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IN THE ASBESTOS CLAIMS COURT OF THE STATE OF MONTANA

IN RE ASBESTOS LITIGATION,  <i>Consolidated Cases</i>	Cause No. AC 17-0694  PLAINTIFFS' COMMENTS RE: DEFENDANTS' PROPOSED LEAD CASES
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This Court was created by the Montana Supreme Court with the inherent recognition that “litigating these cases on an individual basis” will have an “enormous detrimental impact on the resources of Montana district courts.” Order Establishing the Asbestos Claims Court and Consolidating Cases, November 28, 2017, at p.1. Soon thereafter, this Court directed the parties “to familiarize themselves with the *Manual for Complex Litigation, Fourth* (MCL)” with the aim of “facilitat[ing] the expeditious, economical and just resolution of these cases.” Order, January 9, 2018, at p.1. A touchstone throughout this process is consolidation, an element ignored in Defendants’ proposed five singleton lead cases. *See generally* MCL § 11.631 (consolidation of cases

involving common questions of law or fact should occur if it will avoid unnecessary cost or delay). Plaintiffs can and should be grouped in a manner that will allow for the efficient presentation of evidence common to them. *See Id.*, § 22.316. The MCL advocates for a joint trial in such circumstances and discourages separate trials. *See Id.*, § 11.632. Aggregations and consolidation are even more appropriate where, as proposed by Plaintiffs, several Plaintiffs can present substantially similar evidence from the same experts or common witnesses. *See Id.*, § 22.316. Any potential advantage of separate trials must be weighed against the potential for increased cost, delay (including delay in reaching settlement), and inconvenience, particularly if the same witnesses might be needed to testify at multiple trials. *See Id.*, § 11.632.

With these principles in mind and in the interest of finding common ground with Defendants, Plaintiffs are amenable, as set forth below, to consolidating several of Defendants' proposed lead cases with Plaintiffs' proposed lead cases. Trying similar cases with common issues of fact and law will better resolve substantive liability issues applicable to broad groups of Libby Plaintiffs, and thereby substantially inform the value of similarly situated claims, all while maintaining and promoting the important goal of judicial efficiency.

Finally, Plaintiffs ask the Court to strike Defendants' Objections to Plaintiffs' Proposed Lead Cases. Defendants' Objections are stated in a 25-page brief, including a substantial "Argument" that blatantly exceeds this Court's clear Order of February 21, 2018, that limits the parties' comments to one-paragraph per case. Defendants' Objections further revisit and reargue for its five proposed lead cases, again violating the

letter and spirit of the clear limitations in the Court's Order on the parties. Plaintiffs cannot be expected, in the several limited paragraphs that the Court directed, to respond to or match Defendants' filing. The appropriate relief is that the Court strike Defendants' Objections.

**1. Mary Robertson (Cause No. ADV-17-0502)**

Both Plaintiffs and Defendants identify this case as one of the appropriate lead cases because of the time-sensitivity attendant to the life expectancy of a mesothelioma victim. However, in contrast to the cases against the State of Montana and BNSF, which have been well developed through prior discovery and pretrial litigation in previous cases, the case against the International Paper ("IP") Defendants is in the early stages of development; the first identification of witnesses and documents is yet to be completed. Given the additional work that is required to prepare any IP case for trial, it is proposed that this case be sequenced to reflect the need for appropriate trial preparation.

**2. Clayton Allen (Cause No. CDV-16-0780)**

Mr. Allen's pulmonary function test results are well above 100% of predicted for a healthy man of his age. His DLCO is 142% of predicted, the highest measured value among all MHSL Libby Plaintiffs. He is only 38 years old, left Libby at the age of 10, and now lives in Colorado. He is not representative of a significant number of Libby Plaintiffs, and his case will not in any way inform the value, or encourage resolution, of the large number of cases in which currently unimpaired Plaintiffs will progress to moderate or severe asbestosis or cancer. Moreover, by choosing Mr. Allen, Defendants are proposing that the current injuries of plaintiffs with little or no current impairment

should now be adjudicated. The proposal side-steps the consideration of whether a “deferred docket” is appropriate for the large group of diagnosed plaintiffs with normal lung function. If this case becomes a “lead case,” Plaintiff will move for such relief as necessary to preserve his constitutional right to a remedy for every injury he sustains.<sup>1</sup> Alternative forms of relief available to secure this constitutional right would include (a) permitting trial and adjudication of Plaintiff’s current injury, while severing and preserving for a **future potential trial any claims for future injury** should the Plaintiff incur a disabling injury;<sup>2</sup> **or** (b) placing this case on a **deferred docket** until such time as the Plaintiff’s disability does occur and may be adjudicated efficiently in a single trial. *See* MCL., §§ 22.633 and 40.52.<sup>3</sup>

