

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION**

Case No. _____

NORTH COLLIER FIRE CONTROL AND
RESCUE DISTRICT

Plaintiff,

vs.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi
Glass Co., Ltd.); ANGUS INTERNATIONAL
SAFETY GROUP, LTD; ARCHROMA
MANAGEMENT, LLC; ARCHROMA U.S., INC.;
ARKEMA, INC.; BASF CORPORATION;
BUCKEYE FIRE EQUIPMENT COMPANY;
CARRIER GLOBAL CORPORATION; CENTRAL
SPRINKLER, LLC; CHEMDESIGN PRODUCTS,
INC.; CHEMGUARD, INC.; CHEMICALS INC.;
CHUBB FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1-49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION;
E. I. DUPONT DE NEMOURS AND COMPANY;
FIRE PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE PLC,
INC.; KIDDE-FENWAL, INC.; NATION FORD
CHEMICAL COMPANY; NATIONAL FOAM, INC.;
RAYTHEON TECHNOLOGIES CORPORATION
(f/k/a United Technologies Corporation); THE CHEMOURS
COMPANY; THE CHEMOURS COMPANY FC, LLC;
TYCO FIRE PRODUCTS LP; and UTC FIRE &
SECURITY AMERICAS CORPORATION, INC.,

Defendants.

_____ /

NOTICE OF REMOVAL

Defendants Tyco Fire Products LP and Chemguard, Inc. (collectively “Tyco” unless identified individually by full name), by and through undersigned counsel, hereby give notice of the removal of this action, pursuant to 28 U.S.C. §§ 1442(a)(1) and 1446, from the Circuit Court of the Twentieth Judicial Circuit in and for Collier County, Florida, to the United States District Court for the Middle District of Florida. As grounds for removal, Tyco alleges as follows on personal knowledge as to its own conduct and status and on information and belief as to all other matters:

PRELIMINARY STATEMENT

1. Plaintiff, North Collier Fire Control and Rescue District seeks to hold Tyco and certain other Defendants liable based on their alleged conduct in designing, manufacturing, marketing, and/or selling aqueous film-forming foam (“AFFF”) that Plaintiff alleges was used for fire-training and firefighting activities, thereby resulting in contamination.

2. Specifically, Plaintiff alleges that Defendants’ AFFF contained per- and polyfluoroalkyl substances (“PFAS”), including perfluorooctanoic acid (“PFOA”) and perfluorooctane sulfonic acid (“PFOS”), and that the use of these substances caused contamination of the Plaintiff’s lands, properties, facilities, infrastructures, equipment, and resources (“Plaintiff’s Property”).

3. At least some of the AFFF that gives rise to Plaintiff’s claims has been

manufactured by a select group of suppliers (including Tyco) in accordance with the military's rigorous specifications ("MilSpec AFFF"). Under the federal "government contractor" defense recognized in *Boyle v. United Technologies Corp.*, 487 U.S. 500 (1988), Tyco claims immunity from tort liability for its design and manufacture of MilSpec AFFF and its provision of warnings for the product. Under the federal officer removal statute, 28 U.S.C. § 1442, Tyco is entitled to remove this action in order to have its federal defense adjudicated in a federal forum. *See Papp v. Fore-Kast Sales Co.*, 842 F.3d 805, 810–15 (3d Cir. 2016). Such removal "fulfills the federal officer removal statute's purpose of protecting persons who, through contractual relationships with the Government, perform jobs that the Government otherwise would have performed." *Isaacson v. Dow Chem. Co.*, 517 F.3d 129, 133 (2d Cir. 2008).

BACKGROUND

4. This action was filed on January 13, 2023, in the Circuit Court of the Twentieth Judicial Circuit in and for Collier County, Florida, bearing Case No. 11-2023-CA-000079-0001-XX (DE 1-1, Complaint).

5. Tyco Fire Products LP was served with this action on February 17, 2023. Chemguard, Inc. has not been served in this action. This Notice of Removal is timely filed in accordance with 28 U.S.C. § 1446(b).

6. In accordance with Local Rule 1.06(b), Tyco is filing with this Notice

of Removal copies of all process, pleadings, orders, and other papers on file in the Circuit Court of the Twentieth Judicial Circuit in and for Collier County, Florida. (DE 1-1; DE 1-2; DE 1-3).

7. Venue is proper in this Court pursuant to 28 U.S.C. §§ 89(b) and 1441(a) because the Circuit Court of the Twentieth Judicial Circuit in and for Collier County, Florida, is located within the Middle District of Florida.

8. Tyco is not required to notify or obtain the consent of any other Defendant in this action in order to remove Plaintiff's action as a whole under § 1442(a)(1). *See, e.g., Durham v. Lockheed Martin Corp.*, 445 F.3d 1247, 1253 (9th Cir. 2006); *Hilbert v. McDonnell Douglas Corp.*, 529 F. Supp. 2d 187, 195 (D. Mass. 2008); *Linden v. Chase Manhattan Corp.*, No. 99 Civ. 3970(LLS), 1999 WL 518836, at *1–2 (S.D.N.Y. July 21, 1999).

9. Plaintiff generally alleges that Defendants, including Tyco, have designed, manufactured, marketed, distributed, and/or sold AFFF products, which contain PFAS. (*See* DE 1-1, Compl. ¶¶ 10, 59). Plaintiff alleges that the AFFF designed, manufactured, marketed, distributed, and/or sold by Defendants, due to the use of AFFF in firefighting activities, has caused contamination of, among other things, Plaintiff's water sources. (*Id.* ¶¶ 11–15). Plaintiff further alleges that it has incurred and will incur costs associated with the investigation, remediation, monitoring, and treatment of PFOS and PFOA on Plaintiff's Property. (*Id.* ¶¶ 1, 17,

Prayer for Relief at 34–35).

10. Plaintiff seeks to recover costs and damages associated with the alleged contamination of Plaintiff’s Property. (*Id.* ¶¶ 1, 17). In addition to compensatory damages, Plaintiffs also seek consequential damages, and pre- and post-judgement interest. (*Id.* Prayer for Relief at 34–35).

11. Plaintiff asserts claims against all Defendants for defective design (*Id.* ¶¶ 81–95), failure to warn (*id.* ¶¶ 96–105), public nuisance (*id.* ¶¶ 106–116), private nuisance (*id.* ¶¶ 117–120), negligence (*id.* ¶¶ 121–135), negligence *per se* (*id.* ¶¶ 136–138). Plaintiff also brings a claim for fraudulent transfer against Defendants E. I. Du Pont De Nemours and Company, The Chemours Company, The Chemours Company FC, LLC, Corteva, Inc., and DuPont De Nemours, Inc. only. (*Id.* ¶¶ 139–150).

12. Pursuant to 28 U.S.C. § 1446(d), Tyco is serving a copy of this Notice of Removal upon all other parties to this case and Tyco is filing a copy with the Clerk of the Circuit Court of the Twentieth Judicial Court in and for Collier County, Florida.

13. By filing a Notice of Removal in this matter, Tyco does not waive the rights of any Defendant to object to service of process, the sufficiency of process, jurisdiction over the person, or venue; and Tyco specifically reserves the rights of all Defendants to assert any defenses and/or objections to which they may be

entitled.

14. Tyco reserves the right to amend or supplement this Notice of Removal.

**REMOVAL IS PROPER UNDER THE FEDERAL
OFFICER REMOVAL STATUTE, 28 U.S.C. § 1442(A)(1)**

15. Removal here is proper under the federal officer removal statute, 28 U.S.C. § 1442(a)(1), which provides for removal of an action relating to a defendant's acts undertaken at the direction of a federal officer. Removal is appropriate under this provision where the removing defendant establishes that: (a) it is a "person" within the meaning of the statute; (b) it acted under federal authority; (c) its actions taken pursuant to a federal officer's direction have a causal nexus with plaintiff's claims or injuries or are otherwise related to the lawsuit; and (d) it can assert a "colorable" federal defense. *Papp*, 842 F.3d at 812; *cf. Mesa v. California*, 489 U.S. 121, 124–25, 129–31, 133–35 (1989); *Cuomo v. Crane Co.*, 771 F.3d 113, 115 (2d Cir. 2014); *Hilbert v. McDonnell Douglas Corp.*, 529 F. Supp. 2d 187, 196 (D. Mass. 2008); *Isaacson*, 517 F.3d at 135; *Durham*, 445 F.3d at 1251.

16. Removal rights under the federal officer removal statute are much broader than under the general removal statute, 28 U.S.C. § 1441. Suits against defendants acting on behalf of federal officers "may be removed despite the nonfederal cast of the complaint; the federal-question element is met if the defense depends on federal law." *Jefferson County v. Acker*, 527 U.S. 423, 431 (1999). This is because § 1442(a)(1) protects "the government's need to provide a federal forum

for its officers and those who are ‘acting under’ a federal office.” *Albrecht v. A.O. Smith Water Prods.*, No. 11 Civ. 5990(BSJ), 2011 WL 5109532, at *3 (S.D.N.Y. Oct. 21, 2011) (citations omitted). This important federal policy “should not be frustrated by a narrow, grudging interpretation of [§] 1442(a)(1).” *Willingham v. Morgan*, 395 U.S. 402, 407 (1969); *see Durham*, 445 F.3d at 1252. To the contrary, § 1442 as a whole must be “liberally construe[d]” in favor of removal. *Papp*, 842 F.3d at 812 (alterations in original; internal quotation marks omitted).

17. All requirements for removal under § 1442(a)(1) are satisfied where, as here, the notice of removal alleges that the Plaintiff’s injuries are caused at least in part by MilSpec AFFF. *See, e.g., Nessel v. Chemguard, Inc.*, No. 1:20-cv-1080, 2021 WL 744683, at *3 (W.D. Mich. Jan. 6, 2021) (denying motion to remand in AFFF case against Tyco and other manufacturers and holding that, notwithstanding plaintiffs’ assertion “that they do not seek resolution of any claims related to MilSpec AFFF[,] . . . Plaintiffs cannot decide what defense Defendants might present”); *Ayo v. 3M Co.*, No. 18-CV-0373(JS)(AYS), 2018 WL 4781145 (E.D.N.Y. Sept. 30, 2018) (denying motion to remand and finding that federal officer removal was proper in a lawsuit against Tyco and other manufacturers of MilSpec AFFF). The court overseeing the *In re Aqueous Film-Forming Foams Products Liability Litigation* multi-district litigation has also found on multiple occasions that removal under § 1442 is proper where the notice of removal alleges that plaintiff’s injuries

are caused, at least in part, by MilSpec AFFF. *See* Order, *In re AFFF Prods. Liab. Litig.*, MDL No. 2:18-mn-2873-RMG, ECF No. 103 (D.S.C. May 24, 2019) (“MDL Order 1”), at 3–6; Order, *In re AFFF Prods. Liab. Litig.*, MDL No. 2:18-mn-2873-RMG, ECF No. 320 (D.S.C. Sept. 27, 2019) (“MDL Order 2”), at 3–5; Order, *In re AFFF Prods. Liab. Litig.*, MDL No. 2:18-mn-2873-RMG, ECF No. 325 (D.S.C. Oct. 1, 2019) (“MDL Order 3”), at 3–6. Given its experience with the claims and defenses in AFFF litigation, the MDL Court’s holdings clearly demonstrate that this case, too, has been properly removed to federal court.¹

A. MilSpec AFFF

18. The United States Naval Research Laboratory developed AFFF in the 1960s to quickly suppress and extinguish liquid fuel fires, which are an ever-present risk in aviation and military environments. Since the late 1960s, following catastrophic fires aboard the aircraft carriers USS *Forrestal* in 1967 and USS *Enterprise* in 1969,² the United States military has used MilSpec AFFF on military bases, airfields, and Navy ships—settings where fuel fires are inevitable and potentially devastating—to put out fires, train its personnel, save lives, and protect property. Decades later, the Naval Research Laboratory described the development

¹ Following removal, Tyco intends to designate this action for transfer to the MDL.

² *See* Press Release 71-09r, U.S. Naval Research Lab., Navy Researchers Apply Science to Fire Fighting (Oct. 23, 2009), <https://tinyurl.com/y2jq4q4w>.

of AFFF as “one of the most far-reaching benefits to worldwide aviation safety[.]”³

19. The manufacture and sale of MilSpec AFFF are governed by rigorous military specifications created and administered by Naval Sea Systems Command. The applicable specification, Mil-F-24385, was first promulgated in 1969, and has been revised a number of times since then.⁴ All MilSpec AFFF products must be qualified for listing on the applicable Qualified Products List prior to military procurement. Prior to such listing, a manufacturer’s products are examined, tested, and approved to be in conformance with specification requirements.⁵ The MilSpec designates Naval Sea Systems Command as the agency responsible for applying these criteria and determining whether AFFF products satisfy the MilSpec’s requirements. After a product is added to the Qualified Products List, “[c]riteria for retention of qualification are applied on a periodic basis to ensure continued integrity of the qualification status.”⁶ Naval Sea Systems Command reserves the right to perform any of the quality assurance inspections set forth in the specification where such inspections are deemed necessary to ensure supplies and services conform to

³ U.S. Navy, NRL/MR/1001-06-8951, The U.S. Naval Research Laboratory (1923–2005): Fulfilling the Roosevelts’ Vision for American Naval Power 37 (2006) (“Fulfilling the Roosevelts’ Vision”), <https://permanent.fdlp.gov/gpo125428/roosevelts.pdf>.

⁴ The 1969 MilSpec and all its revisions and amendments through April 2020 are available at <https://tinyurl.com/yxwotjpg>.

⁵ Dep’t of Defense SD-6, Provisions Governing Qualification 1 (Feb. 2014), <https://tinyurl.com/y5asm5bw>.

⁶ *Id.*

prescribed requirements.

20. From its inception until recently, the MilSpec included the express requirement that MilSpec AFFF contain “fluorocarbon surfactants.” All fluorocarbon surfactants are PFAS, and that category includes PFOA, PFOS, and their chemical precursors—the very compounds at issue in the Complaint here. This requirement has been in force for virtually the entire time period at issue in the Complaint. In 2019 the MilSpec removed the modifier “fluorocarbon” from “surfactants,” but it expressly states that “the DoD intends to acquire and use AFFF with the lowest demonstrable concentrations of . . . PFOS and PFOA” “[i]n the short term.” PFOA or PFOS are unavoidably present at some concentrations in fluorocarbon surfactants, and the current MilSpec expressly contemplates that AFFF formulations will contain PFOA and PFOS (subject to recently imposed limits).

B. All The Requirements Of 28 U.S.C. § 1442(a)(1) Are Satisfied

1. The “Person” Requirement Is Satisfied

21. The first requirement for removal under the federal officer removal statute is satisfied here because Tyco Fire Products LP and Chemguard, Inc. (a limited partnership and corporation, respectively) meet the definition of “persons” under the statute. For purposes of § 1442(a)(1), the term “person” includes “corporations, companies, associations, firms, [and] partnerships[.]” *Papp*, 842 F.3d at 812 (quoting 1 U.S.C. § 1); accord *Bennett v. MIS Corp.*, 607 F.3d 1076, 1085

(6th Cir. 2010); *Isaacson*, 517 F.3d at 135–36.

2. *The “Acting Under” Requirement Is Satisfied*

22. The second requirement (“acting under” a federal officer) is satisfied when an entity assists or helps carry out, the duties or tasks of a federal officer. *Papp*, 842 F.3d at 812. The phrase “acting under” is to be “liberally construed in favor of the entity seeking removal.” *Sawyer*, 860 F.3d at 255 (internal quotation marks omitted). “[C]ourts have unhesitatingly treated the ‘acting under’ requirement as satisfied where a contractor seeks to remove a case involving injuries arising from equipment that it *manufactured for the government*.” *Id.* (emphasis in original).

23. The requirement of “acting under” a federal officer is met here because the effect of Plaintiff’s claims, at least in part, is to challenge Tyco’s alleged conduct in providing vital products “that, in the absence of Defendants, the Government would have had to produce itself.” *Isaacson*, 517 F.3d at 137. MilSpec AFFF is a mission-critical military and aviation safety product that, without the support of private contractors, the government would have to produce for itself. *See Ayo*, 2018 WL 4781145, at *9 (describing MilSpec AFFF as a “mission-critical” and “life-saving product” used by all branches of the U.S. armed forces and NATO members (internal quotation marks omitted)); *cf. Isaacson*, 517 F.3d at 137. The Naval Research Laboratory states that, “[a]lthough [it] was responsible for the original concepts and formulations, it was necessary to elicit the aid of the chemical industry

to synthesize the fluorinated intermediates and agents to achieve improvements in formulations.”⁷ Accordingly, the military has long depended upon outside contractors like Tyco to develop and supply AFFF. *See Chemguard*, 2021 WL 744683, at *3 (holding that Tyco and other AFFF manufacturers were “acting under” a federal officer in connection with the manufacture and sale of MilSpec AFFF); *Ayo*, 2018 WL 4781145, at *8–9 (same); *see also* MDL Order 1, at 3–4 (finding that the “acting under” requirement was satisfied because defendant demonstrated that it was manufacturing AFFF under the guidance of the U.S. military); MDL Order 2, at 3–4; MDL Order 3, at 3–4 (same). If Tyco and other manufacturers did not provide MilSpec AFFF, the government would have to manufacture and supply the product itself.

