

ATRIUM II, Site 101
3000 Atrium Way
Mt Laurel, New Jersey 08054
Attorneys for the Plaintiffs
(609) 727-1991

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

JOAN MAERTIN, Executrix of the :
Estate of Lothar Maertin, JOAN :
MAERTIN, individually and in her : CIVIL ACTION NO.
OWN RIGHT, MARQUERITE CERIMELE : 95-CV-2849 (JBS)
Executrix of the Estate of :
Robert Campo, HAROLD LEEDY, :
Executor of the Estate of :
Elizabeth Leedy, JAMES STEWART, :
JOHN HOPEN, WILLIAM WHITE, :
ROBERT SCULLY and MARCIA SCULLY, :
his wife, DOUGLAS MELEGARI and :
DIANE MELEGARI, his wife :
THOMAS THOMPSON and :
LILLIAN THOMPSON, his wife, : THIRD AMENDED COMPLAINT
VINCENT SOLLIMO and : AND JURY DEMAND
PATRICIA SOLLIMO, his wife, :
ARMEN GNEPP, MARY ANN STETS :
PATRICIA BARNES, MARY ANN :
YUENGLING, KATHLEEN SWEENEY, :
BARBARA MAKUCH EDMUND MAKUCH, :
JOHN E. SMITH, :
CAROLE JENSEN and THOMAS JENSEN, :
her husband, CHARLES PERRONE :
and MARQUERITE PERRONE, his wife, :
JAMES CUNNINGHAM and MARGARET :
CUNNINGHAM, his wife, CHARLES :
SAVANA, HARRY SCHMOLL and RITA :
SCHMOLL, his wife, STANLEIGH :
AYRES and HELGA AYRES, his wife, :
BENNIE WOODS and ERNA WOODS, his :
wife, and JACQUE VAIL, :
MARIE C. VAIL, his wife, :
SANDRA Kaelin, C. DEWITT PETERSON :
JOANNE PETERSON and SAMUEL MOYER, :
AUDRA MOYER, his wife, WILLIAM :
HATCHER, MARY HATCHER, his wife :
PERRY KAUFMAN, WILLIAM VEIT, :
IRENE VEIT, his wife, :
GENEVA KOHLER, and M. PATRICIA :
KALATA, PAUL KALATA, her :
husband, CLAIRE CORREALE, JUDITH :
NELSON, PATRICIA DILLER and :
TERRY DILLER, her husband :
Plaintiff(s) :

ORIGINAL FILED

DEC 6 1995

WILLIAM T. WALSH, CLERK

vs.	:
	:
ARMSTRONG WORLD INDUSTRIES, INC.	:
JOHN DOE(S) (fictitious name(s)	:
A-Z as manufacturer, RICHARD	:
ROE(S) (fictitious names(s) A-Z	:
as distributor, JOHN SMITH(s)	:
(fictitious name(s) A-Z as	:
wholesaler	:
	:
Defendant(s)	:
	:
	:

Plaintiffs, as stated in caption of this Complaint, resided at various addresses and various counties, including Camden County, in the State of New Jersey, by way of complaint say:

FIRST COUNT

1. In or about 1970 defendants, Armstrong World Industries Inc., hereinafter referred to as Armstrong, John Doe(s) (fictitious name(s) A-Z as manufacturer, hereinafter referred to as John Doe, Richard Roe(s) (fictitious name(s) A-Z as distributor, hereinafter referred to as Richard Roe, John Smith(s) (fictitious name(s) A-Z as wholesaler, hereinafter referred to as John Smith, were engaged in the business of manufacturing, designing, assembling and/or distributing certain ceiling tiles, coated with Aroclor 1254, throughout the United States.

2. In or about 1970 the defendants, Armstrong, John Doe, Richard Roe and John Smith, did design, manufacture, assemble and/or otherwise distribute or caused to be distributed, the

aforesaid ceiling tiles. Said ceiling tiles were caused to be installed in various areas at the Burlington County Community College, Burlington, New Jersey.

3. The ceiling tiles that defendants, Armstrong, John Doe, Richard Roe and John Smith made available were not safe for their intended use in that they were improperly designed, contained no instructions for their proper use and no warnings about their improper use and were otherwise defective.

4. As a direct and proximate result of the foregoing, plaintiff's decedent, Lothar Maertin, sustained severe, permanent and crippling injuries; has suffered great pain and anguish of mind and body was confined for a long period of time; became seriously incapacitated and restricted in his normal activities; had to undergo medical treatment; continued to endure much physical and mental pain and suffering, disability and permanent injury and has otherwise been damaged.

5. As a further direct and proximate result and effect of the foregoing, plaintiff's decedent, Lothar Maertin, was caused to suffer certain severe and permanent personal injuries as hereinabove set forth; had suffered great pain, discomfort and mental anguish, had been forced to expend large sums of money for hospitalization, medical treatment and nursing care in an effort to cure said injuries; had been prevented from attending to his normal daily, economic and social pursuits, thereby resulting in a loss of income; and

has otherwise been damaged for which defendants, Armstrong, John Doe, Richard Roe and John Smith are liable in strict liability pursuant to N.J.S.A. 2A:58C-1. et seq.

