St, Stes 102-108	Westminster	Orange	3/19/04	
314	20445 Yorba Linda Blvd	Yorba Linda	Orange	10/27/17	10/21/22
315	3133 Professional Dr, Ste 16	Auburn	Placer	10/23/03	
316	1530 3rd St, Ste 100	Lincoln	Placer	10/24/03	
317	2220 Sunset Blvd	Rocklin	Placer	10/23/16	
318	4240 Rocklin Rd, Ste 10	Rocklin	Placer	11/22/03	10/21/16
319	550 W Ranch View Dr, Ste 3000	Rocklin	Placer	6/24/13	5/31/14
320	1420 E Roseville Pkwy, Ste 120	Roseville	Placer	2/23/04	
321	151 N Sunrise Ave, Ste 711	Roseville	Placer	10/24/03	
322	8207 Sierra College Blvd, Ste 520-C	Roseville	Placer	10/24/03	2/28/15
323	8690 Sierra College Blvd, Ste 120	Roseville	Placer	6/24/13	
324	701 Highland Springs Ave, Ste 6	Beaumont	Riverside	3/19/04	
325	118 W 9th St	Corona	Riverside	3/19/04	1/31/23
326	2071 Compton Ave, Ste 105A	Corona	Riverside	1/24/14	1/23/23
327	2250 S Main St, Ste 105	Corona	Riverside	4/1/02	
328	308 W 6th St, Ste 201	Corona	Riverside	6/1/21	
329	6102 Orbis Wy, Ste 510	Eastvale	Riverside	3/31/21	
330	6102 Orbis Wy, Ste 510	Eastvale	Riverside	7/1/21	6/15/21
331	6170 Hamner Ave	Eastvale	Riverside	11/1/17	7/3/21
332	1850 W Florida Ave	Hemet	Riverside	2/1/21	
333	3853 W Stetson Ave, Ste 101	Hemet	Riverside	3/19/04	
334	850 E Latham Ave, Stes 203 & 204	Hemet	Riverside	3/1/21	
335	81-715 Dr Carreon Blvd, Ste A-4	Indio	Riverside	3/19/04	
336	31712 Casino Dr, Ste 7B	Lake Elsinore	Riverside	10/29/07	4/29/17
337	32251 Mission Trl, Ste G1	Lake Elsinore	Riverside	5/1/17	
338	29798 Haun Rd, Ste 206	Menifee	Riverside	9/11/06	
339	12730 Heacock St, Ste 2	Moreno Valley	Riverside	7/11/05	7/26/22
340	12968-C Frederick St	Moreno Valley	Riverside	6/24/13	7/13/14
341	25405 Hancock Ave, Ste 102	Murrieta	Riverside	2/15/05	
342	25460 Medical Center Dr, Ste 102	Murrieta	Riverside	7/25/16	
343	39765 Date St, Ste 102	Murrieta	Riverside	2/4/13	6/30/15
344	73091 Country Club Dr, Ste A4	Palm Desert	Riverside	10/1/21	
345	1695 N Sunrise Wy	Palm Springs	Riverside	12/30/11	1/5/17
346	555 E Tachevah Dr, Ste 102W	Palm Springs	Riverside	3/19/04	
347	1688 N Perris Blvd, Ste H1	Perris	Riverside	5/19/08	
348	36101 Bob Hope Dr, Ste E6	Rancho Mirage	Riverside	3/19/04	8/30/22
349	2711 Canyon Springs Pkwy, Ste 101	Riverside	Riverside	1/1/00	
350	3520 Riverside Plaza Dr	Riverside	Riverside	5/22/17	10/21/22
351	3975 Jackson St, Ste 100	Riverside	Riverside	6/24/13	
352	4000 14th St, Ste 508	Riverside	Riverside	6/24/13	4/26/14
353	4100 Central Ave, Ste 102	Riverside	Riverside	3/30/13	5/22/17
354	4646 Brockton Ave, Ste 102	Riverside	Riverside	3/19/04	

EXHIBIT A - Quest Covered Facilities

	ADDRESS	CITY	COUNTY	OPEN DATE	CLOSE DATE
355	4646 Brockton Ave, Ste 2021A	Riverside	Riverside	6/24/13	11/22/14
