BARDSLEY ET AL V. BLOSENSKI ET AL NO. 02087



HARTMETZ ET AL V. BLOSENSKI ET AL NO. 07288

MISCELLANEOUS PLEADINGS AND DOCUMENTS

Deposition of Joseph Blosenski, Jr. - October 27, 1987 Civil Action No. 84-02087)

Deposition of Irene Hartmetz - June 26, 1986 (Civil Action No. 84-07288)

Deposition of Jacob A. Hartmetz - May 14, 1986 (Civil Action No. 84-07288)

Deposition of Richard Bardsley - May 1, 1986 (Civil Action No. 84-02087)

Deposition of Richard Bardsley - May 7, 1987 (Civil Action No. 84-02087)

Deposition of Renee Rutha Bardsley - May 28, 1987 (Civil Action No. 84-02087)

Medical Records of Irene and Jacob Hartmetz

Response of Plaintiffs' Hartmetz' to First Request for Production of Documents (Civil Action No. 84-07288) (April 23, 1986)

Defendant Inland Pumping and Dredging Company's Answer to the New Matter Pursuant to Pa.R.C.P. 2252(D) of Defendant ICI Americas, Inc. (July 13, 1987)

Draft Protective Order in Bardsley, et al and Hartmetz et al (July 7, 1987)

Order of Judge Wood dated August 3, 1987 Discontinuing Counterclaim of Joseph Blosenski, Jr. against Jacob Hartmetz and Irene Hartmetz

Order of Judge Wood in Bardsley v. Blosenski, Civil Action No. 84-02087, dated August 3, 1987, overruling Preliminary Objections of additional Defendants Hartmetz

Order of Judge Wood in Bardsley v. Blosenski, Civil Action No. 84-02087, dated August 3, 1987 sustaining preliminary objections of additional Defendants Jacob A. Hartmetz and Irene Hartmetz to the new matter of Budd Company.

Order of Judge Wood, in Hartmetz v. Blosenski, Civil Action No. 84-07288, overruling preliminary objections of additional

defendants Hartmetz to New Matter of Defendant ICI Americas, Inc.

Answer of A. Johnson & Co. to the New Matter of Defendant LNP Corporation and Bardsley v. Blosenski, No.84-02087 and Hartmetz v. Blosenski, No. 84-07288 (dated July 17, 1987).

Draft Protective Order in Bardsley et al v. Blosenski et al and Hartmetz v. Blosenski et al (July 29, 1987).

Blosenski's Reply to LNP Corporation's Answer to New Matter and Cross Claim to First Amended Complaint (July 21, 1987)

Ada Blosenski's Reply to ICI Americas, Inc. New Matter Cross Claim (July 21, 1987) (No. 84-02087)

Ada Blosenski's Reply to LNP Corporation's Answer with New Matter and Cross Claim to Second Amended Complaint (July 21, 1987) (No. 84-02087)

Ada Blosenski's Reply to ICI Americas Inc. New Matter Cross Claim (July 21, 1987) (No. 84-07288)

Preliminary objections of Additional Defendants Jacob A. Hartmetz and Irene O. Hartmetz to the Amended Answer and New Matter and New Matter Pursuant to Pa R.C.P. 2252(D) of Defendant, ICI Americas, Inc., to Plaintiffs' First Amended Complaint (July 27, 1987) (No. 84-02087)

Preliminary objections of the additional defendants Jacob A. Hartmetz and Irene O. Hartmetz to the Amended Answer and New Matter and New Matter Pursuant to Pa R.C.P. 2252(D) of Defendant, ICIC Americas, Inc. to Plaintiffs' Second Amended Complaint (July 27, 1987)

Plaintiffs' Reply to New Matter of Defendant ICI Americas Inc. (July 17, 1987) (No. 84-07288)

Motion to Make Rule Absolute, Order and Praecipe for Withdraw of Appearance of Wade, Wade & Wade as Counsel for Perry and Jeanne Phillips (June 24, 1987) (No. 84-02087)

Praecipe to Discontinue Additional Defendant Complaint against Jacob Hartmetz and Irene Hartmetz (June 15, 1987) (No. 84-02087)

Preliminary Objections of the Additional Defendants, Jacob A. Hartmetz and Irene O. Hartmetz to the New Matter pursuant to Rule 2252(D) of Defendant the Budd Company (March 16, 1987) (No. 84-02087).