6. Plaintiff's decedent, Lothar Maertin, was a professor at Burlington County Community College and after being exposed to the ceiling tiles he contracted cancer.

WHEREFORE, plaintiff, Joan Maertin, Executrix of the Estate of Lothar Maertin, deceased demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith, for such sums as would reasonably and properly compensate the Estate of Lothar Maertin for his damages in accordance with the laws of the State of New Jersey, together with interest and costs of suit.

SECOND COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the previous counts but for the sake of brevity same are not set forth herein at length.

2. The plaintiff, Joan Maertin, is the wife of the plaintiff, Lothar Maertin, deceased, and is entitled to his services and society.

3. The plaintiff, Joan Maertin, was deprived of and will in the future be deprived of her husband's consortium, society and services.

4. The plaintiff, Joan Maertin, had been caused to incur great expenses for medical treatment in an effort to cure her husband of the injuries caused him by the defendant's

negligence.

WHEREFORE, plaintiff, Joan Maertín, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages plus interest and cost of suit.

THIRD COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First, and Second counts but for the sake of brevity the same are not set forth herein at length.

2. Lothar Maertín left him surviving his wife Joan Maertín, and one son, Eric, a minor, two years of age.

3. This action is commenced within two years from the date of death of Lothar Maertín.

4. As a result of the negligence of the defendants as aforesaid, and as a result of the death of Lothar Maertín, plaintiff, Joan Maertín and Eric Maertín, a minor have suffered pecuniary loss including but not limited to loss of income, loss of companionship and loss of advice and guidance and were otherwise damaged.

WHEREFORE, plaintiff, Joan Maertín, Executrix of the Estate of Lothar Maertín, deceased, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith, for damages, interest and cost of suit.

FOURTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First, Second and Third Counts but

for the sake of brevity the same are not set forth herein at length.

2. As a result of the negligence of the defendants, Armstrong, John Doe, Richard Roe and John Smith, as aforesaid, Joan Maertin was caused to suffer severe pain and emotional distress while watching her husband slowing dying before her eyes and plaintiff, Eric Maertin, a minor, was caused to suffer severe pain and emotional distress while watching his father slowing dying before his eyes.

WHEREFORE, plaintiffs, Joan Maertin and Eric Maertin, a minor, individually, jointly, severally and/or in the alternative, demand judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith, for damages, interest plus costs of suit.

FIFTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Joan Maertin was a professor at the Burlington County Community College and as a result of being exposed to the ceiling tiles which were coated with Aroclor 1254 she has a fear of contracting cancer in the future as a result of her exposure.

3. WHEREFORE, plaintiff, Joan Maertin, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith, for such sums as would reasonably and properly

compensate her for her damages in accordance with the laws of the State of New Jersey, together with interest and costs of suit.

SIXTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity are not set forth herein at length.

2. Plaintiff's decedent, Robert Campo was a professor at the Burlington County Community College and as a result of his exposure to the defendant's, Armstrong's ceiling tiles which were coated with Aroclor 1254, he contracted cancer and died.

3. As a direct and proximate result of the foregoing, plaintiff's decedent, Robert Campo, sustained severe, permanent and crippling injuries; has suffered great pain and anguish of mind and body was confined for a long period of time; became seriously incapacitated and restricted in his normal activities; had to undergo medical treatment; continued to endure much physical and mental pain and suffering, disability and permanent injury and has otherwise been damaged.

4. As a further direct an proximate result and effect of the foregoing, plaintiff's decedent, Robert Campo, was caused to suffer certain severe and permanent personal injuries as hereinabove set forth; had suffered great pain, discomfort and mental anguish, had been forced to expend large

sums of money for hospitalization, medical treatment and nursing care in an effort to cure said injuries; had been prevented from attending to his normal daily, economic and social pursuits, thereby resulting in a loss of income; and has otherwise been damaged for which defendants, Armstrong, John Doe, Richard Roe and John Smith are liable in strict liability pursuant to N.J.S.A. 2A:58C-1. et seq.

WHEREFORE, plaintiff, Marguerite Cerimele, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages plus interest and costs of suit.

SEVENTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Sixth Count but for the sake of brevity same are not set forth herein at length.

2. Robert Campo left him surviving his sister, Marguerite Cerimele.

3. This action is commenced within two years from the date of the death of Robert Campo.

4. As a result of the negligence of the defendants as aforesaid, and as a result of the death of Robert Campo plaintiff, Marguerite Cerimele, has suffered pecuniary loss including but not limited to loss of income, loss of companionship and loss of advice and guidance and was otherwise damaged.

WHEREFORE, plaintiff, Marguerite Cerimele, Executrix of

the Estate of Robert Campo, demands judgment against the defendants, Armstrong, John Doe, Richard Roe, and John Smith, for damages, interest and costs of suit.

EIGHTH COUNT

1. Plaintiff repeats and incorporates each and every allegation of the First, Sixth and Seventh Counts but for the sake of brevity same are set forth herein at length.

