NYSCEF DOC. NO. 74

INDEX NO. 190011/2024

RECEIVED NYSCEF: 03/26/2024

SUPREME COURT OF THE STATE OF NEW YORK **COUNTY OF NEW YORK**

DENNIS KILKENNY AND PATRICIA KILKENNY,

Index No. 190011/2024

Plaintiffs,

X

-against-

FURNACE COMPANY, et al.

AII ACQUISITION, LLC, F/K/A AII ACQUISITION CORP., F/K/A ATHLONE INDUSTRIES, INC., F/K/A HOLLAND

ANSWER TO PLAINTIFFS' THIRD AMENDED COMPLAINT

Defendants.

Defendant WILSON-SNYDER PUMPS, improperly pled herein as "Flowserve US, Inc. ind. and as suc. to Edward Valves, Inc., Rockwell Manufacturing Inc., Gestra Inc., Aldrich Pumps, Durco Pumps, Cameron Pumps, Vogt Valves, Nordstrom Valves, and Wilson-Snyder Centrifugal Pumps" by its attorneys, Landman Corsi Ballaine & Ford P.C., hereby Answer Plaintiffs' Third Amended Complaint herein as follows:

- 1. Wilson-Snyder Pumps lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1.
- 2. Wilson-Snyder Pumps denies the allegations contained in Paragraph 2, except admits that Wilson-Snyder Pumps conducts business in New York and lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 2 as they pertain to other defendants.
- 3. Wilson-Snyder Pumps denies the allegations contained in Paragraph 3 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3 as they pertain to other defendants.



RECEIVED NYSCEF: 03/26/2024

INDEX NO. 190011/2024

4. Wilson-Snyder Pumps avers that Paragraph 4 contains conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

- 5. Wilson-Snyder Pumps denies the allegations contained in Paragraph 5 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5 as they pertain to other defendants.
- 6. Wilson-Snyder Pumps denies the allegations contained in Paragraph 6 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6 as they pertain to other defendants.
- 7. Wilson-Snyder Pumps denies the allegations contained in Paragraph 7 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 7 as they pertain to other defendants.
- 8. Wilson-Snyder Pumps avers that Paragraph 8 contains conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
- 9. Wilson-Snyder Pumps avers that Paragraph 9 contains conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

FIRST CAUSE OF ACTION

Wilson-Snyder Pumps repeats and realleges its answers to the allegations contained in Paragraphs 1 through 9 as though set forth at length herein.

Wilson-Snyder Pumps denies the allegations contained in Paragraph 10 as they 10. pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 10 as they pertain to other defendants.



INDEX NO. 190011/2024

RECEIVED NYSCEF: 03/26/2024

11. Wilson-Snyder Pumps denies the allegations contained in Paragraph 11 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief

as to the truth of the allegations contained in Paragraph 11 as they pertain to other defendants.

- 12. Wilson-Snyder Pumps denies the allegations contained in Paragraph 12 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 12 as they pertain to other defendants.
- 13. Wilson-Snyder Pumps denies the allegations contained in Paragraph 13 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 13 as they pertain to other defendants.
- 14. Wilson-Snyder Pumps denies the allegations contained in Paragraph 14 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 14 as they pertain to other defendants.
- 15. Wilson-Snyder Pumps denies the allegations contained in Paragraph 15 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 15 as they pertain to other defendants.
- 16. Wilson-Snyder Pumps denies the allegations contained in Paragraph 16 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 16 as they pertain to other defendants.
- 17. Wilson-Snyder Pumps denies the allegations contained in Paragraph 17 as they pertain to Wilson-Snyder Pumps, and its subparts (a) through (h), except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 17 as they pertain to other defendants.



INDEX NO. 190011/2024

RECEIVED NYSCEF: 03/26/2024

18. Wilson-Snyder Pumps denies the allegations contained in Paragraph 18 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 18 as they pertain to other defendants.

- 19. Wilson-Snyder Pumps denies the allegations contained in Paragraph 19 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 19 as they pertain to other defendants.
- 20. Wilson-Snyder Pumps denies the allegations contained in Paragraph 20 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 20 as they pertain to other defendants.
- 21. Wilson-Snyder Pumps denies the allegations contained in Paragraph 21 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 21 as they pertain to other defendants.
- 22. Wilson-Snyder Pumps denies the allegations contained in Paragraph 22 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 22 as they pertain to other defendants.
- 23. Wilson-Snyder Pumps denies the allegations contained in Paragraph 23 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 23 as they pertain to other defendants.
- 24. Wilson-Snyder Pumps denies the allegations contained in Paragraph 24 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 24 as they pertain to other defendants.



RECEIVED NYSCEF: 03/26/2024

INDEX NO. 190011/2024

25. Wilson-Snyder Pumps denies the allegations contained in Paragraph 25 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 25 as they pertain to other defendants.

- 26. Wilson-Snyder Pumps denies the allegations contained in Paragraph 26 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 26 as they pertain to other defendants.
- 27. Wilson-Snyder Pumps denies the allegations contained in Paragraph 27 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 27 as they pertain to other defendants.
- 28. Wilson-Snyder Pumps denies the allegations contained in Paragraph 28 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 28 as they pertain to other defendants.
- 29. Wilson-Snyder Pumps denies the allegations contained in Paragraph 29 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 29 as they pertain to other defendants.
- 30. Wilson-Snyder Pumps denies the allegations contained in Paragraph 30 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 30 as they pertain to other defendants.
- 31. Wilson-Snyder Pumps denies the allegations contained in Paragraph 31 as they pertain to Wilson-Snyder Pumps, except lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 31 as they pertain to other defendants.
- 32. Wilson-Snyder Pumps avers that Paragraph 32 contains conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.



DOCKET

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.