356	6485 Day St, Ste 102	Riverside	Riverside	11/22/06	7/25/22
357	6926 Brockton Ave, Ste 2	Riverside	Riverside	3/19/04	
358	9041 Magnolia Ave, Ste 205	Riverside	Riverside	3/19/04	
359	28125 Bradley Rd, Ste 245	Sun City	Riverside	7/24/16	
360	27699 Jefferson Ave, Ste 109	Temecula	Riverside	3/19/04	
361	28780 Single Oak Dr, Ste 165	Temecula	Riverside	11/1/15	3/19/19
362	28780 Single Oak Dr, Ste 275	Temecula	Riverside	8/20/18	
363	31150 Temecula Pkwy, Ste 203	Temecula	Riverside	1/29/16	
364	31515 Rancho Pueblo Rd, Ste 104	Temecula	Riverside	2/10/08	2/7/17
365	36243 Inland Valley Dr, Ste 260	Wildomar	Riverside	3/19/04	4/29/17
366	3637 Mission Ave, Ste 1	Carmichael	Sacramento	10/24/03	1/11/18
367	5811 Jameson Ct	Carmichael	Sacramento	10/24/03	
368	6555 Coyle Ave , Ste 100	Carmichael	Sacramento	4/21/13	6/2/14
369	6555 Coyle Ave, Ste 160	Carmichael	Sacramento	10/23/03	
370	6620 Coyle Ave, Ste 100	Carmichael	Sacramento	10/23/03	
371	7423 Fair Oaks Blvd	Carmichael	Sacramento	3/1/16	
372	7115 Greenback Ln	Citrus Heights	Sacramento	12/1/18	
373	8220 Wymark Dr	Elk Grove	Sacramento	6/24/13	10/25/17
374	9281 Office Park Cir, Ste 120	Elk Grove	Sacramento	10/30/16	
375	9340 W Stockton Blvd, Ste 100	Elk Grove	Sacramento	10/28/03	10/27/16
376	9394 Big Horn Blvd	Elk Grove	Sacramento	6/24/13	3/21/17
377	5265 Sunrise Blvd	Fair Oaks	Sacramento	10/24/03	
378	1300 E Bidwell St, Ste 150	Folsom	Sacramento	1/9/12	6/1/20
379	1600 Creekside Dr, Ste 1100	Folsom	Sacramento	10/23/03	
380	1730 Prairie City Rd	Folsom	Sacramento	6/24/13	5/2/19
381	1731 Creekside Dr, Bldg C, Ste 150	Folsom	Sacramento	12/3/07	9/2/17
382	1750 Prairie City Rd, Ste 100	Folsom	Sacramento	10/26/18	
383	2180 Golden Center Ln, Ste 50	Gold River	Sacramento	4/3/18	
384	1995 Zinfandel Dr, Ste 102	Rancho Cordova	Sacramento	10/24/03	3/30/18
385	1020 29th St, Ste 340	Sacramento	Sacramento	10/23/03	4/26/19
386	1500 21st St	Sacramento	Sacramento	10/23/03	6/13/17
387	1725 Professional Dr	Sacramento	Sacramento	10/23/03	2/6/18
388	2288 Auburn Blvd, Ste 103	Sacramento	Sacramento	10/23/03	
389	3000 Q St, 1st Floor	Sacramento	Sacramento	6/24/13	
390	3270 Arena Blvd, Ste 505	Sacramento	Sacramento	5/1/18	
391	3320 Arden Wy	Sacramento	Sacramento	10/30/17	9/16/22
392	3941 J St, Ste 100	Sacramento	Sacramento	6/24/13	
393	4112 E Commerce Wy, Ste 101	Sacramento	Sacramento	8/13/07	11/2/18
394	4400 Duckhorn Dr, Ste 100	Sacramento	Sacramento	6/24/13	12/17/18
395	5025 J St, Ste 103	Sacramento	Sacramento	8/1/99	
396	6029 Florin Rd, Ste 100	Sacramento	Sacramento	5/1/18	
397	65 University Ave, Ste G6	Sacramento	Sacramento	7/24/17	
398	7237 E Southgate Dr, Ste D	Sacramento	Sacramento	10/23/03	10/29/18
399	7248 S Land Park Dr, Ste 120	Sacramento	Sacramento	10/24/03	