24. In designing, manufacturing, and supplying the MilSpec AFFF at issue, Tyco acted under the direction and control of one or more federal officers. Specifically, Tyco acted in accordance with detailed specifications, promulgated by Naval Sea Systems Command, that govern AFFF formulation, performance, testing, storage, inspection, packaging, and labeling. Further, the AFFF products in question were subject to various tests by the United States Navy before and after being approved for use by the military and for inclusion on the Qualified Products List

⁷ Fulfilling the Roosevelts’ Vision, *supra* n.3, at 37.

maintained by the DoD.⁸

3. *The Nexus Requirement Is Satisfied*

25. The third requirement, that the defendant's actions taken "under color of federal office" have a causal nexus with plaintiff's claims or injuries or be otherwise related to the lawsuit, erects a hurdle that "is quite low." *Isaacson*, 517 F.3d at 137.⁹ To satisfy this requirement, it is sufficient for a defendant to establish that an act that allegedly caused or contributed to the plaintiff's injury occurred while the defendant was performing its official duties. *Id.* at 137–38.

26. Here, the Plaintiff's claims arise at least in part from Tyco's production and sale of AFFF manufactured to military specifications. Plaintiff alleges that the use of PFAS in AFFF is the source of its injuries. Tyco contends that the use of such chemicals in MilSpec AFFF was required by military specifications. The conflict is apparent: MilSpec AFFF was developed by Tyco, and other manufacturers to meet specifications established by the DoD. The design choices Plaintiff is attempting to impose via state tort law would create a conflict in which Tyco could not comply with both the MilSpec and the purported state-prescribed duty of care. *See Boyle*, 487 U.S. at 509; *see also Ayo*, 2018 WL 4781145, at *9 ("[T]here is evidence of a

⁸ *See* Dep't of Defense, SD-6, *supra* n.5, at 1.

⁹ The "acting under" and "under color of" prongs overlap. Both "are satisfied if the actions subject to suit resulted directly from government specifications or direction." *Albrecht*, 2011 WL 5109532, at *5.

‘casual connection’ between the use of PFCs in AFFF and the design and manufacture of AFFF for the government.”); MDL Order 1, at 5–6 (“Here, [Plaintiff]’s claims arise out of use of AFFF products that it claims Tyco manufactured and sold, and for which the U.S. military imposes MilSpec standards. The Court . . . finds that the causation element of federal officer removal is satisfied here.”); MDL Order 2, at 5 (finding the causation element of federal officer removal satisfied where Tyco’s AFFF products, “for which the military imposes MilSpec standards,” were used at several airports); MDL Order 3, at 5–6 (same as to MilSpec AFFF used at a single airport).

27. Here, Plaintiff’s purported injuries arise at least in part from MilSpec AFFF. The causal connection or relationship between Plaintiff’s alleged injuries and Tyco’s actions under color of federal office is clear. It is irrelevant that Plaintiff does not expressly contend that they have been injured by MilSpec AFFF. Courts “credit Defendants’ theory of the case when determining whether [the] causal connection exists.” *Isaacson*, 517 F.3d at 137; *see also Chemguard*, 2021 WL 744683, at *3 (noting that “Plaintiffs cannot decide what defense Defendants might present”).

4. The “Colorable Federal Defense” Requirement Is Satisfied

28. The fourth requirement (“colorable federal defense”) is satisfied by Tyco’s assertion of the government contractor defense.

29. At the removal stage, a defendant need only show that its government contractor defense is colorable; that is, “that the defense was ‘legitimate and [could] reasonably be asserted, given the facts presented and the current law.’” *Papp*, 842 F.3d at 815 (alteration in original) (citation omitted). “A defendant ‘need not win his case before he can have it removed.’” *Id.* (quoting *Willingham*, 395 U.S. at 407); *see also Isaacson*, 517 F.3d at 139 (“To be ‘colorable,’ the defense need not be ‘clearly sustainable,’ as the purpose of the statute is to secure that the validity of the defense will be tried in federal court.” (citation omitted)); *O’Connell v. Foster Wheeler Energy Corp.*, 544 F. Supp. 2d 51, 54 (D. Mass. 2008) (upon removal, defendant must raise “colorable federal defense”). At the removal stage, the inquiry “is purely jurisdictional, and neither the parties nor the district courts should be required to engage in fact-intensive motion practice, pre-discovery, to determine the threshold jurisdictional issue.” *Cuomo*, 771 F.3d at 116; *see also Kraus v. Alcatel-Lucent*, No. 18-2119, 2018 WL 3585088, at *2 (E.D. Pa. July 25, 2018) (“A court does not ‘determine credibility, weigh the quantum of evidence or discredit the source of the defense’ at this stage. Instead, [the court] only determine[s] whether there are sufficient facts alleged to raise a colorable defense.” (internal citation omitted)). Moreover, “this inquiry is undertaken whilst viewing the facts in the light most favorable to Defendants[.]” *Hagen v. Benjamin Foster Co.*, 739 F. Supp. 2d 770, 783–84 (E.D. Pa. 2010). “Precisely in those cases where a plaintiff challenges

the factual sufficiency of the defendant’s defense, the defendant should ‘have the opportunity to present [his] version of the facts to a federal, not a state, court.’” *Cuomo*, 771 F.3d at 116 (alteration in original; citation omitted).

30. Under the government contractor defense, the defendant is not liable for the design, manufacture, or warnings of equipment or supplies “when (1) the United States approved reasonably precise specifications; (2) the equipment conformed to those specifications; and (3) the supplier warned the United States about the dangers in the use of the equipment that were known to the supplier but not to the United States.” *Boyle*, 487 U.S. at 512.

31. Tyco has satisfied these elements for purposes of removal. As discussed above, Naval Sea Systems Command approved reasonably precise specifications, governing MilSpec AFFF formulation, performance, testing, storage, inspection, packaging, and labeling. Tyco’s products appeared on the DoD Qualified Products List, which could have happened only if Naval Sea Systems Command had first determined that they conformed to the MilSpec. *See Ayo*, 2018 WL 4781145, at *13 (“[T]here is colorable evidence that Manufacturing Defendants’ Mil-Spec AFFF is not a stock product and that the government approved reasonably precise specifications requiring them to use PFCs, including PFOS and PFOA, in their products.”); *see also id.* (“There is also colorable evidence . . . that Manufacturing Defendants’ AFFF products conformed to the government’s reasonably precise

specifications.”); MDL Order 1, at 5 (finding defendant demonstrated a colorable defense “where it contends that its AFFF products were manufactured according to the U.S. military’s MilSpec specifications”); MDL Order 2, at 4 (same, as to Tyco); MDL Order 3, at 5 (same); *see also Chemguard*, 2021 WL 744683, at *4.

32. Moreover, for purposes of removal, the government was sufficiently informed regarding alleged product-related “dangers,” *Boyle*, 487 U.S. at 512, to exercise its discretionary authority in specifying and procuring MilSpec AFFF. The military specifications have long included testing protocols and requirements for toxicity, chemical oxygen, and biological demand. Indeed, it is clear that the United States has long understood that AFFF contains PFAS and may contain or break down into PFOS and/or PFOA; that AFFF constituents can migrate through the soil and potentially reach groundwater; and that it has been reported that this may raise environmental or human health issues.¹⁰ For example, as early as October 1980, a report supported by the U.S. Navy Civil Engineering Laboratory, U.S. Air Force Engineering Service Center, and the U.S. Army Medical Research and Development Command stated that AFFF contained fluorocarbons and that “[a]ll of the constituents resulting from firefighting exercises are considered to have adverse

¹⁰ *See, e.g., EPA, Revised Draft Hazard Assessment of Perfluorooctanoic Acid and Its Salts 1–6* (Nov. 4, 2002).

effects environmentally.”¹¹ By no later than 2001, DoD was aware of data purportedly showing PFAS compounds in MilSpec AFFF to be “toxic” and “persistent.” In 2002, the United States Environmental Protection Agency issued a draft hazard assessment for PFOA, which reviewed in detail, among other data, human epidemiological studies and animal toxicology studies pertaining to alleged associations between PFOA and cancer. More recently, in a November 2017 report to Congress, the DoD acknowledged the concerns raised by the EPA regarding PFOS and PFOA. Nonetheless, it still described AFFF containing PFOS or PFOA as a “mission critical product [that] saves lives and protects assets by quickly extinguishing petroleum-based fires[.]”¹² Indeed, Naval Sea Systems Command continues to require that MilSpec AFFF contain “surfactants,” and recognizes that PFAS, including PFOS and PFOA, will be present (subject to recently imposed limits for PFOS and PFOA) in AFFF formulations.¹³ *See Ayo*, 2018 WL 4781145, at *12 (“That the DoD knows of the alleged risks of PFC-based AFFF products but

¹¹ *See* Edward S. K. Chian et al., *Membrane Treatment of Aqueous Film Forming Foam (AFFF) Wastes for Recovery of Its Active Ingredients* 1 (Oct. 1980), <https://apps.dtic.mil/dtic/tr/fulltext/u2/a136612.pdf>.

¹² Dep’t of Defense, *Aqueous Film Forming Foam Report to Congress* 1–2 (Oct. 2017) (pub. Nov. 3, 2017), <https://tinyurl.com/wshcww4>.

¹³ *See* MIL-PRF-24385F(SH), Amendment 4, § 6.6 & Tables I, III (2020), https://quicksearch.dla.mil/qsDocDetails.aspx?ident_number=17270; *see also* David Vergun, *DOD Officials Discuss Fire-Fighting Foam Replacement, Remediation Efforts* (Sept. 16, 2020), <https://tinyurl.com/ty5ku8hp>.

continues to purchase them supports the position that the government approved reasonably precise specifications for the claimed defective design.” (citation omitted)); MDL Order 1, at 5 (“As to whether [defendant] adequately informed the U.S. military of dangers associated with its AFFF products of which the military was not already aware, [defendant] points to materials such as a November 2017 Department of Defense report to Congress, in which the agency acknowledged the [EPA]’s stated concerns with PFOS/PFOA in drinking water . . .”).

33. At minimum, these facts constitute colorable evidence that Naval Sea Systems Command “made a discretionary determination” regarding the formulation of MilSpec AFFF after weighing the fire-suppression benefits against the alleged risks. *See Twinam v. Dow Chem. Co. (In re “Agent Orange” Prod. Liab. Litig.)*, 517 F.3d 76, 90 (2d Cir. 2008); *see also Albrecht*, 2011 WL 5109532, at *5 (“A defendant is not required to warn the government where ‘the government knew as much or more than the defendant contractor about the hazards of the product.’” (citation omitted)). Where, as here, the government has exercised “discretionary authority over areas of significant federal interest such as military procurement,” the government contractor defense applies. *In re “Agent Orange” Prod. Liab. Litig.*, 517 F.3d at 89–90; *see also Ayo*, 2018 WL 4781145, at *10, 12–13.

34. Tyco’s use of PFAS in MilSpec AFFF was required by military specifications. By seeking to impose tort liability on Tyco for alleged injuries to

Plaintiff that were caused in whole or in part by Tyco's compliance with military specifications, Plaintiff is attempting to use state tort law to attack design choices dictated by the military. The government contractor defense precludes such an attack. *See Boyle*, 487 U.S. at 509.

35. In the MDL, the court has found based on an extensive factual record that the government contractor defense asserted by Tyco and other defendants presents genuine issues of fact for trial. *See In re Aqueous Film-Forming Foams Prods. Liab. Litig.*, 2022 WL 4291357, at *12–15 (D.S.C. Sept. 16, 2022). A defense that presents triable issues is by definition better than merely “colorable.”

WHEREFORE, Tyco hereby removes this action from the Circuit Court of the Twentieth Judicial Court in and for Collier County, Florida, to this Court.

Dated: March 9, 2023

Respectfully submitted,

/s/ Michael D. Sloan

Michael D. Sloan (FBN 104385)

CARLTON FIELDS, P.A.

CityPlace Tower

525 Okeechobee Blvd., Ste. 1200

West Palm Beach, Florida 33401

P: (561) 822-2979

F: (561) 659-7368

Email: msloan@carltonfields.com

*Counsel for Tyco Fire Products, LP &
Chemguard, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 9, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that copies of the foregoing **NOTICE OF REMOVAL**, with its Exhibits, were served on all parties on the attached Service List, in the manner specified, on March 9, 2023.

/s/ Michael D. Sloan

Michael D. Sloan

SERVICE LIST

<p>Louise R. Caro Cossich, Sumich, Parsiola & Taylor LLC 8397 Highway 23, Suite 100 Belle Chasse, LA 70037 lcaro@carolawpa.com <i>Counsel for Plaintiff</i> <u>Served via E-mail</u></p>	<p>Laura Donaldson MANSON BOLVES DONALDSON TANNER, P.A. 109 North Brush Street, Suite 300 Tampa, FL 33602 ldonaldson@mansonbolves.com <i>Counsel for Plaintiff</i> <u>Served via E-mail</u></p>
	<p>Daniel L. Ring Tyler D. Alfermann MAYER BROWN LLP 71 South Wacker Drive Chicago, IL 60606 Tel: (312) 782-0600 dring@mayerbrown.com talfermann@mayerbrown.com Counsel for Defendant 3M Company <u>Served via E-mail</u></p>
<p>David R. Erickson Brent Dwerlkotte SHOOK, HARDY & BACON L.L.P. 2555 Grand Blvd. Kansas City, MO 64108 Tel: (816) 474-6550 derickson@shb.com dbdwerlkotte@shb.com Counsel for Defendants E. I. duPont de Nemours and Company, The Chemours Company, and The Chemours Company FC, LLC <u>Served via E-mail</u></p>	<p>Kat Hacker BARTLIT BECK LLP 1801 Wewatta, Suite 1200 Denver, CO 80202 Tel: (303) 592-3100 dupont@bartlitbeck.com Counsel for Defendants Corteva, Inc. and DuPont de Nemours, Inc. <u>Served via E-mail</u></p>
<p>Jonathan I. Handler Keith H. Bensten DAY PITNEY LLP One Federal Street, 29th Floor Boston, MA 02110 Tel: (617) 345-4600 jihandler@daypitney.com kbensten@daypitney.com Counsel for Defendants Kidde-Fenwal, Inc., Carrier Global Corporation, Kidde PLC, Inc., Chubb Fire, Ltd., UTC Fire &</p>	<p>Keith E. Smith GREENBERG TRAUERIG, LLP 1717 Arch Street, Suite 400 Philadelphia, PA 19103 Tel: (215) 988-7800 smithkei@gtlaw.com Counsel for Defendant National Foam Inc. <u>Served via E-mail</u></p>

Security Americas Corporation, Inc., Raytheon Technologies Corporation <u>Served via E-mail</u>	
Michael L. Carpenter GRAY LAYTON KERSH SOLOMON FURR & SMITH, P.A. 516 S. New Hope Road Gastonia, NC 28054 Tel: 704-865-4400 mcarpenter@gastonlegal.com Counsel for Defendant Buckeye Fire Equipment Company <u>Served via E-mail</u>	Heidi Levine SIDLEY AUSTIN LLP 787 Seventh Avenue New York, NY 10019 Tel: (212) 839-5300 hlevine@sidley.com Counsel for Defendant Arkema, Inc. <u>Served via E-mail</u>
John R. Wellschlager DLA PIPER LLP (US) The Marbury Building 6225 Smith Avenue Baltimore, MD 21209 Tel: (410) 580-3000 john.wellschlager@dlapiper.com Counsel for Defendant BASF Corporation <u>Served via E-mail</u>	Jonathan B. Blakley GORDON REES SCULLY MANSUKHANI, LLP One North Franklin, Suite 800 Chicago, IL 60606 Tel: (312) 565-1400 jblakley@grsm.com Counsel for Defendant ChemDesign Products Inc. <u>Served via E-mail</u>
Melanie Black Dubis Charles E. Raynal IV PARKER POE ADAMS & BERNSTEIN LLP 301 Fayetteville Street, Suite 1400 Raleigh, NC 27601 Tel: (919) 828-0564 melaniedubis@parkerpoe.com charlesraynal@parkerpoe.com Counsel for Defendants Archroma U.S., Inc., Archroma Management, LLC, and Clariant Corporation <u>Served via E-mail</u>	John F. Parker Oliver E. Twaddell GOLDBERG SEGALLA LLP 711 Third Avenue, Suite 1900 New York, NY 10017 Tel: (646) 292-8700 jparker@goldbergsegalla.com otwaddell@goldbergsegalla.com Counsel for Defendant Chemicals Inc. <u>Served via E-mail</u>
Ethan R. Ware WILLIAMS MULLEN 1230 Main Street, Suite 330 Columbia, SC 29201 Tel: (803) 567-4600 eware@williamsmullen.com	Clifford J. Zatz CROWELL & MORING 1001 Pennsylvania Avenue, NW Washington, D.C. 20004 Tel: (202) 624-2500 czatz@crowell.com pcondron@crowell.com