2. As a result of the negligence of the defendants, Armstrong, John Doe, Richard Roe and John Smith, as aforesaid, Marguerite Cerimele was caused to suffer severe pain and emotional distress while watching her brother slowly dying before her eyes.

WHEREFORE, plaintiff, Marguerite Cerimele, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest plus costs of suit.

NINTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity are not set forth herein at length.

2. Plaintiff's decedent, Elizabeth Leedy, was an employee at the Burlington County Community College and as a result of her exposure to the defendant, Armstrong's ceiling tiles which were coated with Aroclor 1254, she contracted cancer and died.

3. As a direct and proximate result of the foregoing, plaintiff's decedent, Elizabeth Leedy, sustained severe,

permanent and crippling injuries; has suffered great pain and anguish of mind and body was confined for a long period of time; became seriously incapacitated and restricted in her normal activities; had to undergo medical treatment; continued to endure much physical and mental pain and suffering, disability and permanent injury and has otherwise been damaged.

4. As a further direct and proximate result and effect of the foregoing, plaintiff's decedent, Elizabeth Leedy, was caused to suffer certain severe and permanent personal injuries as hereinabove set forth; had suffered great pain, discomfort and mental anguish, had been forced to expend large sums of money for hospitalization, medical treatment and nursing care in an effort to cure said injuries; had been prevented from attending to her normal daily, economic and social pursuits, thereby resulting in a loss of income; and has otherwise been damaged for which defendants, Armstrong, John Doe, Richard Roe and John Smith are liable in strict liability pursuant to N.J.S.A. 2A:58C-1. et seq.

WHEREFORE, plaintiff, Harold Leedy, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages plus interest and costs of suit.

TENTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Ninth Counts but for the sake of brevity same are not set forth herein at length.

2. The plaintiff, Harold Leedy, is the husband of the plaintiff, Elizabeth Leedy, deceased and is entitled to her services and society.

3. The plaintiff, Harold Leedy, was deprived of and will in the future be deprived of his wife's consortium, society and services.

4. The plaintiff, Harold Leedy, has been caused to incur great expenses for medical treatment in an effort to cure his wife of the injuries caused her by the defendant's negligence.

WHEREFORE, plaintiff, Harold Leedy, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages plus interest and costs of suit.

ELEVENTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Ninth Counts but for the sake of brevity same are not set forth herein at length.

2. Elizabeth Leedy left her surviving her husband, Harold Leedy, and 2 daughters and one son, Robin D. Burdumi, Sheila Ann Laws and Harold S. Leedy, III, being over the age of eighteen years, and this action is being instituted on their behalf.

3. This action is commenced within two years from the date of death of Elizabeth Leedy.

4. As a result of the negligence of the defendants as aforesaid, and as a result of the death of Elizabeth Leedy,

plaintiffs, Harold Leedy, Robin D. Burdumi, Sheila Ann Laws and Harold S. Leedy, III, have suffered pecuniary loss including but not limited to loss of income, loss of companionship and loss of advice and guidance and were otherwise damaged.

WHEREFORE, plaintiff, Harold Leedy, Executor of the Estate of Elizabeth Leedy, deceased, demand judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith, for damages, interest and costs of suit.

TWELFTH COUNT

1. Plaintiffs repeat and incorporate each and every allegation contained in the First, Ninth and Eleventh Counts but for the sake of brevity same are not set forth herein at length.

2. As a result of the negligence of the defendants, Armstrong, John Doe, Richard Roe and John Smith, as aforesaid, Harold Leedy was caused to suffer severe pain and emotional distress while watching his wife slowing dying before his eyes and plaintiffs, Robin D. Burdumi, Sheila Ann Laws and Harold Leedy, III were caused to suffer severe pain and emotional distress while watching their mother slowing dying.

WHEREFORE, plaintiffs, Harold Leedy, Robin D. Burdumi, Sheila Ann Laws and Harold S. Leedy, III, individually, jointly, severally and/or in the alternative, demand judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith, for damages, interest and costs of suit.

THIRTEENTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, James Stewart, was a professor at the Burlington County Community College and as a result of his exposure to defendant's, Armstrongs' ceiling tiles, which were coated with Aroclor 1254 he has contracted cancer.

3. As a direct and proximate result of the foregoing, plaintiff, James Stewart, sustained severe, permanent and crippling injuries; has suffered is suffering and may in the future suffer great pain and anguish of mind and body was confined for a long period of time; became seriously incapacitated and restricted in his normal activities; had to undergo medical treatment; continued to endure much physical and mental pain and suffering, disability and permanent injury and has otherwise been damaged.

4. As a further direct and proximate result and effect of the foregoing, plaintiff, James Stewart, was caused to suffer certain severe and permanent personal injuries as hereinabove set forth; has suffered and may in the future suffer great pain, discomfort and mental anguish, has been forced to expend and may in the future be forced to expend large sums of money for hospitalization, medical treatment and nursing care in an effort to cure said injuries; has been and

may in the future be prevented from attending to his normal daily, economic and social pursuits, thereby resulting in a loss of income; and has otherwise been damaged for which defendants, Armstrong, John Doe, Richard Roe and John Smith are liable in strict liability pursuant to N.J.S.A. 2A:58C-1. et seq.