400	7501 Hospital Dr, Ste 100	Sacramento	Sacramento	1/13/15	12/18/15
401	77 Cadillac Dr, Ste 280	Sacramento	Sacramento	6/9/08	3/14/18
402	8191 Timberlake Wy, Ste 300	Sacramento	Sacramento	4/30/12	
403	87 Scripps Dr, Ste 100	Sacramento	Sacramento	10/24/03	8/1/17
404	591 Tres Pinos Rd	Hollister	San Benito	9/5/17	
405	18523 Corwin Rd, Ste P	Apple Valley	San Bernardino	3/19/04	
406	309 E Mountain View St, Ste 112	Barstow	San Bernardino	6/1/05	
407	42002 Fox Farm Rd, Ste 103	Big Bear Lake	San Bernardino	1/13/20	
408	13768 Roswell, Ste 220	Chino	San Bernardino	3/19/04	11/18/16
409	4028 Grand Ave, Ste B	Chino	San Bernardino	11/20/16	
410	5562 Philadelphia St, Ste 206	Chino	San Bernardino	11/1/18	
411	17051 Sierra Lakes Pkwy, Ste 250	Fontana	San Bernardino	12/1/11	
412	7390 Cherry Ave	Fontana	San Bernardino	11/2/20	
413	14101 Main St, Ste 102	Hesperia	San Bernardino	9/12/22	

EXHIBIT A - Quest Covered Facilities

	ADDRESS	CITY	COUNTY	OPEN DATE	CLOSE DATE
414	15462 Main St, Ste B	Hesperia	San Bernardino	4/1/04	1/12/23
415	25805 Barton Rd, Ste A-104	Loma Linda	San Bernardino	8/11/08	
416	9723 Sierra Vista Rd, Ste B	Phelan	San Bernardino	3/19/04	8/1/14
417	10399 Lemon Ave, Ste 104	Rancho Cucamonga	San Bernardino	3/19/04	
418	245 Terracina Blvd, Ste 104B	Redlands	San Bernardino	5/31/15	
419	1700 N Waterman Ave	San Bernardino	San Bernardino	9/2/19	
420	2150 N Waterman Ave, Ste 100B	San Bernardino	San Bernardino	3/19/04	
421	1399 E Foothill Blvd, Ste B	Upland	San Bernardino	3/19/04	
422	573 N Mountain Ave	Upland	San Bernardino	4/15/04	
423	81 W Foothill Blvd	Upland	San Bernardino	11/1/17	
424	12199 Hesperia Rd	Victorville	San Bernardino	12/2/19	1/31/23
425	12370 Hesperia Rd, Ste 4	Victorville	San Bernardino	3/19/04	
426	33490 Oak Glen Rd, Ste D	Yucaipa	San Bernardino	3/19/04	
427	57370 29 Palms Hwy, Ste 102	Yucaipa Valley	San Bernardino	12/7/15	
428	3257 Camino De Los Coches, Ste 201	Carlsbad	San Diego	4/27/12	4/30/20
429	3439 Via Montebello	Carlsbad	San Diego	2/24/20	7/20/22
430	480 4th Ave, Ste 101	Chula Vista	San Diego	1/3/00	
431	563 Telegraph Canyon Rd	Chula Vista	San Diego	9/9/02	
432	841 Kuhn Dr, Ste 101	Chula Vista	San Diego	5/16/05	
433	855 3rd Ave, Ste 2250	Chula Vista	San Diego	1/5/04	
434	860 Jamacha Rd, Ste 103	El Cajon	San Diego	11/5/99	
435	477 N El Camino Real, Ste B201	Encinitas	San Diego	6/28/00	
436	351 W Felicita Ave	Escondido	San Diego	10/16/17	9/18/17
437	488 E Valley Pkwy, Ste 314	Escondido	San Diego	11/5/99	
438	521 E Elder St, Ste 201	Fallbrook	San Diego	12/7/15	
439	5103 Garfield St	La Mesa	San Diego	1/8/01	
440	5565 Grossmont Center Dr, Bldg 3, Ste 463	La Mesa	San Diego	4/18/05	12/1/14
