

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

CAROLYN MCCARTHY,

**X** Index No.:

Date Filed:

Plaintiff(s),  
-against-

Plaintiff Designates  
**NEW YORK**  
County as the Place of Trial

A.O. SMITH WATER PRODUCTS CO.,  
AIR & LIQUID SYSTEMS CORPORATION,  
as successor-by-merger to BUFFALO PUMPS, INC.,

The Basis of Venue is  
Defendants' Place of Business

AMCHEM PRODUCTS, INC.,  
n/k/a RHONE POULENC AG COMPANY,  
n/k/a BAYER CROPSCIENCE INC.,

**SUMMONS**

ATWOOD & MORRILL COMPANY,  
AURORA PUMP COMPANY,

BEAZER EAST, INC.,  
f/k/a KOPPERS COMPANY INC.,  
BELL & GOSSETT COMPANY,  
BLACKMER,

BURNHAM, LLC,

Individually, and as successor to  
BURNHAM CORPORATION,

BW/IP, INC. AND ITS WHOLLY OWNED SUBSIDIARIES,

BYRON JACKSON PUMPS,

CBS CORPORATION, f/k/a VIACOM INC.,  
successor by merger to

CBS CORPORATION, f/k/a  
WESTINGHOUSE ELECTRIC CORPORATION,

CERTAINTED CORPORATION,

CARRIER CORPORATION,

CLEAVER BROOKS COMPANY, INC.,

CLYDE UNION, INC.,

CONSOLIDATED EDISON COMPANY  
OF NEW YORK, INC.,

COURTER & COMPANY INCORPORATED,

CRANE CO.,

CROLL REYNOLDS ENGINEERING CO., INC.,

DANA COMPANIES, LLC,

ELECTROLUX HOME PRODUCTS, INC.

Individually, and as Successor to Tappan and Copes-Vulcan,  
FLOWSERVE US, INC.

Solely as Successor to Rockwell Manufacturing Company,  
Edward Valve, Inc., Nordstrom Valves, Inc., Edward Vogt  
Valve Company, and Vogt Valve Company,

FMC CORPORATION on behalf of its former  
subsidiary, CROSBY VALVE, INC.,

FMC CORPORATION,

on behalf of its former CHICAGO PUMP  
& NORTHERN PUMP BUSINESSES,

FOSTER WHEELER, L.L.C.,  
GARDNER DENVER, INC.,  
GENERAL ELECTRIC COMPANY,  
GEORGIA PACIFIC LLC.,  
GOODYEAR CANADA, INC.,  
GOULDS PUMPS, INC.,  
GRINNELL LLC,  
HENRY VOGT MACHINE COMPANY,  
IMO INDUSTRIES, INC.,  
ITT INDUSTRIES, INC.  
    Individually and as Successor-in-interest to HOFFMAN  
    SPECIALTY,  
ITT INDUSTRIES, INC.,  
    Individually, and as successor to  
    BELL & GOSSETT COMPANY and  
    as successor to KENNEDY VALVE MANUFACTURING  
    Co., Inc.,  
J.H. FRANCE REFRACTORIES COMPANY,  
JENKINS VALVES, INC.,  
KAISER GYPSUM COMPANY, INC.,  
KEELER-DORR-OLIVER BOILER COMPANY,  
KENNEDY VALVE MANUFACTURING Co., Inc.,  
KEYSPAN GENERATION LLC,  
    f/k/a LONG ISLAND POWER AUTHORITY,  
KOHLER CO.,  
LENNOX INDUSTRIES, INC.,  
LIBERTY MUTUAL INSURANCE COMPANY,  
MORSE DIESEL, INC.,  
NELES-JAMESBURY INC.,  
OAKFABCO, INC.,  
O'CONNOR CONSTRUCTORS, INC.,  
    f/k/a THOMAS O'CONNOR & CONNOR & CO., INC.,  
OWENS-ILLINOIS, INC.,  
PEERLESS INDUSTRIES, INC.,  
PFIZER, INC. (PFIZER),  
RESEARCH-COTTRELL INCORPORATED,  
    n/k/a AWT AIR COMPANY INC.,  
RILEY POWER INC,  
ROBERTSHAW CONTROLS COMPANY, Individually and as  
    Successor to FULTON SYLPHON COMPANY,  
ROPER PUMP COMPANY,  
SEQUOIA VENTURES, INC.,  
    f/k/a BECHTEL CORPORATION,  
SPIRAX SARCO, INC.  
    Individually and as successor to SARCO COMPANY,  
TDY INDUSTRIES, INC.,  
    f/k/a TELEDYNE INDUSTRIES, INC.,  
    (Teledyne Continental Motors Division),  
THE FAIRBANKS COMPANY,  
THE GOODYEAR TIRE AND RUBBER COMPANY,  
TREADWELL CORPORATION,  
TURNER CONSTRUCTION COMPANY,

