

RUTH BELCHE MAY, Individually and as Executrix of the Estate of PHILIP ROYCE MAY,	*	IN THE
	*	COURT OF APPEALS
Appellant,	*	OF MARYLAND
v.	*	NO. 5
AIR & LIQUID SYSTEMS CORP., et al.,	*	September Term, 2015
Appellees.	*	

\* \* \* \* \*

**MOTION TO STRIKE *AMICI CURIAE* BRIEF OF MARYLAND CHAMBER OF  
COMMERCE, MANUFACTURERS’ ALLIANCE OF MARYLAND, COALITION FOR  
LITIGATION JUSTICE, INC., CHAMBER OF COMMERCE OF THE UNITED  
STATES OF AMERICA, NATIONAL ASSOCIATION OF MANUFACTURERS,  
AMERICAN TORT REFORM ASSOCIATION, AMERICAN INSURANCE  
ASSOCIATION, PROPERTY CASUALTY INSURERS ASSOCIATION OF  
AMERICAN AND NFIB SMALL BUSINESS LEGAL CENTER**

Appellant, by her undersigned counsel, files the following Motion to Strike the *Amici Curiae* brief of Maryland Chamber of Commerce, Manufacturers’ Alliance of Maryland, Coalition for Litigation Justice, Inc., Chamber of Commerce of the United States of America, National Association of Manufacturers, American Tort Reform Association, American Insurance Association, Property Casualty Insurers Association of American and NFIB Small Business Legal Center authored by Mark A. Behrens (the “Behrens Brief”). As grounds therefore, Appellate states as follows:

1. On June 4, 2015, various alleged *amici curiae* filed the Behrens Brief.
2. The brief is an *ad hominen* attack piece authored by a well-known asbestos industry lobbyist that nearly exclusively is devoted to citing other asbestos industry consultants, lawyers and lobbyists’ position pieces. The issues raised in the brief are reckless and scandalous, beyond the record in this case, irrelevant to the matter being considered, and a blatant attempt to smear all lawyers who represent victims of asbestos poisoning.

3. Moreover, the purported *amici curiae* fail to advise the Court that at least some of them have a direct stake in the outcome of this matter. Specifically, as demonstrated by the record in this case and by published caselaw, the Appellees had insurance available to them to cover the risks that arose from the use of their products – the pumps in question in this appeal. *See* Appellant’s brief at p. 30-31 and cases cited therein and below.

4. On June 8, 2015, counsel for the Appellants was provided with the identity of the members of the Coalition for Litigation Justice from counsel for the Coalition in a different lawsuit. Exhibit A, May 29, 2015 e-mail from William Anderson, Crowell & Moring, LLP, counsel for the Coalition for Litigation Justice – identifying members. There, counsel for the Coalition for Litigation Justice identified the following insurance companies as members of the Coalition for Litigation Justice:

- a. Century Indemnity Company;
- b. Chubb & Son, a division of Federal Insurance Company;
- c. Fireman’s Fund Insurance Company;
- d. Great American Insurance Company;
- e. Nationwide Indemnity Company;
- f. Resolute Management, Inc. a third-party administrator for numerous insurers;<sup>1</sup>  
and
- g. TIG Insurance company

5. Examination of the information from published cases and articles involving insurance coverage of Appellees, Warren Pumps, IMO Industries, Inc. and Air & Liquid Systems reflects that many of these insurers have potential liability for the claims in this case.