441	8881 Fletcher Pkwy, Ste 285	La Mesa	San Diego	1/5/04	
442	2340 E 8th St, Ste F	National City	San Diego	2/28/05	
443	3601 Vista Wy, Ste 104	Oceanside	San Diego	1/1/00	
444	15725 Pomerado Rd, Ste 208	Poway	San Diego	6/12/96	
445	1855 First Ave, Ste 200-B	San Diego	San Diego	8/2/10	
446	3131 Berger Ave, Ste 100	San Diego	San Diego	6/14/00	6/2/14
447	3260 3rd Ave	San Diego	San Diego	4/1/00	2/1/23
448	4060 4th Ave, Ste 125	San Diego	San Diego	4/1/00	
449	6367 Alvarado Ct, Ste 205	San Diego	San Diego	11/8/96	3/30/19
450	7910 Frost St, Ste 180	San Diego	San Diego	6/14/96	1/14/21
451	9333 Genesee Ave, Ste 180	San Diego	San Diego	9/9/10	
452	9643 Mission Gorge Rd	Santee	San Diego	10/16/17	10/21/22
453	9665 Mission Gorge	Santee	San Diego	1/10/23	
454	902 Sycamore Ave, Ste 201	Vista	San Diego	1/5/04	
455	1640 Valencia St, Ste 1B	San Francisco	San Francisco	11/1/13	
456	2198 15th St	San Francisco	San Francisco	8/1/03	
457	2201 Post St	San Francisco	San Francisco	8/1/03	
458	2300 16th St	San Francisco	San Francisco	11/6/17	1/31/21
459	2480 Mission St, Ste 221	San Francisco	San Francisco	11/4/03	8/17/21
460	350 Parnassus Ave, Ste 201	San Francisco	San Francisco	8/1/03	4/26/14
461	450 Sutter St, Ste 2540	San Francisco	San Francisco	10/15/09	
462	490 Post St, Ste 914	San Francisco	San Francisco	8/1/15	2/20/21
463	941 Clay St	San Francisco	San Francisco	9/12/05	
464	15810 S Harlan Rd, Ste A	Lathrop	San Joaquin	6/24/13	5/12/14
465	801 S Ham Ln, Ste 1	Lodi	San Joaquin	4/21/13	
466	845 S Fairmont Ave, Ste 6	Lodi	San Joaquin	3/10/10	
467	1140 Norman Dr, Ste 2	Manteca	San Joaquin	11/19/07	
468	287 Spreckels Ave	Manteca	San Joaquin	4/21/13	11/27/17
469	293 E Commerce Ave	Manteca	San Joaquin	4/21/13	
470	365 Pearson Dr, Ste 4	Porterville	San Joaquin	10/3/11	9/12/14
471	1708 W Hammer Ln	Stockton	San Joaquin	2/17/15	
472	1801 E March Ln, Ste B200	Stockton	San Joaquin	6/24/13	

EXHIBIT A - Quest Covered Facilities

	ADDRESS	CITY	COUNTY	OPEN DATE	CLOSE DATE
473	2291 W March Ln, Ste F145	Stockton	San Joaquin	8/1/15	
474	2349 N California St, Ste A	Stockton	San Joaquin	6/24/13	8/25/17
475	2524 E Main St	Stockton	San Joaquin	3/9/15	6/17/17
476	2800 N California St, Ste 12	Stockton	San Joaquin	6/24/13	
477	3132 W March Ln, Ste 1	Stockton	San Joaquin	6/24/13	
478	510 E Magnolia St, Ste 130	Stockton	San Joaquin	6/24/13	
479	75 W March Ln, Ste L	Stockton	San Joaquin	6/24/13	6/5/23
480	89 W March Ln, Ste 3	Stockton	San Joaquin	6/24/13	11/1/14
481	1801 W 11th St	Tracy	San Joaquin	11/1/16	10/18/16
482	1832 W 11th St	Tracy	San Joaquin	5/17/21	
483	530 W Eaton Ave, Ste D	Tracy	San Joaquin	6/24/13	10/22/18
484	569 W Lowell Ave	Tracy	San Joaquin	6/24/13	1/20/22
485	632 W 11th St, Ste 115	Tracy	San Joaquin	10/31/03	1/27/22