<p>Counsel for Defendant Nation Ford Chemical Company <u>Served via E-mail</u></p>	<p>Counsel for Defendant AGC Chemicals Americas, Inc. and AGC, Inc. <u>Served via E-mail</u></p>
<p>Kurt D. Weaver WOMBLE BOND DICKSON (US) LLP 555 Fayetteville Street, Suite 1100 Raleigh, NC 27601 Tel: (919) 755-2100 kurt.weaver@wbd-us.com Counsel for Defendant Deepwater Chemicals, Inc. <u>Served via E-mail</u></p>	<p>Kirk G. Warner Clifton L. Brinson Addie K.S. Ries SMITH, ANDERSON, BLOUNT, DORSETT, MITCHELL & JERNIGAN, LLP. 150 Fayetteville Street, Suite 2300 Raleigh, North Carolina 27601 Tel: (919) 821-1220 kwarner@smithlaw.com cbrinson@smithlaw.com aries@smithlaw.com Counsel for Defendant Dynax Corporation <u>Served via E-mail</u></p>
<p>CENTRAL SPRINKLER, LLC c/o Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, Delaware 19801 <u>Served via First Class U.S. Mail</u></p>	<p>FIRE PRODUCTS GP HOLDING, LLC c/o Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, Delaware 19801 <u>Served via First Class U.S. Mail</u></p>
<p>ANGUS INTERNATIONAL SAFETY GROUP, LTD. c/o Paul Williams, CEO Station Road, High Bentham Near Lancaster, United Kingdom LA2 7NA <u>Served via First Class U.S. Mail</u></p>	

Filing # 164755768 E-Filed 01/13/2023 07:11:17 PM

**IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA**

<p>NORTH COLLIER FIRE CONTROL AND RESCUE DISTRICT,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>3M COMPANY (f/k/a Minnesota Mining and Manufacturing Co.); AGC CHEMICALS AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co., Ltd.); ANGUS INTERNATIONAL SAFETY GROUP, LTD; ARCHROMA MANAGEMENT, LLC; ARCHROMA U.S., INC.; ARKEMA, INC.; BASF CORPORATION; BUCKEYE FIRE EQUIPMENT COMPANY; CARRIER GLOBAL CORPORATION; CENTRAL SPRINKLER, LLC; CHEMDESIGN PRODUCTS, INC.; CHEMGUARD, INC.; CHEMICALS INCORPORATED; CHUBB FIRE, LTD.; CLARIANT CORPORATION; CORTEVA, INC.; DEEPWATER CHEMICALS, INC.; JOHN DOE DEFENDANTS 1-49; DUPONT DE NEMOURS, INC.; DYNAX CORPORATION; E. I. DUPONT DE NEMOURS AND COMPANY; FIRE PRODUCTS GP HOLDING, LLC; JOHNSON CONTROLS INTERNATIONAL, PLC; KIDDE PLC, INC.; KIDDE-FENWAL, INC.; NATION FORD CHEMICAL COMPANY; NATIONAL FOAM, INC.; RAYTHEON TECHNOLOGIES CORPORATION (f/k/a United Technologies Corporation); THE CHEMOURS COMPANY; THE CHEMOURS COMPANY FC, LLC; TYCO FIRE PRODUCTS LP; and UTC FIRE & SECURITY AMERICAS CORPORATION, INC.,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No.:</p> <p>COMPLAINT WITH JURY DEMAND</p>
--	--

PLAINTIFF’S ORIGINAL COMPLAINT

Plaintiff, North Collier Fire Control and Rescue District (“Plaintiff” or “the District”), by and through its undersigned counsel, brings this action against Defendants, 3M Company (f/k/a Minnesota Mining and Manufacturing Co.), AGC Chemicals Americas, Inc., AGC, Inc. (f/k/a Asahi Glass Co., Ltd.), Angus International Safety Group, Ltd., Archroma Management, LLC,

Archroma U.S., Inc., Arkema, Inc., BASF Corporation, Buckeye Fire Equipment Company, Carrier Global Corporation, Central Sprinkler, LLC, ChemDesign Products, Inc., Chemguard, Inc., Chemicals Incorporated, Chubb Fire, Ltd., Clariant Corporation, Corteva, Inc., Deepwater Chemicals, Inc., DuPont de Nemours, Inc., Dynax Corporation, E. I. DuPont De Nemours and Company, Fire Products GP Holding, LLC, Johnson Controls International, plc, Kidde PLC, Inc., Kidde-Fenwal, Inc., Nation Ford Chemical Company, National Foam, Inc., Raytheon Technologies Corporation (f/k/a United Technologies Corporation), The Chemours Company, The Chemours Company FC, LLC, Tyco Fire Products LP (individually and as successor-in-interest to The Ansul Company), UTC Fire & Security Americas Corporation, Inc., and John Doe Defendants 1-49 (collectively, “Defendants”), and alleges as follows:

SUMMARY OF THE CASE

1. Plaintiff brings this action against Defendants to recover any and all past and future compensatory and/or consequential damages for the investigation, remediation, removal, disposal, treatment, and monitoring of the ongoing contamination of its surface water, groundwater, soil and sediment caused and/or created by Defendants’ products, diminished property value, attorneys’ fees and costs, as well as any and all other damages available as a result of the actions and/or inactions of Defendants.

2. Plaintiff is an independent special district governed by Chapters 189 and 191, Florida Statutes, and Chapter 2015-191, Laws of Florida.

3. Pursuant to §189.074, F.S., the District was formed on January 1, 2015, by the merger of two existing independent special fire control districts – the North Naples Fire Control and Rescue District, created in 1961, and the Big Corkscrew Island Fire Control and Rescue District, created in 1977.

4. In accordance with §189.074(6), Florida Statutes, all rights, assets, real property, as well as other things in action, of the North Naples Fire Control and Rescue District and the Big Corkscrew Island Fire Control and Rescue District were deemed as transferred to and vested in the District without further act or deed, and the District is subject to all obligations and liabilities imposed and possesses all the rights, powers, and privileges vested by law in other similar entities.

5. The District encompasses approximately 264 square miles in Collier County.

6. Plaintiff is the owner and operator of various lands, properties, facilities, infrastructures, equipment, and resources located throughout Collier County, Florida, including, but not limited to, the North Collier Fire Training Facility located at 1885 Veterans Park Dr., Naples, FL 34109 (collectively, “Plaintiff’s Property”).

7. The North Collier Fire Training Facility is a fire training facility located at the District’s Station 45 and is equipped with, among other things, a fire training tower and burn room.

8. Per- and polyfluoroalkyl substances (“PFAS”), including perfluorooctanoic acid (“PFOA”) and perfluorooctane sulfonic acid (“PFOS”), have been detected in Plaintiff’s Property.

9. PFOA and PFOS are man-made compounds that are toxic and persistent in the environment, do not biodegrade, move readily through soil, surface water and groundwater, and pose a significant risk to human health and safety.

10. At various times from the 1960s through today, Defendants designed, manufactured, formulated, marketed, distributed, sold, and/or assumed or acquired liabilities for the manufacture and/or sale of PFOA, PFOS, the chemical precursors of PFOA and/or PFOS, and/or aqueous film-forming foam (“AFFF”) containing PFOA, PFOS and/or their chemical precursors (collectively, “Fluorosurfactant Products”).

11. AFFF is a firefighting agent used to control and extinguish Class B fuel fires and is used at sites such as military bases, airports, petroleum refineries, and fire training centers.

12. Defendants designed, manufactured, marketed, distributed, sold, and/or assumed or acquired liabilities for the manufacture and/or sale of Fluorosurfactant Products with the knowledge that these toxic compounds would be released into the environment during fire protection, training, and response activities, even when used as directed and intended by the Defendants.

13. Upon information and belief, at all times pertinent herein, Defendants' Fluorosurfactant Products have been released, used, stored, and/or disposed of at or near Plaintiff's Property for fire protection, training, and response activities. During these activities, Defendants' Fluorosurfactant Products were stored, used, released, and/or disposed of as directed and intended by the Defendants, which allowed PFOS, PFOA, and/or their chemical precursors to enter the environment, and migrate through the soil, sediment, surface water, and groundwater, thereby contaminating Plaintiff's Property.

14. As a result of the use of Defendants' Fluorosurfactant Products for their intended purpose, PFOS, PFOA, and/or their chemical precursors have been detected in Plaintiff's Property.

15. Plaintiff's Property has been, and continues to be, contaminated by Defendants' Fluorosurfactant Products.

16. At all times pertinent herein, Plaintiff did not know, nor should Plaintiff have known, of the ongoing contamination of its Property through the use, release, storage, and/or disposal of Defendants' Fluorosurfactant Products as Defendants did not disclose the toxic nature and harmful effects of their Fluorosurfactant Products.

17. Through this action, Plaintiff seeks to recover compensatory and/or consequential damages for all past and future costs to investigate, remediate, remove, dispose of, treat, and monitor the PFOS and PFOA contamination of Plaintiff's Property caused by the use, storage, and/or disposal of Defendants' Fluorosurfactant Products, as well as any and all other damages

recoverable under state and/or applicable federal laws. Plaintiff also seeks damages and restitution for the diminution of value of Plaintiff's Property, as well as reasonable attorneys' fees and costs.

JURISDICTION AND VENUE

18. This Court has subject matter jurisdiction over this action because this is an action for damages in excess of thirty thousand dollars (\$30,000.00).

19. Venue is appropriate pursuant to Fla. Stat. § 47.011 because a substantial part of the events and omissions giving rise to Plaintiff's causes of action accrued in Collier County, and because the property and resources affected by Defendants' conduct are located in Collier County.

PARTIES

20. Plaintiff North Collier Fire Control and Rescue District is an independent special district, with its principal address located at 1885 Veterans Park Drive, Naples, FL 34109.

21. Plaintiff is the owner of various properties throughout Collier County, Florida, either believed to be or found to be contaminated with Defendants' Fluorosurfactant Products.

22. Upon information and belief, the following Defendants designed, manufactured, formulated, marketed, promoted, distributed, sold, and/or assumed or acquired liabilities for the manufacture and/or sale of the Fluorosurfactant Products that have and continue to contaminate Plaintiff's Property:

- a. Defendant 3M Company (f/k/a Minnesota Mining and Manufacturing Company) ("3M") is a Delaware corporation authorized to conduct business in Florida, with its principal place of business located at 3M Center, St. Paul, Minnesota 55144. 3M is the only company that manufactured and/or sold AFFF containing PFOS in the United States, including in Florida.

- b. Defendant E. I. DuPont De Nemours and Company (“DuPont”) is a Delaware corporation with its principal place of business located at 974 Centre Road, Wilmington, Delaware 19805. DuPont is registered to do business in Florida.
- c. Defendant The Chemours Company (“Chemours”) is a Delaware corporation with its principal place of business located at 1007 Market Street, Wilmington, Delaware 19899. Chemours is registered to do business in the State of Florida.
- d. In 2015, DuPont spun off its “Performance Chemicals” business to Chemours, along with certain environmental liabilities. Upon information and belief, at the time of the transfer of its Performance Chemicals business to Chemours, DuPont had been sued, threatened with suit and/or had knowledge of the likelihood of litigation to be filed regarding DuPont’s liability for damages and injuries arising from the manufacture and sale of fluorosurfactants and the products that contain fluorosurfactants.
- e. Defendant The Chemours Company FC, LLC (“Chemours FC”), successor-in-interest to DuPont Chemical Solutions Enterprise, is a Delaware limited liability company with its principal place of business at 1007 Market Street, Wilmington, Delaware, 19899. Chemours FC is registered to do business in Florida.
- f. Defendant DuPont de Nemours, Inc. is a Delaware corporation with its principal place of business located at 974 Centre Road, Building 730, Wilmington, Delaware 19805. Upon information and belief, DowDuPont, Inc. was formed in 2017 as a result of the merger of Dow Chemical and DuPont. DowDuPont, Inc. was subsequently divided into three publicly traded companies and on June 1, 2019, DowDuPont, Inc. changed its registered name to DuPont de Nemours, Inc. (“New DuPont”). New DuPont is registered to do business in Florida.

- g. Defendant Corteva, Inc. is a Delaware corporation with its principal place of business located at 974 Centre Road, Wilmington, Delaware 19805. Upon information and belief, Corteva, Inc. is one of the aforementioned spin-off companies from DowDuPont, Inc., and is believed to have assumed some of the PFAS liabilities of the former DuPont. Corteva, Inc. is registered to do business in Florida.
- h. Defendant Chemguard, Inc. (“Chemguard”) is a Texas corporation with its principal place of business located at One Stanton Street, Marinette, Wisconsin 54143. Upon information and belief, Chemguard has conducted and/or availed itself of doing business throughout the United States, including in Florida. Chemguard acquired Williams Fire and Hazard Control, Inc. (“WFHC”). Upon information and belief, WFHC has and continues to sell and/or distribute AFFF throughout the United States, including in the State of Florida.
- i. Defendant Tyco Fire Products LP (“Tyco”) is a Delaware limited partnership with its principal place of business located at 1400 Pennbrook Parkway, Lansdale, Pennsylvania 19446. Tyco acquired Chemguard in 2011. Tyco is registered to do business in Florida.
- j. Tyco is the successor-in-interest to The Ansul Company (“Ansul”) and manufactures the Ansul brand of products (Ansul and/or Tyco as the successor-in-interest to Ansul will be referred to collectively as “Tyco/Ansul”). Upon information and belief, Tyco/Ansul does and/or has done business throughout the United States, including in Florida.
- k. Defendant Johnson Controls International, plc is an Irish public limited company with its principal place of business located at One Albert Quay, Cork, Ireland. Upon

information and belief, Johnson Controls International, plc is the parent company of Tyco.

- l. Defendant Central Sprinkler, LLC is a Delaware limited liability company with its principal place of business located at 1400 Pennbrook Parkway, Lansdale, Pennsylvania, 19446. Upon information and belief, this Defendant is a limited partner of Tyco. Upon information and belief, Chemguard is wholly-owned by Central Sprinkler, LLC. Upon information and belief, Central Sprinkler, LLC has conducted and/or availed itself of doing business throughout the United States, including in Florida.
- m. Defendant Fire Products GP Holding, LLC is a Delaware limited liability company with its principal place of business located at 5757 N Green Bay Ave., Milwaukee, Wisconsin 53209. Upon information and belief, this Defendant is a general partner of Tyco. Fire Products GP Holding, LLC is registered to do business in Florida.
- n. Defendant Kidde-Fenwal, Inc. (“Kidde”) is a Delaware corporation with its principal place of business located at 400 Main Street, Ashland, Massachusetts 01721. Kidde is registered to do business in Florida. Upon information and belief, Kidde was part of UTC Fire & Security Americas Corporation, Inc. Upon information and belief, Kidde-Fenwal, Inc. is the successor-in-interest to Kidde Fire Fighting, Inc. (collectively, “Kidde/Kidde Fire”). Upon information and belief, Kidde/Kidde Fire does and/or has done business throughout the United States, including in the State of Florida.
- o. Defendant Kidde PLC, Inc. is a Delaware corporation with its principal place of business located at 9 Farm Springs Road, Farmington, Connecticut 06032. Upon information and belief, Kidde PLC, Inc. was part of UTC Fire & Security Americas

Corporation, Inc. Upon information and belief, Kidde PLC, Inc. has conducted and/or availed itself of doing business throughout the United States, including in Florida.

- p. Defendant Chubb Fire, Ltd. (“Chubb”) is a foreign private limited company, United Kingdom registration number 134210, with offices at Littleton Road, Ashford, Middlesex, United Kingdom TW15 1TZ. Upon information and belief, Chubb is or has been composed of different subsidiaries and/or divisions, including but not limited to, Chubb Fire & Security Ltd., Chubb Security, PLC, Red Hawk Fire & Security, LLC, and/or Chubb National Foam, Inc. Upon information and belief, Chubb was part of UTC Fire & Security Americas Corporation, Inc.
- q. Defendant UTC Fire & Security Americas Corporation, Inc. (“UTC”) is a Delaware corporation with its principal place of business at 13995 Pasteur Blvd., Palm Beach Gardens, Florida 33418. Upon information and belief, UTC was a division of United Technologies Corporation. UTC is registered to do business in Florida.
- r. Defendant Carrier Global Corporation is a Delaware corporation with its principal place of business located at 13995 Pasteur Boulevard, Palm Beach Gardens, Florida 33418. Carrier Global Corporation is registered to do business in Florida.
- s. Defendant Raytheon Technologies Corporation (f/k/a United Technologies Corporation) (“Raytheon Tech f/k/a United Tech”) is a Delaware corporation with its principal place of business at 870 Winter Street, Waltham, Massachusetts 02451. Raytheon Tech f/k/a United Tech is registered to do business in Florida.
- t. Defendant National Foam, Inc. is a Delaware corporation with its principal place of business located at 141 Junny Road, Angier, North Carolina 27501. Upon information and belief, National Foam, Inc. is a subsidiary of Angus International Safety Group, Ltd. Upon information and belief, National Foam, Inc. manufactures

the Angus brand of AFFF products. Upon information or belief, National Foam, Inc. has conducted and/or availed itself of doing business throughout the United States, including in Florida.