Memorandum of Law of the Budd Company in Opposition to Preliminary Objections of Additional Defendants Jacob A. Hartmetz and Irene O. Hartmetz to the New Matter Pursuant to Rule 2252(D) of Defendant the Budd Company (April 4, 1987) (No. 84-02087).

ICI Americas, Inc. Supplemental Memorandum of Law and Opposition to Preliminary Objections of the Additional Defendants Jacob A. Hartmetz and Irene O. Hartmetz (April 9, 1987) (No. 84-02087).

Motion for Protective Order of Joseph Blosenski, Jr. (May 20, 1987) (No. 84-07288).

Draft Protective Order of Blosenski's Customer List (June 15, 1987)

Response of Plaintiff's Bardsley et al to Motion for Protective Order (June 3, 1987)

Answers of Defendant Joseph Blosenski, Jr. to Interrogatories of Defendant the Budd Company (first set) (Nos. 84-07288; 84-02087) (May 18, 1987)

Answers of Defendant Joseph Blosenski, Jr. to Request for Production of Documents (Nos. 84-07288; 84-02087) (May 15, 1987)

Notices of Deposition for Records for: a) Chester County Health Department; b) West Caln Township Police Department; c) Wagontown Fire Company; and d) Martins Corner Fire Department (No. 84-02087) (May 13, 1987)

Petition for Leave to Withdraw Appearance of Wade, Wade & Wade (No. 84-07288) (April 28, 1987)

Notice of Deposition of Plaintiffs' Richard Bardsley and Renee Bardsley (No. 84-02087) (April 16, 1987)

Reply of Defendant Ada Blosenski to New Matter of Joseph Blosenski, Jr. (No. 84-02087) (April 27, 1987)

Reply of Defendant Ada Blosesnki to Amended New Matter Pursuant to PA R.C.P. 2252(D) of Defendant A Johnson Company (No. 84-02087) (April 27, 1987)

Reply of Defendant Ada Blosenski to New Matter of Defendant ICI Americas, Inc. (No. 84-02087) (April 27, 1987)

Reply of Defendant Ada Blosenski to New Matter of Perry and Jeanne Phillips (No. 84-02087) (April 27, 1987)

Reply of Defendant Ada Blosenski to New Matter of Sartomer Company (No. 84-02087) (April 27, 1987)

Reply of Defendant Ada Blosenski to New Matter of Budd Company (No. 84-02087) (April 29, 1987)

Reply of Defendant Ada Blosenski to New Matter of Sartomer Company to Plaintiffs' Second Amended Complaint (No. 84-07288) (April 27, 1987)

Reply of Defendant Ada Blosenski to New Matter and New Matter in the Nature of a Cross Claim Pursuant to Pa R.C.P. 2252(D) of the Budd Company (No. 84-07288) (April 27, 1987)

Reply of Defendant Ada Blosenski to New Matter of ICI Americas, Inc. to Plaintiffs' Second Amended Complaint (No. 84-07288) (April 27, 1987)

Answers of Plaintiffs' Bardsley to New Matter of Defendants' Perry Phillips and Jeanne Phillips (No. 84-02087) (April 10, 1987)

Docket entries in Strausburg Landfill Litigation and Chester County C.A. No. 85-020663; E.D.Pa. C.A. No. 85-2801 (April 13, 1987)

Reply of Joseph Blosenski, Jr. to New Matter and Cross Claim New Matter of Budd Company to First Amended Complaint (No. 84-02087) (April 21, 1987)

Reply of Joseph M. Blosenski, Jr., to Phillips New Matter to First Amended Complaint (No. 84-02087) (April 21, 1987)