486	310 S Halcyon Rd	Arroyo Grande	San Luis Obispo	8/1/00	4/2/14
487	1758 W Grand Ave	Grover Beach	San Luis Obispo	5/1/19	
488	1239 Osos St	San Luis Obispo	San Luis Obispo	12/1/03	2/13/15
489	3900 Broad St	San Luis Obispo	San Luis Obispo	5/1/17	
490	225 Posada Ln, Ste B	Templeton	San Luis Obispo	12/1/03	8/1/14
491	1100 El Camino Real	Belmont	San Mateo	10/18/17	9/29/18
492	901 Campus Dr, Ste 103	Daly City	San Mateo	1/22/07	
493	1098 Foster City Blvd, Ste 102	Foster City	San Mateo	6/3/13	6/20/17
494	1241 E Hillsdale Blvd, Ste 260	Foster City	San Mateo	7/1/17	
495	248 Main St, Ste 110	Half Moon Bay	San Mateo	11/4/13	6/7/14
496	525 El Camino Real	Menlo Park	San Mateo	10/4/17	
497	65 El Camino Real	Menlo Park	San Mateo	11/4/03	7/18/15
498	120 S El Camino Real, Ste 5	Millbrae	San Mateo	1/13/15	
499	1071 El Camino Real	Redwood City	San Mateo	10/30/16	10/14/22
500	401 Warren St, Ste 100	Redwood City	San Mateo	11/16/05	11/1/16
501	1100 Laurel St, Ste F	San Carlos	San Mateo	11/4/03	
502	110 2nd Ave	San Mateo	San Mateo	8/5/21	
503	127 N San Mateo Dr	San Mateo	San Mateo	2/16/04	8/12/21
504	5360B Hollister Ave, Ste B	Goleta	Santa Barbara	6/30/03	
505	729 N H St	Lompoc	Santa Barbara	11/8/17	9/26/17
506	1046 Coast Village Rd, Ste B	Montecito	Santa Barbara	4/6/20	
507	2420 Castillo St, Ste 200	Santa Barbara	Santa Barbara	6/30/03	4/12/18
508	3905 State St, Ste 9	Santa Barbara	Santa Barbara	4/26/11	
509	116 S Palisade Dr, Ste 202	Santa Maria	Santa Barbara	12/1/03	4/12/14
510	2345 S Broadway, Ste D	Santa Maria	Santa Barbara	12/1/03	
511	2040 Viborg Rd, Ste 210	Solvang	Santa Barbara	12/1/03	
512	20620 Homestead Rd	Cupertino	Santa Clara	2/1/19	
513	7880 Wren Ave, Ste A114	Gilroy	Santa Clara	11/4/03	
514	9360 No Name Uno, Ste 220	Gilroy	Santa Clara	11/20/17	
515	15066 Los Gatos Almaden Rd	Los Gatos	Santa Clara	11/4/03	1/21/17
516	470 N Santa Cruz Ave	Los Gatos	Santa Clara	11/1/17	9/28/18
517	777 Knowles Dr, Ste 1	Los Gatos	Santa Clara	11/4/03	
518	649 E Calaveras Blvd	Milpitas	Santa Clara	10/14/10	
519	50 E Main Ave, Ste B	Morgan Hill	Santa Clara	11/4/03	
520	840 E Dunne Ave	Morgan Hill	Santa Clara	4/6/17	4/6/17
521	205 South Dr, Ste G	Mountain View	Santa Clara	11/4/03	
522	645 San Antonio Rd	Mountain View	Santa Clara	11/6/17	
523	115 N Jackson Ave, Ste 102	San Jose	Santa Clara	11/4/03	12/14/16
524	123 DiSalvo Ave, Ste 10	San Jose	Santa Clara	11/4/03	
525	155 N Jackson Ave, Ste 102	San Jose	Santa Clara	12/14/16	9/9/22
526	1675 Burdette Dr, Ste 40	San Jose	Santa Clara	11/4/03	2/15/17
527	2039 Forest Ave, Ste 101	San Jose	Santa Clara	11/4/03	8/30/14
528	2365 Quimby Rd, Ste 211	San Jose	Santa Clara	2/14/17	