U.S. RUBBER COMPANY (UNIROYAL),  
UNION CARBIDE CORPORATION,  
UNITED CONVEYOR CORPORATION,  
VELAN VALVE CORPORATION,  
VIKING PUMP, INC.,  
WARREN PUMPS, LLC,  
WEIL-MCLAIN, a division of The Marley-Wylain Company,  
a wholly owned subsidiary of The Marley Company, LLC,  
WEINMAN PUMP & SUPPLY CO.,  
YUBA HEAT TRANSFER LLC.,

Defendants.

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To the above named Defendant(s)

**You are hereby summoned** to answer the **verified** complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated, October 25, 2013  
New York, New York

Defendant's address:

**SEE ATTACHED DEFENDANTS RIDER**

WEITZ & LUXENBERG, P.C.  
Attorney(s) for Plaintiff  
Post Office Address  
700 Broadway  
New York, New York 10003  
(212) 558-5500

**DEFENDANTS' RIDER**

**A.O. SMITH WATER PRODUCTS CO.**  
11270 West Park Place  
Milwaukee, WI 11270

**AIR & LIQUID SYSTEMS CORPORATION,**  
as successor-by-merger to **BUFFALO PUMPS, INC.**  
874 OLIVER STREET  
N. TONAWANDA, NY 14120

**AMCHEM PRODUCTS, INC.,**  
n/k/a **RHONE POULENC AG COMPANY,**  
n/k/a **BAYER CROPSCIENCE INC.**  
41 State Street  
Albany, NY 11207

**ATWOOD & MORRILL COMPANY**  
29 Old Right Road  
Ipswich, MA 01938

**AURORA PUMP COMPANY**  
13320 Ballantyne Corporate Place  
Charlotte, NC 28277

**BEAZER EAST, INC.,**  
f/k/a **KOPPERS COMPANY INC.**  
c/o Three Rivers Management  
Manor Oak One, Suite 200  
1910 Cochrane Road

Pittsburgh, PA 15220

**BELL & GOSSETT COMPANY**  
8200 North Austin Avenue  
Morton Grove, IL 60053

**BLACKMER**  
1809 Century Avenue SW  
Grand Rapids, MI 49503-1530

**BURNHAM, LLC,**  
Individually, and as successor to  
**BURNHAM CORPORATION**  
1239 Harrisburg Pike  
Lancaster, PA 17603

**BW/IP, INC. AND ITS WHOLLY OWNED SUBSIDIARIES**  
5215 North O'Conner Blvd  
Suite 2300  
Irving, TX 75039

**BYRON JACKSON PUMPS**  
5215 N. O'Conner Boulevard  
Suite 2300  
Irving, TX 75039

**CARRIER CORPORATION**  
CT Corporation System  
**111 8th Avenue**  
**New York, NY 10011**

**CBS CORPORATION, f/k/a VIACOM INC.,**  
successor by merger to  
**CBS CORPORATION, f/k/a**  
**WESTINGHOUSE ELECTRIC CORPORATION**  
Asbestos Litigation Support Manager  
ECKERT SEAMANS CHERIN & MELLOTT, LLC  
Case Management & Technology Center  
USX Towers  
600 Grant Street  
Pittsburgh, PA 15219

**CERTAINTEED CORPORATION**  
CT Corporation System  
111 8th Avenue  
New York, NY 10011

**CLEAVER BROOKS COMPANY, INC.**  
11950 West Park Place  
Milwaukee, WI 11270

**CLYDE UNION, INC.**  
4600 T West Dickman Road  
Battle Creek, MI 49015

**CONSOLIDATED EDISON COMPANY  
OF NEW YORK, INC.**  
4 Irving Place  
New York, NY 10003

**COURTER & COMPANY INCORPORATED**  
McGivney, Kluger & Gannon  
C/O Richard E. Leff, Esq.  
80 Broad Street, 23rd Floor  
New York, NY 10004