WHEREFORE, plaintiff, James Stewart demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and costs of suit.

FOURTEENTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, John Hopen, was a professor at the Burlington County Community College and as a result of his exposure to defendant's, Armstrongs' ceiling tiles which were coated with Aroclor 1254, he has contracted cancer.

3. As a direct and proximate result of the foregoing, plaintiff, John Hopen, sustained severe, permanent and crippling injuries; has suffered great pain and anguish of mind and body was confined for a long period of time; became seriously incapacitated and restricted in his normal activities; had to undergo medical treatment; continued to endure much physical and mental pain and suffering, disability and permanent injury and has otherwise been damaged.

4. As a further direct and proximate result and effect

of the foregoing, plaintiff, John Hopen, was caused to suffer certain severe and permanent personal injuries as hereinabove set forth; has suffered is suffering and may in the future suffer great pain, discomfort and mental anguish, has been and may in the future be forced to expend large sums of money for hospitalization, medical treatment and nursing care in an effort to cure said injuries; has been and may in the future be prevented from attending to his normal daily, economic and social pursuits, thereby resulting in a loss of income; and has otherwise been damaged for which defendants, Armstrong, John Doe, Richard Roe and John Smith are liable in strict liability pursuant to N.J.S.A. 2A:58C-1. et seq.

WHEREFORE, plaintiff, John Hopen, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and costs of suit.

FIFTEENTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, William White, was a professor at the Burlington County Community College and as a result of his exposure to defendant's, Armstrongs' ceiling tiles which were coated with Aroclor 1254, he has contracted cancer.

3. As a direct and proximate result of the foregoing, plaintiff, William White, sustained severe, permanent and crippling injuries; has suffered great pain and anguish of

mind and body was confined for a long period of time; became seriously incapacitated and restricted in his normal activities; had to undergo medical treatment; continued to endure much physical and mental pain and suffering, disability and permanent injury and has otherwise been damaged.

4. As a further direct and proximate result and effect of the foregoing, plaintiff, William White, was caused to suffer certain severe and permanent personal injuries as hereinabove set forth; has suffered and may in the future suffer great pain, discomfort and mental anguish, has been forced and may in the future be forced to expend large sums of money for hospitalization, medical treatment and nursing care in an effort to cure said injuries; has been and may in the future be prevented from attending to his normal daily, economic and social pursuits, thereby resulting in a loss of income; and has otherwise been damaged for which defendants, Armstrong, John Doe, Richard Roe and John Smith are liable in strict liability pursuant to N.J.S.A. 2A:58C-1. et seq.

WHEREFORE, plaintiff, William White, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and costs of suit.

SIXTEENTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Robert Scully, was a professor at the

Burlington County Community College and as a result of his exposure to defendant's, Armstrongs' ceiling tiles which were coated with Aroclor 1254, he has contracted cancer.

3. As a direct and proximate result of the foregoing, plaintiff, Robert Scully, sustained severe, permanent and crippling injuries; has suffered great pain and anguish of mind and body was confined for a long period of time; became seriously incapacitated and restricted in his normal activities; had to undergo medical treatment; continued to endure much physical and mental pain and suffering, disability and permanent injury and has otherwise been damaged.

4. As a further direct and proximate result and effect of the foregoing, plaintiff, Robert Scully, was caused to suffer certain and permanent personal injuries as hereinabove set forth; has suffered and may in the future suffer great pain, discomfort and mental anguish, has been and may in the future be forced to expend large sums of money for hospitalization, medical treatment and nursing care in an effort to cure said injuries; has been and may in the future be prevented from attending to his normal daily, economic and social pursuits, thereby resulting in a loss of income; and has otherwise been damaged for which defendants, Armstrong, John Doe, Richard Roe and John Smith are liable in strict liability pursuant to N.J.S.A 2A:58C-1. et seq.

WHEREFORE, plaintiff, Robert Scully, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and

John Smith for damages, interest and costs of suit.

SEVENTEENTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Twelfth Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Marcia Scully, was and is the wife of Plaintiff, Robert Scully, and as such is entitled to his services and society.

3. The plaintiff, Marcia Scully, was deprived of and may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Marcia Scully, has incurred and may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate her husband of the injuries he sustained.

WHEREFORE, plaintiff, Marcia Scully, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages plus interest and costs of suit.

EIGHTEENTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Douglas Melegari, was a professor at the Burlington County Community College and as a result of his exposure to defendant's, Armstrongs' ceiling tiles which were

coated with Aroclor 1254, he has contracted cancer.

3. As a direct and proximate result of the foregoing, plaintiff, Douglas Melegari, sustained severe, permanent and crippling injuries; has suffered great pain and anguish of mind and body was confined for a long period of time; became seriously incapacitated and restricted in his normal activities; had to undergo medical treatment, continued to endure much physical and mental pain and suffering, disability and permanent injury and has otherwise been damaged.