529	2375 Montpelier Dr, Ste 20	San Jose	Santa Clara	11/4/15	11/4/15
530	244 N Jackson Ave, Ste 108	San Jose	Santa Clara	11/4/03	3/7/17
531	25 N 14th St, Ste 160	San Jose	Santa Clara	11/4/03	10/7/20

EXHIBIT A - Quest Covered Facilities

	ADDRESS	CITY	COUNTY	OPEN DATE	CLOSE DATE
532	2505 Samaritan Dr, Ste 108	San Jose	Santa Clara	11/4/03	4/30/16
533	2581 Samaritan Dr, Ste 108	San Jose	Santa Clara	11/5/03	
534	2618 Alum Rock Ave	San Jose	Santa Clara	11/4/03	
535	455 Oconnor Dr, Ste 100	San Jose	Santa Clara	11/4/03	7/11/16
536	5150 Graves Ave, Ste 10-D	San Jose	Santa Clara	11/4/03	
537	6475 Camden Ave, Ste 104	San Jose	Santa Clara	11/4/03	
538	840 Willow St, Ste 700	San Jose	Santa Clara	11/13/13	
539	150 E El Camino Real	Sunnyvale	Santa Clara	11/6/16	9/3/20
540	500 E Remington Dr, Ste 28	Sunnyvale	Santa Clara	11/5/03	11/28/16
541	785 E El Camino Real	Sunnyvale	Santa Clara	11/6/16	
542	528 Capitola Ave	Capitola	Santa Cruz	10/31/03	
543	202 Green Valley Rd, Ste A	Freedom	Santa Cruz	12/7/16	
544	212 Green Valley Rd, Ste 8	Freedom	Santa Cruz	11/5/03	12/7/16
545	1505 Soquel Dr, Ste 4	Santa Cruz	Santa Cruz	11/1/19	3/22/21
546	1595 Soquel Dr, Ste 100	Santa Cruz	Santa Cruz	11/5/03	
547	2203 Mission St	Santa Cruz	Santa Cruz	7/30/17	
548	550 Water St, Ste A	Santa Cruz	Santa Cruz	11/5/03	7/28/17
549	2980 El Rancho Dr	Scotts Valley	Santa Cruz	11/5/03	9/8/17
550	4340 Scotts Valley Dr, Ste F	Scotts Valley	Santa Cruz	8/30/17	
551	2656 Gateway Dr	Anderson	Shasta	10/28/03	11/28/17
552	2995 East St	Anderson	Shasta	11/28/17	
553	1070 E Cypress Ave	Redding	Shasta	11/6/16	10/20/22
554	1340 Churn Creek Rd	Redding	Shasta	3/20/23	
555	2510 Airpark Dr, Ste 202	Redding	Shasta	8/1/15	
556	3328 Churn Creek Rd, Ste B1	Redding	Shasta	11/5/03	11/7/16
557	909 Dana Dr, Ste 2H	Redding	Shasta	6/24/13	5/28/14
558	4156 Ashby Ct	Shasta Lake	Shasta	11/5/03	
559	746 S Main St	Yreka	Siskiyou	5/10/14	6/10/14
560	2042 Columbus Pkwy	Benicia	Solano	11/10/03	1/29/21
561	810 Southampton Rd, Ste 109	Benicia	Solano	1/25/21	
562	1411 Oliver Rd, Ste 130	Fairfield	Solano	10/23/03	
563	770 Mason St, Ste 140	Vacaville	Solano	11/7/03	
564	160 Hospital Dr	Vallejo	Solano	10/24/03	
565	421 March Ave, Ste C	Healdsburg	Sonoma	1/1/11	
566	1550 Professional Dr, Ste B	Petaluma	Sonoma	10/30/03	
567	990 Sonoma Ave, Ste 18A	Santa Rosa	Sonoma	10/28/03	
568	6800 Palm Ave, Ste G	Sebastopol	Sonoma	10/28/03	
569	386 Perkins St	Sonoma	Sonoma	5/16/11	
570	2531 E Whitmore Ave, Ste P	Ceres	Stanislaus	6/27/16	
571	1008 6th St, Ste C	Modesto	Stanislaus	10/30/03	
572	1401 Spanos Ct, Ste 107	Modesto	Stanislaus	10/30/03	
573	1510 Florida Ave, Ste G	Modesto	Stanislaus	10/31/03	8/17/22
574	1524 Mchenry Ave, Ste 120	Modesto	Stanislaus	10/31/03	
