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ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco
10/21/2015
Clerk of the Court
BY: ROMY RISK
Deputy Clerk

Attorneys for Plaintiff

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN FRANCISCO

YSIDRO LIMON, SR.,)	ASBESTOS
)	No. CGC-15-276378
Plaintiff,)	
)	DECLARATION OF NANCY T.
vs.)	WILLIAMS IN SUPPORT OF EX PARTE
)	APPLICATION FOR ORDER GRANTING
AMCORD, INC., et al.,)	LEAVE TO FILE AMENDMENT TO THE
)	COMPLAINT TO SUBSTITUTE
Defendants.)	DEFENDANT'S TRUE NAME FOR DOE 1

[C.C.P. § 473]

Date: October 22, 2015
Time: 11:00 a.m.
Dept.: 503, Hon. Teri L. Jackson
Trial Date: N/A
Filing Date: January 2, 2015

I, Nancy T. Williams, declare as follows:

1. I am an attorney at law duly licensed to practice before all courts in the State of California; and am an associate in the law firm of Brayton❖Purcell LLP, attorneys of record for plaintiff herein.
2. Plaintiff proposes to file an Amendment to the Complaint to substitute defendant's true name for "Doe," a true and correct copy of which is attached hereto as Exhibit A.
3. After further discovery and investigation and subsequent confirmation from plaintiff, it was revealed there are additional entities who may share liability for plaintiff YSIDRO LIMON, SR.'s asbestos-related disease. Therefore, the one new defendant who manufactured,

1 distributed, supplied and/or installed asbestos-containing products to plaintiff, YSIDRO LIMON,
2 SR.'s employers/jobsites, has been added to the Amendment to the complaint (UNION
3 CARBIDE CORPORATION).

4 4. I have reviewed our records and the Register of Action and have determined that the
5 DOE defendants have not been dismissed in this action.

6 5. The statute of limitations for filing claims against any defendant or adding new parties
7 to the action has not yet run.

8 6. Filing of an Amendment to the Complaint is necessary and proper to allow plaintiff to
9 allege all claims for his asbestos-related injuries and damages, to include all defendants identified
10 as proper parties herein, and properly present all theories of liability.

11 I declare under penalty of perjury, under the laws of the State of California, that the
12 foregoing is true and correct.

13 Executed on October 20, 2015 at Novato, California.

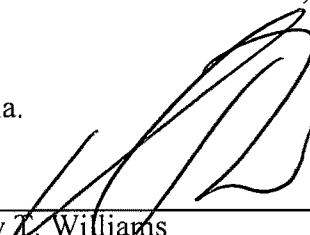
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16 Nancy T. Williams
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EXHIBIT A

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Attorneys for Plaintiff

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN FRANCISCO

YSIDRO LIMON, SR.,
Plaintiff,

vs.

AMCORD, INC., et al.,
Defendants.

ASBESTOS
No. CGC-15-276378

AMENDMENT TO COMPLAINT TO
SUBSTITUTE DEFENDANT'S TRUE
NAME FOR DOE 1

[C.C.P. Section 474]

Plaintiff amends the complaint in this action as follows:

Plaintiff has learned the true name of the defendant designated in the complaint as
fictitious DOE as set forth below:

TRUE NAME

FICTITIOUS NAME

UNION CARBIDE CORPORATION

DOE 1

Alternate Entity:

UNION CARBIDE CHEMICALS AND PLASTICS COMPANY, INC.
UNION CARBIDE AND CARBON PRODUCTS
LINDE AIR PRODUCTS COMPANY

Plaintiff makes a claim for punitive damages against defendant UNION CARBIDE CORPORATION.

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EXHIBIT A

1 Plaintiff hereby substitutes such true name for the fictitious name as set forth above
2 wherever said name appears in the complaint.

3 Dated: 6/18/15

BRAYTON ♦ PURCELL LLP

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5 By: 
6 David R. Donadio
7 Attorneys for Plaintiff
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