

I SHORT FORM COMPLAINT

WILENTZ, GOLDMAN & SPITZER
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Attorneys for Plaintiffs

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-MIDDLESEX COUNTY
DOCKET NO. _____

-----X	:	
<u>FILL IN NAME OF PLAINTIFFS</u>	:	ASBESTOS LITIGATION
[Indicate "husband and wife"	:	
where appropriate]	:	
	:	
[Indicate "Executrix or	:	
Administratrix and Admini-	:	
stratrix Ad Prosequendum"	:	Civil Action
where appropriate]	:	
	:	
Plaintiffs,	:	
	:	
vs.	:	COMPLAINT, DEMAND FOR TRIAL
	:	BY JURY AND DEMAND FOR
<u>FILL IN NAME OF DEFENDANTS</u>	:	ANSWERS TO INTERROGATORIES
	:	
	:	
	:	
	:	
	:	
JOHN DOE 1 through JOHN	:	
DOE 75 (fictitious),	:	
	:	
Defendants.	:	
	:	
-----X	:	

Plaintiffs, by way of Complaint against defendants,
upon information and belief allege as follows:

PARTIES - PLAINTIFFS

1. Plaintiff, _____, resides at [address], New Jersey, and was employed by [name of company] at its plant in [city and state] from [dates of employment] and [name of spouse] resides at the same address and is the wife of [name of plaintiff].

2. Plaintiff, _____, resides at [address], New Jersey, and was employed by [name of company] at its plant in [city and state] from [dates of employment] and [name of spouse] resides at the same address and is the wife of [name of plaintiff].

3. Plaintiff, _____, is the [Administratrix and Administratrix Ad Prosequendum/Executrix] of the Estate of _____, is the widow of _____, and resides at [address]. Decedent was employed at [name of company] from [dates of employment].

4. Reference herein to "plaintiff" or "plaintiffs' decedent" is reference to all the persons set forth above as is syntactically and contextually correct.

PARTIES - DEFENDANTS

1. Defendant, _____, is a corporation and was doing business in the State of New Jersey.

2. Defendant [name of discovery only defendant], is named for discovery only in this matter and the only relief sought from said defendant is the relief requested in the ~~plea~~ ^{petition}

Count of the Standard ^{Amended} Complaint on file with the Middlesex County Clerk.

3. Defendant, John Doe 1 (believed to be Johns-Manville Sales Corporation); John Doe 2 (believed to be Johns-Manville Sales Corporation, successor to Johns-Manville Products Corporation); John Doe 3 (believed to be Johns-Manville Corporation); John Doe 4 (believed to be Johns-Manville Canada, Inc., formerly known as Canadian Johns-Manville Co., Ltd.); John Doe 5 (believed to be Canadian Johns-Manville Amiante Ltd., formerly known as Canadian Johns-Manville Asbestos, Ltd.); John Doe 6 (believed to be Manville Corporation); and John Doe 7 (believed to be International Johns-Manville Corporation, Ltd.) are the fictitious names of corporations, partnerships, or other business entities or organizations, whose identities are not presently known.

4. John Doe 8 through John Doe 50, are the fictitious names of corporations, partnerships, or other business entities or organizations whose identities are not presently known, and who mined, manufactured, sold, marketed, installed or removed, asbestos or asbestos containing products which plaintiff used or was exposed to.

5. John Doe 51 through John Doe 75 are the fictitious names of corporations, partnerships, or other business entities or organizations whose identities are not presently known, and who are the alter egos of or are otherwise responsible for the

conduct or liability of those who mined, milled, manufactured, sold, marketed, installed or removed asbestos or asbestos containing products which plaintiff used or to which plaintiff was exposed.

6. The term "defendants" is used hereafter to refer to all of the entities named above.

7. Defendants do business in Middlesex County, New Jersey.

Plaintiff(s) hereby incorporate by reference all allegations set forth in the Standard Complaint previously served upon all parties and filed with the Middlesex County Clerk. Additional copies of the Standard Complaint are available upon written request.

WILENTZ, GOLDMAN & SPITZER, P.A.
Attorneys for Plaintiffs

By: _____
PHILIP A. PAHIGIAN
For the Firm

Dated: ;

DEMAND FOR TRIAL BY JURY

Plaintiffs demand a trial by jury on all issues.

PHILIP A. PAHIGIAN

DEMAND FOR ANSWERS TO INTERROGATORIES

Plaintiffs demand answers to the Standard Interrogatories pursuant to the Court's January 25, 1982 General Order annexed hereto. Said Standard Interrogatory forms may be obtained from the Court upon request.

PHILIP A. PAHIGIAN

CERTIFICATION

The undersigned certifies that to the best of my knowledge this matter is not the subject of any other legal or arbitration proceeding in the Courts of New Jersey other than a workers compensation matter. The undersigned further certifies that to my knowledge no other persons should be party to this matter other than those named in this complaint.

PHILIP A. PAHIGIAN

Dated: