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STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
98-CVS-9679

GARY ROBERT ALBRIGHT, et al.

Plaintiffs,

v.

HNA HOLDINGS, INC., also known as
TREVIRA, INC. formerly HOECHST
CELANESE, INC. and FIBER
INDUSTRIES, INC.,

Defendants.

ANSWER

The defendant HNA Holdings, Inc. ("HNA Holdings"), answering the plaintiffs' complaint, alleges and says that:

FIRST DEFENSE

(Specifically Responding to the Numbered Paragraphs in the Complaint -
Section I. Identification of Parties and Jurisdiction)

1. The defendant has insufficient information to form a belief as to the truth of the allegations in Paragraph 1 of the complaint and accordingly denies the same.

2. The allegations in Paragraph 2 of the complaint include legal conclusions to which no response is required. To the extent Paragraph 2 alleges facts, the defendant has insufficient information to form a belief as to the truth of those allegations and accordingly denies the same.

3. The defendant has insufficient information to form a belief as to the truth of the allegations in Paragraph 3 of the complaint and accordingly denies the same.

4 - 39. The defendant has insufficient information to form a belief as to the allegations in Paragraphs 4 through 39 of the complaint and accordingly denies the same.

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40. With respect to the allegations in Paragraph 40 of the complaint, it is admitted that the defendant HNA Holdings is a corporation organized under the laws of the State of Delaware and is duly licensed and/or authorized to do business in the State of North Carolina. It is further admitted that HNA Holdings owns the fiber manufacturing facility in Salisbury, North Carolina that at one time was owned by Fiber Industries, Inc. Except as herein specifically admitted, the allegations of Paragraph 40 of the complaint are denied.

41. With respect to the allegations in Paragraph 41 of the complaint, it is admitted that the Fiber Industries plant in Salisbury, North Carolina began operations in 1966. It is further admitted that Fiber Industries, Inc. was originally incorporated as Lindum Fibers Corporation, which was organized as a joint venture between Celanese Corporation of America and Imperial Chemical Industries, Inc. It is further admitted that when Celanese Corporation merged with American Hoechst Corporation, the new company, Hoechst Celanese Corporation, owned the fiber manufacturing plant in Salisbury, North Carolina. Except as herein specifically admitted, the allegations of Paragraph 41 of the complaint are denied.

42. With respect to the allegations in Paragraph 42 of the complaint, it is admitted that HNA Holdings is the current owner of the fiber manufacturing plant in Salisbury, North Carolina and is the proper party defendant in this case. Except as herein specifically admitted, the allegations of Paragraph 42 of the complaint are denied.

**(Specifically Responding to the Allegations of Section II.
First Cause of Action - Negligence)**

43. The defendant reasserts and incorporates herein by reference Paragraphs 1 through 42 of the first defense of this answer.