

STATE OF CONNECTICUT

DOCKET NO.: FBT-CV23-6120092-S

SUPERIOR COURT

CONRAD JOHNS and ELIZABETH JOHNS,

Plaintiffs,

v.

ALFA LAVAL, INC., et al.,

Defendants.

J.D. OF FAIRFIELD

AT BRIDGEPORT

June 15, 2023

**DEFENDANT VANDERBILT MINERALS, LLC'S ANSWER TO PLAINTIFFS'
THIRD AMENDED COMPLAINT WITH SPECIAL DEFENSES AND ANSWER TO
CROSS-CLAIMS AND THIRD PARTY COMPLAINTS**

Defendant, Vanderbilt Minerals, LLC, incorrectly sued as R.T. Vanderbilt Holding Company, Inc. (hereinafter "Vanderbilt" or "Defendant"), hereby files this Answer to the Plaintiffs' Third Amended Complaint with Special Defenses and Answer to Cross-Claims and Third Party Complaints.

COUNT I

1. Defendant is without information or knowledge sufficient to admit or deny the truth of the allegations contained in Paragraph 1 and, as such, denies the same.
2. Defendant is without information or knowledge sufficient to admit or deny the truth of the allegations contained in Paragraph 2 and, as such, denies the same.
3. Defendant admits that it has conducted business in the state of Connecticut. Defendant denies each and every other allegation contained in this paragraph to the extent the allegations relate to Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and, therefore, denies the same.

4. Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 4 and, therefore, denies the same.
5. Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 5 and, therefore, denies the same.
6. Defendant denies each and every allegation contained in this paragraph to the extent the allegations relate to Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and, therefore, denies the same.
7. Defendant denies each and every allegation contained in this paragraph to the extent the allegations relate to Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and, therefore, denies the same.
8. Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 8 and, therefore, denies the same.
9. Defendant denies each and every allegation contained in this paragraph to the extent the allegations relate to Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and, therefore, denies the same.
10. Defendant denies each and every allegation contained in this paragraph to the extent the allegations relate to Defendant and is without information or

knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and, therefore, denies the same.

11. Defendant denies each and every allegation contained in this paragraph to the extent the allegations relate to Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and, therefore, denies the same.
12. Defendant denies each and every allegation contained in this paragraph to the extent the allegations relate to Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and, therefore, denies the same.
13. Defendant denies each and every allegation contained in this paragraph to the extent the allegations relate to Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and, therefore, denies the same.
14. Defendant denies each and every allegation contained in this paragraph to the extent the allegations relate to Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and, therefore, denies the same.
15. Defendant denies each and every allegation contained in this paragraph to the extent the allegations relate to Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and, therefore, denies the same.

16. Defendant denies each and every one of the allegations contained in this paragraph and subparagraphs (a)(i-ii), (b)(i-v), (c)(i-iii), and (d) to the extent the allegations relate to Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and, therefore, denies the same.
17. Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 17 and, therefore, denies the same.
18. Defendant denies each and every allegation contained in this paragraph to the extent the allegations relate to Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and, therefore, denies the same.
19. Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 19 and, therefore, denies the same.
20. Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 20 and, therefore, denies the same.
21. Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 21 and, therefore, denies the same.

22. This paragraph contains conclusions of law which no response is required. In the event that a response is required, Defendant denies the allegations in Paragraph 22.

23. This paragraph contains conclusions of law which no response is required. In the event that a response is required, Defendant denies the allegations in Paragraph 23.

COUNT II

1-23. The Defendant's answers to Paragraphs 1 through 23 of the First Count are incorporated by reference and hereby made the Defendant's answers to Paragraphs 1 through 23 of this, the Second Count.

24-27. Defendant denies each and every allegation contained in these paragraphs to the extent the allegations relate to Defendant and is without information or knowledge sufficient to form a belief as to the truth of the allegations as they relate to other Defendants and, therefore, denies the same.

28. This paragraph contains conclusions of law which no response is required. In the event that a response is required, Defendant denies the allegations in Paragraph 28.

COUNT III

1-28. The Defendant's answers to Paragraphs 1 through 28 of the previous Counts are incorporated by reference and hereby made the Defendant's answers to Paragraphs 1 through 28 of this, the Third Count.

29. Defendant denies each and every allegation contained in this paragraph to the extent the allegations relate to Defendant and is without information or

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