4. As a further direct and proximate result and effect of the foregoing, plaintiff, Douglas Melegari, was caused to suffer certain severe and permanent personal injuries as hereinabove set forth; has suffered and may in the future suffer great pain, discomfort and mental anguish, has been and may in the future be forced to expend large sums of money for hospitalization, medical treatment and nursing care in an effort to cure said injuries; has been and may in the future be prevented from attending his normal daily, economic and social pursuits, thereby resulting in a loss of income; and has otherwise been damaged for which defendants, Armstrong, John Doe, Richard Roe and John Smith are liable in strict liability pursuant to N.J.S.A. 2A:58C-1. et seq.

WHEREFORE, plaintiff, Douglas Melegari, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and costs of suit.

NINETEENTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Fourteenth Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Diane Melegari, was and is the wife of plaintiff, Douglas Melegari, and as such is entitled to his services and society.

3. The plaintiff, Diane Melegari, was deprived of and may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Diane Melegari, has incurred and may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate her husband of the injuries he sustained.

WHEREFORE, the plaintiff, Diane Melegari demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith, for damages, interest and costs of suit.

TWENTIETH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Thomas Thompson, was a professor at the Burlington County Community College and as a result of his exposure to defendant's, Armstrongs' ceiling tiles which were coated with Aroclor 1254, he has contracted cancer.

3. As a direct and proximate result of the foregoing, plaintiff, Thomas Thompson, sustained severe, permanent and crippling injuries; has suffered great pain and anguish of mind and body was confined for a long period of time; became seriously incapacitated and restricted in his normal activities; had to undergo medical treatment; continued to endure much physical and mental pain and suffering, disability and permanent injury and has otherwise been damaged.

4. As a further direct and proximate result and effect of the foregoing, plaintiff, Thomas Thompson, was caused to suffer certain severe and permanent personal injuries as hereinabove set forth; has suffered and may in the future suffer great pain, discomfort and mental anguish, has been and may in the future be forced to expend large sums of money for hospitalization, medical treatment and nursing care in an effort to cure said injuries; has been and may in the future be prevented from attending to his normal daily, economic and social pursuits, thereby resulting in a loss of income; and has otherwise been damaged for which defendants, Armstrong, John Doe, Richard Roe and John Smith are liable in strict liability pursuant to N.J.S.A. 2A:58C-1. et seq.

WHEREFORE, plaintiff, Thomas Thompson, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and costs of suit.

TWENTY-FIRST COUNT

1. Plaintiff repeats and incorporates each and every

allegation contained in the First and Sixteenth Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Lillian Thompson, was and is the wife of Plaintiff, Thomas Thompson, and as such is entitled to his services and society.

3. The plaintiff, Lillian Thompson, was deprived of and may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Lillian Thompson, has incurred and may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate her husband of the injuries he sustained.

5. WHEREFORE the plaintiff, Lillian Thompson, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

TWENTY-SECOND COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Vincent Sollimo, was a professor at the Burlington County Community College and as a result of his exposure to defendant's, Armstrongs' ceiling tiles which were coated with Aroclor 1254, he has contracted cancer.

3. As a direct and proximate result of the foregoing, plaintiff, Vincent Sollimo, sustained severe, permanent and

crippling injuries; has suffered great pain and anguish of mind and body was confined for a long period of time; became seriously incapacitated and restricted in his normal activities; had to undergo medical treatment; continued to endure much physical and mental pain and suffering, disability and permanent injury and has otherwise been damaged.

4. As a further direct and proximate result and effect of the foregoing, plaintiff, Vincent Sollimo, was caused to suffer certain severe and permanent personal injuries as hereinabove set forth; has suffered and may in the future suffer great pain, discomfort and mental anguish, has and may be in the future forced to expend large sums of money for hospitalization, medical treatment and nursing care in an effort to cure said injuries; has been and may in the future be prevented from attending to his normal daily, economic and social pursuits, thereby resulting in a loss of income; and has otherwise been damaged for which defendants, Armstrong, John Doe, Richard Roe and John Smith are liable in strict liability pursuant to N.J.S.A. 2A:58C-1. et seq.

WHEREFORE, plaintiff, Vincent Sollimo, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and costs of suit.

TWENTY-THIRD COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Eighteenth Counts but for the sake of brevity same are not set forth herein at

length.

2. At all times herein mentioned, the plaintiff, Patricia Sollimo, was and is the wife of Plaintiff, Vincent Sollimo, and as such is entitled to his services and society.

3. The plaintiff, Patricia Sollimo, was deprived of and may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Patricia Sollimo, has incurred and may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate her husband of the injuries he sustained.

5. WHEREFORE the plaintiff, Patricia Sollimo, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

TWENTY-FOURTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Armen Gnepp, is a professor at the Burlington County Community College and as a result of his exposure to defendant, Armstrong's ceiling tiles he has contracted cancer.

3. As a direct and proximate result of the foregoing, plaintiff, Armen Gnepp, sustained severe, permanent and crippling injuries; has suffered is suffering and may in the

future suffer great pain and anguish of mind and body was confined for a long period of time; became seriously incapacitated and restricted in his normal activities; had to undergo medical treatment; continued to endure much physical and mental pain and suffering, disability and permanent injury and has otherwise been damaged.

