

ASB-FBT-CV-23-6120092-S : SUPERIOR COURT :

CONRAD JOHNS AND ELIZABETH :  
JOHNS :

J.D. OF FAIRFIELD

Plaintiffs,

v.

AT BRIDGEPORT

ALFA LAVAL, INC., ET AL. :

APRIL 5, 2023

Defendants.

**DEFENDANT DURACELL U.S. OPERATIONS, INC.'S ANSWER, SPECIAL  
DEFENSES AND CROSS CLAIMS TO PLAINTIFFS' THIRD AMENDED  
COMPLAINT**

Defendant Duracell U.S. Operations, Inc. (hereinafter "Duracell" or "Defendant"), hereby responds to the allegations of the Third Amended Complaint [#140.00] (hereinafter "Complaint") dated March 29, 2023 as follows:

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

1. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 1 and, as such, denies them.

2. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 2 and, as such, denies them.

3. Insofar as the allegations of Paragraph 3 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 3, and therefore denies the remaining allegations contained in Paragraph 3.

4. Insofar as the allegations of Paragraph 4 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth

of the remaining allegations of Paragraph 4, and therefore denies the remaining allegations contained in Paragraph 4.

5. Insofar as the allegations of Paragraph 5 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 5, and therefore denies the remaining allegations contained in Paragraph 5.

6. Insofar as the allegations of Paragraph 6 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 6, and therefore denies the remaining allegations contained in Paragraph 6.

7. Insofar as the allegations of Paragraph 7 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 7, and therefore denies the remaining allegations contained in Paragraph 7.

8. Insofar as the allegations of Paragraph 8 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 8, and therefore denies the remaining allegations contained in Paragraph 8.

9. Insofar as the allegations of Paragraph 9 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 9, and therefore denies the remaining allegations contained in Paragraph 9.

10. Insofar as the allegations of Paragraph 10 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 10, and therefore denies the remaining allegations contained in Paragraph 10.

11. Insofar as the allegations of Paragraph 11 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 11 and therefore denies the remaining allegations contained in Paragraph 11.

12. Insofar as the allegations of Paragraph 12 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 12, and therefore denies the remaining allegations contained in Paragraph 12.

13. Insofar as the allegations of Paragraph 13 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 13, and therefore denies the remaining allegations contained in Paragraph 13.

14. Insofar as the allegations of Paragraph 14 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 14, and therefore denies the remaining allegations contained in Paragraph 14.

15. Insofar as the allegations of Paragraph 15 and its subparts are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a

belief as to the truth of the remaining allegations of Paragraph 15 and its subparts and therefore denies the remaining allegations contained in Paragraph 15.

16. Insofar as the allegations of Paragraph 16 and its subparts are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 16 and therefore denies the remaining allegations contained in Paragraph 16 and its subparts.

17. Insofar as the allegations of Paragraph 17 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 17, and therefore denies the remaining allegations contained in Paragraph 17.

18. Insofar as the allegations of Paragraph 18 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 18, and therefore denies the remaining allegations contained in Paragraph 18.

19. Insofar as the allegations of Paragraph 19 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 19, and therefore denies the remaining allegations contained in Paragraph 19.

20. Insofar as the allegations of Paragraph 20 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 20, and therefore denies the remaining allegations contained in Paragraph 20.

21. Insofar as the allegations of Paragraph 21 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 22, and therefore denies the remaining allegations contained in Paragraph 21.

22. Insofar as the allegations of Paragraph 22 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 22, and therefore denies the remaining allegations contained in Paragraph 22.

23. Insofar as the allegations of Paragraph 23 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 23, and therefore denies the remaining allegations contained in Paragraph 23.

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

1-23. Defendant repeats and incorporates by reference its responses to Paragraphs 1-23, inclusive, as if fully set forth herein.1-23.

24. Insofar as the allegations of Paragraph 24 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 24, and therefore denies the remaining allegations contained in Paragraph 24.

25. Insofar as the allegations of Paragraph 25 are directed against Defendant, they are denied. Defendant is without knowledge or information sufficient to form a belief as to the truth

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.