

**IN RE: ASBESTOS LITIGATION**

<b>DOCKET NO.: FBT-CV-23-6120092-S</b>	)	<b>SUPERIOR COURT</b>
	)	
<b>CONRAD JOHNS and</b>	)	<b>J.D. OF FAIRFIELD</b>
<b>ELIZABETH JOHNS</b>	)	<b>AT BRIDGEPORT</b>
	)	
<b>VS.</b>	)	
	)	
<b>ALFA LAVAL, INC., ET AL.</b>	)	<b>February 2, 2023</b>

**ANSWER AND SPECIAL DEFENSES OF**  
**DEFENDANT, FMC CORPORATION ON BEHALF OF ITS FORMER TURBO PUMP**  
**OPERATION AND ON BEHALF OF ITS FORMER NORTHERN PUMP AND**  
**JOHN BEAN BUSINESSES, TO PLAINTIFFS' COMPLAINT**

Defendant, FMC Corporation on behalf of its former Turbo Pump Operation and on behalf of its former Northern Pump and John Bean businesses, *improperly sued as “FMC Corporation, individually and as successor in interest to Northern Pump, Coffin and John Bean”* (hereinafter “Defendant”), by and through its undersigned counsel, hereby answers the Complaint and asserts the following special defenses.

**COUNT I**  
**(Product Liability as against all defendants)**

1. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the allegations of paragraph 1 of Count I of the Complaint.
2. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the allegations of paragraph 2 of Count I of the Complaint.
3. To the extent that the allegations of paragraph 3 of Count 1 are directed to this Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 3 of Count I of the Complaint.

4. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the allegations of paragraph 4 of Count I of the Complaint.

5. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the allegations of paragraph 5 of Count I of the Complaint.

6. Defendant denies that Plaintiff was exposed to asbestos containing products which were contracted for, mined, milled, processed, manufactured, designed, tested, assembled, fashioned, fabricated, packaged, supplied, distributed, delivered, marketed and/or sold by this defendant. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of paragraph 6 of Count I of the Complaint.

7. To the extent that the allegations of paragraph 7 of Count 1 are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 7 of Count I of the Complaint.

8. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the allegations of paragraph 8 of Count I of the Complaint.

9. To the extent that the allegations of paragraph 9 of Count I are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 9 of Count I of the Complaint.

10. To the extent that the allegations of paragraph 10 of Count I are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 10 of Count I of the Complaint.

11. To the extent that the allegations of paragraph 11 of Count I are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 11 of Count I of the Complaint.

12. To the extent that the allegations of paragraph 12 of Count I are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 12 of Count I of the Complaint.

13. To the extent that the allegations of paragraph 13 of Count I are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 13 of Count I of the Complaint.

14. To the extent that the allegations of paragraph 14 of Count I are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 14 of Count I of the Complaint.

15. To the extent that the allegations of paragraph 15 of Count I are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 15 of Count I of the Complaint.

16. To the extent that the allegations of paragraph 16 of Count I are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 16 of Count I of the Complaint.

17. To the extent that the allegations of paragraph 17 of Count I are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 17 of Count I of the Complaint.

18. To the extent that the allegations of paragraph 18 of Count I are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 18 of Count I of the Complaint.

19. To the extent that the allegations of paragraph 19 of Count I are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 19 of Count I of the Complaint.

20. To the extent that the allegations of paragraph 20 of Count I are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 20 of Count I of the Complaint.

21. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the allegations of paragraph 21 of Count I of the Complaint.

22. To the extent that the allegations of paragraph 22 of Count I are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 22 of Count I of the Complaint.

23. The allegations of paragraph 23 of Count I of the Complaint are denied, except that Defendant admits that Plaintiff purports to bring this suit pursuant to *Conn. Gen. Stat.* §§ 52-240a, 52-240b and 52-572m *et seq.*

WHEREFORE, Defendant demands judgment dismissing Plaintiffs' Complaint and for its costs.

**COUNT II**  
**(Recklessness as to all Defendants)**

1-23. Defendant repeats and incorporates by reference its responses to all paragraphs above of the Complaint as if fully set forth herein.

24. To the extent that the allegations of paragraph 24 of Count II are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 24 of Count II of the Complaint.

25. To the extent that the allegations of paragraph 25 of Count II are directed to Defendant, they are denied. Defendant is without sufficient knowledge or information upon which to form a belief as to the truth of the remaining allegations of this paragraph 25 of Count II of the Complaint.

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