4. As a further direct and proximate result and effect of the foregoing, plaintiff, Armen Gnepp, was caused to suffer certain severe and permanent personal injuries as hereinabove set forth; has suffered and may in the future suffer great pain, discomfort and mental anguish, has been forced to expend and may in the future be forced to expend large sums of money for hospitalization, medical treatment and nursing care in an effort to cure said injuries; has been and may in the future be prevented from attending to his normal daily, economic and social pursuits, thereby resulting in a loss of income; and has otherwise been damaged for which defendants, Armstrong, John Doe, Richard Roe and John Smith are liable in strict liability pursuant to N.J.S.A. 2A:58C-1. et seq.

WHEREFORE, plaintiff, Armen Gnepp, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and costs of suit.

TWENTY FIFTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of

brevity same are not set forth herein at length.

2. Plaintiff, Mary Ann Stets, was a professor at the Burlington County Community College and as a result of her exposure to defendant, Armstrong's ceiling tiles she has contracted cancer.

3. As a direct and proximate result of the foregoing, plaintiff, Mary Ann Stets, sustained severe, permanent and crippling injuries; has suffered is suffering and may in the future suffer great pain and anguish of mind and body was confined for a long period of time; became seriously incapacitated and restricted in her normal activities; had to undergo medical treatment; continued to endure much physical and mental pain and suffering, disability and permanent injury and has otherwise been damaged.

4. As a further direct and proximate result and effect of the foregoing, plaintiff, Mary Ann Stets, was caused to suffer certain severe and permanent personal injuries as hereinabove set forth; has suffered and may in the future suffer great pain, discomfort and mental anguish, has been forced to expend and may in the future be forced to expend large sums of money for hospitalization, medical treatment and nursing care in an effort to cure said injuries; has been and may in the future be prevented from attending to her normal daily, economic and social pursuits, thereby resulting in a loss of income; and has otherwise been damaged for which defendants, Armstrong, John Doe, Richard Roe and John Smith

are liable in strict liability pursuant to N.J.S.A. 2A:58C-1.
et seq.

WHEREFORE, plaintiff, Mary Ann Stets, demands judgment
against the defendants, Armstrong, John Doe, Richard Roe and
John Smith for damages, interest and costs of suit.

TWENTY-SIXTH COUNT

1. Plaintiff repeats and incorporates each and every
allegation contained in the First Count but for the sake of
brevity same are not set forth herein at length.

2. Plaintiff, Patricia Barnes, is a nurse at the
Burlington County Community College and as a result of being
exposed to the ceiling tiles which were coated with Aroclor
1254 she has a fear of developing cancer in the future.

WHEREFORE, plaintiff, Patricia Barnes, demands
judgment against the defendants, Armstrong, John Doe, Richard
Roe and John Smith for damages, interest and cost of suit.

TWENTY-SEVENTH COUNT

1. Plaintiff repeats and incorporates each and every
allegation contained in the First County but for the sake of
brevity same are not set forth herein at length.

2. Plaintiff, Mary Ann Yuengling, was employed as a
teacher at the Burlington County Community College and as a
result of her being exposed to the ceiling tiles which were
coated with Aroclor 1254 she has a fear of developing cancer
in the future.

WHEREFORE, plaintiff, Mary Ann Yuengling, demands

judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

TWENTY-EIGHTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Kathleen Sweeney, is employed as a professor at the Burlington County Community College and as a result of her being exposed to the ceiling tiles which were coated with Aroclor 1254 she has a fear of developing cancer in the future.

WHEREFORE, plaintiff, Kathleen Sweeney, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

TWENTY-NINTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Barbara Makuch, was employed as a secretary at the Burlington County Community College and as a result of her being exposed to the ceiling tiles which were coated with Aroclor 1254 she has a fear of developing cancer in the future.

WHEREFORE, plaintiff, Barbara Makuch, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

THIRTIETH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Edmund Makuch, was employed as a teacher at the Burlington County Community College and as a result of his being exposed to the ceiling tiles which were coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, plaintiff, Edmund Makuch, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

THIRTY-FIRST COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, John E. Smith, was employed as a professor at the Burlington County Community College and as a result of his being exposed to the ceiling tiles which were coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, plaintiff, John E. Smith, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

THIRTY-SECOND COUNT

1. Plaintiff repeats and incorporates each and every

allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Carole Jensen, was employed at the Burlington County Community College and as a result of her being exposed to the ceiling tiles which were coated with Aroclor 1254 she has a fear of developing cancer in the future.

WHEREFORE, plaintiff, Carole Jensen, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

THIRTY-THIRD COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Thirty-second Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Thomas Jensen, was and is the husband of plaintiff, Carole Jensen, and as such is entitled to her services and society.

3. The plaintiff, Thomas Jensen, may in the future be deprived of his wife's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Thomas Jensen, may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate his wife of the illness she may develop as a result of her exposure.

WHEREFORE, the plaintiff, Thomas Jensen, demands

judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

THIRTY-FOURTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Charles Perrone, was employed as a librarian at the Burlington County Community College and as a result of him being exposed to the ceiling tiles coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, Charles Perrone, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

THIRTY-FIFTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Thirty-fourth Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Marguerite Perrone, was and is the wife of plaintiff, Charles Perrone, and as such is entitled to his services and society.

