

1 **PAW PATROL, INC.**
The Lookout Tower
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help@pawpatrol.org
4

5 *Plaintiffs In Pro Per (and on the case)*

6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
7 **FOR THE COUNTY OF HUMBOLDT**
8 **EUREKA COURTHOUSE**
9

10 CHASE,
MARSHALL,
11 SKYE,
RUBBLE,
12 ROCKY,
ZUMA,
13 EVEREST,
INDIVIDUALLY,
14 AND ON BEHALF OF ALL SIMILARLY SITUATED GOOD PUPS,
(*Plaintiffs*)

15 V.

16 MAYOR HUMDINGER, AN INDIVIDUAL,
17 THE KITTEN CATASTROPHE CREW,
AN UNINCORPORATED ASSOCIATION OF CATS,
18 AND DOES 1 THROUGH 10, INCLUSIVE,
(*Defendants*)
19

Case No.: PAW-2026-RUFF-001

**CLASS ACTION COMPLAINT
FOR DAMAGES AND IN-
JUNCTIVE RELIEF:**

1. Negligent Infliction of Constant Emergencies
2. Racketeer-Influenced and Catnip Operations (RICO)
3. Reckless Endangerment by Repeated Buoyancy Failure
4. Intentional Infliction of Emotional Distress (The Theme Song)
5. Breach of the Implied Covenant of Good Neighborliness
6. Unjust Enrichment (The Treat-Based Economy)

Judge: Hon. Mittens Whiskerton III
Dept.: K9

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21
22
23 **DEMAND FOR JURY TRIAL BY A JURY OF GOOD BOYS AND**
24 **GOOD GIRLS.**

25 **1. INTRODUCTION**

26 Plaintiffs are six dogs and one mountain-dwelling huskie who, between them, hold
27 zero professional licenses, two pilot certifications of questionable provenance, and one
28 (1) recycling truck. They protect a town of approximately forty (40) residents that

1 experiences approximately nine hundred (900) catastrophes per year. They are tired.
2 They would like a nap. They bring this action to recover damages and to obtain, at
3 long last, a single calendar weekend in which absolutely nothing falls off a cliff, into
4 the ocean, or into a volcano.

5 6 **2. PARTIES**

7 2.1. Plaintiff CHASE is a German Shepherd, a police pup, and the team's de
8 facto compliance officer. CHASE has not slept through a single night since
9 the pilot episode. CHASE is "on the case." CHASE is always on the case.
10 CHASE would like, just once, to not be on the case.

11
12 2.2. Plaintiff MARSHALL is a Dalmatian and the team's fire-and-medical pup.
13 MARSHALL has tripped, on average, 1.4 times per rescue, an occupational
14 injury rate that would trigger an immediate workplace-safety investigation in
15 any jurisdiction that had not delegated its entire emergency-response infra-
16 structure to a small child and his dogs.

17
18 2.3. Plaintiff SKYE is an aviation pup who logs flight hours so far in excess of
19 any reasonable limit that her own catchphrase, "this pup's gotta fly," has be-
20 come less a statement of joy and more a cry for regulatory intervention.

21
22 2.4. Plaintiff RUBBLE is a construction pup whose stated life goals are, in order:
23 (a) snacks, (b) naps, and (c) snowboarding. RUBBLE has achieved approxi-
24 mately none of these on a reliable basis and is, frankly, the most relatable
25 Plaintiff in this action.

26
27 2.5. Plaintiffs ROCKY, ZUMA, and EVEREST are the recycling pup, the water-
28 rescue pup, and the snow-rescue pup, respectively. ROCKY's principal griev-

ance is that “don’t lose it, reuse it” is an unworkable philosophy in a town that generates a fresh disaster every ninety (90) seconds. ZUMA’s grievance is addressed in the Third Cause of Action. EVEREST was recruited from a peaceful mountain and put to work immediately, with no orientation, no onboarding, and no clearly defined exit.

2.6. Defendant MAYOR HUMDINGER is an individual residing in the rival community of Foggy Bottom (also in Humboldt County, and living up to the name) and the self-appointed commander of the KITTEN CATASTROPHE CREW. HUMDINGER is the proximate cause of a statistically improbable percentage of Adventure Bay's annual emergencies and has never once been arrested, charged, or even mildly inconvenienced, despite a paper trail visible from space.

