

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WORCESTER DIVISION**

Thomas BURKE; Randi BURKE;)	
Joshua CHACKO; Asha CHACKO; Federico)	
RAFFA; Melisa CUNNINGHAM; Ryan)	Civil Case No.:
DORTCH; Melanie DORTCH; Suzanne HAYS;)	
Frederick HAYS, JR.; Lawrence HETTINGER;)	COMPLAINT
Edie HUBER; Brian KING; Julia KING; Sean)	AND JURY DEMAND
MURPHY; Kimberley MURPHY; Christopher)	
KRUEGLER; and Gillian PRICE,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
3M COMPANY (f/k/a Minnesota Mining and)	
Manufacturing, Co.); AGC, INC. (f/k/a Asahi)	
Glass Co.,Ltd.); AGC CHEMICAL)	
AMERICAS, INC.;ARCHROMA)	
MANAGEMENT, LLC; ARCHROMA U.S.,)	
INC.; ARKEMA, INC.;)	
BASF CORPORATION; BUCKEYE FIRE)	
EQUIPMENT COMPANY; CARRIER)	
GLOBAL CORPORATION; CHEMDESIGN)	
PRODUCTS, INC.; CHEMGUARD, INC.;)	
CHEMICAL COMPANY; CHEMICALS)	
INCORPORATED; THE CHEMOURS)	
COMPANY; THE CHEMOURS COMPANY)	
FC, LLC; CHUBB FIRE, LTD.; CLARIANT)	
CORPORATION; CORTEVA, INC.;)	
DEEPWATER CHEMICALS, INC.; DUPONT)	
DE NEMOURS, INC.; DYNAX)	
CORPORATION; E. I. DU PONT DE)	
NEMOURS AND COMPANY; KIDDE PLC,)	
INC.; KIDDE-FENWAL, INC.; NATIONAL)	
FOAM, INC.; NATION FORD; RAYTHEON)	
TECHNOLOGIES CORPORATION)	
(f/k/a United Technologies Corporation); TYCO)	
FIRE PRODUCTS LP (successor-in-interest to)	
The Ansul Company); and UTC FIRE &)	
SECURITY AMERICAS CORPORATION,)	
INC.,)	

Defendants.