Reply of Joseph M. Blosenski, Jr. to ICI Americas, Inc. New Matter to Second Amended Complaint (No. 84-07288) (April 21, 1987)

Reply of Joseph Blosenski, Jr. to New Matter and Cross Claim New Matter of Budd Company to Second Amended Complaint (No. 84-07288) (April 21, 1987)

Reply of Joseph M. Blosenski, Jr. to Sartomer Company New Matter to Second Amended Complaint (No. 84-07288) (April 21, 1987)

Reply of Plaintiffs' Hartmetz' to New Matter of Defendant Sartomer Company (No. 84-07288) (April 23, 1987)

Answer of Defendant Sartomer Company to Second Amended Complaint (No. 84-07288) (April 6, 1987)

Answer of Defendants Perry Phillips and Jeanne Phillips to Plaintiffs' First Amended Complaint (No. 84-02087) (March 26, 1987)

Answer of Defendant Inland Pumping and Dredging Corporation to the New Matter and Cross Claim of Budd Company (No. 84-07288) (March 19, 1987)

Praecipe to Substitute Affidavit for Verification of Counsel of the Budd Company (No. 84-02087) (March 18, 1987)

Answer of Defendant the Budd Company to New Matter in the Nature of a Cross Claim by Defendant Joseph Blosenski, Jr. (No. 84-



07288) (March 17, 1987)

Supplemental Answers of Joseph Blosenski, Jr. to Interrogatories of Hartmetz (No. 84-02087) (February 19, 1987)

Defendant Inland Pumping and Dredging Corp's. Answer to New Matter and Cross Claim Pursuant to Pa. R.C.P. 2252(D) of Budd Company (March 6, 1987)

Answer of Plaintiffs' Bardsley to New Matter of Budd Company (No. 84-02087) (March 6, 1987)

Order of Judge Wood, dated September 25, 1987, Granting Leave to Joseph Blosenski, Jr. to file Amended Pleadings and New Matter

Preliminary Objections of Additional Defendants Jacob A. Hartmetz and Irene O. Hartmetz to Amended New Matter pursuant to Pa. R.C.P. 2252(d) of Defendant A. Johnson & Company, Inc. (No. 84-02087) (July 10, 1987)

Proposed protective order for Blosenski Customer List (August 12, 1987)

Reply of Plaintiffs' Hartmetz' to New Matters of Defendant Joseph Blosenski to Original Complaint, First Amended Complaint, and Second Amended Complaint (No. 84-07288) (August 20, 1987)

Answers of Plaintiffs' Bardsley et al to Amended New Matter of the Budd Company (No. 84-02087) (August 25, 1987)

Reply of Plaintiffs' Hartmetz' to New Matter of Defendant LNP Corporation (No. 84-070288) (August 4, 1987)

Medical records of Plaintiffs' Bardsely's prepared by Edward M. Fleegler, M.D., Dr. N.M. Warner, Richard Dunsmore, West Chester Pediatric, Dr. Allan Goldfine, Dr. William S. Lovrinic, Dr. Maury Hoberman, and Dr. Traiman.

Medical records of Irene, Holly, James Arther, Jacob and Katherine Hartmetz prepared by of Dr. Elizabeth Carroll, Brandywine Hospital, Dr. G. John Digregorio, Director of Toxicology, Coatesville Hospital, Dr. C. Thomas McChesney, Jr. and Dr. John W. Pratt, II.

Answer of Inland Pumping and Dredging Corp. to New Matter of Joseph Blosenski, Jr. (No. 84-02087) (October 1987)

Reply of Joseph Blosenski, Jr. to Amended and Additional New Matter of Defendant the Budd Company pursuant to Pa.R.C.P. 2252(D) (September 30, 1987)

Reply of Joseph Blosenski, Jr. to Amended and Additional New Matter of Defendant the Budd Company against Defendant LNP (No. 84-02087) (September 30, 1987)

Reply of Joseph Blosenski to Amended New Matter Pursuant to Pa.R.C.P. 2252(D) of Defendant A. Johnson & Co., Inc., (No. 84-02087) (September 30, 1987)