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<sup>1</sup> Resolute is a third party administrator for a company in the Berkshire Hathaway group of companies. Resolute has claims management authority for asbestos policies for which Underwriters at Lloyds, AIG, CNA and other insurers are contractually liable. A description of how Resolute works and various lawsuits about it can be found on the website of the American Bar Association. [http://www.americanbar.org/content/dam/aba/administrative/litigation/materials/2014\\_inscle\\_materials/written\\_materials/b14\\_2\\_policyholder\\_litigation\\_involving\\_claims.authcheckdam.pdf](http://www.americanbar.org/content/dam/aba/administrative/litigation/materials/2014_inscle_materials/written_materials/b14_2_policyholder_litigation_involving_claims.authcheckdam.pdf). See also, e.g., Greenblatt, *Berkshire Hathaway subsidiaries deny, delay asbestos, hazard claims, suits, insiders allege*, October 7, 2013, [http://www.wptv.com/news/local-news/investigations/berkshire-hathaway-subsidiaries-deny-delay-asbestos-hazard-claims-suits-insiders-allege\\_20140102230128180](http://www.wptv.com/news/local-news/investigations/berkshire-hathaway-subsidiaries-deny-delay-asbestos-hazard-claims-suits-insiders-allege_20140102230128180).

6. *In re Viking Pump, Inc. and Warren Pumps, LLC Insurance Appeals*, 2015 Del. LEXIS 278 (Del. June 10, 2015), lists TIG Insurance Company and Century Indemnity Company and Underwriters at Lloyds as having issued excess insurance policies that may be available to cover Warren Pumps' liabilities in cases like the *May* case. All three are members of the Coalition for Litigation Justice – directly or through Resolute.

7. *IMO Industries, Inc. v. Transamerica Corporation et. al.*, 101 A.3d 1085 (N.J. Super. 2014), lists Century Indemnity Company, Fireman's Fund Insurance Company, and TIG Insurance Company, as insurers who provide portions of the \$1.85 billion dollars in insurance coverage available to IMO for asbestos related personal injury claims such as the *May* case. All three are members of the Coalition for Litigation Justice. Importantly, *IMO Industries, Inc. v. Transamerica Corporation et. al.* makes clear that the only parties with a financial interest in the *May* case with respect to IMO's liability are IMO's insurers, because IMO is fully covered not only for any liability in the *May* case, but for its entire expected asbestos litigation liability.

Over the years, IMO purchased a total of \$1.85 billion in insurance coverage from all the defendant insurers. That amount is sufficient to pay for its anticipated liabilities and defense costs for asbestos-related personal injury claims.

*Id.* 101 A.3d at 1091.

8. *Air & Liquid Systems et al. v. Allianz Underwriters et al.*, 2014 U.S. Dist. LEXIS 117827 (W.D. Pa. Aug. 15, 2014) lists TIG Insurance Company and Underwriters at Lloyds as insurers with coverage for Air & Liquid Systems in this case. Both are members of the Coalition for Litigation Justice, directly or through Resolute. Additionally, the article discussed in Footnote 1, herein, notes that Air & Liquid Systems sued Utica Mutual Insurance Company and Resolute regarding insurance coverage by Utica now apparently managed by Resolute. See Sylvester, *Policyholder Litigation Involving Claims Handling by Resolute Management Inc.*,

ABA Insurance Coverage Litigation Seminar at p. 7. As such, it would appear that Resolute also has a direct financial stake in the outcome of this case regarding Air & Liquid Systems through policies issued by both Underwriters and Lloyds and through Utica Mutual Insurance Company.

9. Moreover, the Behrens Brief is purportedly also filed on the behalf of the American Tort Reform Association (“ATRA”), the members of whom are substantially overlapping with the members of the Product Liability Advisory Counsel (“PLAC”), which also filed an *amicus curiae* brief in this matter. Compare **Exhibit B** (membership list of PLAC) with **Exhibit C** (“Sample List of ATRA Members”). While Appellants have no access to the full list of the members of ATRA, at a minimum the following companies are members of both purported *amici* who have filed briefs in this case:

- a. Altria Client Services
- b. Caterpillar
- c. Chrysler Group
- d. Ford Motor Company
- e. Emerson Electric Company
- f. ExxonMobil
- g. General Electric
- h. Hyundai Motor America
- i. Johnson & Johnson
- j. Merck & Company
- k. Pfizer
- l. Shell Oil Company<sup>2</sup>

Indeed, in addition to the corporate overlap, Behrens himself is a member of the PLAC.

<http://www.shb.com/professionals/b/behrens-mark>.

10. It is fundamentally inappropriate for entities with direct financial stakes in the outcome of litigation to masquerade as *amicus curiae* – particularly when that interest is not

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<sup>2</sup> Although Appellant is concerned about the overlap of *amici*, Appellant does not ask the Court to strike the brief of the PLAC. While Appellant believes that the brief of the PLAC is misguided regarding Maryland law and ignores critical facts in the record in this case, the brief discusses issues that are before the Court and that were briefed and/or argued below, is free of the inappropriate accusations of the Behrens Brief, and none of the insurers who appear to be on the risk in the *May* case are members of the PLAC.

disclosed up front. Furthermore, it is inappropriate and unfair when the same group of entities and lawyers file multiple briefs purporting to be from different viewpoints or entities.

11. The Behrens Brief should also be stricken because it is grossly inappropriate in numerous ways.

12. The Behrens Brief is rife with direct and thinly veiled accusations of impropriety at any and all lawyers who dare have the audacity to represent victims of asbestos disease. *See e.g.*, Behrens Brief, p. 7, n. 11 (discussing internet search term prices); p. 11 (simultaneously accusing “plaintiffs’ firms” of sinisterly “refreshing their clients’ recollections” and failing to do so; p. 11, suggesting “plaintiffs” of widespread perjurious “I don’t recall” testimony; p. 11 accusing “plaintiffs’ firms” of “manipulate[ing] the timing of bankruptcy filings”. None of these sweeping accusations are addressed to the facts of this case or the facts or issues before the Court. As such, the sole possible purpose for these reckless and baseless accusations can only be to try to poison the Court with irrelevant and scandalous material.

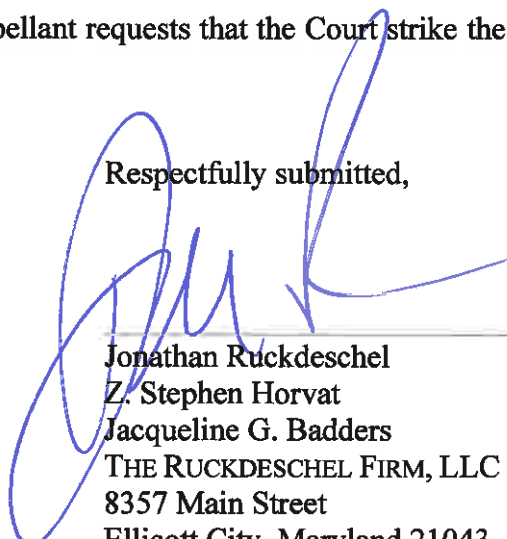
13. These accusations are inappropriate and reckless. Furthermore, the sources quoted as the basis for most of these accusations are lawyers and firms who represent asbestos defendants, such as publications by Behrens himself and his partner at Shook Hardy & Bacon, Victor E. Schwartz; the firm of Bates White (who lobbied for the U.S. Chamber of Commerce in Texas regarding an asbestos product liability bill in the spring of 2015, <http://www.hro.house.state.tx.us/pdf/ba84R/HB1492.PDF>); former judge Peggy L. Ableman (now “special counsel” at national asbestos defense law firm, <http://www.mccarter.com/Peggy-L-Ableman/>); Lester Brickman (consultant to asbestos defense law firms, <http://www.cardozo.yu.edu/directory/lester-brickman>); Mark D. Plevin from Crowell & Moring (counsel for the Coalition for Litigation Justice, [5](https://www.crowell.com/Professionals/Mark-</a></p></div><div data-bbox=)

Plevin); and William P. Shelley from Gordon Rees (national coordinating counsel for “a top property and casualty insurer” on asbestos bankruptcy, <http://www.gordonrees.com/lawyers/w/william-p-shelley#tab2>). In fact, Mr. Shelley is listed as counsel for Munich Reinsurance America, Inc. and Federal Insurance Company, insurers of one of the Appellees. *See, Air & Liquid Systems et al. v. Allianz Underwriters et al.*, 2014 U.S. Dist. LEXIS 117827 (W.D. Pa. Aug. 15, 2014).