**CRANE CO.**  
100 First Stamford Place  
Stamford, CT 06902

**CROLL REYNOLDS ENGINEERING CO., INC.**  
80 Broad Street, 23rd Floor  
New York, NY

**DANA COMPANIES, LLC**  
900 West South Boundary St., Bldg. 8A  
Perrysburg, OH 43551

**ELECTROLUX HOME PRODUCTS, INC.**  
**Individually, and as Successor to Tappan and Copes-Vulcan**  
**20445 EMERALD PARKWAY,**

Cleveland, OH 44135

**FLOWSERVE US, INC.**  
**Solely as Successor to Rockwell Manufacturing Company,**  
**Edward Valve, Inc., Nordstrom Valves, Inc., Edward Vogt**  
**Valve Company, and Vogt Valve Company**  
c/o Corporate trust Systems  
111 8th Avenue 13th Floor  
New York, NY 10011

and

5215 North O'Connor Blvd, Ste 2300  
Irving, Texas 75039

**FMC CORPORATION on behalf of its former**  
**subsidiary, CROSBY VALVE, INC.**  
**CT CORPORATION SYSTEM**  
101 Federal Street  
Boston, MA 02110

**FMC CORPORATION,**  
**on behalf of its former CHICAGO PUMP**  
**& NORTHERN PUMP BUSINESSES**  
1735 Market Street  
Philadelphia, PA 19103

**FOSTER WHEELER, L.L.C.**  
Route 173 at Frontage Road  
Clinton, NJ 08809

**GARDNER DENVER, INC.**  
1800 Gardner Expressway  
Quincy, IL 62301

**GENERAL ELECTRIC COMPANY**  
Electric Insurance Company  
75 Sam Fonzo Drive  
Beverly, MA 01915

**GEORGIA PACIFIC LLC.**  
CT Corporation Systems  
111 8th Avenue  
New York, NY 10011

**GOODYEAR CANADA, INC.**  
450 Kipling Avenue  
Atobicoke, Ontario CANADA M8ZSE1

**GOULDS PUMPS, INC.**  
2881 E. Bayard Street  
Seneca Falls, NY 13148

**GRINNELL LLC**  
CT Corporation System  
111 8th Avenue  
New York, NY 10011

**HENRY VOGT MACHINE COMPANY**  
13551 Triton Park Blvd.  
Suite 2500  
Louisville, KY 10223

**IMO INDUSTRIES, INC.,**  
CT Corporation  
1209 Orange Street  
Wilmington, DE 19801

**ITT INDUSTRIES, INC.**  
Individually and as Successor-in-interest to **HOFFMAN  
SPECIALTY**  
CT Corporation  
208 S. Lasalle Street, Suite 814  
Chicago, IL 60604

**ITT INDUSTRIES, INC.,**  
Individually, and as successor to  
**BELL & GOSSETT COMPANY** and  
as successor to **KENNEDY VALVE MANUFACTURING  
Co., Inc.,**  
CT CORPORATION  
111 8th Avenue  
New York, NY 10011

**J.H. FRANCE REFRactories COMPANY**  
SPECIAL CLAIMS SERVICES, INC.  
809 Coshocton Avenue  
Suite 1  
Mount Vernon, OH 43050-1931

**JENKINS VALVES, INC.**  
Prentice-Hall Corporation System  
30 High Street  
Hartford, CT 06103

**KAISER GYPSUM COMPANY, INC.**

Manor Oak One  
1910 Cochran Road  
Pittsburgh, PA 15220

and

TRMI  
301 Grant Street  
Suite 3000  
One Oxford Centre  
Pittsburgh, PA 15219  
Attention: Rezwan Mogri

**KEELER-DORR-OLIVER BOILER COMPANY**

Wayne A. Marvel, Esq.  
Maron & Marvel  
1201 N. Market Street  
Wilmington, DE 19899

**KENNEDY VALVE MANUFACTURING Co., Inc.**

1021 East Water Street  
Elmira, NY 14901

**KEYSPAN GENERATION LLC,  
f/k/a LONG ISLAND POWER AUTHORITY**

Cynthia R. Clark, Esq.  
175 East Old Country Road  
Hicksville, NY 11801

**KOHLER CO.**

HOAGLAND, LONGO, MORAN, DUNST, &  
DOUKAS, LLP  
Marc S. Gaffrey, Esq.  
40 Patterson Street  
New Brunswick, NJ 08903