Reply of Defendant Blosenski to Amended Answer and New Matter of Defendant the Budd Company pursuant to Pa.R.C.P. 2252(D) to Plaintiffs' First Amended Complaint (No. 84-02087) (September 30, 1987)

Answer of A. Johnson & Company, Inc. to Amended Answer New Matter and Counter-claim and Defendant Joseph Blosenski, Jr. to Plaintiffs' Second Amended Complaint (No. 84-07288) (October 13, 1987)

Answer of Defendant A. Johnson & Company, Inc. to the Amended Answer in New Matter of Defendant Joseph Blosenski, Jr. to Plaintiffs' First Amended Complaint (No. 84-02087) (October 13, 1987)

Ada Blosenski's Reply to Joseph Blosenski, Jr.'s Amended New Matter to Plaintiffs' Original Complaint (Nos. 87-07288 and 87-02087) (October 21, 1987)

Ada Blosenski's Reply to Joseph Blosenski, Jr.'s Amended New Matter to Plaintiffs' Amended Complaint (Nos. 87-07288 and 87-02087) (October 21, 1987)

Ada Blosenski's Reply to Joseph Blosenski, Jr.'s, New Matter to Plaintiffs' First Amended Complaint (Nos. 87-07288 and 87-02087) (October 21, 1987)

Ada Blosenski's Reply to Joseph Blosenski, Jr.'s, Amended New Matter to Original Complaint (No.s 87-07288 and 87-02087) (October 21, 1987)

Ada Blosenski's Reply to Joseph Blosenski, Jr.'s Amended New Matter to Plaintiffs' First Amended Complaint (No.s 87-07288 and 87-02087) (October 21, 1987)

Ada Blosenski's Reply to Joseph Blosenski, Jr.'s Amended New Matter to Plaintiffs' Second Amended Complaint (No.s 87-07288 and 87-02087) (October 21, 1987)

Amended Answer and Counterclaim of Joseph Blosenski, Jr. to Original Complaint (No. 84-07288) (August 18, 1987)

Amended Answer and New Matter Counterclaim of Defendant Joseph Blosenski, Jr. to Plaintiffs' First Amended Complaint (No. 84-07288) (August 18, 1987)

Amended Answer and Counterclaim of Defendant Joseph Blosenski, Jr. to Plaintiffs' Second Amended Complaint (No. 84-07288 (August 18, 1986)



Amended Answer and New Matter of Defendant Joseph Blosenski, Jr. to Original Complaint (No. 84-02087)

Amended Answer and New Matter of Defendant Joseph Blosenski, Jr. to Amended Complaint (No. 84-02087)

Amended Answer and New Matter of Defendant Joseph Blosenski, Jr. to Plaintiffs' First Amended Complaint (No. 84-02087)

Reply of Defendant ICI Americas, Inc. to the New Matter of Defendant of LNP Corporation (Nos. 84-02087 and 84-07288) (September 21, 1987)

Answer of Plaintiffs' Bardsley to Amended Answer and New Matter of Defendant Joseph Blosenski, Jr. to Plaintiffs' First Amended Complaint (No. 84-02087) (September 28, 1987)

Answer of Plaintiffs' Bardsley to Amended Answer and New Matter to Amended Complaint (No. 84-02087) (September 28, 1987)

Reply of Defendant LNP Corporation to New Matter in the Nature of a Cross-claim by Defendant Joseph Blosenski, Jr. (No. 84-07288) (May 23, 1986)

Answer of Defendant LNP Corporation to Plaintiffs' Second Amended Complaint with New Matter Directed to Plaintiffs' and New Matter Pursuant to Pa.R.C.P. 2252(d) (No. 84-07288) (July 6, 1987)

Answer of Defendant ICI Americas, Inc. to Plaintiffs' Second Amended Complaint (Nos. 84-07288 and 84-02087) (March 13, 1987)

Reply of Defendant ICI Americas, Inc. to New Matter in the Nature of Cross-Claim by Defendant Joseph Blosenski, Jr. (84-07288)