14. Second, the Behrens Brief’s fundamental premise is that the existence of various bankruptcy trusts and the potential recovery therefrom makes it unfair that persons sickened while performing required maintenance on products like Appellees’ pumps seek compensation from the manufacturers of those pumps for their injuries. This argument is both baseless and specious. Furthermore, responding to these issues and the mudslinging and suggestions of impropriety unrelated to the case at bar – would require substantial additional briefing by the Appellees. Furthermore, given the widespread suggestions of impropriety levied at all “plaintiffs’ firms” allowing this scandalous brief to stand would unfairly tarnish parties and lawyers who are not before the Court and who are unable to respond to the accusations.

**WHEREFORE**, Appellant requests that the Court strike the Behrens Brief in its entirety from the record in this case.

Respectfully submitted,



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Jonathan Ruckdeschel  
Z. Stephen Horvat  
Jacqueline G. Badders  
THE RUCKDESCHEL FIRM, LLC  
8357 Main Street  
Ellicott City, Maryland 21043  
410-750-7825

Jeffrey A. O'Connell (Admitted *Pro Hac Vice*)  
The Nemeroff Law Firm  
2626 Cole Ave., Suite 450  
Dallas, Texas 75204  
214-774-2258

*Attorneys for Appellants*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 9<sup>th</sup> day of July 2015, a copy of the foregoing

Notice was sent via U.S. Mail to:

F. Ford Loker  
Miles & Stockbridge, PC  
10 Light Street  
Baltimore, Maryland 21202  
410-385-3840

*Counsel for Respondent Air & Liquid Systems Corp.,  
Successor By merger to Buffalo Pumps*

Joel Newport  
Moore & Jackson, LLC  
305 Washington Avenue, Ste. 401  
Towson, Maryland 21204  
410-583-5241

*Counsel for Respondent IMO Industries, Inc.*

Thomas M. Goss  
Goodell, DeVries, Leech & Dann, LLP  
One South Street, 20<sup>th</sup> Floor  
Baltimore, Maryland 21202  
410-783-4000

*Counsel for Respondent Warren Pumps LLC*



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Jonathan Ruckdeschel

RUTH BELCHE MAY, Individually and  
as Executrix of the Estate of  
PHILIP ROYCE MAY,

Appellant,

v.

AIR & LIQUID SYSTEMS CORP., et al.,

Appellees.

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IN THE  
COURT OF APPEALS  
OF MARYLAND  
NO. 5  
September Term, 2015

\* \* \* \* \*

ORDER

Having considered Appellant’s Motion to Strike the *Amici Curiae* brief of Maryland Chamber of Commerce, Manufacturers’ Alliance of Maryland, Coalition for Litigation Justice, Inc., Chamber of Commerce of the United States of America, National Association of Manufacturers, American Tort Reform Association, American Insurance Association, Property Casualty Insurers Association of American and NFIB Small Business Legal Center in this matter, and any opposition thereto, it is hereby, this \_\_\_\_ day of \_\_\_\_\_, 2015,

ORDERED that Appellant’s Motion to Strike the *Amici Curiae* brief of Maryland Chamber of Commerce, et al., is GRANTED; and

IT IS FURTHER ORDERED that the *Amici Curiae* brief of Maryland Chamber of Commerce, et al., is stricken from the record in this case.

\_\_\_\_\_  
Judge, Court of Appeals



# EXHIBIT A

**From:** Christian Hartley <CHartley@mrhfmllaw.com>  
**Subject:** Fwd: Scapa v. Knight  
**Date:** July 8, 2015 at 9:11 AM  
**To:** Jonathan Ruckdeachel <ruck@rucklawfirm.com>

See below

Christian

Christian Hartley  
Maune Raichle Hartley French & Mudd, LLC  
900 West Coleman Boulevard  
Suite 200  
Mount Pleasant, South Carolina 29464  
Office: 843.388.1330  
Direct: 843.388.8210  
Mobile: 843.834.4732  
Fax: 803.753.9931

Begin forwarded message:

**From:** "Anderson, William" <WAnderson@crowell.com>  
**Date:** May 29, 2015 at 11:58:27 AM EDT  
**To:** Rob Buck <rbuck@buckfirm.com>  
**Cc:** Christian Hartley <CHartley@mrhfmllaw.com>  
**Subject:** RE: Scapa v. Knight

Rob and Christian, you asked for the membership of the Coalition – the members are Century Indemnity Company; Chubb & Son, a division of Federal Insurance Company; Fireman's Fund Insurance Company; Great American Insurance Company; Nationwide Indemnity Company; Resolute Management, Inc. a third-party administrator for numerous insurers; and TIG Insurance Company. As the cover page of the brief notes, Crowell & Moring's client for purposes of this brief is the Coalition. Crowell & Moring does not represent the other entities who joined the brief.

**From:** Rob Buck [<mailto:rbuck@buckfirm.com>]  
**Sent:** Friday, May 29, 2015 10:03 AM  
**To:** Anderson, William  
**Cc:** Christian Hartley  
**Subject:** Re: Scapa v. Knight

Mr. Anderson:

Please let me know if you will be providing answers to the questions raised in my email below. I intend to file a Response to your brief as early as today and will be also seeking discovery on the identity and interest of your clients if you will not willingly disclose their identities.

Because time is of the essence, I will proceed with discovery if I do not receive a reply to the below email by 3pm today.

Please let me know your position at your earliest convenience.

All the best,

Rob Buck

BuckLogoAtlanta\_b



Suite 940  
1050 Crown Pointe Parkway  
Atlanta, Georgia 30338  
(678) 338-4999 main  
(678) 338-4994 direct dial  
(888) 338-2600 toll free  
(678) 338-4990 facsimile  
[rbuck@buckfirm.com](mailto:rbuck@buckfirm.com)  
[rbuck@mesogeorgia.com](mailto:rbuck@mesogeorgia.com)

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**From:** Robert Buck <[rbuck@buckfirm.com](mailto:rbuck@buckfirm.com)>  
**Date:** Thursday, May 28, 2015 at 2:14 PM  
**To:** "Anderson, William" <[WAnderson@crowell.com](mailto:WAnderson@crowell.com)>  
**Cc:** Christian Hartley <[CHartley@mrhfmlaw.com](mailto:CHartley@mrhfmlaw.com)>  
**Subject:** Re: Scapa v. Knight

Mr. Anderson:

Thank you for your reply email. Since you did not answer my inquiry regarding whether or not any of the constituent members of your client organizations are financially responsible for the Scapa judgment at issue, I provide you with the following list of insurers that Scapa has identified (in response to post judgment discovery) as having what it believes to be responsibility to pay the judgment:

- 1) Hartford A&I,
- 2) The Phoenix Ins. Co. (now part of Travelers),
- 3) Aetna C&S,
- 4) Travelers Indem. Co.,
- 5) Bituminous Casual. Corp.,
- 6) Maryland Casualty,
- 7) Royal Globe Ins. Co.,
- 8) National Union Ins. Co.,
- 9) Continental Casualty,
- 10) U.S. Fire Ins. Co.,
- 11) Mission,
- 12) Transit Casualty Co.,
- 13) International Ins. Co. (Crum & Forster), and
- 14) New Hampshire Ins. Co.
- 15) Resolute

In regards to the fifteen above-listed Insurance companies that hold liability for payment of the Knight judgment, are any of the listed entities (including their parent companies) members of, or affiliated with your

clients: the COALITION FOR LITIGATION JUSTICE, INC; the CHAMBER OF COMMERCE OF THE UNITED STATES OF AMERICA; the AMERICAN TORT REFORM ASSOCIATION; or the NFIB SMALL BUSINESS LEGAL CENTER?

I would appreciate a prompt reply to this inquiry so that we can avoid the necessity of serving your clients with post judgment discovery to obtain truthful information in response to my questions.

Thank you.

