

STATE OF CONNECTICUT

DOCKET NO.: ASB-FBT-CV23-6120092-S	x	SUPERIOR COURT
	:	
CONRAD JOHNS AND ELIZABETH JOHNS	:	
	:	J.D. OF FAIRFIELD
Plaintiffs	:	
	:	AT BRIDGEPORT
v.	:	
	:	
ALFA LAVAL INC., ET UX., <i>et al.</i> ,	:	
	:	
Defendants	:	May 12, 2023

**ANSWER, SPECIAL DEFENSES AND CROSS CLAIM OF DEFENDANT,
DAP, INC. K/N/A LA MIRADA PRODUCTS CO., INC.,
TO PLAINTIFFS' THIRD AMENDED COMPLAINT**

Defendant, DAP, INC. K/N/A LA MIRADA PRODUCTS CO., INC., (hereinafter “DAP” or “Defendant”), plead as DAP, Inc., hereby responds to Plaintiffs, Conrad Johns and Elizabeth Johns, Complaint, dated March 29,2023, (hereinafter “Plaintiffs’ Complaint” or the “Complaint”) as follows:

COUNT I

1. Defendant, DAP, denies any knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “1” of Plaintiffs’ Complaint and therefore leaves Plaintiffs to their proof.
2. Defendant, DAP, denies any knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “2” of Plaintiffs’ Complaint and therefore leaves Plaintiffs to their proof.
3. Defendant, DAP, denies each and every allegation contained in Paragraph “3” of Plaintiffs’ Complaint as it pertains to this answering Defendant and denies any knowledge or

information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraph as it pertains to the remaining Defendants in Plaintiffs' Complaint.

4. Defendant, DAP, denies any knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "4" of Plaintiffs' Complaint and therefore leaves Plaintiffs to their proof.

5. Defendant, DAP, denies each and every allegation contained in Paragraph "5" of Plaintiffs' Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraph as it pertains to the remaining Defendants in Plaintiffs' Complaint.

6. Defendant, DAP, denies each and every allegation contained in Paragraph "6" of Plaintiffs' Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraph as it pertains to the remaining Defendants in Plaintiffs' Complaint.

7. Defendant, DAP, denies each and every allegation contained in Paragraph "7" of Plaintiffs' Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraph as it pertains to the remaining Defendants in Plaintiffs' Complaint.

8. Defendant, DAP, denies any knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "8" of Plaintiffs' Complaint and therefore leaves Plaintiffs to their proof.

9. Defendant, DAP, denies each and every allegation contained in Paragraph "9" of Plaintiffs' Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid

paragraph as it pertains to the remaining Defendants in Plaintiffs' Complaint.

10. Defendant, DAP, denies each and every allegation contained in Paragraph "10" of Plaintiffs' Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraph as it pertains to the remaining Defendants in Plaintiffs' Complaint.

11. Defendant, DAP, denies each and every allegation contained in Paragraph "11" of Plaintiffs' Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraph as it pertains to the remaining Defendants in Plaintiffs' Complaint.

12. Defendant, DAP, denies each and every allegation contained in Paragraph "12" of Plaintiffs' Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraph as it pertains to the remaining Defendants in Plaintiffs' Complaint.

13. Defendant, DAP, denies each and every allegation contained in Paragraph "13" of Plaintiffs' Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraph as it pertains to the remaining Defendants in Plaintiffs' Complaint.

14. Defendant, DAP, denies each and every allegation contained in Paragraph "14" of Plaintiffs' Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraph as it pertains to the remaining Defendants in Plaintiffs' Complaint.

15. The allegations in Paragraph "15" of Plaintiffs' Complaint call for a legal conclusion, and DAP refers all legal conclusions to the Court. To the extent that any further

response is required of DAP, DAP denies each and every allegation contained in Paragraph “15” of Plaintiffs’ Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraph as it pertains to the remaining Defendants in Plaintiffs’ Complaint.

16. Defendant, DAP, denies each and every allegation contained in Paragraphs “16(a)” through “16(d)” of Plaintiffs’ Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraphs as they pertain to the remaining Defendants in Plaintiffs’ Complaint.

17. Defendant, DAP, denies any knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “17” of Plaintiffs’ Complaint and therefore leaves Plaintiffs to their proof.

18. Defendant, DAP, denies each and every allegation contained in Paragraph “18” of Plaintiffs’ Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraphs as they pertain to the remaining Defendants in Plaintiffs’ Complaint.

19. Defendant, DAP, denies each and every allegation contained in Paragraph “19” of Plaintiffs’ Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraphs as they pertain to the remaining Defendants in Plaintiffs’ Complaint.

20. Defendant, DAP, denies each and every allegation contained in Paragraph “20” of Plaintiffs’ Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid

paragraphs as they pertain to the remaining Defendants in Plaintiffs' Complaint.

21. Defendant, DAP, denies each and every allegation contained in Paragraph "21" of Plaintiffs' Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid paragraphs as they pertain to the remaining Defendants in Plaintiffs' Complaint.

22. The allegations in Paragraph "22" of Plaintiffs' Complaint state legal conclusions to which no response is required. To the extent that a response is required of DAP, DAP denies the allegations that are asserted in Paragraph "22" of Plaintiffs' Complaint to the extent they are directed towards it. DAP is without sufficient knowledge or information to form a belief as to the truth of the allegations asserted in Paragraph "22" of Plaintiffs' Complaint that are not directed towards it, therefore leaving Plaintiffs to their proof.

23. The allegations in Paragraph "23" of Plaintiffs' Complaint state legal conclusions to which no response is required. To the extent that a response is required of DAP, DAP denies the allegations that are asserted in Paragraph "23" of Plaintiffs' Complaint to the extent they are directed towards it. DAP is without sufficient knowledge or information to form a belief as to the truth of the allegations asserted in Paragraph "23" of Plaintiffs' Complaint that are not directed towards it, therefore leaving Plaintiffs to their proof.

COUNT II

1-23. Defendant, DAP, herein repeats, reiterates and realleges each and every answer to Paragraphs 1 through 23 of Plaintiffs' Complaint, dated March 29, 2023.

24. Defendant, DAP, denies each and every allegation contained in Paragraph "24" of Plaintiffs' Complaint as it pertains to this answering Defendant and denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in the aforesaid

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