Reply of Defendant ICI Americas, Inc. to New Matter of Defendant Joseph Blosenski, Jr. (No. 84-020287) (March 13, 1987)

Reply of Defendant ICI Americas, Inc. to New Matter of Defendant Ada Blosenski (No. 84-02087) (March 13, 1987)

Answer of Joseph Blosenski, Jr. and New Matter to Complaint (No. 84-02087) (February 5, 1987)

Answer of Joseph Blosenski, Jr. and New Matter to Amended Complaint (No. 84-02087) (February 5, 1987)

Answer of Joseph Blosenski, Jr. and New Matter to First Amended Complaint (No. 84-02087) (February 5, 1987)

Additional Defendant Complaint (No. 84-02087) (February 5, 1987)

Reply of Joseph Blosenski, Jr. to New Matter of Commonwealth of Pennsylvania (No. 84-02087) (February 5, 1987)



Reply of Joseph Blosenski, Jr. to New Matter of Hartmetz (No. 84- % 02087) (February 5, 1987)

Reply of Joseph Blosenski, Jr. to New Matter of Inland Pumping and Dredging Corporation (No. 84-02087) (February 5, 1987)

Reply of Joseph Blosenski, Jr. to New Matter of A. Johnson Company (No. 84-02087) (February 5, 1987)

Reply of Joseph Blosenski, Jr. to Amended New Matter of A. Johnson Company (No. 84-02087) (February 5, 1987)

Reply of Joseph Blosenski, Jr. to New Matter of Sartomer Company (No. 84-02087) (February 5, 1987)

Reply of Joseph Blosenski, Jr. to New Matter of ICI Americas, Inc. (No. 84-02087) (February 5, 1987)

Reply of Joseph Blosenski, Jr. to New Matter of Ada Blosenski (No. 84-02087) (February 5, 1987)

Interrogatory Answers of Joseph Blosenski, Jr. to Plaintiffs' Interrogatories (No. 84-02087) (February 5, 1987)

Response of Defendant Joseph Blosenski, Jr. to Plaintiffs' Request for Production of Documents (No. 84-02087) (December 15, 1986)

Preliminary objections of Defendant Joseph Blosenski, Jr. to Preliminary objections of Commonwealth of Pennsylvania (No. 84-07288) (February 5, 1987)

Additional Defendant Complaint of Defendant Joseph Blosenski, Jr. (No. 84-07288) (February 5, 1987)

Reply of Defendant Joseph Blosenski, Jr. to New Matter of Commonwealth of Pennsylvania (No. 84-07288) (February 5, 1987)

Answer New Matter and Counter-Claim of Defendant Joseph Blosenski, Jr. to Complaint (No. 84-07288) (February 5, 1987)

Reply of Defendant Joseph Blosenski, Jr. to New Matter of Defendants Phillips (No. 84-07288) (February 5, 1987)

Answer to New Matter and Counter-claim of Defendant Joseph Blosenski, Jr. to First and Second Amended Complaints (No. 84-07288) (February 5, 1987)

Reply of Defendant Joseph Blosenski, Jr. to New Matter of Defendants Phillips (Second Amended Complaint) (No. 84-07288) (February 5, 1987)

Reply of Defendant Joseph Blosenski, Jr. to New Matter of Ada



Blosenski (No. 84-07288) (February 5, 1987)

Reply of Joseph Blosenski, Jr. to New Matter of A. Johnson Company (No. 84-07288) (February 5, 1987)

Reply of Defendant Joseph Blosenski, Jr. to New Matter of A. Johnson Company (Second Amended Complaint) (No. 84-07288) (February 5, 1987)

Complaint of Joseph Blosenski, Jr. against additional Defendants Perry Phillips and Jeanne Phillips and Commonwealth of Pennsylvania, Department of Environmental Resources (No. 84-07288) (February 5, 1987)

Interrogatories of Defendant the Budd Company addressed to Defendants Joseph Blosenski, Jr. and Blosenski Disposal Service (First Set) (No. 84-07288) (January 23, 1987)