**Rob Buck**  
**BuckLogoAtlanta\_b**



Suite 940  
1050 Crown Pointe Parkway  
Atlanta, Georgia 30338  
(678) 338-4999 main  
(678) 338-4994 direct dial  
(888) 338-2600 toll free  
(678) 338-4990 facsimile  
[rbuck@buckfirm.com](mailto:rbuck@buckfirm.com)  
[rbuck@mesogeorgia.com](mailto:rbuck@mesogeorgia.com)

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**From:** <Anderson>, William <[WAnderson@crowell.com](mailto:WAnderson@crowell.com)>  
**Date:** Tuesday, May 26, 2015 at 9:34 AM  
**To:** Robert Buck <[rbuck@buckfirm.com](mailto:rbuck@buckfirm.com)>  
**Subject:** RE: Scapa v. Knight

Mr. Buck: The interest of my client the Coalition for Litigation Justice is not specific to this case but the same as its interest in other amici briefs the Coalition has filed in similar appellate matters across the country for the last fifteen years. The Coalition is composed of a group of insurance company members whose briefs are intended to assist courts in making these sorts of important causation and other asbestos and toxic tort case determinations. I am not aware of the nature of Scapa's insurance coverage - you may want to pose that question to Scapa's counsel.

**From:** Rob Buck [<mailto:rbuck@buckfirm.com>]  
**Sent:** Friday, May 22, 2015 5:36 PM  
**To:** Anderson, William  
**Cc:** Christian Hartley  
**Subject:** Scapa v. Knight

Dear Mr. Anderson:

I received a copy of the joint amicus brief for your clients **COALITION FOR LITIGATION JUSTICE, INC., CHAMBER OF COMMERCE OF THE UNITED STATES OF AMERICA, NATIONAL ASSOCIATION OF MANUFACTURERS, AMERICAN TORT REFORM ASSOCIATION, AND NFIB SMALL BUSINESS LEGAL CENTER.**

In reading the Interest of the Amici section, I see that you argue that if the verdict is upheld, it will adversely impact Amici's members. Would you please identify any specific members that have suffered, or will suffer, an adverse impact? Please also let me know if any of your members have an actual financial stake in the outcome of the case? I know that Scapa considers itself defunct and basically only exists through its insurance companies and their lawyers. Are any of Scapa's insurance companies, their lawyers, or law firms members? Is there publicly available information about the membership of each group that you represent that you could refer me to?

Please advise as soon as possible.

Thanks in advance,

**Rob Buck**  
**BuckLogoAtlanta\_b**

Suite 940  
1050 Crown Pointe Parkway  
Atlanta, Georgia 30338  
(678) 338-4999 main  
(678) 338-4994 direct dial  
(888) 338-2600 toll free  
(678) 338-4990 facsimile  
[rbuck@buckfirm.com](mailto:rbuck@buckfirm.com)  
[rbuck@mesogeorgia.com](mailto:rbuck@mesogeorgia.com)

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ATLANTA ATLANTA ATLANTA

# EXHIBIT B

[Skip to main content](#)



[Home](#)

## **Sample List of ATRA Members**

**AGIS Insurance Services**

**Advance Medical Technology Association**

**Altria Client Services**

**ASFE**

**American Association of Orthopaedic Surgeons**

**American College of Obstetricians & Gynecologists**

**American Institute of Architects**

**American Insurance Association**

**American Legislative Exchange Council**

**American Medical Association**

**American Suzuki Motor Company**

**American Trucking Associations**

**Associated Wire Rope Fabricators**

**Bayer Pharmaceutical Corporation**

**CNA Financial Corporation**

**CSX Corporation**

**Caterpillar**

**Chrysler Group**

Coca-Cola Bottlers' Association  
Cybex International  
Doctors' Company  
Eli Lilly and Company  
Farmers Insurance  
Ford Motor Company  
Emerson Electric Company  
ExxonMobil  
General Electric  
Great American Insurance Companies  
Hyundai Motor America  
Johnson & Johnson  
Koch Industries, Inc.  
Medical Mutual  
Merck & Company  
MetLife  
Motor & Equipment Manufacturers Association  
National Association of Home Builders  
National Federation of Independent Business  
National Fuel Gas Distribution  
Nationwide  
Pfizer  
Pharmaceutical Research and Manufacturers of America  
Physician Insurers Association of America  
PPG Industries



Preferred Physician Medical

Prudential Insurance Company of America

SeamCraft, Inc.