**LENNOX INDUSTRIES, INC.**

80 State Street  
Albany, NY 12207

**LIBERTY MUTUAL INSURANCE COMPANY**

Unknown at Present Time

**MORSE DIESEL, INC.**

150 Broadway  
Suite 600  
New York, NY 10038

**NELES-JAMESBURY INC.**

2711 Centerville Road  
Suite 400  
Wilmington, DE 19808

**OAKFABCO, INC.**

C/O Vanessa CiCI Fry  
1 Lincoln Center, Suite 1100

Oakbrook Terrace, IL 60181

**O'CONNOR CONSTRUCTORS, INC.,**

**f/k/a THOMAS O'CONNOR & CONNOR & CO., INC.**  
c/o THE SECRETARY OF STATE  
41 State Street  
Albany, NY 12207

**OWENS-ILLINOIS, INC.**

One Michael Owens Way  
Perrysburg, OH 43551

**PEERLESS INDUSTRIES, INC.**

77 Water Street  
New York, NY 10005

**PFIZER, INC. (PFIZER)**

CT Corporation Systems  
111 8th Avenue  
New York, NY 10011

**RESEARCH-COTTRELL INCORPORATED,**

**n/k/a AWT AIR COMPANY INC.**  
CT CORPORATION SYSTEM  
111 Eighth Avenue  
New York, NY 10011

**RILEY POWER INC**

CT Corporation System  
111 8th Avenue  
New York, NY 10011

**ROBERTSHAW CONTROLS COMPANY, Individually and as  
Successor to FULTON SYLPHON COMPANY**

1602 Mustang Dr.  
Maryville, TN 37801

**ROPER PUMP COMPANY**

CSC of GWINNETT COUNTY INC.  
40 Technology Parkway South, #1230  
Norcross, GA 30092

**SEQUOIA VENTURES, INC.,**  
**f/k/a BECHTEL CORPORATION**  
C/O Dan Moretti, Esq  
120 Broadway, 27th Flr  
New York, NY 12207

**SPIRAX SARCO, INC.**  
**Individually and as successor to SARCO COMPANY**  
1150 Northpoint Blvd.  
Blythewood, SC 29016

**TDY INDUSTRIES, INC.,**  
**f/k/a TELEDYNE INDUSTRIES, INC.,**  
**(Teledyne Continental Motors Division)**  
CT Corporation System  
111 Eighth Avenue  
New York, NY

**THE FAIRBANKS COMPANY**  
CT Corporation System (GA)  
1201 Peachtree Street NE  
Atlanta, GA 30361

**THE GOODYEAR TIRE AND RUBBER COMPANY**  
Corporation Service Company  
80 State Street  
Albany, NY 12207

**TREADWELL CORPORATION**  
McGivney, Kluger & Gannon  
C/O Richard E. Leff, Esq.  
80 Broad Street, 23rd Floor  
New York, NY 10004

**TURNER CONSTRUCTION COMPANY**  
375 HUDSON STREET  
NEW YORK, NY 10014

**U.S. RUBBER COMPANY (UNIROYAL)**  
Greenfield, Stein & Senior  
(Agent for Service of Process)  
600 Third Avenue, 11th Floor  
New York, NY 10016-1903

**UNION CARBIDE CORPORATION**  
CT Corporation Systems  
111 8th Avenue  
New York, NY 10019

**UNITED CONVEYOR CORPORATION**  
2100 Norman Drive West  
Waukegan, IL 60085

**VELAN VALVE CORPORATION**  
94 Avenue C  
Williston, VT 05495

**VIKING PUMP, INC.**  
406 State Street  
Cedar Falls, IA 50613

**WARREN PUMPS, LLC**  
CT Corporation  
1209 Orange Street  
Wilmington, DE 19801

**WEIL-MCLAIN, a division of The Marley-Wylain Company,  
a wholly owned subsidiary of The Marley Company, LLC**  
13320 Ballantyne Corporate Place  
Charlotte, NC 28277

**WEINMAN PUMP & SUPPLY CO.**  
100 First Stamford Place  
Stamford, CT 06902

and

James Abraham, Esq.  
5001 Baum Blvd, Suite 419  
Pittsburgh, PA 15213

**YUBA HEAT TRANSFER LLC.**  
THE CORPORATION COMPANY  
1833 South Morgan Road  
Oklahoma City, OK 73128

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

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CAROLYN MCCARTHY,

X Index No.:

Date Filed:

Plaintiff(s),

-against-

**VERIFIED  
COMPLAINT**

A.O. SMITH WATER PRODUCTS CO.,  
AIR & LIQUID SYSTEMS CORPORATION,  
as successor-by-merger to BUFFALO PUMPS, INC.,  
AMCHEM PRODUCTS, INC.,  
n/k/a RHONE POULENC AG COMPANY,  
n/k/a BAYER CROPSCIENCE INC.,  
ATWOOD & MORRILL COMPANY,  
AURORA PUMP COMPANY,  
BEAZER EAST, INC.,  
f/k/a KOPPERS COMPANY INC.,  
BELL & GOSSETT COMPANY,  
BLACKMER,  
BURNHAM, LLC,  
Individually, and as successor to  
BURNHAM CORPORATION,  
BW/IP, INC. AND ITS WHOLLY OWNED SUBSIDIARIES,  
BYRON JACKSON PUMPS,  
CARRIER CORPORATION,  
CBS CORPORATION, f/k/a VIACOM INC.,  
successor by merger to  
CBS CORPORATION, f/k/a  
WESTINGHOUSE ELECTRIC CORPORATION,  
CERTAINTEED CORPORATION,  
CLEAVER BROOKS COMPANY, INC.,  
CLYDE UNION, INC.,  
CONSOLIDATED EDISON COMPANY  
OF NEW YORK, INC.,  
COURTER & COMPANY INCORPORATED,  
CRANE CO.,  
CROLL REYNOLDS ENGINEERING CO., INC.,  
DANA COMPANIES, LLC,  
ELECTROLUX HOME PRODUCTS, INC.  
Individually, and as Successor to Tappan and Copes-Vulcan,  
FLOWSERVE US, INC.  
Solely as Successor to Rockwell Manufacturing Company,  
Edward Valve, Inc., Nordstrom Valves, Inc., Edward Vogt  
Valve Company, and Vogt Valve Company,  
FMC CORPORATION on behalf of its former  
subsidiary, CROSBY VALVE, INC.,  
FMC CORPORATION,  
on behalf of its former CHICAGO PUMP  
& NORTHERN PUMP BUSINESSES,  
FOSTER WHEELER, L.L.C.,  
GARDNER DENVER, INC.,

GENERAL ELECTRIC COMPANY,  
GEORGIA PACIFIC LLC.,  
GOODYEAR CANADA, INC.,  
GOULDS PUMPS, INC.,  
GRINNELL LLC,  
HENRY VOGT MACHINE COMPANY,  
IMO INDUSTRIES, INC.,  
ITT INDUSTRIES, INC.

Individually and as Successor-in-interest to HOFFMAN  
SPECIALTY,  
ITT INDUSTRIES, INC.,  
Individually, and as successor to  
BELL & GOSSETT COMPANY and  
as successor to KENNEDY VALVE MANUFACTURING  
Co., Inc.,

J.H. FRANCE REFRactories COMPANY,  
JENKINS VALVES, INC.,  
KAISER GYPSUM COMPANY, INC.,  
KEELER-DORR-OLIVER BOILER COMPANY,  
KENNEDY VALVE MANUFACTURING Co., Inc.,  
KEYSPAN GENERATION LLC,

f/k/a LONG ISLAND POWER AUTHORITY,  
KOHLER CO.,

LENNOX INDUSTRIES, INC.,  
LIBERTY MUTUAL INSURANCE COMPANY,  
MORSE DIESEL, INC.,  
NELES-JAMESBURY INC.,  
OAKFABCO, INC.,

O'CONNOR CONSTRUCTORS, INC.,  
f/k/a THOMAS O'CONNOR & CONNOR & CO., INC.,  
OWENS-ILLINOIS, INC.,  
PEERLESS INDUSTRIES, INC.,  
PFIZER, INC. (PFIZER),

RESEARCH-COTTRELL INCORPORATED,  
n/k/a AWT AIR COMPANY INC.,

RILEY POWER INC,

ROBERTSHAW CONTROLS COMPANY, Individually and as  
Successor to FULTON SYLPHON COMPANY,

ROPER PUMP COMPANY,  
SEQUOIA VENTURES, INC.,

f/k/a BECHTEL CORPORATION,  
SPIRAX SARCO, INC.