First Request for Production of Documents of Defendant the Budd Company addressed to Defendants Joseph Blosenski, Jr. and Blosenski Disposal Service (No. 84-02087) (January 21, 1987)

Reply of Joseph Blosenski, Jr. to New Matter of A. Johnson Company (No. 84-07288) (January 21, 1987)

Answer of Plaintiffs' Bardsley to Request for Production of Documents Propounded by the Budd Company, A. Johnson Company, ICI Americas, Inc., LNP Corporation and Sartomer Company (No. 84-02087) (May 7, 1986)

Medical records of Mr. & Mrs. Richard Bardsley (No. 84-02087) (May 7, 1986)

Answer of Defendant Sartomer Company to the New Matter Pursuant to Pa.R.C.P. 2252(D) of Defendant LNP Corporation (No. 84-02087) (October 1, 1987)

Motion to Make Rule Absolute of Defendant Joseph Blosenski, Jr. for Leave to Amend and Leave to File Additional Matter (No. 84-02087) (September 18, 1987)

Answer of Defendant LNP Corporation to Plaintiffs' First Amended Complaint with New Matter Directed to Plaintiffs' (No. 84-02087) (July 6, 1987)

Reply of A. Johnson & Company to the Preliminary Objections of the Additional Defendants Jacob A. Hartmetz and Irene O. Hartmetz, and Amended New Matter of Defendant A. Johnson & Company (No. 84-02087) (July 21, 1987)

Answer of Plaintiffs' Bardsley to New Matter of Defendant LNP Corporation (No. 84-02087) (July 22, 1987)

Notice of Deposition of Joseph Blosenski, Jr. (No. 84-02087)



(July 21, 1987)

Letter dated August 18, 1987 from Sartomer Company providing notice that Atlantic Richfield Company ("ARCO") had sold its interest in Sartomer Company as of December 19, 1986)

Proposed stipulation regarding protective order of Blosenski Customer List (August 17, 1987)

Answer of Defendant the Budd Company to New Matter of Defendant LNP Corporation (No. 84-02087)

Amended and Additional New Matter of Defendant the Budd Company against Defendant LNP Corporation (July 23, 1987)

Answer of Defendant the Budd Company to New Matter, Defendant LNP Corporation (No. 84-02087) (July 23, 1987)

Petition of Joseph Blosenski, Jr. for reconsiderations of Orders for Leave to Amend and for Leave to File Additional New Matter (No. 84-07288) (August 20, 1987)

Amended Answer and New Matter and New Matter of Defendant the Budd Company to Plaintiffs' First Amended Complaint (No. 84-02087) (August 21, 1987)

Amended Answer with New Matter of ICI Americas, Inc. to Plaintiffs' Amended Complaint (No. 84-02087) (July 2, 1987)

Plaintiffs' Bardsley Answer to New Matter of Defendant Joseph Blosenski, Jr. (No. 84-02087) (December 19, 1986)

Response of Joseph Blosenski, Jr. to Request for Production of Documents (No. 84-02087) (December 16, 1987)

Answer of Defendant ICI Americas, Inc. to Plaintiffs' First Amended Complaint (No. 84-02087)

Answer of the Budd Company to Plaintiffs' First Amended Complaint with New Matter (No. 84-02087) (February 21, 1987)

Miscellaneous Transmittal Letters (Nos. 84-07288 and 84-02087)

Miscellaneous Administrative Orders of the Chester County Court of Common Pleas

Proposed Protective Order of Blosenski Customer List in Nos. 84-02087 and 84-07288 (December 3, 1987)

Reply of Additional Defendants Jacob and Irene Hartmetz to Amended New Matter and Cross-Claim of the Budd Company (No. 84-02087) (November 10, 1987)

Reply of Defendant Blosenski to New Matter of LNP (No. 84-02087)



(August 6, 1987)

Reply of Defendant Blosenski to Amended New Matter of Defendant ICI Americas, Inc. (No. 84-02087) (August 6, 1987)

Answer of Defendant LNP to Plaintiffs' First Amended Complaint with New Matter (No. 84-02087) (July 6, 1987)