

IN THE COMMON PLEAS COURT OF ERIE COUNTY, OHIO

MARY A. DENDINGER, executrix of the
Estate of Herman A. Dendinger,
deceased,
1823 West Monroe Street,
Sandusky, Ohio 44870

and

ETTA W. WALLACE,
personal representative of the
Estate of Fred A. Wallace, deceased,
881 N.W. Columbia Street
Port Charlotte, Florida 33948

Plaintiffs,

vs.

CHRYSLER PLASTIC PRODUCTS CORPORATION
3130 West Monroe Street
Sandusky, Ohio 44870

THE GOODYEAR TIRE & RUBBER COMPANY
1144 East Market Street
Akron, Ohio 44305

B.F. GOODRICH COMPANY
500 South Main Street
Akron, Ohio 44318

FIRESTONE TIRE & RUBBER COMPANY
1200 Firestone Parkway
Akron, Ohio 44317

CONOCO, INC.
1007 Market Street
Wilmington, Delaware 19898

UNION CARBIDE CORPORATION
Old Ridgebury Road, Section C-2
Danbury, Connecticut 06817

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ATTORNEYS AT LAW
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CASE NO. 46027
Judge Ann B. Maschari

AMENDED COMPLAINT
(Following Consolidation)

Jury Demand Endorsed Hereon

UCC 072438

UNIROYAL, INC.
World Headquarters
Middlebury, Connecticut 06749

DIAMOND SHANROCK CHEMICALS CO.
717 North Harwood Street
Dallas, Texas 75201

OCCIDENTAL CHEMICAL CORP.
Armond Hammer Blvd.
P.O. Box 699
Pottstown, Pennsylvania 19464

STAUFFER CHEMICAL CO.
Nyala Farm Road
Westport, Connecticut 06880

SHINTECH, INC.
5618 Highway 332 East
Freeport, Texas 77541

DIVERSITECH GENERAL, INC.
One General Street
Akron, Ohio 44329

A. SCHULMAN, INC.
3550 West Market Street
Akron, Ohio 44313

TENNECO, INC.
1010 Milam
P.O. Box 2511
Houston, Texas

AKE V. LJUNG
General Manager
Chrysler Plastic Products Corporation
Sandusky, Ohio 44870
Current address unknown

NORMAN P. PHILLIPS
1819 Millsboro Road East
Mansfield, Ohio 44906

ALBERT W. CRAMER
1427 Chandler Drive, S.E.
Huntsville, Alabama 35801

ROBERT D. GUSTINE
5183 Christine Drive
Ann Arbor, Michigan 48103

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RICHARD ALTHISER
Production Color Department Supervisor
Chrysler Plastic Products Corporation
Sandusky, Ohio 44870
Current address unknown

RON C. ABBOTT
Production Color Department Supervisor
Chrysler Plastic Products Corporation
Sandusky, Ohio 44870
Current address unknown

WILLIAM C. HOLSAPPLE
Production Color Department Supervisor
Chrysler Plastic Products Corporation
Sandusky, Ohio 44870
Current address unknown

Defendants.

-o0o-

Now come plaintiffs, and for their Amended Complaint
(Following Consolidation) against defendants state as follows:

FIRST CAUSE OF ACTION

1. Plaintiff Mary A. Dendinger's decedent, Herman A. Dendinger (hereinafter "Dendinger"), was, at all times pertinent hereto, a resident of Erie County, Ohio, and worked at Chrysler Plastic Products Corporation's plant in the City of Sandusky, Erie County, Ohio, from August, 1968 until October, 1980.

2. Plaintiff Etta W. Wallace's decedent, Fred A. Wallace (hereinafter "Wallace"), was, at all times pertinent hereto, a resident of Erie County, Ohio, and worked at Chrysler Plastic Products Corporation's plant in the City of Sandusky, Erie County, Ohio, from October, 1972 until April, 1978.

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3. Plaintiff Mary A. Dendinger is the widow and duly appointed executrix of the estate of Dendinger, who died on April 2, 1986.

4. Plaintiff Etta Wallace is the widow and duly appointed personal representative of the estate of Wallace, who died on July 23, 1985.

5. Plaintiff Mary A. Dendinger is a resident of the County of Erie, State of Ohio.

6. Plaintiff Etta W. Wallace is a resident of the State of Florida.

7. Defendant, Chrysler Plastic Products Corporation (hereinafter "Chrysler") is a corporation incorporated in the State of Delaware. Chrysler is licensed to do business in the State of Ohio and, at all times pertinent hereto, has transacted business and maintained operations in Erie County, Ohio, known as the Sandusky facility, that gave rise to the activities and claims set forth herein.

8. Defendants, Goodyear Tire and Rubber Co., B.F. Goodrich Co. and Firestone Tire and Rubber Co. are corporations incorporated in the State of Ohio and/or licensed to do business in the State of Ohio.

9. Defendants Ake V. Ljung, Norman P. Phillips, Albert W. Cramer, Robert D. Gustine, Richard Althiser, Ron C. Abbott, and William C. Holsapple (collectively hereinafter "Individual Defendants") are present and/or former employees of Chrysler and, at times pertinent hereto, exercised direct and/or ultimate supervision in a management capacity over Dendinger and/or Wallace at the Sandusky facility. The Individual Defendants are residents of various states, including Ohio.

10. All defendants, at times pertinent hereto, transacted business and/or maintained operations in Erie County, Ohio, with the Chrysler facility that gave rise to the activities and claims set forth herein.

11. Defendants The Goodyear Tire & Rubber Company, B.F. Goodrich Company, Firestone Tire & Rubber Company, Conoco, Inc., Union Carbide Corporation, Uniroyal, Inc., Diamond Shamrock Chemicals Co., Occidental Chemical Corp., Stauffer Chemical Co., Shintech, Inc., Tenneco Chemicals, Inc., Diversitech General, Inc. and A. Schulman, Inc. (collectively hereinafter "PVC Resin Manufacturers"), at times relevant hereto, have been in the business of manufacturing and selling to the Sandusky facility of Chrysler in Erie County, Ohio, polyvinyl chloride resin (hereinafter "PVC"), a substance containing vinyl chloride monomer (hereinafter "VC"), a known human carcinogen.

12. At all times during their employment at the Sandusky facility of Chrysler, Dendinger and Wallace inhaled, ingested and/or absorbed into their bodies quantities of toxic and carcinogenic substances, to-wit PVC and VC, as a direct and proximate result of the activities Dendinger and Wallace were required to perform in their employment at Chrysler's Sandusky facility.

13. The levels of PVC and VC to which Dendinger and Wallace were exposed were above safe levels, permissible exposure limits, and threshold limit values.

14. Dendinger and Wallace's continuous, repeated exposure to PVC and VC at the Sandusky facility of Chrysler:

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(a) caused Dendinger and Wallace serious physical injuries, including cancer and associated pathologies, which resulted in their deaths;

(b) inflicted upon Dendinger and Wallace, prior to their deaths, severe physical and mental pain and suffering and extreme emotional distress;

(c) rendered Dendinger and Wallace, prior to their deaths, permanently and totally disabled from employment;

(d) repeatedly required Dendinger and Wallace, prior to their deaths, to obtain necessary hospital and medical care and to undergo surgeries and radiation and chemotherapy;

(e) resulted in a permanent loss of Dendinger and Wallace's earning capacities;

(f) caused Dendinger and Wallace's death.

15. At all times since Dendinger and Wallace's date of hire, Chrysler and the Individual Defendants knew or should have known that the work performed by Dendinger and Wallace at the Sandusky facility gave rise to the inhalation, ingestion and/or absorption into their bodies of quantities of toxic and carcinogenic PVC and VC, the dangerous and deadly propensities of which were known to, or should have been known by, Chrysler and the Individual Defendants.

16. Chrysler and the Individual Defendants intentionally exposed Dendinger and Wallace to toxic and carcinogenic PVC and VC at unsafe levels during the course of Dendinger and Wallace's employment at the Sandusky facility of Chrysler as a condition of continued employment, as a result of which Dendinger and Wallace sustained the injuries and losses, including the loss of life, referred to herein.

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17. During the course of Dendinger and Wallace's employment with Chrysler, and following the termination of Dendinger and Wallace's employment with Chrysler, Chrysler and the Individual Defendants intentionally withheld and/or concealed from Dendinger and Wallace and their physicians, material information and warnings concerning PVC and VC, including information as to the dangerous and deadly propensities of such substances, the effects of overexposure to such substances on human health, the signs and symptoms of overexposure, the routes and mechanisms of exposure and the precautions to take to avoid overexposure. Chrysler and the Individual Defendants knew or should have known of the material nature of the information described herein, information concerning which Dendinger and Wallace and their physicians were unaware and knowledgeable.

18. Chrysler and the Individual Defendants knew or should have known of the serious health hazards to Dendinger and Wallace which would result from their continuous, repeated exposure to PVC and VC, health hazards which could have been prevented had Chrysler and the Individual Defendants fulfilled the duties and obligations enumerated herein.

19. Chrysler and the Individual Defendants, by their intentional conduct, failed to provide Dendinger and Wallace with a safe place to work.

20. Chrysler and the Individual Defendants, by their conduct, acted in willful and/or wanton disregard for the life, health and safety of Dendinger and Wallace.

21. As a direct result of Chrysler's and the Individual Defendants' intentional conduct, Dendinger and Wallace sustained the injuries and losses, including the loss of life, described herein.

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22. This cause of action is brought by Mary A. Dendinger, executrix of the Estate of Dendinger and Etta W. Wallace, personal representative of the Estate of Wallace, pursuant to common law and R.C. 2305.21, to recover for the injuries and losses sustained by Dendinger and Wallace up to and including the time of their deaths.

WHEREFORE, plaintiff Mary A. Dendinger prays for compensatory damages from Chrysler and the Individual Defendants, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for punitive damages from Chrysler and the Individual Defendants, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for reasonable attorney and expert witness fees and costs; and for such other and further relief as the Court deems proper.

WHEREFORE, plaintiff Etta W. Wallace prays for compensatory damages from Chrysler and the Individual Defendants, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for punitive damages from Chrysler and the Individual Defendants, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for reasonable attorney and expert witness fees and costs; and for such other and further relief as the Court deems proper.

SECOND CAUSE OF ACTION

23. All well-pleaded allegations contained in paragraphs 1 through 22 of the First Cause of Action are repleaded as if fully rewritten herein.

24. The PVC Resin Manufacturers negligently failed to take proper steps to instruct and warn Dendinger and Wallace of the dangers of

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overexposure to PVC and VC and the routes and mechanisms of exposure; failed to provide Dendinger and Wallace with information on the dangerous carcinogenic propensities of PVC and VC; neglected to inform Dendinger and Wallace of the effects of overexposure to PVC and VC on human health; failed to instruct or warn Dendinger and Wallace concerning the signs and symptoms of overexposure to PVC and VC; and failed to provide information to Dendinger and Wallace as to precautions necessary to prevent overexposure to PVC and VC.

25. The above-described actions and omissions of the PVC Resin Manufacturers were in willful and/or wanton disregard of the life, health, and safety of the users of their product, including Dendinger and Wallace.

26. As a direct and proximate result of the conduct of the PVC Resin Manufacturers described herein, Dendinger and Wallace sustained the injuries and losses, including the loss of life, enumerated above.

WHEREFORE, plaintiff Mary A. Dendinger prays for compensatory damages from the PVC Manufacturers, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for punitive damages from the PVC Manufacturers, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for reasonable attorney and expert witness fees and costs; and for such other and further relief as the Court deems proper.

WHEREFORE, plaintiff Etta W. Wallace prays for compensatory damages from the PVC Manufacturers, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for punitive damages from the PVC Manufacturers, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for reasonable attorney and expert witness fees and costs; and for such other and further relief as the Court deems proper.

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THIRD CAUSE OF ACTION

27. All well-pleaded allegations contained in paragraphs 1 through 26 of the First and Second Causes of Action are repleaded as if fully rewritten herein.