Shell Oil Company

State Farm

Taussig Corporation

Unimin Corporation

[Back to top](#)

# EXHIBIT C

## APPENDIX A

### **CORPORATE MEMBERS OF THE PRODUCT LIABILITY ADVISORY COUNCIL, INC. as of May 15, 2015**

Total: 104

3M	Discount Tire
Altec, Inc.	The Dow Chemical Company
Altria Client Services Inc.	E.I. duPont de Nemours and Company
Ansell Healthcare Products LLC	Eisai Inc.
Astec Industries	Emerson Electric Co.
Bayer Corporation	Endo Pharmaceuticals, Inc.
BIC Corporation	Exxon Mobil Corporation
Biro Manufacturing Company, Inc.	Ford Motor Company
BMW of North America, LLC	Presenlus Kabl USA, LLC
The Boeing Company	General Electric Company
Bombardier Recreational Products, Inc.	General Motors LLC
Boston Scientific Corporation	Georgia-Pacific Corporation
Bridgestone Americas, Inc.	GlaxoSmithKline
C. R. Bard, Inc.	The Goodyear Tire & Rubber Company
Caterpillar Inc.	Great Dane Limited Partnership
CC Industries, Inc.	Harley-Davidson Motor Company
Celgene Corporation	The Home Depot
Chevron Corporation	Honda North America, Inc.
Chrysler Group LLC	Hyundai Motor America
Cirrus Design Corporation	Illinois Tool Works Inc.
Continental Tire the Americas LLC	Isuzu North America Corporation
Cooper Tire & Rubber Company	Jaguar Land Rover North America, LLC
Crane Co.	Jarden Corporation
Crown Cork & Seal Company, Inc.	Johnson & Johnson
Crown Equipment Corporation	Johnson Controls, Inc.
Daimler Trucks North America LLC	Kawasaki Motors Corp., U.S.A.
Deere & Company	KBR, Inc.
Delphi Automotive Systems	Kia Motors America, Inc.

## APPENDIX A

### **CORPORATE MEMBERS OF THE PRODUCT LIABILITY ADVISORY COUNCIL, INC. as of May 15, 2015**

Total: 104

Kolcraft Enterprises, Inc.	Subaru of America, Inc.
Lincoln Electric Company	Takeda Pharmaceuticals U.S.A., Inc.
Magna International Inc.	TAMKO Building Products, Inc.
Mazak Corporation	TASER International, Inc.
Mazda Motor of America, Inc.	Techtronic Industries North America, Inc.
Medtronic, Inc.	Teleflex Incorporated
Merck & Co., Inc.	Teva Pharmaceuticals USA, Inc.
Meritor WABCO	TK Holdings Inc.
Michelin North America, Inc.	Toyota Motor Sales, USA, Inc.
Microsoft Corporation	TRW Automotive
Mine Safety Appliances Company	Vermeer Manufacturing Company
Mitsubishi Motors North America, Inc.	The Viking Corporation
Mueller Water Products	Volkswagen Group of America, Inc.
Novartis Pharmaceuticals Corporation	Volvo Cars of North America, Inc.
Novo Nordisk, Inc.	Wal-Mart Stores, Inc.
NuVasive, Inc.	Western Digital Corporation
Pella Corporation	Whirlpool Corporation
Pfizer Inc.	Yamaha Motor Corporation, U.S.A.
Pirelli Tire, LLC	Yokohama Tire Corporation
Polaris Industries, Inc.	Zimmer, Inc.
Porsche Cars North America, Inc.	
RJ Reynolds Tobacco Company	
Robert Bosch LLC	
SABMiller Plc	
Shell Oil Company	
The Sherwin-Williams Company	
St. Jude Medical, Inc.	
Stanley Black & Decker, Inc.	