- u. Defendant Angus International Safety Group, Ltd. is a foreign private limited company, United Kingdom registration number 8441763, with offices at Station Road, High Bentham, Near Lancaster, United Kingdom. Upon information and belief, Angus International Safety Group, Ltd. is the parent company of National Foam, Inc.
- v. Defendant Buckeye Fire Equipment Company (“Buckeye”) is an Ohio corporation with its principal place of business at 110 Kings Road, Mountain, North Carolina 28086. Upon information or belief, Buckeye has conducted and/or availed itself of doing business throughout the United States, including in Florida.
- w. Defendant Arkema, Inc. is a Pennsylvania corporation with its principal place of business at 900 1st Avenue, King of Prussia, Pennsylvania 19406. Arkema, Inc. is registered to do business in Florida.
- x. Defendant BASF Corporation is a Delaware corporation with its principal place of business at 100 Park Avenue, Florham Park, New Jersey 07932. Upon information and belief, BASF Corporation acquired Ciba-Geigy Corporation and/or Ciba Specialty Chemicals. BASF Corporation is registered to do business in Florida. Upon information and belief, Ciba-Geigy Corporation and/or Ciba Specialty Chemicals conducted and/or availed itself of doing business throughout the United States, including in Florida.
- y. Defendant ChemDesign Products, Inc. is a Delaware corporation with its principal place of business located at 2 Stanton Street, Marinette, Wisconsin 54143. Upon

information and belief, ChemDesign Products, Inc. has conducted and/or availed itself of doing business throughout the United States, including in Florida.

- z. Defendant Clariant Corporation is a New York corporation with its principal place of business located at 4000 Monroe Road, Charlotte, North Carolina 28205. Clariant is registered to do business in Florida.
- aa. Defendant Chemicals Incorporated is a Texas corporation with its principal place of business located at 12321 Hatcherville Road, Baytown, Texas 77521. Upon information and belief, Chemicals Incorporated has conducted and/or availed itself of doing business throughout the United States, including in Florida.
- bb. Defendant Nation Ford Chemical Company is a South Carolina corporation with its principal place of business at 2300 Banks Street, Fort Mill, SC 29715. Upon information and belief, Nation Ford Chemical Company has conducted and/or availed itself of doing business throughout the United States, including in Florida.
- cc. Defendant AGC Chemicals Americas, Inc. (“AGCCA”) is a Delaware corporation with its principal business office at 55 E. Uwchlan Avenue, Suite 201, Exton, Pennsylvania 19341. Upon information and belief, AGCCA is a subsidiary of AGC, Inc., a Japanese corporation formerly known as Asahi Glass Company, Ltd. Upon information and belief, AGCCA has conducted and/or availed itself of doing business throughout the United States, including in Florida.
- dd. Defendant AGC, Inc. f/k/a Asahi Glass Co., Ltd. (“AGC”), is a corporation organized under the laws of Japan and does business throughout the United States. AGC has its principal place of business at 1-5-1, Marunouchi, Chiyoda-ku, Tokyo 100-8405 Japan.

- ee. Defendant Deepwater Chemicals, Inc. is a Delaware corporation with its principal place of business located at 196122 E County Road 40, Woodward, OK 73801. Upon information and belief, Deepwater Chemicals, Inc. has conducted and/or availed itself of doing business throughout the United States, including in Florida.
 - ff. Defendant Dynax Corporation is a Delaware corporation with its principal place of business located at 103 Fairview Park Drive, Elmsford, New York 10523. Upon information and belief, Dynax Corporation has conducted and/or availed itself of doing business throughout the United States, including in Florida.
 - gg. Defendant Archroma Management, LLC, is a foreign limited liability company registered in Switzerland, with a principal business address of Neuhofstrasse 11, 4153 Reinach, Basel-Land, Switzerland.
 - hh. Defendant Archroma U.S., Inc. is a Delaware corporation with its principal place of business at 5435 77 Center Dr., #10, Charlotte, NC 28217. Upon information and belief, Archroma U.S., Inc. is a subsidiary of Archroma Management, LLC. Upon information and belief, Archroma U.S., Inc. has conducted and/or availed itself of doing business throughout the United States, including in Florida.
 - ii. Upon information and belief, Defendants John Doe 1-49 were designers, manufacturers, marketers, distributors, and/or sellers of Fluorosurfactant Products that have and continue to contaminate Plaintiff's Property. Although the identities of the John Doe Defendants are currently unknown, it is expected that their names will be ascertained during discovery, at which time Plaintiff will move for leave of this Court to add those individuals' actual names to the Complaint as Defendants.
23. Any and all references to a Defendant or Defendants in this Complaint include any predecessors, successors, parents, subsidiaries, affiliates and divisions of the named Defendants.

24. When the term “Defendants” is used alone, it refers to all Defendants named in this Complaint jointly and severally. When reference is made to any act or omission of the Defendants, it shall be deemed to mean that the officers, directors, agents, employees, or representatives of the Defendants committed or authorized such act or omission, or failed to adequately supervise or properly control or direct their employees while engaged in the management, direction, operation or control of the affairs of Defendants, and did so while acting within the scope of their employment or agency.

FACTUAL ALLEGATIONS

A. THE CONTAMINANTS: PFOA & PFOS

25. PFOA and PFOS are man-made chemicals within a class known as perfluoroalkyl acid (“PFAA”). PFAAs are part of the larger chemical family known as per- and polyfluoroalkyl substances (“PFAS”). PFAA is composed of a chain of carbon atoms in which all but one of the carbon atoms are bonded to fluorine atoms, and the last carbon atom is attached to a functional group. The carbon-fluorine bond is one of the strongest chemical bonds that occur in nature, which is a reason why these molecules are so persistent. PFOA and PFOS contain eight carbon-fluorine bonds. For this reason, they are sometimes referred to as “C8.”

26. PFOA and PFOS are highly water soluble, which increases the rate at which they spread throughout the environment, contaminating soil, groundwater, and surface water. Their mobility is made more dangerous by their persistence in the environment and resistance to biologic, environmental, or photochemical degradation.¹

¹ See EPA, Drinking Water Health Advisory for Perfluorooctanoic Acid (PFOA), EPA Document Number: 822-R-16-005 (May 2016) at 16; and Drinking Water Health Advisory for Perfluorooctane Sulfonate (PFOS), EPA Document Number: 822-R-16-004 (May 2016) at 16, both available at <https://www.epa.gov/ground-water-and-drinking-water/supporting-documents-drinking-water-health-advisories-pfoa-and-pfos>.

27. PFOA and PFOS are readily absorbed in animal and human tissues after oral exposure and accumulate in the serum, kidney, and liver. They have been found globally in water, soil, air, as well as in human food supplies, breast milk, umbilical cord blood, and human serum.²

28. PFOA and PFOS are persistent in the human body. A short-term exposure can result in a body burden that persists for years and can increase with additional exposures.³

29. Since they were first produced, information has emerged showing negative health effects caused by exposure to PFOA and PFOS.

30. According to the United States Environmental Protection Agency (“EPA”), “...studies indicate that exposure of PFOA and PFOS over certain levels may result in...developmental effects to fetuses during pregnancy or to breastfed infants (e.g., low birth weight, accelerated puberty, skeletal variations), cancer (e.g., testicular, kidney), liver effects (e.g., tissue damage), immune effects (e.g., antibody production and immunity), thyroid effects and other effects (e.g., cholesterol changes).”⁴

31. EPA has also warned that “there is suggestive evidence of carcinogenic potential for PFOS.”⁵

32. EPA has noted that “drinking water can be an additional source [of PFOA/PFOS in the body] in the small percentage of communities where these chemicals have contaminated water supplies.” In communities with contaminated water supplies, “such contamination is typically

² See EPA Document Number: 822-R-16-005 (May 2016) at 18-20, 25-27; and EPA Document Number: 822-R-16-004 (May 2016) at 19-21, 26 28.

³ See EPA Document Number: 822-R-16-005 (May 2016) at 55; and EPA Document Number: 822-R-16-004 (May 2016) at 55.

⁴ See “Fact Sheet PFOA & PFOS Drinking Water Health Advisories,” EPA Document Number: 800-F-16-003, available at <https://www.epa.gov/ground-water-and-drinking-water/supporting-documents-drinking-water-health-advisories-pfoa-and-pfos>.

⁵ See “Health Effects Support Document for Perfluorooctane Sulfonate (PFOS)” U.S. Environmental Protection Agency Office of Water Health and Ecological Criteria Division, EPA Document Number: 822-R-16-002, available at <https://www.epa.gov/ground-water-and-drinking-water/supporting-documents-drinking-water-health-advisories-pfoa-and-pfos>.

localized and associated with a specific facility, for example...an airfield at which [PFOA/PFOS] were used for firefighting.”⁶

33. EPA has issued Health Advisory Levels of 70 parts per trillion (“ppt”) for PFOA and PFOS found in drinking water. When both PFOA and PFOS are found in drinking water, the combined concentrations should not exceed 70 ppt.

34. On June 15, 2022, EPA issued interim, updated drinking water health advisories of 0.004 ppt for PFOA and 0.02 ppt PFOS that replace those EPA issued in 2016.⁷

B. AQUEOUS FILM-FORMING FOAM

35. AFFF is a type of water-based foam that was first developed in the 1960s to extinguish flammable liquid fuel fires at airports and military bases, among other places.

36. The AFFF designed, manufactured, marketed, distributed, and/or sold by Defendants, or which Defendants assumed and/or acquired liabilities for, contained either or both PFOA and PFOS, or the chemical precursors to PFOA or PFOS.

37. PFOS and/or the chemical precursors to PFOS contained in 3M’s AFFF were manufactured by 3M’s patented process of electrochemical fluorination.

38. All other Defendants manufactured fluorosurfactants for use in AFFF through the process of telomerization. Telomerization produced fluorotelomers, including PFOA and/or the chemical precursors to PFOA.

39. AFFF can be made without PFOA, PFOS, or their precursor chemicals. Fluorine-free foams and short-chains foams do not release PFOA, PFOS, and/or their precursor chemicals into the environment.

⁶ See “Fact Sheet PFOA & PFOS Drinking Water Health Advisories,” EPA Document Number: 800-F-16-003, available at <https://www.epa.gov/ground-water-and-drinking-water/supporting-documents-drinking-water-health-advisories-pfoa-and-pfos>.

⁷ See “Technical Fact Sheet: Drinking Water Health Advisories for Four PFAS (PFOA, PFOS, GenX chemicals, and PFBS),” EPA 822-F-22-002, available at <https://www.epa.gov/newsreleases/epa-announces-new-drinking-water-health-advisories-pfas-chemicals-1-billion-bipartisan>.

40. AFFF is used to extinguish fires that are difficult to fight, particularly fires that involve petroleum or other flammable liquids. AFFF is typically sprayed directly onto a fire, where it works by coating the ignited fuel source, preventing its contact with oxygen and suppressing combustion.

41. When used as the Defendants intended and directed, Defendants' AFFF releases PFOA, PFOS, and/or their precursor chemicals into the environment.

42. Once free in the environment, these chemicals do not hydrolyze, photolyze, or biodegrade under typical environmental conditions and are extremely persistent in the environment. As a result of their persistence, they are widely distributed throughout soil, air, and groundwater.

43. The use of Defendants' Fluorosurfactant Products as directed and intended by the Defendants allowed PFOA, PFOS, and/or their precursor chemicals to enter into and onto Plaintiff's Property where these compounds migrated through the subsurface and into the groundwater, thereby contaminating the surface water, soil, sediment, and groundwater, as well as causing other extensive and ongoing damage to Plaintiff's Property.

44. Due to the chemicals' persistent nature, among other things, these chemicals have, and continue to cause injury and damage to Plaintiff's Property.

C. DEFENDANTS' KNOWLEDGE OF PFOA AND PFOS HAZARDS

45. On information and belief, by the early 1980s, Defendants knew, or reasonably should have known, among other things, that: (a) PFOA and PFOS are toxic; and (b) when sprayed in the open environment per the instructions given by the manufacturer, PFOA and PFOS readily migrate through the subsurface, mix easily with groundwater, resist natural degradation, render drinking water unsafe and/or non-potable, and can be removed from public drinking water supplies only at substantial expense.

46. Defendants also knew or reasonable should have known that PFOA and PFOS could be absorbed into the lungs and gastrointestinal tract, potentially causing severe damage to the liver, kidneys, and central nervous system, in addition to other toxic effects, and that PFOA and PFOS are known carcinogens that cause genetic damage.

47. In 1980, 3M published data in peer reviewed literature showing that humans retain PFOS in their bodies for years. Based on that data, 3M estimated it could take a person up to 1.5 years to clear just half of the accumulated PFOS from their body after all exposures had ceased.⁸

48. By the early 1980s, the industry suspected a correlation between PFOS exposure and human health effects. Specifically, manufacturers observed bioaccumulation of PFOS in workers' bodies and birth defects in children of workers.

49. In 1981, DuPont tested for and found PFOA in the blood of female plant workers in Parkersburg, West Virginia. DuPont observed and documented pregnancy outcomes in exposed workers, finding two of seven children born to female plant workers between 1979 and 1981 had birth defects—one an “unconfirmed” eye and tear duct defect, and one a nostril and eye defect.⁹

50. Beginning in 1983, 3M documented a trend of increasing levels of PFOS in the bodies of 3M workers. In an internal memo, 3M's medical officer warned “we must view this present trend with serious concern. It is certainly possible that ... exposure opportunities are providing a potential uptake of fluorochemicals that exceeds excretion capabilities of the body.”¹⁰

⁸ See Letter from 3M to Office of Pollution Prevention and Toxics, EPA titled “TSCA 8e Supplemental Submission, Docket Nos. 8EHQ-0373/0374 New Data on Half Life of Perfluorochemicals in Serum,” available at <http://www.ewg.org/research/dupont-hid-teflon-pollution-decades>.

⁹ See Memorandum “C-8 Blood Sampling Results, Births and Pregnancies,” available at <http://www.ewg.org/research/dupont-hid-teflon-pollution-decades>.

¹⁰ See Memorandum “Organic Fluorine Levels,” August 31, 1984, available at <http://www.ewg.org/research/dupont-hid-teflon-pollution-decades>.

51. Based on information and belief, in 2000, under pressure from the EPA, 3M announced that it was phasing out PFOS and U.S. production of PFOS; 3M's PFOS-based AFFF production did not fully phase out until 2002.

52. From 1951, DuPont, and on information and belief, Chemours, designed, manufactured, marketed, and sold Fluorosurfactant Products, including Teflon nonstick cookware, and more recently PFAS feedstocks, such as Forafac 1157 N, for the use in the manufacture of AFFF products.

53. Based on information and belief, in 2001 or earlier, DuPont manufactured, produced, marketed, and sold Fluorosurfactant Products and/or PFAS feedstocks to some or all of the AFFF product manufacturers for use in their AFFF products that were discharged into the environment and contaminated Plaintiff's Property.

54. DuPont had been studying the potential toxicity of PFOA since at least the 1960s and knew that it was contaminating drinking water drawn from the Ohio River and did not disclose to the public or to government regulators what they knew about the substance's potential effects on humans, animals, or the environment.¹¹

55. By December 2005, the EPA uncovered evidence that DuPont concealed the environmental and health effects of PFOA, and the EPA announced the "Largest Environmental Administrative Penalty in Agency History."¹² The EPA fined DuPont for violating the Toxic Substances Control Act "Section 8(e)—the requirement that companies report to the EPA substantial risk information about chemicals they manufacture, process or distribute in commerce."¹³

¹¹ See, e.g., Fred Biddle, "DuPont confronted over chemical's safety," *Wilmington News Journal* (Apr. 13, 2003). The *Wilmington News Journal* is published in Wilmington, Ohio.

¹² \$16.5 million.

¹³ U.S. Env'tl. Prot. Agency, Reference News Release, "EPA Settles PFOA Case Against DuPont for Largest Environmental Administrative Penalty in Agency History" (Dec. 14, 2005),

56. By July 2011, DuPont could no longer credibly dispute the human toxicity of PFOA, which it continued to manufacture. The “C8 Science Panel” created as part of the settlement of a class action over DuPont’s releases from the Washington Works plant had reviewed the available scientific evidence and notified DuPont of a “probable link”¹⁴ between PFOA exposure and the serious (and potentially fatal) conditions of pregnancy-induced hypertension and preeclampsia.¹⁵ By October 2012, the C8 Science Panel had notified DuPont of a probable link between PFOA and five other conditions—high cholesterol, kidney cancer, thyroid disease, testicular cancer, and ulcerative colitis.

57. In July 2015, DuPont spun off its chemicals division by creating Chemours as a new publicly-traded company, once wholly owned by DuPont. By mid-2015, DuPont had dumped its perfluorinated chemical liabilities into the lap of the new Chemours.

58. Notwithstanding this knowledge, Defendants negligently and carelessly: (1) designed, manufactured, marketed, distributed, and/or sold Fluorosurfactant Products; (2) issued instructions on how Fluorosurfactant Products should be used and disposed of (namely, by washing the foam into the soil or wastewater system), thus improperly permitting PFOA and/or PFOS to contaminate the surface water, soil, and groundwater in and around the Plaintiff’s Property; (3) failed to recall and/or warn the users of Fluorosurfactant Products, negligently designed products containing or degrading into PFOA and/or PFOS, of the dangers of surface water, soil, and groundwater contamination as a result of standard use and disposal of these products; and (4) further failed and refused to issue the appropriate warnings and/or recalls to the

<https://www.epa.gov/enforcement/reference-news-release-epa-settles-pfoa-case-against-dupont-largest-environmental> (last viewed on January 30, 2018).

¹⁴ Under the settlement, “probable link,” means that given the available scientific evidence, it is more likely than not that among class members a connection exists between PFOA/C8 exposure and a particular human disease.