28. PVC and VC are inherently dangerous, ultrahazardous products. As to the injuries and loss of life sustained by Dendinger and Wallace, the PVC Resin Manufacturers are strictly liable. PVC and VC were sold by the PVC Resin Manufacturers in a defective condition unreasonably dangerous to Dendinger and Wallace. Said PVC and VC reached Dendinger and Wallace without substantial change in the condition in which they were sold.

29. The above-described actions and omissions of the PVC Resin Manufacturers were in willful and/or wanton disregard of the life, health, and safety of the users of their product, including Dendinger and Wallace.

30. As a direct and proximate result of the conduct of the PVC Resin Manufacturers described herein, Dendinger and Wallace sustained the injuries and losses, including the loss of life, enumerated above.

WHEREFORE, plaintiff Mary A. Dendinger prays for compensatory damages from the PVC Manufacturers, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for punitive damages from the PVC Manufacturers, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for reasonable attorney and expert witness fees and costs; and for such other and further relief as the Court deems proper.

WHEREFORE, plaintiff Etta W. Wallace prays for compensatory damages from the PVC Manufacturers, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for punitive damages from the PVC

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Manufacturers, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for reasonable attorney and expert witness fees and costs; and for such other and further relief as the Court deems proper.

FOURTH CAUSE OF ACTION

31. All well-pleaded allegations contained in paragraphs 1 through 30 of the First, Second and Third Causes of Action are repleaded as if fully rewritten herein.

32. This cause of action is brought, in part, by Mary A. Dendinger, executrix of the Estate of Dendinger, pursuant to R.C. 2125.01 et seq., for the wrongful death of Dendinger and for the exclusive benefit of the surviving spouse and children of Dendinger, all of whom have suffered catastrophic damages by reason of Dendinger's terminal cancer and death, including:

- (a) funeral, burial, hospital and medical expenses;
- (b) loss of support as a result of the elimination of Dendinger's earning capacity;
- (c) loss of Dendinger's services;
- (d) loss of Dendinger's society, companionship, consortium, care, assistance, attention, protection, advice, guidance, counsel, instruction, training, education and love;
- (e) loss of prospective inheritance; and,
- (f) extreme physical and emotional pain and suffering and mental anguish.

33. This cause of action is also brought, in part, by Etta W. Wallace, personal representative of the Estate of Wallace, pursuant to R.C.

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2125.01 et seq., for the wrongful death of Wallace and for the exclusive benefit of the surviving spouse, children and father of Wallace, all of whom have suffered catastrophic damages by reason of Wallace's terminal cancer and death, including:

- (a) funeral, burial, hospital and medical expenses;
- (b) loss of support as a result of the elimination of Wallace earning capacity;
- (c) loss of Wallace's services;
- (d) loss of Wallace's society, companionship, consortium, care, assistance, attention, protection, advice, guidance, counsel, instruction, training, education and love;
- (e) loss of prospective inheritance; and,
- (f) extreme physical and emotional pain and suffering and mental anguish.

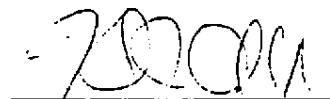
34. As a direct result of the conduct of the defendants enumerated herein, Dendinger contracted terminal cancer and died on April 2, 1986. As a direct result of the conduct of defendants enumerated herein and the consequent cancer and death of Dendinger, Mary A. Dendinger, Dendinger and the Dendinger's children: Maureen A. Dendinger, Lisa M. Dendinger, Brian F. Dendinger and Sean A. Dendinger, sustained the injuries, losses and damages described herein.

35. As a direct result of the conduct of the defendants enumerated herein, Wallace contracted terminal cancer and died on July 23, 1985. As a direct result of the conduct of defendants enumerated herein and

the terminal cancer and death of Wallace, Etta Wallace and Etta's two minor children, Angela May Wallace and Sarah Joanne Wallace, and Wallace's father Roscoe Wallace, sustained the injuries, losses and damages described herein.

