

DOCKET NO.: FBT-CV-23-6120092-S : SUPERIOR COURT  
CONRAD JOHNS and : JUDICIAL DISTRICT OF  
ELIZABETH JOHNS : FAIRFIELD  
v. : AT BRIDGEPORT  
ALFA LAVAL, INC. et al. : FEBRUARY 2, 2023

**DEFENDANT THE WM. POWELL COMPANY'S ANSWER AND SPECIAL DEFENSES  
TO PLAINTIFFS' COMPLAINT AND ANSWER TO CROSS-CLAIMS**

The Wm. Powell Company ("Wm. Powell"), a defendant in the above-captioned action, respectfully submits the following Answer and Special Defenses to Plaintiffs' Complaint and Answer to Cross-Claims.

**COUNT I**

1. As to the allegations of Paragraph 1 of Count I of the Complaint, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.
2. As to the allegations of Paragraph 2 of Count I of the Complaint, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.
3. Wm. Powell admits that it conducted business in the State of Connecticut. Wm. Powell denies the remaining allegations of Paragraph 3 of Count I of the Complaint to

the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 3 of Count I of the Complaint as they relate to other defendants, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

4. Wm. Powell denies the allegations of Paragraph 4 of Count I of the Complaint to the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 4 of Count I of the Complaint as they relate to other defendants, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

5. Wm. Powell denies the allegations of Paragraph 5 of Count I of the Complaint to the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 5 of Count I of the Complaint as they relate to other defendants, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

6. Wm. Powell denies the allegations of Paragraph 6 of Count I of the Complaint to the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 6 of Count I of the Complaint as they relate to other defendants, Wm. Powell

does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

7. Wm. Powell denies the allegations of Paragraph 7 of Count I of the Complaint to the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 7 of Count I of the Complaint as they relate to other defendants, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

8. Wm. Powell denies the allegations of Paragraph 8 of Count I of Complaint to the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 8 of Count I of the Complaint as they relate to other defendants, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

9. Wm. Powell denies the allegations of Paragraph 9 of Count I of the Complaint to the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 9 of Count I of the Complaint as they relate to other defendants, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

10. Wm. Powell denies the allegations of Paragraph 10 of Count I of the Complaint to the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 10 of Count I of the Complaint as they relate to other defendants, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

11. Wm. Powell denies the allegations of Paragraph 11 of Count I of the Complaint to the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 11 of Count I of the Complaint as they relate to other defendants, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

12. Wm. Powell denies the allegations of Paragraph 12 of Count I of the Complaint to the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 12 of Count I of the Complaint as they relate to other defendants, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

13. Wm. Powell denies the allegations of Paragraph 13 of Count I of the Complaint to the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 13 of Count I of the Complaint as they relate to other defendants, Wm.

Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

14. Wm. Powell denies the allegations of Paragraph 14 of Count I of the Complaint to the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 14 of Count I of the Complaint as they relate to other defendants, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

15. Wm. Powell denies the allegations of Paragraph 15 of Count I of the Complaint to the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 15 of Count I of the Complaint as they relate to other defendants, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

16. Wm. Powell denies the allegations of Paragraph 16 of Count I of Complaint, including its subparts, to the extent the allegations relate to Wm. Powell. As to the remaining allegations of Paragraph 16 of Count I of the Complaint as they relate to other defendants, Wm. Powell does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

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