¹⁵ See The C8 Science Panel, Status Report: PFOA (C8) exposure and pregnancy outcome among participants in the C8 Health Project (July 15, 2011), http://www.c8sciencepanel.org/pdfs/Status_Report_C8_and_pregnancy_outcome_15July2011.pdf (last viewed on January 28, 2018).

users of Fluorosurfactant Products, notwithstanding the fact that Defendants knew the identity of the purchasers of the Fluorosurfactant Products.

59. As a direct result of Defendants' actions and/or inactions alleged in this Complaint, Plaintiff's Property has been and will continue to be contaminated with PFAS, including PFOA and PFOS, creating an environmental hazard, unless such contamination is remediated. As a direct and proximate result of Defendants' actions and/or inactions, Plaintiff must assess, evaluate, investigate, monitor, remove, clean up, correct, treat, and remediate PFOA and PFOS contamination on its Property at significant expense, loss and damage.

60. Defendants had a duty and breached their duty to evaluate and test such Fluorosurfactant Products adequately and thoroughly to determine their potential human health and environmental impacts before they sold such products. They also had a duty and breached their duty to minimize the environmental harm caused by Fluorosurfactant Products.

D. OLD DUPONT AND RELATED ENTITIES' PLANS TO SHIELD ASSETS FROM PFAS LIABILITIES

61. By 2013, Old DuPont faced mounting liabilities arising out of its long-running manufacture, use, marketing, distribution, and sale of PFOA and/or its chemical precursors throughout the country. These liabilities included, among other things, clean-up costs, remediation obligations, tort damages, natural resources damages, and potential punitive damages.

62. Upon information and belief, by 2013, in order to shield its assets from these liabilities and make itself a more appealing merger partner, Old DuPont began to consider and/or engage in a complex series of corporate restructurings and spin-offs.

63. In or around 2014, Old DuPont formed The Chemours Company as a wholly-owned and operated subsidiary. Shortly thereafter, Old DuPont transferred its "Performance Chemicals" business (which included Teflon® and other products, the manufacture of which involved the use of PFOA and other PFAS) to Chemours.

64. At the time of the transfer of its Performance Chemicals business to Chemours, Old DuPont had been sued, threatened with suit, and/or had knowledge of the likelihood of litigation to be filed regarding Old DuPont's liabilities for damages and injuries arising from its manufacture and sale of its PFAS products, including PFOA and its chemical precursors.

65. Upon information and belief, prior to the spinoff, Chemours was a wholly-owned subsidiary of Old DuPont and its four-member Board of Directors consisted of three Old DuPont employees and a former member of Old DuPont's Board of Directors. Then, effective immediately prior to the spinoff, the Chemours Board of Directors doubled in size, the three Old DuPont employees resigned, and seven new members were appointed to fill the vacancies. This new Chemours Board of Directors did not take part in negotiating the Separation Agreement.

66. In or around July 1, 2015, Old DuPont completed the spin-off Chemours as a separate public entity and saddled Chemours with Old DuPont's massive PFAS liabilities.

67. Although many of the details of the Separation Agreement remain largely hidden from the public, upon information and belief, as part of the Separation Agreement, Chemours accepted broad assumption of Old DuPont's environmental liabilities arising out of its long-running manufacture, use, discharge, marketing, distribution, and sale of PFAS.

68. Additionally, Chemours agreed to assume for itself and indemnify Old DuPont against all liabilities relating to or arising from the operation of the Performance Chemicals business at any time and regardless of which entity is named in any action or against whom such liabilities are asserted or determined.

69. Further, Chemours agreed to assume for itself and indemnify Old DuPont from all environmental liabilities that arose prior to the spinoff if Old DuPont reasonably determined that 50.1% of the liabilities were attributable to the Performance Chemicals business.

70. Upon information and belief, the value of the assets Chemours transferred to Old DuPont was substantially more than the value of the assets it received from Old DuPont, and Chemours assumed billions of dollars of Old DuPont's PFAS and other liabilities.

71. Old DuPont knew that Chemours was undercapitalized and unable to satisfy the massive liabilities that it assumed from Old DuPont. In addition to the assumption of such liabilities, Chemours was required to provide broad indemnification to Old DuPont in connection with these liabilities, which is uncapped and does not have a survival period.

72. In or around December 2015, Old DuPont entered into an agreement with Dow, Inc. ("Old Dow") pursuant to which Old DuPont and Old Dow merged with subsidiaries of a newly formed holding company, DowDuPont, Inc. ("DowDuPont"), which was created solely for the purpose of effectuating the merger. Old DuPont and Old Dow became subsidiaries of DowDuPont.

73. Following its creation, DowDuPont engaged in a number of realignments and divestitures, the details of which remain largely hidden from Plaintiff and other creditors, intended to frustrate and/or hinder creditors with claims against Old DuPont. Upon information and belief, the net effect of these transactions was the transfer, directly or indirectly, of a substantial portion of Old DuPont's assets to DowDuPont for far less than these assets were worth.

74. By 2019, DowDuPont spun-off two new publicly traded companies, Corteva, Inc. and Dow, Inc. ("New Dow"). DowDuPont was then renamed DuPont de Nemours, Inc. ("New DuPont").

75. Upon information and belief, Corteva currently holds Old DuPont as a subsidiary.

76. Upon information and belief, as part of the DowDuPont Separation Agreement, Corteva and New DuPont also assumed direct financial liability of Old DuPont that was not related to the Agriculture, Material Science, or Specialty Products Businesses, including the PFAS liabilities which are allocated on a pro rata basis between Corteva and New DuPont.

E. THE IMPACT OF PFOA AND PFOS ON PLAINTIFF’S PROPERTY

77. PFOA and PFOS have been detected in soil, sediment, and water extracted from Plaintiff’s Property. PFOA and PFOS have been detected and/or are present in certain of areas of Plaintiff’s Property.

78. The detection and/or presence of PFOA and PFOS, and the threat of further detection and/or presence of PFOA and PFOS, in Plaintiff’s Property has resulted, and will continue to result, in significant injuries and damage to Plaintiff.

79. Upon information and belief, the invasion of Plaintiff’s Property with PFOA and PFOS is recurring, resulting in new harm to Plaintiff on each occasion.

80. The injuries to Plaintiff caused by Defendants’ conduct constitute an unreasonable interference with, and damage to, Plaintiff and Plaintiff’s Property. Plaintiff’s interests in protecting its Property constitute a reason for seeking damages sufficient to restore such Property to its pre-contamination condition, in addition to the other damages sought herein.

FIRST CAUSE OF ACTION

STRICT LIABILITY – DEFECTIVE DESIGN

81. Plaintiff realleges and reaffirms all allegations set forth in the preceding paragraphs.

82. The Fluorosurfactant Products which were designed, manufactured, marketed, sold and/or distributed by Defendants were defectively designed when they entered the stream of commerce and received by Plaintiff. Said Fluorosurfactant Products did not include sufficient instructions, did not include sufficient warning of potential safety or environmental hazards, and use of the Fluorosurfactant Products caused pollution of soil and surface and groundwater.

83. Defendants’ Fluorosurfactant Products did not perform as safely as an ordinary consumer would have expected them to perform when used or misused in an intended or reasonably foreseeable way.

84. Defendants represented, asserted, claimed and/or warranted that their Fluorosurfactant Products could be used in conformity with accompanying instructions and labels in a manner that would not cause injury or damage.

85. As manufacturers, designers, refiners, formulators, distributors, suppliers, sellers, and marketers of Fluorosurfactant Products, Defendants owed a duty to all persons whom Defendants' products might foreseeably harm, including Plaintiff, not to manufacture, sell, or market any product which is unreasonably dangerous for its intended and foreseeable uses.

86. Defendants' Fluorosurfactant Products used on and/or in the vicinity of Plaintiff's Property were used in a reasonably foreseeable manner and without substantial change in the condition in which the products were sold.

87. It was reasonably foreseeable that Defendants' Fluorosurfactant Products would be used on and/or in the vicinity of Plaintiff's Property.

88. Defendants knew, or should have known, that use of Defendants' Fluorosurfactant Products in their intended manner would result in the spillage, discharge, disposal, or release of PFAS into the surface water, soil, and groundwater.

89. Furthermore, Defendants knew, or should have known, that their Fluorosurfactant Products were toxic, could not be contained, and do not readily degrade in the environment.

90. Plaintiff was, is and will continue to be harmed by Defendants' defectively designed Fluorosurfactant Products.

91. Defendants' Fluorosurfactant Products' failure to perform safely was a substantial factor in causing Plaintiff's harm.

92. The gravity of the environmental harm resulting from Defendants' Fluorosurfactant Products was, is, and will be enormous because PFAS contamination is widespread, persistent and toxic.

93. The likelihood that this harm would occur was, is, and will be very high because Defendants knew and/or should have known that Defendants' Fluorosurfactant Products were toxic, could not be contained, and do not readily degrade in the environment.

94. At the time of manufacture, there were safer alternative designs that were feasible, cost effective, and advantageous, including not using PFOS, PFOA and/or their precursor chemicals in products.

95. As a direct and proximate result of Defendants' above described acts and omissions, Plaintiff has incurred, continues to incur, and/or will incur costs and damages related to the PFAS contamination of its Property, including but not limited to the investigation, monitoring, treatment, testing, remediation, removal, filtration, and/or disposal of the PFAS contamination, operating, maintenance and consulting costs, legal fees, diminution of property value, and all other equitable and applicable damages.

SECOND CAUSE OF ACTION

STRICT LIABILITY – FAILURE TO WARN

96. Plaintiff realleges and reaffirms all allegations set forth in the preceding paragraphs.

97. As manufacturers, distributors, suppliers, sellers, and marketers of Fluorosurfactant Products, Defendants had a duty to issue warnings to Plaintiff, the public, water providers, and public officials of the risks posed by PFOA and PFOS.

98. Defendants knew that their Fluorosurfactant Products would be purchased, transported, stored, handled, and used without notice of the hazards that PFOA and PFOS pose to human health and the environment.

99. Defendants breached their duty to warn by unreasonably failing to provide Plaintiff, public officials, purchasers, downstream handlers, and/or the general public with warnings about

the potential and/or actual contamination of the environment by PFOA and PFOS, despite Defendants' knowledge that PFOA and PFOS were real and potential threats to the environment.

100. Fluorosurfactant Products purchased or otherwise acquired from Defendants were used, discharged, and/or released at and/or in the vicinity of Plaintiff's Property.

101. Defendants' Fluorosurfactant Products were used in a reasonably foreseeable manner and without substantial changes in the condition in which the products were sold.

102. Defendants' Fluorosurfactant Products used on and/or in the vicinity of Plaintiff's Property were defective in design and unreasonably dangerous for the reasons set forth above.

103. Despite the known and/or foreseeable environmental and human health hazards associated with the use and/or disposal of Defendants' Fluorosurfactant Products on or near Plaintiff's Property, including contamination of Plaintiff's Property with PFOA and/or PFOS, Defendants failed to provide adequate warnings of, or take any other precautionary measures to mitigate, those hazards.

104. In particular, Defendants failed to describe such hazards or provide any precautionary statements regarding such hazards in the labeling of their Fluorosurfactant Products.

105. As a direct and proximate result of Defendants' above described acts and omissions, Plaintiff has incurred, continues to incur, and/or will incur costs and damages related to the PFAS contamination of its Property, including but not limited to the investigation, monitoring, treatment, testing, remediation, removal, filtration, and/or disposal of the PFAS contamination, operating, maintenance and consulting costs, legal fees, diminution of property value, and all other equitable and applicable damages.

THIRD CAUSE OF ACTION

PUBLIC NUISANCE

106. Plaintiff realleges and reaffirms all allegations set forth in the preceding paragraphs.

107. Defendants designed, manufactured, distributed, marketed, sold, and/or assumed or acquired liabilities for the manufacture and/or sale of Fluorosurfactant Products in a manner that created, or participated in creating, a public nuisance that unreasonably and substantially interferes with the use and enjoyment of Plaintiff's Property, and unreasonably endangers or injures the health, safety, and comfort of the general public and Plaintiff, causing inconvenience and annoyance.

108. The unreasonable and substantial interference with the use and enjoyment of Plaintiff's Property includes, but is not limited to: the contamination of Plaintiff's Property, including Plaintiff's water supply source, with PFAS; and the exposure to known toxic chemicals manufactured and/or sold by Defendants.

109. The presence of PFAS causes significant costs, inconvenience, and annoyance to Plaintiff. The contamination affects a substantial number of people who rely upon Plaintiff for commercial and recreational purposes and interferes with the rights of the public at large to clean and safe natural resources and environment.

110. The seriousness of the environmental and human health risk far outweighs any social utility of Defendants' conduct in manufacturing Fluorosurfactant Products and concealing the dangers those Products posed to human health and the environment.

111. Actual and threatened PFOA and/or PFOS contamination caused by Defendants' conduct has caused, and continues to cause, injury to Plaintiff in the form of present and serious interference with the use, benefit, and/or enjoyment of its Property in a way that an ordinary, reasonable person would find is a substantial inconvenience and annoyance.

112. As a result of the actual and threatened PFAS contamination caused by Defendants' conduct, Plaintiff has suffered, and will continue to suffer, harm that is different from the type of

harm suffered by the general public, and Plaintiff has incurred, and will continue to incur, substantial costs to remove the contamination from its Property.

113. Plaintiff did not consent to the conduct that resulted in the contamination of its Property.

114. Defendants' conduct was a substantial factor in causing the harm to Plaintiff.

115. Defendants knew or, in the exercise of reasonable care, should have known that the use and introduction of their Fluorosurfactant Products into the environment would and has continuously, unreasonably and seriously endangered and interfered with the ordinary safety, use, benefit, and enjoyment of Plaintiff's Property by Plaintiff.

116. As a direct and proximate result of Defendants' above described acts and omissions, Plaintiff has incurred, continues to incur, and/or will incur costs and damages related to the PFAS contamination of its Property, including but not limited to the investigation, monitoring, treatment, testing, remediation, removal, filtration, and/or disposal of the PFAS contamination, operating, maintenance and consulting costs, legal fees, diminution of property value, and all other equitable and applicable damages.

FOURTH CAUSE OF ACTION

PRIVATE NUISANCE

117. Plaintiff realleges and reaffirms all allegations set forth in the preceding paragraphs.

118. Plaintiff's Property has been, and continues to be, contaminated by PFAS as a direct and proximate result of the acts and omissions of Defendants as set forth above.

119. Actual and threatened PFAS contamination caused by Defendants' conduct has caused, and continues to cause, injury to Plaintiff in the form of present and serious interference with the ordinary safety, use, benefit, and/or enjoyment of Plaintiff's Property.

120. As a direct and proximate result of Defendants' above described acts and omissions, Plaintiff has incurred, continues to incur, and/or will incur costs and damages related to the PFAS contamination of its Property, including but not limited to the investigation, monitoring, treatment, testing, remediation, removal, filtration, and/or disposal of the PFAS contamination, operating, maintenance and consulting costs, legal fees, diminution of property value, and all other equitable and applicable damages.

FIFTH CAUSE OF ACTION

NEGLIGENCE

121. Plaintiff realleges and reaffirms all allegations set forth in the preceding paragraphs.

122. As manufacturers, refiners, formulators, distributors, suppliers, sellers, marketers, shippers, and/or handlers of Fluorosurfactant Products, Defendants owed a duty to Plaintiff, as well as to all persons whom Defendants' Fluorosurfactant Products might foreseeably harm, to exercise due care in the instructing, labeling, and warning of the handling, control, use, and disposal of Defendants' Fluorosurfactant Products.

123. Despite the fact that Defendants knew that PFOA and PFOS are toxic, can contaminate soil and water resources, and present significant risks to human health and the environment, Defendants negligently: (a) designed, manufactured, formulated, handled, labeled, instructed, controlled, marketed, promoted, and/or sold Fluorosurfactant Products; (b) issued instructions on how Fluorosurfactant Products should be used and disposed of, thus improperly permitting PFOA and/or PFOS to enter and contaminate Plaintiff's Property; (c) failed to warn the users of Fluorosurfactant Products of the dangers of soil and water contamination as a result of standard use and disposal of these products; and (d) failed and refused to issue the appropriate warnings to the users of Fluorosurfactant Products regarding the proper use and disposal of these

products, notwithstanding the fact that Defendants knew, or could determine with reasonable certainty, the identity of the purchasers of their Fluorosurfactant Products.

124. A reasonable manufacturer, seller, or distributor, under the same or similar circumstances would have warned of the danger or instructed on the safe use of Fluorosurfactant Products.

125. Plaintiff was, is, and will continue to be harmed by Defendants' conduct.

126. Defendants' Fluorosurfactant Products were designed, manufactured, marketed, distributed, and sold without adequate warning of toxicity, potential human health risks and environmental hazards.

127. Defendants were negligent by not using reasonable care to warn or instruct about the risks associated with their Fluorosurfactant Products.

128. Defendants knew or reasonably should have known that their Fluorosurfactant Products were dangerous or likely to be dangerous when used or misused in a reasonably foreseeable manner.

129. Defendants knew or reasonably should have known that users and third parties would not realize the dangers.

130. Defendants became aware of the human health risks and environmental hazards presented by their Fluorosurfactant Products by no later than the year 2000.