Individually and as successor to SARCO COMPANY,  
TDY INDUSTRIES, INC.,

f/k/a TELEDYNE INDUSTRIES, INC.,  
(Teledyne Continental Motors Division),

THE FAIRBANKS COMPANY,  
THE GOODYEAR TIRE AND RUBBER COMPANY,  
TREADWELL CORPORATION,  
TURNER CONSTRUCTION COMPANY,  
U.S. RUBBER COMPANY (UNIROYAL),  
UNION CARBIDE CORPORATION,  
UNITED CONVEYOR CORPORATION,  
VELAN VALVE CORPORATION,

VIKING PUMP, INC.,  
WARREN PUMPS, LLC,  
WEIL-MCLAIN, a division of The Marley-Wylain Company,  
a wholly owned subsidiary of The Marley Company, LLC,  
WEINMAN PUMP & SUPPLY CO.,  
YUBA HEAT TRANSFER LLC.,

Defendants.

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Plaintiff(s), CAROLYN MCCARTHY, by their attorneys WEITZ & LUXENBERG, P.C., upon information and belief, at all times hereinafter mentioned alleges as follows:

1. Plaintiff(s), CAROLYN MCCARTHY, by their attorneys, WEITZ & LUXENBERG, P.C., for their **verified complaint** respectfully alleges:
2. Defendant AIR & LIQUID SYSTEMS CORPORATION, as successor-by-merger to BUFFALO PUMPS, INC., was and still is a duly organized domestic corporation doing business in the State of New York.
3. Defendant ATWOOD & MORRILL COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.
4. Defendant AURORA PUMP COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.
5. Defendant BEAZER EAST, INC., f/k/a KOPPERS COMPANY INC., was and still is a duly organized domestic corporation doing business in the State of New York.
6. Defendant BELL & GOSETT COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.
7. Defendant BLACKMER, was and still is a duly organized domestic corporation doing business in the State of New York.

8. Defendant BW/IP, INC. AND ITS WHOLLY OWNED SUBSIDIARIES, was and still is a duly organized domestic corporation doing business in the State of New York.

9. Defendant BYRON JACKSON PUMPS, was and still is a duly organized domestic corporation doing business in the State of New York.

10. Defendant CLYDE UNION, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

11. Defendant CROLL REYNOLDS ENGINEERING CO., INC., was and still is a duly organized domestic corporation doing business in the State of New York.

12. Defendant ELECTROLUX HOME PRODUCTS, INC. Individually, and as Successor to Tappan and Copes-Vulcan, was and still is a duly organized domestic corporation doing business in the State of New York.

13. Defendant FLOWSERVE US, INC. Solely as Successor to Rockwell Manufacturing Company, Edward Valve, Inc., Nordstrom Valves, Inc., Edward Vogt Valve Company, and Vogt Valve Company, was and still is a duly organized domestic corporation doing business in the State of New York.

14. Defendant FMC CORPORATION on behalf of its former subsidiary, CROSBY VALVE, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

15. Defendant FMC CORPORATION, on behalf of its former CHICAGO PUMP & NORTHERN PUMP BUSINESSES, was and still is a duly organized domestic corporation doing business in the State of New York.

16. Defendant GARDNER DENVER, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

17. Defendant GEORGIA PACIFIC LLC., was and still is a duly organized domestic corporation doing business in the State of New York.

18. Defendant GRINNELL LLC, was and still is a duly organized domestic corporation doing business in the State of New York.

19. Defendant HENRY VOGT MACHINE COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.

20. Defendant IMO INDUSTRIES, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

21. Defendant ITT INDUSTRIES, INC. Individually and as Successor-in-interest to HOFFMAN SPECIALTY, was and still is a duly organized domestic corporation doing business in the State of New York.

22. Defendant ITT INDUSTRIES, INC., Individually, and as successor to BELL & GOSSETT COMPANY and as successor to KENNEDY VALVE MANUFACTURING Co., Inc., was and still is a duly organized domestic corporation doing business in the State of New York.

23. Defendant JENKINS VALVES, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

24. Defendant JENKINS VALVES, INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

25. Defendant KAISER GYPSUM COMPANY, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

26. Defendant KENNEDY VALVE MANUFACTURING Co., Inc., was and still is a duly organized domestic corporation doing business in the State of New York.