3. The plaintiff, Marguerite Perrone, may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Marguerite Perrone, may in the

future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate her husband of the illness he may develop as a result of his exposure.

WHEREFORE, the plaintiff, Marguerite Perrone, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

THIRTY-SIXTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, James Cunningham, is employed as a professor at the Burlington County Community College and as a result of his exposure to the ceiling tiles coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, James Cunningham, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

THIRTY-SEVENTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Thirty-sixth Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Margaret Cunningham, was and is the wife of plaintiff, James Cunningham, and as such is entitled to his services and

society.

3. The plaintiff, Margaret Cunningham, may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Margaret Cunningham, may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate her husband of the illness he may develop as a result of his exposure.

WHEREFORE, the plaintiff, Margaret Cunningham, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

THIRTY-EIGHTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Charles Savana, is employed as a professor at the Burlington County Community College and as a result of his exposure to the ceiling tiles coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, Charles Savana, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

THIRTY-NINTH COUNT

1. Plaintiff repeats and incorporates each and every

allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Harry Schmoll, is employed as a professor at the Burlington County Community College and as a result of his exposure to the ceiling tiles coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, Harry Schmoll, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FORTIETH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Thirty-ninth Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Rita Schmoll, was and is the wife of plaintiff, Harry Schmoll, and as such is entitled to his services and society.

3. The plaintiff, Rita Schmoll, may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Rita Schmoll, may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate her husband of the illness he may develop as a result of his exposure.

WHEREFORE, the plaintiff, Rita Schmoll, demands judgment against the defendants, Armstrong, John Doe, Richard

Roe and John Smith for damages, interest and cost of suit.

FORTY-FIRST COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Stanleigh Ayres, is employed as a professor at the Burlington County Community College and as a result of his exposure to the ceiling tiles coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, Stanleigh Ayres, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FORTY-SECOND COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Forty-first Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Helga Ayres, was and is the wife of plaintiff, Stanleigh Ayres, and as such is entitled to his services and society.

3. The plaintiff, Helga Ayres, may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Helga Ayres, may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate her husband of

the illness he may develop as a result of his exposure.

WHEREFORE, the plaintiff, Helga Ayres, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FORTY-THIRD COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Bennie Woods, is employed as a professor at the Burlington County Community College and as a result of his exposure to the ceiling tiles coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, Bennie Woods, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FORTY-FOURTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Forty-third Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Erna Woods, was and is the wife of plaintiff, Bennie Woods, and as such is entitled to his services and society.

3. The plaintiff, Erna Woods, may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Erna Woods, may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate her husband of the illness he may develop as a result of his exposure.

WHEREFORE, the plaintiff, Erna Woods, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FORTY-FIFTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Jacque Vail, is employed as a professor at the Burlington County Community College and as a result of his exposure to the ceiling tiles coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, Jacque Vail, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FORTY-SIXTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Forty-fifth Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Marie Vail, was and is the wife of plaintiff, Jacque Vail, and as such is entitled to his services and society.

3. The plaintiff, Marie Vail, may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Marie Vail, may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate her husband of the illness he may develop as a result of his exposure.

WHEREFORE, the plaintiff, Marie Vail, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FORTY-SEVENTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Sandra Kaelin, is employed as a professor at the Burlington County Community College and as a result of her exposure to the ceiling tiles coated with Aroclor 1254 she has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, Sandra Kaelin, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FORTY-EIGHTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, C. Dewitt Peterson, is employed as a professor at the Burlington County Community College and as a result of his exposure to the ceiling tiles coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, C. Dewitt Peterson, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FORTY-NINTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Forty-eighth Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Joanne Peterson, was and is the wife of plaintiff, C. Dewitt Peterson, and as such is entitled to his services and society.

3. The plaintiff, Joanne Peterson, may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Joanne Peterson, may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate her husband of the illness he may develop as a result of his exposure.

WHEREFORE, the plaintiff, Joanne Peterson, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FIFTIETH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Samuel Moyer, is employed as a professor at the Burlington County Community College and as a result of his exposure to the ceiling tiles coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, Samuel Moyer, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FIFTY-FIRST COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Fiftieth Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Audra Moyer, was and is the wife of plaintiff, Samuel Moyer, and as such is entitled to his services and society.

3. The plaintiff, Audra Moyer, may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Audra Moyer, may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate her husband of the illness he may develop as a result of his exposure.

WHEREFORE, the plaintiff, Audra Moyer, demands

judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FIFTY-SECOND COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, William Hatcher, is employed as a professor at the Burlington County Community College and as a result of his exposure to the ceiling tiles coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, William Hatcher, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FIFTY-THIRD COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Fifty-second Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Mary Hatcher, was and is the wife of plaintiff, William Hatcher, and as such is entitled to his services and society.

3. The plaintiff, Mary Hatcher, may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Mary Hatcher, may in the future be caused to incur great expenses for hospital and/or medical

treatment in an effort to cure and alleviate her husband of the illness he may develop as a result of his exposure.

