

STATE OF CONNECTICUT

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

**ANSWER AND SPECIAL DEFENSES OF
DEFENDANT ITT LLC**

Defendant ITT LLC, incorrectly identified as “ITT Corporation, individually and as successor in interest to Bell & Gossett, Foster Engineering, Kennedy Valve, Lunkenheimer, Fabre Valve, ITT Hoffman, Hammer Dahl, and ITT Fluid Products,” (hereafter referred to as “ITT” or “Defendant”), hereby files its Answer and Special Defenses to plaintiffs’, Conrad Johns and Elizabeth Johns (“Plaintiffs”), Complaint dated December 13, 2022 (“Complaint”).

ANSWER
COUNT I

1. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 1 of the Complaint and those allegations are thus denied.
2. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 2 of the Complaint and those allegations are thus denied.
3. ITT denies the allegations in Paragraph 3 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.
4. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 4 of the Complaint and those allegations are thus denied.

5. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 5 of the Complaint and those allegations are thus denied.

6. ITT denies the allegations in Paragraph 6 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

7. ITT denies the allegations in Paragraph 7 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

8. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 8 of the Complaint and those allegations are thus denied.

9. ITT denies the allegations in Paragraph 9 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

10. ITT denies the allegations in Paragraph 10 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

11. ITT denies the allegations in Paragraph 11 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as

to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

12. ITT denies the allegations in Paragraph 12 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

13. ITT denies the allegations in Paragraph 13 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

14. ITT denies the allegations in Paragraph 14 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

15. The allegations in Paragraph 15 of the Complaint contain conclusions of law to which no responsive pleading is required. To the extent a response is deemed necessary, ITT denies the allegations in Paragraph 15 to the extent these allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

16. The allegations in Paragraph 16 (and all subparagraphs) of the Complaint contain conclusions of law to which no responsive pleading is required. To the extent a response is deemed necessary, ITT denies the allegations in Paragraph 16 (and all subparagraphs) to the extent these allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as

to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

17. ITT denies the allegations contained in Paragraph 17 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

18. The allegations in Paragraph 18 of the Complaint contain conclusions of law to which no responsive pleading is required. To the extent a response is deemed necessary, ITT denies the allegations in Paragraph 18 to the extent these allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

19. ITT denies the allegations contained in Paragraph 19 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

20. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 20 of the Complaint and those allegations are thus denied.

21. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 21 of the Complaint and those allegations are thus denied.

22. The allegations in Paragraph 22 of the Complaint contain conclusions of law to which no responsive pleading is required. To the extent a response is deemed necessary, ITT denies the allegations in Paragraph 22 to the extent these allegations relate to ITT. ITT is without

information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

23. The allegations in Paragraph 23 of the Complaint contain conclusions of law to which no responsive pleading is required. To the extent a response is deemed necessary, ITT denies the allegations in Paragraph 23 to the extent these allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

COUNT II

1-23. ITT's answers to Paragraphs 1 through 23 above are hereby made answers to this Count II as if fully set forth herein.

24. ITT denies the allegations contained in Paragraph 24 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

25. ITT denies the allegations in Paragraph 25 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

26. ITT denies the allegations in Paragraph 26 of the Complaint to the extent the allegations relate to ITT. ITT is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and those allegations are thus denied.

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