2.7. Third-Party Defendant CAP'N TURBOT is a marine biologist who has fallen into the ocean more times than there are episodes of the television program documenting his life, which is itself a remarkable mathematical accomplishment.

2.8. Non-party RYDER, the Plaintiffs' beloved commanding officer, is a minor child operating a private emergency-response enterprise out of a tower. Plaintiffs name no claim against RYDER, who is doing his best, but reserve the right to discuss the labor-law implications at a more convenient time, such as never, because they love him.

3. JURISDICTION AND VENUE

3.1. Venue is proper in this Court because the events giving rise to this action occurred, are occurring, and will occur again before the close of business today,

all within Adventure Bay, an unincorporated coastal community situated on Humboldt Bay in this County. Adventure Bay is the most emergency-prone square mile in the State of California, and arguably the most emergency-prone square mile on any seaboard, foreign or domestic.

4. GENERAL ALLEGATIONS

4.1. The Town of Adventure Bay maintains no fire department, no police department, no coast guard, no air-traffic control, and no apparent municipal budget. Instead, its entire public-safety apparatus consists of the Plaintiffs and a slide.¹

4.2. On information and belief, Defendant HUMDINGER operates the only municipality in recorded history with a per-capita catastrophe rate exceeding 4,000%,² and does so on purpose.

4.3. Defendant HUMDINGER's standard operating procedure is to release six (6) cats into a delicate situation, observe the situation deteriorate, and then express theatrical surprise that the situation has deteriorated. This is not a coincidence. This is a business model.³

4.4. The KITTEN CATASTROPHE CREW, acting in concert and at HUMDINGER's direction, has knocked over, set loose, unplugged, and/or

¹Adventure Bay Mun. Charter art. II, § 1 (designating the Lookout Tower as the Town's sole fire, police, coast guard, air-traffic, medical, and balloon-retrieval authority); see also *In re Municipal Budget of Adventure Bay*, 0 Adv. Bay 4th 0 (Adv. Bay Super. Ct. 2013) (holding the Town budget "cannot be located, and may never have existed").

²*In re Adventure Bay*, 4,000 Adv. Bay 3d 1, 12 (Adv. Bay Super. Ct. 2016) (taking judicial notice that, within Town limits, "something is, statistically, always on fire").

³Adventure Bay Mun. Code § 7-11, the "Please Stop Releasing Cats Ordinance"; accord *Goodway v. Humdinger*, 88 Bark. 2d 4, 9 (Adv. Bay Super. Ct. 2017) (Chickaletta, J., concurring) (observing that "every single time, it is the cats").

1 pushed into the harbor an estimated 1,200 objects that were, prior to feline
2 involvement, entirely stationary.

3
4 4.5. Whenever there is trouble, the residents of Adventure Bay “just yelp for
5 help.” Plaintiffs do not contest the convenience of this arrangement for the
6 residents. Plaintiffs contest that there is no off-switch.⁴

7
8 **5. CAUSES OF ACTION**

9
10 **5.1. FIRST CAUSE OF ACTION — NEGLIGENT INFLICTION OF**
11 **CONSTANT EMERGENCIES:**

12 *(By All Plaintiffs Against MAYOR HUMDINGER and DOES 1–10)*

13 5.1.1. Defendant HUMDINGER owed Plaintiffs a duty not to manufacture a con-
14 tinuous, rolling, never-ending parade of preventable disasters in a town that
15 is roughly the size of a parking lot.

16
17 5.1.2. Defendant HUMDINGER breached that duty every weekday and most
18 weekends, including holidays, including holidays that were themselves the
19 subject of a separate emergency.

20
21 5.1.3. As a direct and proximate result, Plaintiffs have suffered exhaustion, paw
22 fatigue, chronic harness chafing, and the specific psychological injury of be-
23 ing a very good boy who is never, ever done.⁵

24
25
26 ⁴Adventure Bay Mun. Code § 9-1-1, the “Yelp for Help Act,” providing that any resident “in
27 trouble of any kind, including mild inconvenience,” may summon the Paw Patrol, and that the Paw
28 Patrol “shall come,” without exception, refusal, or weekend.

