

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

KENNETH GRIMM, Personal
Representative of the ESTATE
OF HELEN GRIMM, Deceased,

Plaintiff,

vs.

FORD MOTOR COMPANY, a foreign
corporation, et al,

Defendants.

Case No. 83-2872 NO

Hon. Raymond R. Cashen

DEFENDANT STAUFFER CHEMICAL COMPANY'S JOINDER
IN CO-DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendant Stauffer Chemical Company, by its attorneys, Meyer, Kirk, Snyder & Safford, joins its Co-Defendants' Motion for Summary Judgment for the following reasons:

1. Plaintiff filed this products liability action on August 15, 1983 to recover damages from Stauffer, among others, as a result of the alleged exposure of Plaintiff's Decedent to polyvinyl chloride products supplied by Stauffer to Ford Motor Company.

2. Stauffer answered Plaintiff's Complaint in part by asserting the affirmative defense that Plaintiff's claim was barred by the applicable statute of limitations.

3. Stauffer incorporates by reference the arguments and briefs previously filed by Co-Defendants in connection with this Motion, Plaintiff's deposition, and the medical records produced thus far.

4. In Count 1, Paragraph 10 of his Complaint, Plaintiff states:

"That the Defendant, STAUFFER CHEMICAL COMPANY, supplied to Defendant, FORD MOTOR COMPANY, polyvinyl chloride, resin specification 96F181 for the year 1976 and 96F51A for the years 1974 through 1976."

5. As to Stauffer, the applicable statute of limitations began to run no later than 1976, the latest possible date of

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Stauffer's alleged wrongful activity.

6. The three year statute of limitations barred Plaintiff's claim against Stauffer in this matter after 1979.

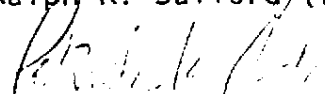
WHEREFORE, Stauffer Chemical Company requests that Plaintiff's Complaint be dismissed with prejudice as to Stauffer.

MEYER, KIRK, SNYDER & SAFFORD

Dated: February 11, 1985

By:


Ralph R. Safford (P-24633)


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