

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 MORSE TEC LLC, F/K/A BORGWARNER MORSE TEC, LLC, AND
SUCCESSOR-BY-MERGER TO BORG-WARNER CORPORATION'S ANSWER AND
SPECIAL DEFENSES TO PLAINTIFFS' COMPLAINT AND
ANSWER TO CROSS-CLAIMS**

Defendant Morse TEC LLC, f/k/a BorgWarner Morse TEC LLC, and Successor-by-Merger to Borg-Warner Corporation ("Morse TEC"), 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, Morse TEC 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, Morse TEC does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

3. Morse TEC admits that it conducted business in the State of Connecticut. Morse TEC denies the remaining allegations of Paragraph 3 of Count I of the Complaint to the extent the allegations relate to Morse TEC. As to the remaining allegations of Paragraph 3 of Count I of the Complaint as they relate to other defendants, Morse TEC does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

4. As to the allegations of Paragraph 4 of Count I of the Complaint, Morse TEC does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

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

6. Morse TEC denies the allegations of Paragraph 6 of Count I of the Complaint to the extent the allegations relate to Morse TEC. As to the remaining allegations of Paragraph 6 of Count I of the Complaint as they relate to other defendants, Morse TEC does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

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

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

9. Morse TEC denies the allegations of Paragraph 9 of Count I of the Complaint to the extent the allegations relate to Morse TEC. As to the remaining allegations of

Paragraph 9 of Count I of the Complaint as they relate to other defendants, Morse TEC does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

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

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

12. Morse TEC denies the allegations of Paragraph 12 of Count I of the Complaint to the extent the allegations relate to Morse TEC. As to the remaining allegations of Paragraph 12 of Count I of the Complaint as they relate to other defendants, Morse TEC

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

13. Morse TEC denies the allegations of Paragraph 13 of Count I of the Complaint to the extent the allegations relate to Morse TEC. As to the remaining allegations of Paragraph 13 of Count I of the Complaint as they relate to other defendants, Morse TEC does not have sufficient knowledge or information upon which to form a belief and therefore leaves Plaintiffs to their proof.

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

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

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