131. Defendants failed to recall their Fluorosurfactant Products.

132. A reasonable manufacturer, seller, or distributor, under the same or similar circumstances would have warned of the dangers or instructed on the safe use of Fluorosurfactant Products.

133. Defendants' failure to warn or instruct was a substantial factor in causing Plaintiff's harm.

134. Defendants' conduct lacked any care and was an extreme departure from what a reasonably careful company would do in the same situation to prevent harm to others and the environment, and thus Defendants were grossly negligent.

135. As a direct and proximate result of Defendants' above described acts and omissions, Plaintiff has incurred, continues to incur, and/or will incur costs and damages related to the PFAS contamination of its Property, including but not limited to the investigation, monitoring, treatment, testing, remediation, removal, filtration, and/or disposal of the PFAS contamination, operating, maintenance and consulting costs, legal fees, diminution of property value, and all other equitable and applicable damages.

SIXTH CAUSE OF ACTION

NEGLIGENCE PER SE

136. Plaintiff realleges and reaffirms all allegations set forth in the preceding paragraphs.

137. Plaintiff alleges that Defendants negligently, carelessly and recklessly designed, manufactured, formulated, handled, labeled, instructed, controlled and/or sold Fluorosurfactant Products and/or negligently, carelessly and recklessly recommended application and disposal techniques for its Fluorosurfactant Products that they directly and proximately caused contamination of Plaintiff's Property in violation of Florida Statute § 403.161(1) (public health), which sets a standard of care or conduct to protect Plaintiff and all persons or property within its jurisdiction, as well as the environment, from the type of improper activities engaged in by Defendants.¹⁶

138. As a direct and proximate result of Defendants' above described acts and omissions, Plaintiff has incurred, continues to incur, and/or will incur costs and damages related to the PFAS contamination of its Property, including but not limited to the investigation, monitoring, treatment,

¹⁶ Soil contamination leached into the Biscayne Aquifer which is the sole source of drinking water in Broward County.

testing, remediation, removal, filtration, and/or disposal of the PFAS contamination, operating, maintenance and consulting costs, legal fees, diminution of property value, and all other equitable and applicable damages.

SEVENTH CAUSE OF ACTION

FRAUDULENT TRANSFER (UFTA DEFENDANTS)

139. Plaintiff realleges and reaffirms all allegations set forth in the preceding paragraphs.

140. Plaintiff seeks equitable and other relief pursuant to the Uniform Fraudulent Transfer Act (“UFTA”) as adopted by the State of Florida in Fl. Stat. Ann. Ch. 726.101-112, against E. I. DuPont de Nemours and Company, The Chemours Company, The Chemours Company FC, LLC, Corteva, Inc., and DuPont De Nemours, Inc. (collectively, the “UFTA Defendants”).

141. Pursuant to Fl. Stat. Ann. Ch. 726.101-112, “[a] transfer made or obligation incurred by a debtor is fraudulent as to a creditor, whether the creditor’s claim arose before or after the transfer was made or the obligation was incurred, if the debtor made the transfer or incurred the obligation:

- a. With actual intent to hinder, delay, or defraud any creditor of the debtor; or
- b. Without receiving a reasonably equivalent value in exchange for the transfer or obligation, and the debtor:
 - i. Was engaged or was about to engage in a business or a transaction for which the remaining assets of the debtor were unreasonably small in relation to the business or transaction; or
 - ii. Intended to incur, or believed or reasonably should have believed that he or she would incur, debts beyond his or her ability to pay as they became due.”

142. Further, the statute states, in part, that “[i]n determining actual intent under paragraph (1)(a), consideration may be given, among other factors, to whether: [...] before the transfer was

made or obligation was incurred, the debtor had been sued or threatened with suit; the transfer was of substantially all the debtor's assets; [...] the value of the consideration received by the debtor was reasonably equivalent to the value of the asset transferred or the amount of the obligation incurred.”

143. Upon information and belief, in February 2014, E. I. DuPont de Nemours and Company formed The Chemours Company as a wholly-owned subsidiary and used it to spin off DuPont's "Performance Chemicals" business line in July 2015.

144. Upon information and belief, at the time of the spinoff, DuPont's Performance Chemicals division contained the Fluorosurfactant Products business segments. In addition to the transfer of the Performance Chemicals division, The Chemours Company accepted broad assumption of liabilities for DuPont's historical use, manufacture, and discharge of PFAS.

145. Upon information and belief, at the time of the transfer of its Performance Chemicals business to The Chemours Company, DuPont had been sued, threatened with suit and/or had knowledge of the likelihood of litigation to be filed regarding DuPont's liability for damages and injuries from the manufacture and sale of Fluorosurfactant Products.

146. The UFTA Defendants acted with actual intent to hinder, delay and to defraud any creditor of the UFTA Defendants because: (1) they were engaged and or about to engage in a business for which the remaining assets of The Chemours Company were unreasonably small in relation to the business and; (2) intended to incur, or believed or reasonably should have believed or reasonably should have believed that the Chemours Company would incur, debts beyond its ability to pay as they became due.

147. The UFTA Defendants engaged in actions in furtherance of a scheme to transfer E. I. DuPont de Nemours and Company's assets out of the reach of Plaintiff, and other similar parties,

that have been damaged as a result of UFTA Defendants' conduct, omissions, and actions described herein.

148. As a result of the transfer of assets and liabilities described in this Complaint, the UFTA Defendants have attempted to limit the availability of assets to cover judgments for all of the liability for damages and injuries from the manufacturing, marketing, distribution and/or sale of Fluorosurfactant Products.

149. Pursuant to Fl. Stat. Ann. Ch. 726.101-112, Plaintiff seeks avoidance of the transfer of E. I. DuPont de Nemours and Company's liabilities for the claims brought in this Complaint and to hold the UFTA Defendants liable for any damages or other remedies that may be awarded by the Court or jury to the Plaintiff in this action.

150. Plaintiff further seeks all other rights and remedies that may be available to it under UFTA, including prejudgment remedies as available under applicable law, as may be necessary to fully compensate Plaintiff for the damages and injuries it has suffered as alleged in this Complaint.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests a trial of this Action before a jury, and that, upon a favorable verdict, this Court enter judgment in favor of Plaintiff and against Defendants, as follows:

1. Compensatory damages according to proof including, but not limited to:
 - a. costs and expenses related to the past, present, and future investigation, sampling, testing, and assessment of the extent of PFAS contamination on and within Plaintiff's Property;
 - b. costs and expenses related to the past, present, and future treatment and remediation of PFAS contamination of Plaintiff's Property;

- c. costs and expenses associated with and related to the removal and disposal of the contamination; and
 - d. costs and expenses related to the past, present, and future installation and maintenance of monitoring mechanisms to assess and evaluate PFAS on and within Plaintiff's Property.
2. Diminished property value;
 3. Consequential damages;
 4. Costs, disbursements, and attorneys' fees of this lawsuit;
 5. Pre-judgment and post-judgment interest; and
 6. Any other and further relief as the Court deems just, proper, and equitable.

DATED: January 13, 2023

Respectfully submitted,

/s/ Louis R. Caro

Louise R. Caro (FL Bar 633380)
**COSSICH, SUMICH, PARSIOLA
& TAYLOR, LLC**
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Telephone: (504) 394-9000
Fax: (504) 394-9110

**MANSON BOLVES DONALDSON
TANNER, P.A.**
109 North Brush Street, Suite 300
Tampa, Florida 33602
Telephone: (813) 514-4700
Fax: (813) 514-4701
Laura Donaldson (FL Bar 139696)

Attorneys for Plaintiff

Case #: 11-2023-CA-000079-0001-XX

Offense Date:

Party Name/Company: North Collier Fire Control And Rescue District,

File Date: 01/13/2023

Party Type: Plaintiff

Status: Pending

Name Suffix:

Case Type: Products Liability

DOB:

Court Type: CA

Citation #:

Court Events


Date	Time	Event Type	Location	Room	Notes
No records found					

Parties

Judge: Unassigned Judge

Party Name/Company	Party Type	Sex	Race	Date of Birth	AKA	Deceased	Sheriffs #
3M Company	Defendant				MINNESOTA MINING AND MANUFACTURING CO		
E I Dupont De Nemours And Company	Defendant						
The Chemours Company	Defendant						
The Chemours Company Fc Llc	Defendant						
Dupont De Nemours Inc	Defendant						
Corteva Inc	Defendant						
Chemguard Inc	Defendant						
Tyco Fire Products Lp	Defendant						
Johnson Controls International Plc	Defendant						
Central Sprinkler Llc	Defendant						
Fire Products Gp Holding Llc	Defendant						
Kidde Fenwal Inc	Defendant						
Kidde Plc Inc	Defendant						
Chubb Fire Ltd	Defendant						
Utc Fire & Security Americas Corporation Inc	Defendant						
Carrier Global Corporation	Defendant						

Party Name/Company	Party Type	Sex	Race	Date of Birth	AKA	Deceased	Sheriffs #
Raytheon Technologies Corporation	Defendant				UNITED TECHNOLOGIES CORPORATION		
National Foam Inc	Defendant						
Angus International Safety Group Ltd	Defendant						
Buckeye Fire Equipment Company	Defendant						
Arkema Inc	Defendant						
Basf Corporation	Defendant						
Chemdesign Products Inc	Defendant						
Clariant Corporation	Defendant						
Chemicals Incorporated	Defendant						
Nation Ford Chemical Company	Defendant						
Agc Chemicals Americas Inc	Defendant						
Agc Inc	Defendant				ASAHI GLASS CO LTD		
Deepwater Chemicals Inc	Defendant						
Dynax Corporation	Defendant						
Archroma Management, Llc	Defendant						
Archroma U S Inc	Defendant						
Doe 1, John	Defendant						
Doe 2, John	Defendant						
Doe 3, John	Defendant						
Doe 4, John	Defendant						
Doe 5, John	Defendant						
Doe 6, John	Defendant						
Doe 7, John	Defendant						
Doe 8, John	Defendant						
Doe 9, John	Defendant						
Doe 10, John	Defendant						
Doe 11, John	Defendant						
Doe 12, John	Defendant						
Doe 13, John	Defendant						
Doe 14, John	Defendant						
Doe 15, John	Defendant						
Doe 16, John	Defendant						
Doe 17, John	Defendant						
Doe 18, John	Defendant						

Party Name/Company	Party Type	Sex	Race	Date of Birth	AKA	Deceased	Sheriffs #
Doe 19, John	Defendant						
Doe 20, John	Defendant						
Doe 21, John	Defendant						
Doe 22, John	Defendant						
Doe 23, John	Defendant						
Doe 24, John	Defendant						
Doe 25, John	Defendant						
Doe 26, John	Defendant						
Doe 27, John	Defendant						
Doe 28, John	Defendant						
Doe 29, John	Defendant						
Doe 30, John	Defendant						
Doe 31, John	Defendant						
Doe 32, John	Defendant						
Doe 33, John	Defendant						
Doe 34, John	Defendant						
Doe 35, John	Defendant						
Doe 36, John	Defendant						
Doe 37, John	Defendant						
Doe 38, John	Defendant						
Doe 39, John	Defendant						
Doe 40, John	Defendant						
Doe 41, John	Defendant						
Doe 42, John	Defendant						
Doe 43, John	Defendant						
Doe 44, John	Defendant						
Doe 45, John	Defendant						
Doe 46, John	Defendant						
Doe 47, John	Defendant						
Doe 48, John	Defendant						
Doe 49, John	Defendant						
North Collier Fire Control And Rescue District  ()	Plaintiff						

Charges

Statute #	Count	Description	Disposition Date	Sentence	Offense Date	Citation #	Offense Level	Plea Date	Court Action	Prosecutor Action
	1				01/13/2023					

Dockets

Image	Docket Num	Effective	Count	Description
	1	01/13/2023	0	Products Liability
<input type="checkbox"/>	2	01/13/2023	0	Civil Cover Sheet with Demand for Jury Trial
<input type="checkbox"/>	3	01/13/2023	0	Complaint with Demand for Jury Trial
<input type="checkbox"/>	4	01/13/2023	0	Standing Order - Circuit
<input type="checkbox"/>	5	01/17/2023	0	Paid \$467.50 on receipt 1333939, Fully Paid
<input type="checkbox"/>	6	01/18/2023	0	Summons issued
<input type="checkbox"/>	7	01/18/2023	0	Summons issued
<input type="checkbox"/>	8	01/18/2023	0	Summons issued
<input type="checkbox"/>	9	01/18/2023	0	Summons issued
<input type="checkbox"/>	10	01/18/2023	0	Summons issued
<input type="checkbox"/>	11	01/18/2023	0	Summons issued
<input type="checkbox"/>	12	01/18/2023	0	Summons issued
<input type="checkbox"/>	13	01/18/2023	0	Summons issued
<input type="checkbox"/>	14	01/18/2023	0	Summons issued
<input type="checkbox"/>	15	01/18/2023	0	Summons issued
<input type="checkbox"/>	16	01/18/2023	0	Summons issued
<input type="checkbox"/>	17	01/18/2023	0	Summons issued
<input type="checkbox"/>	18	01/18/2023	0	Summons issued
<input type="checkbox"/>	19	01/18/2023	0	Summons issued
<input type="checkbox"/>	20	01/18/2023	0	Summons issued
<input type="checkbox"/>	21	01/18/2023	0	Summons issued
<input type="checkbox"/>	22	01/18/2023	0	Summons issued
<input type="checkbox"/>	23	01/18/2023	0	Summons issued
<input type="checkbox"/>	24	01/18/2023	0	Summons issued
<input type="checkbox"/>	25	01/18/2023	0	Summons issued
<input type="checkbox"/>	26	01/18/2023	0	Summons issued
<input type="checkbox"/>	27	01/18/2023	0	Summons issued
<input type="checkbox"/>	28	01/18/2023	0	Summons issued
<input type="checkbox"/>	29	01/18/2023	0	Summons issued
<input type="checkbox"/>	30	01/18/2023	0	Summons issued

Image	Docket Num	Effective	Count	Description
<input type="checkbox"/>	31	01/18/2023	0	Summons issued
<input type="checkbox"/>	32	01/18/2023	0	Summons issued
<input type="checkbox"/>	33	01/18/2023	0	Summons issued
<input type="checkbox"/>	34	01/18/2023	0	Summons issued
<input type="checkbox"/>	35	01/18/2023	0	Summons issued
<input type="checkbox"/>	36	01/18/2023	0	Summons issued
<input type="checkbox"/>	37	01/18/2023	0	Summons issued
<input type="checkbox"/>	38	01/19/2023	0	Paid \$320.00 on receipt 1334852, Fully Paid
<input type="checkbox"/>	39	01/24/2023	0	Problem Letter

Sentences

Date	Count	Sentence	Confinement	Term	Credit Time	Conditions	Status
No records found							

Fees

Fees

Total Balance + Interest: **\$122.50**

(The fees listed below do not necessarily reflect all outstanding fees on the case. For complete balance information, please contact the Clerk's office.)

Effective Date	Due Date	Description	Amount Due	Amount Paid	Balance	In Collections	In Judgment	Judgment Interest
01/17/2023	01/17/2023	Circuit Civil General	\$467.50	\$467.50	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
			\$910.00	\$787.50	\$122.50			\$0.00

Effective Date	Due Date	Description	Amount Due	Amount Paid	Balance	In Collections	In Judgment	Judgment Interest
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
			\$910.00	\$787.50	\$122.50			\$0.00

Effective Date	Due Date	Description	Amount Due	Amount Paid	Balance	In Collections	In Judgment	Judgment Interest
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/18/2023	01/19/2023	Circuit Civil Summons Fee	\$10.00	\$10.00	\$0.00			\$0.00
01/24/2023	01/24/2023	Additional Defendant Fee	\$122.50	\$0.00	\$122.50			\$0.00
			\$910.00	\$787.50	\$122.50			\$0.00

Fees

Plan #	Scheduled Pay Amount	Balance Due	PP
No records found			

Filing # 164755768 E-Filed 01/13/2023 07:11:17 PM

FORM 1.997. CIVIL COVER SHEET

The civil cover sheet and the information contained in it neither replace nor supplement the filing and service of pleadings or other documents as required by law. This form must be filed by the plaintiff or petitioner with the Clerk of Court for the purpose of reporting uniform data pursuant to section 25.075, Florida Statutes. (See instructions for completion.)

I. CASE STYLE

IN THE CIRCUIT/COUNTY COURT OF THE TWENTIETH JUDICIAL CIRCUIT,
IN AND FOR COLLIER COUNTY, FLORIDA

North Collier Fire Control and Rescue District
Plaintiff

Case # _____
Judge _____

vs.

3M Company, E. I. DuPont De Nemours and Company, The Chemours Company, The Chemours Company FC, LLC, DuPont de Nemours, Inc., Corteva, Inc., Chemguard, Inc., Tyco Fire Products LP, Johnson Controls International, plc, Central Sprinkler, LLC, Fire Products GP Holding, LLC, Kidde-Fenwal, Inc., Kidde PLC, Inc., Chubb Fire, Ltd., UTC Fire & Security Americas Corporation, Inc., Carrier Global Corporation, Raytheon Technologies Corporation, National Foam, Inc., Angus International Safety Group, Ltd., Buckeye Fire Equipment Company, Arkema, Inc., BASF Corporation, ChemDesign Products, Inc., Clariant Corporation, Chemicals Incorporated, Nation Ford Chemical Company, AGC Chemicals Americas, Inc., AGC, Inc. f/k/a Asahi Glass Co., Ltd., Deepwater Chemicals, Inc., Dynax Corporation, Archroma Management, LLC, Archroma U.S., Inc.