27. Defendant LENNOX INDUSTRIES, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

28. Defendant LIBERTY MUTUAL INSURANCE COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.

29. Defendant NELES-JAMESBURY INC., was and still is a duly organized domestic corporation doing business in the State of New York.

30. Defendant RESEARCH-COTTRELL INCORPORATED, n/k/a AWT AIR COMPANY INC., was and still is a duly organized domestic corporation doing business in the State of New York.

31. Defendant RESEARCH-COTTRELL INCORPORATED, n/k/a AWT AIR COMPANY INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

32. Defendant ROBERTSHAW CONTROLS COMPANY, Individually and as Successor to FULTON SYLPHON COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.

33. Defendant ROPER PUMP COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.

34. Defendant SPIRAX SARCO, INC. Individually and as successor to SARCO COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.

35. Defendant TDY INDUSTRIES, INC., f/k/a TELEDYNE INDUSTRIES, INC., (Teledyne Continental Motors Division), was and still is a duly organized domestic corporation doing business in the State of New York.

36. Defendant THE FAIRBANKS COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.

37. Defendant TURNER CONSTRUCTION COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.

38. Defendant TURNER CONSTRUCTION COMPANY, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

39. Defendant VELAN VALVE CORPORATION, was and still is a duly organized domestic corporation doing business in the State of New York.

40. Defendant VIKING PUMP, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

41. Defendant WARREN PUMPS, LLC, was and still is a duly organized domestic corporation doing business in the State of New York.

42. Defendant WEINMAN PUMP & SUPPLY CO., was and still is a duly organized domestic corporation doing business in the State of New York.

43. Defendant YUBA HEAT TRANSFER LLC., was and still is a duly organized domestic corporation doing business in the State of New York.

Plaintiff(s), CAROLYN MCCARTHY, repeats and realleges NYAL - WEITZ & LUXENBERG, P.C. STANDARD ASBESTOS COMPLAINT FOR PERSONAL INJURY No. 7 as if fully incorporated herein as it pertains to the defendants in the aforementioned caption.

Dated: *October 25, 2013*  
New York, New York

Yours, etc.,

WEITZ & LUXENBERG, P.C

Attorneys for Plaintiff(s)  
700 Broadway  
New York, NY 10003  
(212) 558-5500

STATE OF NEW YORK )  
COUNTY OF NEW YORK ) SS:

The undersigned, an attorney admitted to practice in the Courts of New York State, shows:

Deponent is an Associate of the firm WEITZ & LUXENBERG, P.C., Counsel for the plaintiff(s) in the within action; deponent has read the foregoing **summons and verified complaint** and knows the contents thereof; the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters deponent believes it to be true. This verification is made by deponent and not by plaintiff(s) because plaintiff(s) resides outside of the County of New York where plaintiffs' counsel and deponent maintain their office.

Dated: October 25, 2013  
New York, New York

/S/

DANIEL BLOUIN

Index No.:

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

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CAROLYN MCCARTHY,

Plaintiff(s),

-against-

A.O. SMITH WATER PRODUCTS CO., et. al.,

Defendants.

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**SUMMONS and COMPLAINT**

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**WEITZ & LUXENBERG, P.C.**  
Attorneys for PLAINTIFFS  
**700 Broadway**  
**New York, NY 10003**  
**212-558-5500**

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To  
Attorney(s) for

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Service of a copy of the within  
is hereby admitted.