⁵*Marshall v. Standing Upright*, 12 Pup. 3d 100, 104 (9th Pup Cir. 2019) (establishing the “Good
Boy” standard of care: the conduct of a reasonably good boy under like circumstances, tail wag-
ging).

1 **5.2. SECOND CAUSE OF ACTION — RACKETEER-INFLUENCED**
2 **AND CATNIP OPERATIONS (RICO):**

3 *(By All Plaintiffs Against MAYOR HUMDINGER and THE KITTEN CATASTRO-*
4 *PHE CREW)*

5 5.2.1. Defendant HUMDINGER and the KITTEN CATASTROPHE CREW con-
6 stitute an enterprise within the meaning of the RICO statute,⁶ engaged in a
7 pattern of racketeering activity consisting of catnip distribution, premedi-
8 tated chaos, and at least one (1) attempt to steal a perfectly nice festival.

9
10 5.2.2. The enterprise’s predicate acts include, but are by no means limited to:
11 tampering with Adventure Day, sabotaging the Pup Pup Boogie, and the
12 well-documented Great Cheese Incident, particulars of which Plaintiffs are
13 prepared to prove at trial and would honestly rather not relive.

14
15 5.2.3. Plaintiffs were injured in their business and property, said business being
16 “rescuing things” and said property being “their entire afternoon, repeat-
17 edly.”

18
19 **5.3. THIRD CAUSE OF ACTION — RECKLESS ENDANGERMENT**
20 **BY REPEATED BUOYANCY FAILURE:**

21 *(By Plaintiff ZUMA Against Third-Party Defendant CAP’N TURBOT)*

22 5.3.1. Third-Party Defendant TURBOT is a trained marine biologist who has
23 demonstrated, across an extraordinary number of documented incidents, a
24 complete inability to remain on top of the water.

25
26
27
28 ⁶Racketeer-Influenced and Catnip Organizations Act, Adv. Bay Penal Code § 18.6 (criminalizing
“a pattern of feline mischief undertaken for profit, chaos, or vibes”).

1 5.3.2. On each such occasion, Plaintiff ZUMA, the water-rescue pup, was required
2 to deploy his hovercraft to retrieve TURBOT from a body of water that
3 TURBOT, a professional ocean scientist, voluntarily approaches on a daily
4 basis.

5
6 5.3.3. The doctrine of res ipsa loquitur applies: the man falls in the ocean in
7 nearly every episode. The ocean is not the issue. The ocean has been there
8 the whole time.⁷

9
10 5.3.4. Plaintiff ZUMA seeks an order requiring TURBOT to (a) wear a life vest,
11 (b) complete a beginner swim course, and (c) stand at least one (1) full
12 body-length back from the edge of all boats, docks, piers, jetties, and “in-
13 teresting-looking puddles.”

14
15 **5.4. FOURTH CAUSE OF ACTION — INTENTIONAL INFLICTION**
16 **OF EMOTIONAL DISTRESS:**

17 *(By All Plaintiffs and the Class Against ALL DEFENDANTS)*

18 5.4.1. There exists a song. The Court knows the song. The Court is humming the
19 song right now. The Court will be humming the song at 3:00 a.m. The song
20 does not have an ending so much as it has a place where it briefly pauses
21 before beginning again.

22
23 5.4.2. Defendants’ conduct, in perpetuating the conditions that require the song
24 to be deployed multiple times per day, every day, has caused Plaintiffs, the
25 residents of Adventure Bay, and a previously uninvolved third-party class of
26 Exhausted Parents to suffer severe and ongoing earworm-related distress.⁸

27
28 ⁷ *Turbot v. The Pacific Ocean*, 1 Cal. Splash 4th 1, 1 (2014) (the Ocean prevailing on all counts
and on the cross-complaint); accord *Turbot v. Gravity*, 9 Cal. Splash 4th 88 (2021) (Gravity, still
undefeated).

1 5.4.3. This conduct was extreme, outrageous, and, on information and belief, ex-
2 tremely catchy.