WHEREFORE, plaintiff Mary A. Dendinger prays for compensatory damages from Defendants, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for punitive damages from Defendants, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for reasonable attorney and expert witness fees and costs; and for such other and further relief as the Court deems proper.

WHEREFORE, plaintiff Etta W. Wallace prays for compensatory damages from Defendants, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for punitive damages from Defendants, jointly and severally, in the amount of ten million dollars (\$10,000,000.00); for reasonable attorney and expert witness fees and costs; and for such other and further relief as the Court deems proper.



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JURY DEMAND

Plaintiff hereby demands a trial by jury.



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Attorneys for Plaintiffs

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CERTIFICATION

This is to certify that a copy of the foregoing was served upon all counsel of record by mailing said copy, postage prepaid, addressed as follows:

M. Donald Carmin, Esq.
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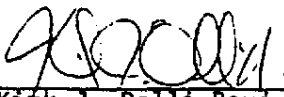
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Attorneys for The Goodyear Tire & Rubber Company, The BF Goodrich Company, Firestone Tire & Rubber Company, Conoco, Inc., Uniroyal, Inc., Union Carbide Corporation, Diamond Shamrock Corporation, Tenneco, Inc. and Occidental Chemical Corp.

this 3rd day of February, 1987.


Kirk J. DeHaven

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Plaintiff has been advised by her attorney that the trial of this case will be advanced out of regular order if she requests that all of the testimony be pre-recorded on videotape pursuant to Civ. R. 40.

_____ Plaintiff requests that the trial be advanced.

 X Plaintiff does not want the trial to be advanced.



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Kirk J. Delli Bovi
MURRAY & MURRAY CO., L.P.A.
Attorneys for Plaintiffs

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**RULES OF PRACTICE
OF
COURT OF COMMON PLEAS, ERIE COUNTY, OHIO
EFFECTIVE AUGUST 15, 1981**

UCC 072453

TABLE OF CONTENTS

Rule 1 - Pleadings and other papers.....	1
1.01 - Contents.....	1
1.02 - Attachments.....	1
1.03 - Copies.....	1
1.04 - Access to and Inspection of Files.....	2
Rule 2 - Leave to Plead and Amendment of Pleadings.....	3
2.01 - General.....	3
2.02 - Cases Assigned for Trial.....	3
Rule 3 - Assignment of Cases to be Prerecorded: Objections to.....	4
Rule 4 - Civil Motions.....	5
4.01 - Memoranda and Oral Arguments.....	5
4.02 - Motions Requiring Immediate Attention of Court.....	5
4.03 - Procedure Subsequent to Filing Motion.....	5
Rule 5 - Appeals to the Common Pleas Court.....	6
5.01 - Briefs.....	6
5.02 - Oral Arguments.....	6
Rule 6 - Equity.....	7
6.01 - Real Estate Proceedings.....	7
A. Foreclosure, Quiet Title and Partition Actions.....	7
B. Sheriff's Sales.....	9
6.02 - Restraining Orders and Injunctions.....	10
Rule 7 - Counsel.....	11
7.01 - Appearances.....	11
7.02 - Withdrawals.....	11

UCC 072454

RULE 4

CIVIL MOTIONS

4.01 Memoranda and Oral Arguments

A memorandum citing the authorities relied upon must be filed with all civil motions, including motions for summary judgment raising questions of law or fact for determination. If oral argument is requested, such will be noted on the motion at the time of filing. Failure to make such request will be considered a waiver of oral argument. The Court, in its discretion, may grant or deny a request for oral argument.

Opposing counsel will file a memorandum contra or request oral argument within fourteen (14) days of the filing of the motion or it will be assumed that the motion is to be submitted on the moving party's memorandum only. A reply memorandum may be filed within seven (7) days of the filing of the memorandum contra.

4.02 Motions Requiring Immediate Attention of Court

When a motion requires the immediate attention of the Court, a copy shall be hand-delivered to the Judge's office or mailed directly to the Judge.

4.03 Procedure Subsequent to Filing Motion

Subsequent to the filing of any motion, all correspondence and communication relative to the case shall be directed to the Judge or Law Clerk.