Dated, October 25, 2013

.....  
**Attorney(s) for**

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

-----X

CAROLYN MCCARTHY,

Plaintiff(s),

**FULL CAPTION**  
**RIDER**

-against-

A.O. SMITH WATER PRODUCTS CO.,  
AIR & LIQUID SYSTEMS CORPORATION,  
as successor-by-merger to BUFFALO PUMPS, INC.,  
AMCHEM PRODUCTS, INC.,  
n/k/a RHONE POULENC AG COMPANY,  
n/k/a BAYER CROPSCIENCE INC.,  
ATWOOD & MORRILL COMPANY,  
AURORA PUMP COMPANY,  
BEAZER EAST, INC.,  
f/k/a KOPPERS COMPANY INC.,  
BELL & GOSSETT COMPANY,  
BLACKMER,  
BURNHAM, LLC,  
Individually, and as successor to  
BURNHAM CORPORATION,  
BW/IP, INC. AND ITS WHOLLY OWNED SUBSIDIARIES,  
BYRON JACKSON PUMPS,  
CARRIER CORPORATION,  
CBS CORPORATION, f/k/a VIACOM INC.,  
successor by merger to  
CBS CORPORATION, f/k/a  
WESTINGHOUSE ELECTRIC CORPORATION,  
CERTAINTEED CORPORATION,  
CLEAVER BROOKS COMPANY, INC.,  
CLYDE UNION, INC.,  
CONSOLIDATED EDISON COMPANY  
OF NEW YORK, INC.,  
COURTER & COMPANY INCORPORATED,  
CRANE CO.,  
CROLL REYNOLDS ENGINEERING CO., INC.,  
DANA COMPANIES, LLC,  
ELECTROLUX HOME PRODUCTS, INC.  
Individually, and as Successor to Tappan and Copes-Vulcan,  
FLOWSERVE US, INC.  
Solely as Successor to Rockwell Manufacturing Company,  
Edward Valve, Inc., Nordstrom Valves, Inc., Edward Vogt  
Valve Company, and Vogt Valve Company,  
FMC CORPORATION on behalf of its former  
subsidiary, CROSBY VALVE, INC.,  
FMC CORPORATION,  
on behalf of its former CHICAGO PUMP  
& NORTHERN PUMP BUSINESSES,  
FOSTER WHEELER, L.L.C.,

GARDNER DENVER, INC.,  
GENERAL ELECTRIC COMPANY,  
GEORGIA PACIFIC LLC.,  
GOODYEAR CANADA, INC.,  
GOULDS PUMPS, INC.,  
GRINNELL LLC,  
HENRY VOGT MACHINE COMPANY,  
IMO INDUSTRIES, INC.,  
ITT INDUSTRIES, INC.  
    Individually and as Successor-in-interest to HOFFMAN  
    SPECIALTY,  
ITT INDUSTRIES, INC.,  
    Individually, and as successor to  
    BELL & GOSSETT COMPANY and  
    as successor to KENNEDY VALVE MANUFACTURING  
    Co., Inc.,  
J.H. FRANCE REFRactories COMPANY,  
JENKINS VALVES, INC.,  
KAISER GYPSUM COMPANY, INC.,  
KEELER-DORR-OLIVER BOILER COMPANY,  
KENNEDY VALVE MANUFACTURING Co., Inc.,  
KEYSPAN GENERATION LLC,  
    f/k/a LONG ISLAND POWER AUTHORITY,  
KOHLER CO.,  
LENNOX INDUSTRIES, INC.,  
LIBERTY MUTUAL INSURANCE COMPANY,  
MORSE DIESEL, INC.,  
NELES-JAMESBURY INC.,  
OAKFABCO, INC.,  
O'CONNOR CONSTRUCTORS, INC.,  
    f/k/a THOMAS O'CONNOR & CONNOR & CO., INC.,  
OWENS-ILLINOIS, INC.,  
PEERLESS INDUSTRIES, INC.,  
PFIZER, INC. (PFIZER),  
RESEARCH-COTTRELL INCORPORATED,  
    n/k/a AWT AIR COMPANY INC.,  
RILEY POWER INC,  
ROBERTSHAW CONTROLS COMPANY, Individually and as  
    Successor to FULTON SYLPHON COMPANY,  
ROPER PUMP COMPANY,  
SEQUOIA VENTURES, INC.,  
    f/k/a BECHTEL CORPORATION,  
SPIRAX SARCO, INC.  
    Individually and as successor to SARCO COMPANY,  
TDY INDUSTRIES, INC.,  
    f/k/a TELEDYNE INDUSTRIES, INC.,  
    (Teledyne Continental Motors Division),  
THE FAIRBANKS COMPANY,  
THE GOODYEAR TIRE AND RUBBER COMPANY,  
TREADWELL CORPORATION,  
TURNER CONSTRUCTION COMPANY,  
U.S. RUBBER COMPANY (UNIROYAL),  
UNION CARBIDE CORPORATION,  
UNITED CONVEYOR CORPORATION,

VELAN VALVE CORPORATION,  
VIKING PUMP, INC.,  
WARREN PUMPS, LLC,  
WEIL-MCLAIN, a division of The Marley-Wylain Company,  
a wholly owned subsidiary of The Marley Company, LLC,  
WEINMAN PUMP & SUPPLY CO.,  
YUBA HEAT TRANSFER LLC.,

Defendants.

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