575	1541 Florida Ave, Ste 105	Modesto	Stanislaus	10/31/03	
576	2222 E Orangeburg Ave, Ste A3	Modesto	Stanislaus	3/1/12	
577	3525 Pelandale Ave	Modesto	Stanislaus	5/20/19	
578	1248 Main St	Newman	Stanislaus	2/15/07	
579	250 S Oak Ave, Bldg C, Ste 2	Oakdale	Stanislaus	2/12/07	
580	1045 Sperry Ave, Ste D	Patterson	Stanislaus	3/3/18	
581	1108 Ward Ave, Ste 16	Patterson	Stanislaus	1/26/04	3/11/18
582	777 E Hawkeye Ave, Ste 1	Turlock	Stanislaus	12/1/05	
583	981 E Tuolumne Rd, Ste 100	Turlock	Stanislaus	10/31/03	
584	1526 Plumas Ct	Yuba City	Sutter	3/1/21	
585	539 Garden Hwy, Ste E	Yuba City	Sutter	9/16/04	4/15/21
586	866 Plumas St, Ste B	Yuba City	Sutter	10/29/03	4/16/21
587	275 Solano St, Ste 501	Corning	Tehama	5/25/05	
588	1054 S Main St	Red Bluff	Tehama	7/21/03	
589	919 N Blackstone St	Tulare	Tulare	10/31/03	
590	131 S Tamarack St, Ste B	Visalia	Tulare	9/26/11	

EXHIBIT A - Quest Covered Facilities

	ADDRESS	CITY	COUNTY	OPEN DATE	CLOSE DATE
591	1827 S Court St, Ste D	Visalia	Tulare	10/21/21	
592	1031 Sanguinetti Rd, Ste B	Sonora	Tuolumne	11/1/18	
593	940 Sylva Ln, Ste F2	Sonora	Tuolumne	7/11/05	3/6/19
594	3801 Las Posas Rd, Ste 208	Camarillo	Ventura	12/1/03	
595	500 Paseo Camarillo, Ste 103	Camarillo	Ventura	8/17/09	
596	5800 Santa Rosa Rd, Ste 105	Camarillo	Ventura	6/24/13	
597	1000 Newbury Rd, Ste 125	Newbury Park	Ventura	7/5/05	
598	1320 Maricopa Hwy, Ste H	Ojai	Ventura	4/5/05	
599	1700 N Rose Ave, Ste 240	Oxnard	Ventura	6/24/13	9/24/21
600	1701 N Lombard St, Ste 106	Oxnard	Ventura	12/1/03	
601	2600 Saviers Rd	Oxnard	Ventura	2/1/21	
602	925 W 7th St	Oxnard	Ventura	12/1/03	
603	957 Faulkner Rd, Ste 111	Santa Paula	Ventura	12/1/03	
604	135 Macaw Ln, Ste 100	Simi Valley	Ventura	9/1/12	
605	2876 Sycamore Dr, Ste 200	Simi Valley	Ventura	4/3/01	
606	305 S Moorpark Rd	Thousand Oaks	Ventura	12/1/03	8/12/19
607	77 Rolling Oaks Dr, Ste 120	Thousand Oaks	Ventura	8/9/19	
608	2991 Loma Vista Rd, Ste 102B	Ventura	Ventura	12/1/03	
609	6040 Telegraph Rd	Ventura	Ventura	11/1/17	
610	7880 Telegraph Rd, Ste D	Ventura	Ventura	3/1/11	
611	1411 W Covell Blvd, Ste 102	Davis	Yolo	10/1/17	
612	2330 W Covell Blvd	Davis	Yolo	6/24/13	9/17/20
613	635 Anderson Rd, Ste 3	Davis	Yolo	10/23/03	1/16/22
614	2101 Stone Blvd, Ste 170	West Sacramento	Yolo	10/24/03	
615	1837 E Gibson Rd, Ste C	Woodland	Yolo	7/5/21	
616	1837 E Gibson Rd, Ste L	Woodland	Yolo	12/2/16	7/11/22
617	520 Cottonwood St, Ste 7	Woodland	Yolo	10/24/03	12/2/16
618	632 W Gibson Rd	Woodland	Yolo	4/21/13	7/11/22

QUEST LABORATORIES

	ADDRESS	CITY	COUNTY
1	8401 Fallbrook Ave	West Hills	Los Angeles
2	27027 Tournay Rd	Valencia	Los Angeles
3	33608 Ortega Hwy	San Juan Capistrano	Orange
4	3714 Northgate Blvd	Sacramento	Sacramento