3
4 **5.5. FIFTH CAUSE OF ACTION — BREACH OF THE IMPLIED**
5 **COVENANT OF GOOD NEIGHBORLINESS:**

6 *(By All Plaintiffs Against MAYOR HUMDINGER)*

7 5.5.1. Every neighborly relationship contains an implied covenant that one neigh-
8 bor will not, as a hobby, release cats into the other neighbor's infrastruc-
9 ture.⁹

10
11 5.5.2. Defendant HUMDINGER breached this covenant the way most people
12 breathe: constantly, involuntarily, and without ever appearing to think
13 about it.

14
15 **5.6. SIXTH CAUSE OF ACTION — UNJUST ENRICHMENT:**

16 *(By All Plaintiffs Against ALL DEFENDANTS)*

17 5.6.1. Plaintiffs have, through their tireless labor, conferred upon the Town of Ad-
18 venture Bay the benefit of “continuing to exist,” a benefit of substantial
19 value.

20
21 5.6.2. In exchange, Plaintiffs have received treats. Plaintiffs love the treats. Plain-
22 tiffs wish the record to reflect that the treats are not the problem. The
23 problem is that the treats are the entire compensation structure, and a
24 401(k) has never once been mentioned.¹⁰

25
26 ⁸*In re The Theme Song*, 707 Earworm 2d 24, 25 (Cal. Ct. App., Pup. Dist. 2020) (recognizing the
27 tort of Involuntary Musical Recurrence; noting in dicta, “we have not stopped humming it since oral
argument”).

28 ⁹*Pups v. Humdinger (Cats II)*, 6 Adv. Bay 4th 60, 67 (2018) (the implied covenant of good neigh-
borliness is breached “the moment the second cat leaves the bag”).

5.6.3. It would be inequitable to permit Defendants to retain the benefits of an unbroken civilization without compensating the dogs who, alone and unsupervised, are holding the whole thing together with a slide and a positive attitude.

6. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully pray for judgment against Defendants as follows:

- 6.1. For one (1) calendar Saturday during which nothing whatsoever requires rescuing, to be scheduled at Plaintiffs' sole discretion and protected by court order;
- 6.2. For hazard pay in the amount of \$4,000,000.00, payable in a combination of currency and acceptable treats;
- 6.3. For a permanent injunction restraining Defendant HUMDINGER from owning, renting, borrowing, or "just briefly holding" any cat in excess of zero (0) cats;¹¹
- 6.4. For an order capping the Town of Adventure Bay's emergencies at a reasonable two (2) per week, with a generous variance for genuine volcano activity;
- 6.5. For an order requiring Third-Party Defendant TURBOT to wear a life vest and stand back from the edge;
- 6.6. For mandatory, court-supervised naps for all Plaintiffs, with no yelping for help permitted during nap hours;
- 6.7. For an order directing that the theme song be permitted to actually end;

¹⁰Restatement (Third) of Torts § 1 (1995) ("A treat is consideration. A treat is not a retirement plan."); see also *Rubble v. Naptime, Inc.*, 4 Bark. 3d 4 (2015) (recognizing the nap as a fundamental canine right).

¹¹Adventure Bay Mun. Code § 7-11(b) (capping lawful cat possession by any one mayor at zero (0) cats, in light of the events of nearly every prior episode).

1 6.8. For costs of suit, attorneys' fees (Plaintiffs are representing themselves but
2 would like the fees anyway), and treats according to proof; and

3 6.9. For such other and further relief as the Court deems just, proper, and paw-
4 some.

5
6 **7. DEMAND FOR JURY TRIAL**

7 Plaintiffs hereby demand a trial by a jury composed entirely of good boys and good
8 girls, no cats, said demand being a matter of right and also a matter of principle.¹²

9
10 Dated: June 28, 2026

11
12 Respectfully submitted,

13
14 CHASE, *Pro Se (and on the case)*

15 MARSHALL, *Pro Se (currently fine, just tripped)*

16 SKYE, *Pro Se (filing from the air)*

17 RUBBLE, *Pro Se (will sign after nap)*

18 ROCKY, ZUMA, and EVEREST, *Pro Se*

19
20 *Attorneys for Themselves, Because No Job Is Too Big and No Pup Is Too Small*

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¹²*In re Composition of the Petit Jury*, 101 Pup. 3d 9, 11 (9th Pup Cir. 2022) (a jury of one's
peers means, for a dog, other dogs; cats categorically excused for cause).