

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK-----X Index No.:
CAROLYN MCCARTHY,

Date Filed:

Plaintiff(s),

Plaintiff Designates

NEW YORK

County as the Place of Trial

-against-

The Basis of Venue is
Defendants' Place of Business

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,
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,
FLOWERVE 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,

SUMMONS

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.

-----X
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

CERTAINTED 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

-----X
CAROLYN MCCARTHY,

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.

-----X

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 & GOSSETT 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

=====

CAROLYN MCCARTHY,

Plaintiff(s),

-against-

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

Defendants.

=====

SUMMONS and COMPLAINT

=====

WEITZ & LUXENBERG, P.C.

Attorneys for PLAINTIFFS

700 Broadway

New York, NY 10003

212-558-5500

=====

To

Attorney(s) for

=====

Service of a copy of the within
is hereby admitted.

Dated, October 25, 2013

.....
Attorney(s) for

=====

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.

-----X