

IN RE: ASBESTOS LITIGATION

ASB-FBT-CV23-6120092-S	:	SUPERIOR COURT
	:	
CONRAD JOHNS and ELIZABETH JOHNS	:	JUDICIAL DISTRICT
	:	
VS.	:	OF FAIRFIELD
	:	AT BRIDGEPORT
	:	
ALFA LAVAL INC., ET UX., ET AL.	:	MARCH 6, 2023

MOTION TO CITE IN PARTY DEFENDANT

The undersigned represents as follows:

1. This action was commenced by summons and complaint returnable to this Court on January 03, 2023.
2. There are thirty (30) party defendants named in the original complaint.
3. The plaintiffs allege that said party defendants manufactured or supplied asbestos containing products that caused the injuries for which the plaintiffs seek compensation.
4. Plaintiffs seek to name the ONE (1) entity listed below as an additional party defendant in this action:

SCHNEIDER ELECTRIC USA INC., individually and as successor to Square D

ORAL ARGUMENT NOT REQUESTED
TESTIMONY NOT REQUIRED

EARLY. LUCARELLI. SWEENEY & MEISENKOTHEN

5. It will be alleged that the entity below engaged in the same tortious acts or omissions toward the plaintiffs as the current defendants in the case, thereby proximately causing the plaintiff's injuries.

Wherefore, the undersigned moves that the plaintiffs' complaint be amended to state facts showing the interests of the defendant listed below in this action, and that they be summoned to appear herein as a co-defendant.

SCHNEIDER ELECTRIC USA INC., individually and as successor to Square D

THE PLAINTIFFS

BY: /s/438191
Kyle R. Navin, Esq.
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265 Church Street
New Haven, CT 06510
(203) 777-7799
Juris No. 409080
Their Attorneys

EARLY, LUCARELLI, SWEENEY & MEISENKOTHEN

ORDER

It appearing that the foregoing motion should be granted, it is hereby

ORDERED that on or before _____, the plaintiffs amend their complaint to state facts showing the interests of the entities listed below to appear as defendants in this action on or before the second day following _____, by causing some proper officer to serve on them in the manner prescribed by law, a true and attested copy of this Order, a true and attested or certified copy of the complaint in this action, as amended, and a Summons-Civil Form 103.1 and due return make.

SCHNEIDER ELECTRIC USA INC., individually and as successor to Square D

BY THE COURT (_____, J.)

Clerk / Assistant Clerk

CERTIFICATION

This is to certify that a copy of the foregoing was served, via electronic mail, to all counsel of record on this 6th day of March, 2023.

BY s/438191
Kyle R. Navin

EARLY, LUCARELLI, SWEENEY & MEISENKOTHEN

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MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S
MOTION TO CITE IN PARTY DEFENDANT

The above captioned plaintiffs, pursuant to Practice Book Section 9-22, are seeking to add the following one (1) additional defendant, listed on the following page, to the pending lawsuit for plaintiffs' injuries due to asbestos exposure. The plaintiffs allege that said party defendant also manufactured or supplied asbestos containing products that caused the injuries for which this action seeks damages.

All persons with an interest in the subject of an action may be joined as defendants. Conn. Gen. Stat. Section 52-101. The party that plaintiffs seek to add is similarly situated to all the other defendants in this pending lawsuit. All other defendants manufactured or supplied asbestos containing products which caused the plaintiffs injuries and are named pursuant to the Connecticut Product Liability Action (P.A. 79-483) Conn. Gen. Stat. Section 52-572m et seq.

EARLY, LUCARELLI, SWEENEY & MEISENKOTHEN

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