Defendant

II. AMOUNT OF CLAIM

Please indicate the estimated amount of the claim, rounded to the nearest dollar. The estimated amount of the claim is requested for data collection and clerical processing purposes only. The amount of the claim shall not be used for any other purpose.

- \$8,000 or less
- \$8,001 - \$30,000
- \$30,001- \$50,000
- \$50,001- \$75,000
- \$75,001 - \$100,000
- over \$100,000.00

III. TYPE OF CASE (If the case fits more than one type of case, select the most definitive category.) If the most descriptive label is a subcategory (is indented under a broader category), place an x on both the main category and subcategory lines.

CIRCUIT CIVIL

- Condominium
- Contracts and indebtedness
- Eminent domain
- Auto negligence
- Negligence—other
 - Business governance
 - Business torts
 - Environmental/Toxic tort
 - Third party indemnification
 - Construction defect
 - Mass tort
 - Negligent security
 - Nursing home negligence
 - Premises liability—commercial
 - Premises liability—residential
- Products liability
- Real Property/Mortgage foreclosure
 - Commercial foreclosure
 - Homestead residential foreclosure
 - Non-homestead residential foreclosure
 - Other real property actions
- Professional malpractice
 - Malpractice—business
 - Malpractice—medical
 - Malpractice—other professional
- Other
 - Antitrust/Trade regulation
 - Business transactions
 - Constitutional challenge—statute or ordinance
 - Constitutional challenge—proposed amendment
 - Corporate trusts
 - Discrimination—employment or other
 - Insurance claims
 - Intellectual property
 - Libel/Slander
 - Shareholder derivative action
 - Securities litigation
 - Trade secrets
 - Trust litigation

COUNTY CIVIL

- Small Claims up to \$8,000
- Civil
- Real property/Mortgage foreclosure

- Replevins
- Evictions
 - Residential Evictions
 - Non-residential Evictions
- Other civil (non-monetary)

COMPLEX BUSINESS COURT

This action is appropriate for assignment to Complex Business Court as delineated and mandated by the Administrative Order. Yes No

IV. REMEDIES SOUGHT (check all that apply):

- Monetary;
- Nonmonetary declaratory or injunctive relief;
- Punitive

V. NUMBER OF CAUSES OF ACTION: []

(Specify)

seven

VI. IS THIS CASE A CLASS ACTION LAWSUIT?

- yes
- no

VII. HAS NOTICE OF ANY KNOWN RELATED CASE BEEN FILED?

- no
- yes If “yes,” list all related cases by name, case number, and court.

VIII. IS JURY TRIAL DEMANDED IN COMPLAINT?

- yes
- no

IX. DOES THIS CASE INVOLVE ALLEGATIONS OF SEXUAL ABUSE?

- yes
- no

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief, and that I have read and will comply with the requirements of Florida Rule of Judicial Administration 2.425.

Signature: s/ Louise R Caro
Attorney or party

Fla. Bar # 633380
(Bar # if attorney)

Louise R Caro
(type or print name)

01/13/2023
Date

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR
COLLIER COUNTY, FLORIDA CIVIL ACTION

North Collier Fire Control And Rescue District
Plaintiff(s),

vs.

CASE NO: 11-2023-CA-000079-0001-XX

3M Company
E I Dupont De Nemours And Company
The Chemours Company
The Chemours Company Fc Llc
Dupont De Nemours Inc
Corteva Inc
Chemguard Inc
Tyco Fire Products Lp
Johnson Controls International Plc
Central Sprinkler Llc
Fire Products Gp Holding Llc
Kidde Fenwal Inc
Kidde Plc Inc
Chubb Fire Ltd
Utc Fire & Security Americas Corporation Inc
Carrier Global Corporation
Raytheon Technologies Corporation
National Foam Inc
Angus International Safety Group Ltd
Buckeye Fire Equipment Company
Arkema Inc
BASF Corporation
Chemdesign Products Inc
Clariant Corporation
Chemicals Incorporated
Nation Ford Chemical Company
Agc Chemicals Americas Inc
Agc Inc
Deepwater Chemicals Inc
Dynax Corporation
Archroma Management Llc
Archroma U S Inc
Defendant(s).

**STANDING ORDER IN CIRCUIT CIVIL CASES IN THE
TWENTIETH JUDICIAL CIRCUIT**

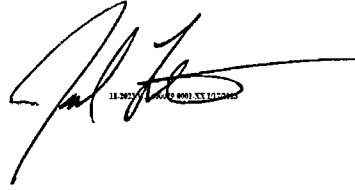
PURSUANT to Florida Rule of Civil Procedure 1.200(a), Florida Rule of Judicial Administration 2.545, and Administrative Order 1.13 entered by the Chief Judge of this Circuit, the parties are ordered to adhere to the following information and procedures applicable to civil lawsuits:

1. **SERVICE OF THIS ORDER.** The Plaintiff is directed to serve a copy of this Order with each Summons issued in this case. One copy of this Order is to be filed with the Clerk of the Circuit Court with proof of service. The Plaintiff shall pay the appropriate statutory clerk's fees on copies for each Standing Order issued and attached to the Summons.
2. **CIVIL CASE MANAGEMENT SYSTEM.** The Supreme Court of Florida has established guidelines for the prompt processing and resolution of civil cases. This Court has adopted a case management system to help meet those guidelines. In contested cases (other than residential foreclosures, involuntary commitment of sexually violent predators, Extraordinary Writs, 90 day Notice of Medical Malpractice Claim, and Administrative Appeals), the parties are required to participate in the case management system. The Court will issue a Case Management Plan after 150 days of the filing of a case in the event the parties have not submitted an Agreed Case Management Plan that has been approved by the Court. However, if it becomes necessary to amend the court-issued Case Management Plan, the parties may submit an Agreed Case Management Plan, subject to approval by the Court, or if the parties cannot agree on an Amended Plan, the parties may request a case management conference. The form of the Agreed Case Management Plan may be accessed at the Court's website at: <http://www.ca.cjis20.org/web/main/civil.asp>. If a case management conference is scheduled, attendance by trial counsel and those parties who are not represented by counsel is mandatory.

Unless all of the Defendants have been served and have defaulted, an Agreed Case Management Plan will be submitted to the Civil Case Manager via email at collieragreedplan@ca.cjis20.org on or before 150 days from the date of filing the initial complaint.

3. **ALTERNATIVE DISPUTE RESOLUTION (ADR).** ADR provides parties with an out-of-court alternative to settling disagreements. The Court requires the parties to participate in ADR prior to trial. Mediation is mandatory unless the parties agree to another form of ADR. Mediation is a conference at which an independent third party attempts to arrange a settlement between the parties. The Court, at its discretion, may order the case be referred to Non-Binding Arbitration. Non-Binding Arbitration is the process in which the court refers a case to a registered arbitrator, or panel of arbitrators, who will hear evidence and make an award which may become a final judgment if a Motion for Trial De Novo is not timely filed pursuant to Fla. R. Civ. P. 1.820(h).
4. **FAILURE TO PROSECUTE.** The Court will issue a Notice of Intent to Dismiss a case if there is no record of activity within a ten (10) month period of time.
5. **RULES OF PROFESSIONALISM.** The Twentieth Judicial Circuit has adopted Administrative Order 2.20, which sets forth standards of professional courtesy and conduct for all counsel or pro-se litigants practicing within the Circuit. The Court requires that all familiarize themselves and comply with Administrative Order 2.20. Administrative Order 2.20 may be viewed on the Court's website at: http://www.ca.cjis20.org/web/main/ao_admin.asp.

DONE AND ORDERED in Chambers at Naples, Collier County, Florida, on this
17th of January, 2023

A handwritten signature in black ink, appearing to be 'Paul H.', written over a faint digital stamp. The signature is fluid and cursive.

11-2023-CA-00079-0001-XX 1/17/2023

Unassigned Judge, Circuit Judge

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **3M Company**

c/o Registered Agent
Corporation Service Company
1201 Hays Street
Tallahassee, Florida 32301-2525

TO THE DEFENDANT:

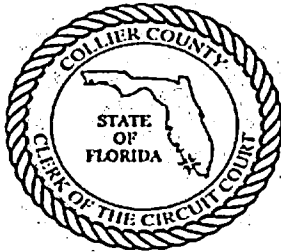
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iguaz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez

pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **AGC Chemicals Americas, Inc.**

**c/o Registered Agent
Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801**

TO THE DEFENDANT:

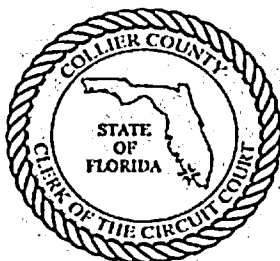
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Lopez
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez

pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tandè ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tandè byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **AGC, Inc.**

**1-5-1, Marunouchi
Chiyoda-ku
Tokyo 100-8405 Japan**

TO THE DEFENDANT:

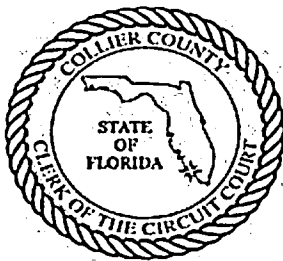
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iqez
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501**

Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal.

Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones). Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefòn ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tandè ka w la. Si ou pa ranpli repons alekri ou nan rele egzijè a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefòn). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tandè byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Angus International Safety Group, Ltd.**

**Station Road, High Bentham
Near Lancaster, United Kingdom**

TO THE DEFENDANT:

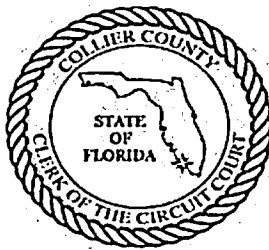
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iguz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112**

Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si

vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones). Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefòn ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzijè a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefòn). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Archroma Management, LLC**

Neuhofstrasse 11
4153 Reinach
Basel-Land, Switzerland

TO THE DEFENDANT:

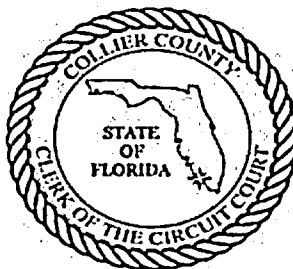
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iguaz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501

Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal.

Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones). Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefòn ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tandè ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefòn). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tandè byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: Archroma U.S., Inc.

**c/o Registered Agent
Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801**

TO THE DEFENDANT:

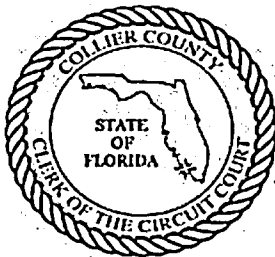
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iguz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez

pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Arkema, Inc.**

c/o Registered Agent
Corporation Service Company
1201 Hays Street
Tallahassee, FL 32301-2525

TO THE DEFENDANT:

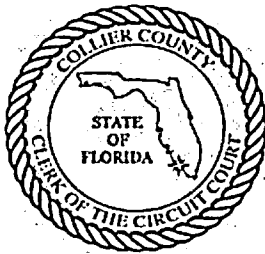
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iguz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vos argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones). Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzijè a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedè sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **BASF Corporation**

c/o Registered Agent
CT Corporation System
1200 S. Pine Island Road
Plantation, FL 33324

TO THE DEFENDANT:

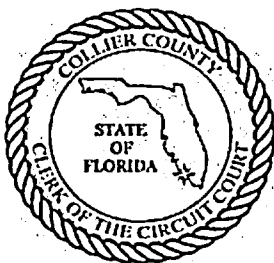
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Lopez
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous etes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedi sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Buckeye Fire Equipment Company**

**c/o Registered Agent
110 Kings Road
Mountain, NC 28086**

TO THE DEFENDANT:

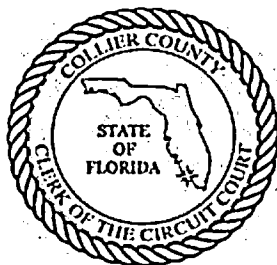
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Izuz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501**

Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal.

Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones). Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tandè ka w la. Si ou pa ranpli repons alekri ou nan rele egzijè a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tandè byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Carrier Global Corporation**

**c/o Registered Agent
United Agent Group, Inc.
801 US Highway 1
North Palm Beach, FL 33408**

TO THE DEFENDANT:

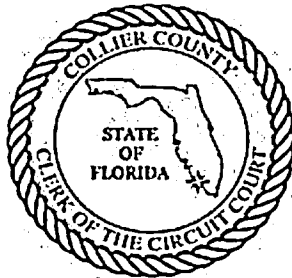
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Lopez
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous etes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedya yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumet yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedi sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Central Sprinkler, LLC**

**c/o Registered Agent
Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801**

TO THE DEFENDANT:

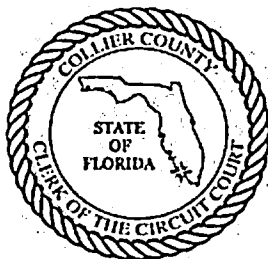
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Izuz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez

pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **ChemDesign Products, Inc.**

c/o Registered Agent
Corporation Service Company
251 Little Falls Dr.
Wilmington, DE 19808

TO THE DEFENDANT:

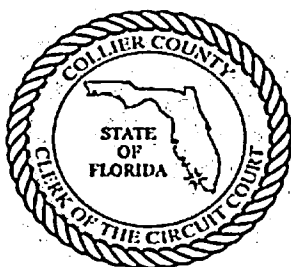
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iguz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous etes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedya yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumet yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedi sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Chemguard, Inc.**

c/o Registered Agent
The Prentice-Hall Corporation System, Inc.
251 Little Falls Dr.
Wilmington, DE 19808

TO THE DEFENDANT:

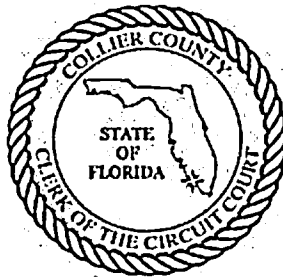
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iruz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzijè a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Chemicals Incorporated**

**c/o Registered Agent
12321 Hatcherville Road
Baytown, TX 77521**

TO THE DEFENDANT:

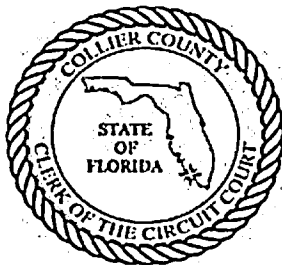
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iguz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501**

Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal.

Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones). Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedya yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Chubb Fire, Ltd.**

Littleton Road, Ashford
Middlesex, United Kingdom TW15 1TZ

TO THE DEFENDANT:

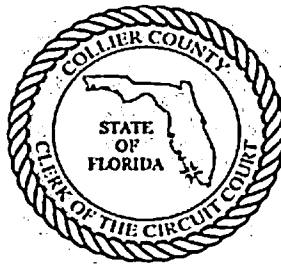
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iguz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112

Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si

vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones). Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefòn ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzijè a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefòn). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Clariant Corporation**

c/o Registered Agent
Corporation Service Company
1201 Hays Street
Tallahassee, FL 32301-2525

TO THE DEFENDANT:

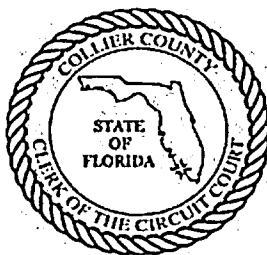
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Inuz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedya yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumet yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedu sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Corteva, Inc.**

c/o Registered Agent
CT Corporation System
1200 S. Pine Island Road
Plantation, FL 33324

TO THE DEFENDANT:

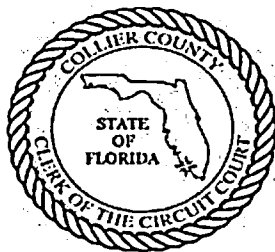
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Long
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous etes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedya yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumet yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedu sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Deepwater Chemicals, Inc.**

**c/o Registered Agent
Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801**

TO THE DEFENDANT:

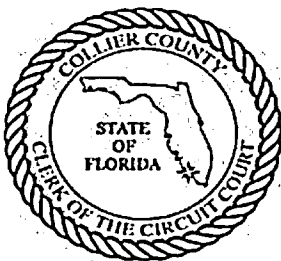
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iguaz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez

pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedya yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

**IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA**

NORTH COLLIER FIRE CONTROL AND RESCUE DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and Manufacturing Co.); AGC CHEMICALS AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co., Ltd.); ANGUS INTERNATIONAL SAFETY GROUP, LTD; ARCHROMA MANAGEMENT, LLC; ARCHROMA U.S., INC.; ARKEMA, INC.; BASF CORPORATION; BUCKEYE FIRE EQUIPMENT COMPANY; CARRIER GLOBAL CORPORATION; CENTRAL SPRINKLER, LLC; CHEMDESIGN PRODUCTS, INC.; CHEMGUARD, INC.; CHEMICALS INCORPORATED; CHUBB FIRE, LTD.; CLARIANT CORPORATION; CORTEVA, INC.; DEEPWATER CHEMICALS, INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT DE NEMOURS, INC.; DYNAX CORPORATION; E. I. DUPONT DE NEMOURS AND COMPANY; FIRE PRODUCTS GP HOLDING, LLC; JOHNSON CONTROLS INTERNATIONAL, PLC; KIDDE PLC, INC.; KIDDE -FENWAL, INC.; NATION FORD CHEMICAL COMPANY; NATIONAL FOAM, INC.; RAYTHEON TECHNOLOGIES CORPORATION (f/k/a United Technologies Corporation); THE CHEMOURS COMPANY; THE CHEMOURS COMPANY FC, LLC; TYCO FIRE PRODUCTS LP; and UTC FIRE & SECURITY AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this action on:

Defendant: **DuPont de Nemours, Inc.**

c/o Registered Agent
CT Corporation System
1200 S. Pine Island Road
Plantation, FL 33324

TO THE DEFENDANT:

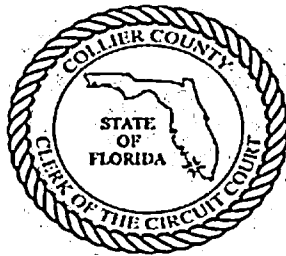
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Lopez
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous etes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedya yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumet yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedi sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Dynax Corporation**

c/o Registered Agent
Corporation Service Company
251 Little Falls Dr.
Wilmington, DE 19808

TO THE DEFENDANT:

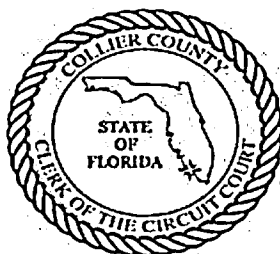
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Lopez
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedya yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumet yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedi sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

**IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA**

NORTH COLLIER FIRE CONTROL AND RESCUE DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and Manufacturing Co.); AGC CHEMICALS AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co., Ltd.); ANGUS INTERNATIONAL SAFETY GROUP, LTD; ARCHROMA MANAGEMENT, LLC; ARCHROMA U.S., INC.; ARKEMA, INC.; BASF CORPORATION; BUCKEYE FIRE EQUIPMENT COMPANY; CARRIER GLOBAL CORPORATION; CENTRAL SPRINKLER, LLC; CHEMDESIGN PRODUCTS, INC.; CHEMGUARD, INC.; CHEMICALS INCORPORATED; CHUBB FIRE, LTD.; CLARIANT CORPORATION; CORTEVA, INC.; DEEPWATER CHEMICALS, INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT DE NEMOURS, INC.; DYNAX CORPORATION; E. I. DUPONT DE NEMOURS AND COMPANY; FIRE PRODUCTS GP HOLDING, LLC; JOHNSON CONTROLS INTERNATIONAL, PLC; KIDDE PLC, INC.; KIDDE -FENWAL, INC.; NATION FORD CHEMICAL COMPANY; NATIONAL FOAM, INC.; RAYTHEON TECHNOLOGIES CORPORATION (f/k/a United Technologies Corporation); THE CHEMOURS COMPANY; THE CHEMOURS COMPANY FC, LLC; TYCO FIRE PRODUCTS LP; and UTC FIRE & SECURITY AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this action on:

Defendant: **E. I. DuPont de Nemours and Company**

c/o Registered Agent
CT Corporation System
1200 S. Pine Island Road
Plantation, FL 33324

TO THE DEFENDANT:

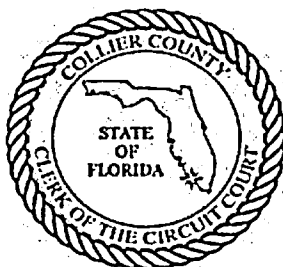
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iguaz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzijè a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Fire Products GP Holding, LLC**

c/o Registered Agent
CT Corporation System
1200 S. Pine Island Road
Plantation, FL 33324

TO THE DEFENDANT:

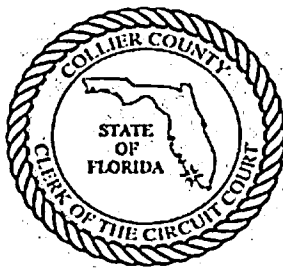
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iruz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous etes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzijje a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Johnson Controls International, plc**

**One Albert Quay
Cork, Ireland**

TO THE DEFENDANT:

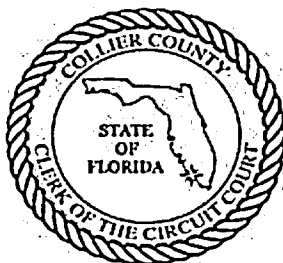
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iqez
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112**

Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si

vous ne connaissez pas d'avocat, vous pourriez téléphoner a un service de référence d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de téléphones). Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nommé ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefòn ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzijè a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefòn). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:
To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Kidde-Fenwal, Inc.**

c/o Registered Agent
United Agent Group, Inc.
801 US Highway 1
North Palm Beach, FL 33408

TO THE DEFENDANT:

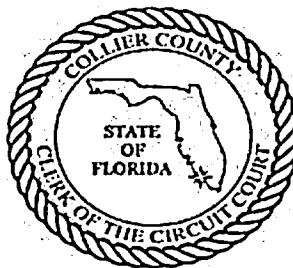
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Lopez
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous etes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzijè a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Kidde PLC, Inc.**

**c/o Registered Agent
United Agent Group, Inc.
3411 Silverside Road, Tatnall Building #104
Wilmington, DE 19810**

TO THE DEFENDANT:

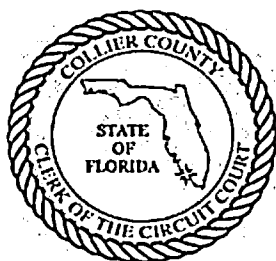
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Izuz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous etes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedi sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Nation Ford Chemical Company**

c/o Registered Agent
2300 Banks Street
Fort Mill, SC 29715

TO THE DEFENDANT:

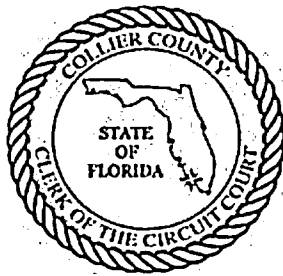
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Lopez
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501

Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal.

Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones). Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tandè ka w la. Si ou pa ranpli repons alekri ou nan rele egzijè a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tandè byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
 Cossich, Sumich, Parisola & Taylor LLC
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037
 Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **National Foam, Inc.**

**c/o Registered Agent
Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801**

TO THE DEFENDANT:

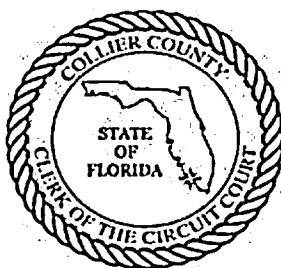
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Izuz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez

pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedya yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedi sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Raytheon Technologies Corporation**

c/o Registered Agent
CT Corporation System
1200 S. Pine Island Road
Plantation, FL 33324

TO THE DEFENDANT:

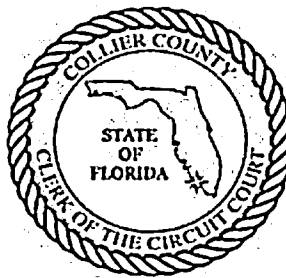
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iguz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous etes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedya yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumet yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedu sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **The Chemours Company FC, LLC**

c/o Registered Agent
CT Corporation System
1200 S. Pine Island Road
Plantation, FL 33324

TO THE DEFENDANT:

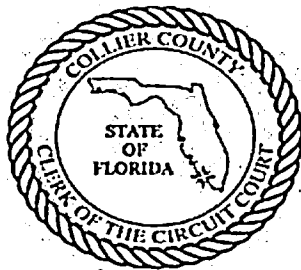
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Iguiz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous etes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedya yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedi sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **The Chemours Company**

c/o Registered Agent
CT Corporation System
1200 S. Pine Island Road
Plantation, FL 33324

TO THE DEFENDANT:

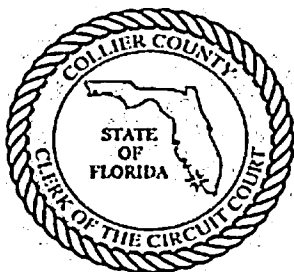
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Louz
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous etes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedya yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedi sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **Tyco Fire Products, LP**

c/o Registered Agent
CT Corporation System
1200 S. Pine Island Road
Plantation, FL 33324

TO THE DEFENDANT:

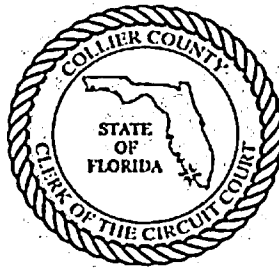
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Long
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous etes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedì legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzijè a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedyà yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumèt yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedì sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA

NORTH COLLIER FIRE CONTROL AND RESCUE
DISTRICT,

Plaintiff,

v.

3M COMPANY (f/k/a Minnesota Mining and
Manufacturing Co.); AGC CHEMICALS
AMERICAS INC.; AGC, INC. (f/k/a Asahi Glass Co.,
Ltd.); ANGUS INTERNATIONAL SAFETY
GROUP, LTD; ARCHROMA MANAGEMENT,
LLC; ARCHROMA U.S., INC.; ARKEMA, INC.;
BASF CORPORATION; BUCKEYE FIRE
EQUIPMENT COMPANY; CARRIER GLOBAL
CORPORATION; CENTRAL SPRINKLER, LLC;
CHEMDESIGN PRODUCTS, INC.; CHEMGUARD,
INC.; CHEMICALS INCORPORATED; CHUBB
FIRE, LTD.; CLARIANT CORPORATION;
CORTEVA, INC.; DEEPWATER CHEMICALS,
INC.; JOHN DOE DEFENDANTS 1 -49; DUPONT
DE NEMOURS, INC.; DYNAX CORPORATION; E.
I. DUPONT DE NEMOURS AND COMPANY; FIRE
PRODUCTS GP HOLDING, LLC; JOHNSON
CONTROLS INTERNATIONAL, PLC; KIDDE
PLC, INC.; KIDDE -FENWAL, INC.; NATION
FORD CHEMICAL COMPANY; NATIONAL
FOAM, INC.; RAYTHEON TECHNOLOGIES
CORPORATION (f/k/a United Technologies
Corporation); THE CHEMOURS COMPANY; THE
CHEMOURS COMPANY FC, LLC; TYCO FIRE
PRODUCTS LP; and UTC FIRE & SECURITY
AMERICAS CORPORATION, INC.,

Defendants.

Case No.: 112023CA0000790001XX

COMPLAINT WITH
JURY DEMAND

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this
action on:

Defendant: **UTC Fire & Security Americas Corporation, Inc.**

c/o Registered Agent
CT Corporation System
1200 S. Pine Island Road
Plantation, FL 33324

TO THE DEFENDANT:

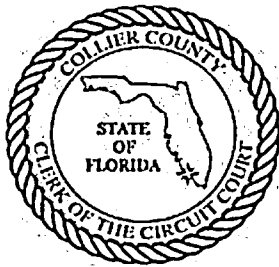
YOU ARE REQUIRED to mail or take a copy of your WRITTEN ANSWER AND DEFENSES to the attached COMPLAINT to Plaintiff's attorney, whose address is:

Louise R. Caro
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037

within 20 days after service of this summons on you, exclusive of the day of service, **AND** to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If you fail to do so, a default will be entered against you for the relief demanded in the Complaint.

DATED: January 19, 2023

CRYSTAL K. KINZEL
CLERK OF CIRCUIT COURT



Elsa Pedro Lopez
DEPUTY CLERK

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book). If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact:

Charles Rice, Administrative Services Manager

**3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

Contact should be initiated at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica. Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con

**Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org**

por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire,

vosre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones). Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous. Si vous êtes une personne handicapée qui a besoin de mesures d'adaptation pour participer à cette procédure, vous avez droit, sans frais pour vous, à une certaine assistance. Veuillez contacter

Charles Rice, Administrative Services Manager
3315 East Tamiami Trail, Suite 501
Naples, Florida 34112
Telephone: (239) 252-8800
Fax: (239) 252-8272
charlesr@ca.cjis20.org

au moins 7 jours avant votre comparution prévue au tribunal, ou immédiatement après avoir reçu cette notification si le délai avant la comparution prévue est inférieur à 7 jours; si vous êtes malentendant ou avez un trouble de la parole, appelez le 711. Enpòtan Pwosedi legal yo te pran kont ou. Ou gen 20 jou konsekitif ki soti nan dat konklizyon sa a pou ou ranpli yon repons alekri pou plent sa a nan tribinal sa a. Yon apel telefon ki senp se pa ase pou pwoteje ou. Ou oblije ranpli repons alekri ou a, ak nimewo a dosye pi wo a ak non pati yo ki te nonmen isit la, si ou vle tribinal la tande ka w la. Si ou pa ranpli repons alekri ou nan rele egzije a, ou riske pedi koz la ak sale ou, lajan ou, ak pwopriyete ou yo ka mete men sou pita, san okenn lot avi nan tribinal la. Gen lot obligasyon legal epi ou ka mande sevis imedya yon avoka. Si ou pa konnen yon avoka, ou ka rele yon sèvis referans avoka oswa yon biwo ed legal (ki nan lis nan anye telefon). Si ou chwazi pou ou soumet yon repons alekri tet ou, ou pral bezwen tou voye oswa voye yon kopi repons ekri ou nan fòm sa a an menm tan an tankou fomalite sa a "Avoka Pleyan/ Pwokire a" (Pleyan oswa avoka li) non anba a. Si ou se yon moun ki enfim ki bezwen akomodasyon pou w kab patisipe nan pwosedi sa a, ou gen dwa, san ou pa bezwen peye okenn lajan, pou w jwenn yon sèten èd. Tanpri kontakte [identify applicable court personnel by name], Kòdonatris pwogram Lwa Ameriken pou Moun ki Enfim yo nan [identify court personnel's address and telephone number], fè sa omwen 7 jou anvan dat ou gen randevou pou parèt nan Tribinal la, oswa fè sa imedyatman apre ou fin resevwa konvokasyon an si dat ou gen pou w parèt nan tribinal la mwens pase 7 jou; si ou gen pwoblèm pou w tande byen oswa pou w pale klè, rele 711.

/s/Louise R. Caro, Esq.
Cossich, Sumich, Parisola & Taylor LLC
8397 Highway 23, Suite 100
Belle Chasse, LA 70037
Florida Bar No. 633380

**IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR
COLLIER COUNTY, FLORIDA CIVIL ACTION**

North Collier Fire Control And Rescue District
PLAINTIFF,

CASE NO 11-2023-CA-000079-0001-XX

3M Company, et al.
DEFENDANT,

01/24/2023

To: Louis R. Caro, Esq
For: North Collier Fire Control And Rescue District

PLEASE READ THE FOLLOWING INFORMATION WHERE THE (X) IS MARKED:

- Filing fee was not received for Extra Defendant's John Doe 1-49 please submit \$122.50 at your earliest convenience via credit card through ePay at www.collierclerk.com or check through US Mail: Clerk of Courts, Attn: Civil, 3315 Tamiami TRL E, Ste 102 Naples, FL 34112.
- Applicant determined not Indigent. Please submit payment of the \$ filing fee at your earliest convenience via credit card through ePay at www.collierclerk.com or check through US Mail: Clerk of Courts, Attn: Civil, 3315 Tamiami TRL E, Ste 102 Naples, FL 34112.
- Your check or money order is being returned for the following reason:
 - Written amount does not match numerical amount
 - Check is not signed/dated
 - Check must be payable to the Clerk of Courts
 - Your case is paid in full.
- Your writ of possession is being returned for the following reason:
 - Address on writ of possession does not match address provided in judgment or order.
 - Check for Collier County Sheriff's Office was not provided with writ of possession.
 - Other: .
- Other: .

If you have any questions, please contact our office at (239) 252-2646 or Crystal K. Kinzel Clerk of the Circuit Court, Collier County Courthouse, 3315 Tamiami Trail East Suite 102, Naples, Florida 34112.

JS 44 (Rev. 04/21)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

North Collier Fire Control and Rescue District

(b) County of Residence of First Listed Plaintiff Collier County, FL (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Louise R. Caro, Cossich, Sumich, Parsiola & Taylor LLC 8397 Highway 23, Suite 100, Belle Chasse, LA 70037 Tel: (786) 471-0920

DEFENDANTS

3M Company, et al.

County of Residence of First Listed Defendant Ramsey County, MN (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known) Daniel L. Ring, Tyler D. Alfermann, MAYER BROWN LLP 71 South Wacker Drive, Chicago, IL 60606, Tel: (312) 782-0600

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship and incorporation status. Includes options for Citizen of This State, Citizen of Another State, and Citizen or Subject of a Foreign Country.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Large table with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal codes and descriptions.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District, 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION. Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): Brief description of cause: Product liability suit based on aqueous film forming foam (AFFF)

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: [X] Yes [] No

VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE Wendy W. Berger DOCKET NUMBER 6:19-cv-02366-WWB-EJK

DATE 3/9/2023 SIGNATURE OF ATTORNEY OF RECORD /s/ Michael D. Sloan (Fla. Bar No. 104385)

FOR OFFICE USE ONLY: RECEIPT #, AMOUNT, APPLYING IFP, JUDGE, MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.