WHEREFORE, the plaintiff, Mary Hatcher, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FIFTY-FOURTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Perry Kaufman, is employed as a professor at the Burlington County Community College and as a result of his exposure to the ceiling tiles coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, Perry Kaufman, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FIFTY-FIFTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, William Veit, is employed as a professor at the Burlington County Community College and as a result of his exposure to the ceiling tiles coated with Aroclor 1254 he has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, William Veit, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and

John Smith for damages, interest and cost of suit.

FIFTY-SIXTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Fifty-fifth Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Irene Veit, was and is the wife of plaintiff, William Veit, and as such is entitled to his services and society.

3. The plaintiff, Irene Veit, may in the future be deprived of her husband's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Irene Veit, may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate her husband of the illness he may develop as a result of his exposure.

WHEREFORE, the plaintiff, Irene Veit, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FIFTY-SEVENTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Geneva Kohler, is employed as a professor at the Burlington County Community College and as a result of her exposure to the ceiling tiles coated with Aroclor 1254 she

has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, Geneva Kohler, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FIFTY-EIGHTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, M. Patricia Kalata, is employed as a professor at the Burlington County Community College and as a result of her exposure to the ceiling tiles coated with Aroclor 1254 she has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, M. Patricia Kalata, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

FIFTY-NINTH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Fifty-eighth Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Paul Kalata, was and is the husband of plaintiff, M. Patricia Kalata, and as such is entitled to his services and society.

3. The plaintiff, Paul Kalata, may in the future be deprived of his wife's consortium, society and services as a

result of the negligence of the defendants as aforesaid.

4. The plaintiff, Paul Kalata, may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate his wife of the illness she may develop as a result of her exposure.

WHEREFORE, the plaintiff, Paul Kalata, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

SIXTIETH COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Claire Correale, is employed as a professor at the Burlington County Community College and as a result of her exposure to the ceiling tiles coated with Aroclor 1254 she has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, Claire Correale, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

SIXTY-FIRST COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Judith Nelson, is employed as a professor at the Burlington County Community College and as a

result of her exposure to the ceiling tiles coated with Aroclor 1254 she has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, Judith Nelson, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

SIXTY-SECOND COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First Count but for the sake of brevity same are not set forth herein at length.

2. Plaintiff, Patricia Diller, is employed as a professor at the Burlington County Community College and as a result of her exposure to the ceiling tiles coated with Aroclor 1254 she has a fear of developing cancer in the future.

WHEREFORE, Plaintiff, Patricia Diller, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

SIXTY-THIRD COUNT

1. Plaintiff repeats and incorporates each and every allegation contained in the First and Sixty-second Counts but for the sake of brevity same are not set forth herein at length.

2. At all times herein mentioned, the plaintiff, Terry Diller, was and is the husband of plaintiff, Patricia Diller, and as such is entitled to his services and society.

3. The plaintiff, Terry Diller, may in the future be deprived of his wife's consortium, society and services as a result of the negligence of the defendants as aforesaid.

4. The plaintiff, Terry Diller, may in the future be caused to incur great expenses for hospital and/or medical treatment in an effort to cure and alleviate his wife of the illness she may develop as a result of her exposure.

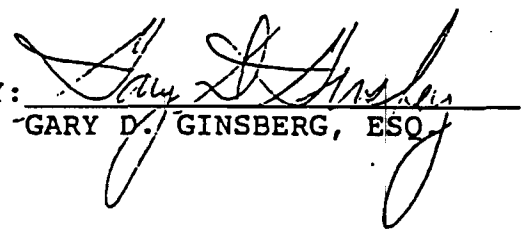
WHEREFORE, the plaintiff, Terry Diller, demands judgment against the defendants, Armstrong, John Doe, Richard Roe and John Smith for damages, interest and cost of suit.

SIXTY-FOURTH COUNT

1. Plaintiffs repeat and incorporate each and every allegation contained in the First through Sixty-third Counts but for the sake of brevity same are not set forth herein at length.

WHEREFORE all plaintiffs named in the caption of this Complaint demand judgment against the defendants, Armstrong World Industries Inc., John Doe(s) (fictitious name(s) A-Z as manufacturer, Richard Roe(s) (fictitious name(s) A-Z as distributor and John Smith(s) (fictitious name(s) A-Z as wholesaler, for damages plus interest, costs of suit and attorney fees.

LAW OFFICES GARY D. GINSBERG

BY: 

GARY D. GINSBERG, ESQ.

JURY DEMAND

Plaintiffs hereby demand a trial by jury as to all issues contained herein.

LAW OFFICES GARY D. GINSBERG

BY: 
GARY D. GINSBERG, ESQ.

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, Gary D. Ginsberg, Esquire is hereby designated as trial counsel on behalf of all named plaintiffs in this matter.

LAW OFFICES GARY D. GINSBERG

BY: 
GARY D. GINSBERG, ESQ.

CERTIFICATION

GARY D. GINSBERG, Esquire, hereby certifies that there are no other actions or arbitrations pending involving the subject matter at this time and there are no additional known parties who should be joined to the present action at this time. I certify the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

LAW OFFICES GARY D. GINSBERG

BY: 
GARY D. GINSBERG, ESQ.

Dated: June 12, 1995