### **3. Jason MacDonald (Cause No. CDV-16-549)**

Similarly, Mr. MacDonald is 41 years old with all pulmonary function tests within the normal range for a healthy man of his age (DLCO is 119% of predicted). By choosing Mr. MacDonald, Defendants have proposed a trial of the injuries and damages that Plaintiff has currently incurred and which are only a small portion of his potential injuries, thus provoking the same issues identified and described above with Mr. Allen,

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<sup>1</sup> *See generally* Article II, Section 16 of the Montana Constitution.

<sup>2</sup> *See, e.g., Fusaro v. Porter-Hayden Co.*, 145 Misc.2d 911, 917, 548 N.Y.S.2d 856, 860 (N.Y. Sup.Ct. 1989), *aff’d without opinion*, 170 A.D.2d 239, 565 N.Y.S.2d 357 (1991) (“Because the law has limited [latent injury] recovery to actually demonstrable injuries and has rejected compensation for injuries that may but have not yet developed . . . an individual who develops a new and more severe ailment might well be foreclosed from initiating a second action unless this Court adopts the position that a subsequent action is appropriate”(emphasis added)).

<sup>3</sup> The numerous jurisdictions employing the deferred docket approach have found it “really a very good system that has worked out.” *Unimpaired Asbestos Dockets: Are They Easing the Flow of Litigation?*, COLUMNS–RAISING THE BAR IN ASBESTOS LITIG., Feb. 2002, at 2.

which strongly supports deferral. Moreover, Mr. MacDonald lives in Alaska with his wife and twin 9-year old daughters. He is currently battling brain cancer. This Court and Defendants should easily recognize that while he may also have been diagnosed with an asbestos-related disease from his time in Libby, he should not be compelled to become a lead Plaintiff in his current situation. Mr. MacDonald's case should be set upon a deferred docket, or at the least deferred in favor of other lead cases presented by the parties as it would be unconscionable to select and force his case to trial before his cancer has been fully treated.

**4. Carol Taylor (Cause No. DV-16-112)**

Plaintiffs are amenable to trying this case in conjunction with Plaintiffs' Proposed Lead Case No.1. (Cause No. DDV-17-0259). Ms. Taylor's case<sup>4</sup> overlaps factually and legally with the individuals identified in Plaintiffs' Proposed Lead Case No.1 based on time period and similarity of exposure. This group suffers from a variety of types of diagnoses (Barnes—moderate ARD, Braaten—mesothelioma , Flores—severe ARD and lung cancer, and Taylor severe ARD and lung cancer) all had significant community exposure from BNSF's operations stemming from the proximity of their homes and work to the railroad tracks and railyard in downtown Libby as well as recreating adjacent to the railyard; all share common years of exposure during active years of vermiculite

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<sup>4</sup> Plaintiffs contest Defendants' premature and conclusory statements about whether claims such as Ms. Taylor's are allowed by the Grace bankruptcy channeling injunction. *See* Defendants' Proposed Test Case List at p.7, fn.2, and Plaintiffs' Response to Notice of Permanent Injunction. In addition, Defendants' statement that "various insurance companies" are involved in Ms. Taylor's case, including CNA Ins. Co., is not correct. Claims originally filed by Ms. Taylor against CNA and its related insurers were dismissed in February 2017, and are not now part of her case.

operations; and Ms. Taylor's additional family exposure to a Grace worker in the 60's is shared by Mr. Barnes. Thus, Plaintiffs do not oppose Ms. Taylor's joinder in this appropriate aggregation of claims, but we do oppose Ms. Taylor's claim as a single setting.

**5. Elmore Richey (Cause Nos. DDV-15-707; DDV-16-0786)**

Mr. Richey is a former worker at W.R. Grace with claims against the primary defendants of MCC and BNSF. He died from his severe ARD in May 2017. Mr. Richey's claim presents a case to test the theories of liability and inform the value of cases against MCC because he was a long term worker at W.R. Grace. Plaintiffs' counsel is amenable to trying this case in conjunction with Ralph Hutt (Plaintiffs' Proposed Lead Case No.4), who likewise suffers from severe ARD and whose tenure at Grace entirely overlaps Mr. Richey's period of exposure at the mine during Maryland Casualty's presence at the Grace operations in Libby. While hundreds of cases are pending against MCC, these two Grace worker cases have been allowed to proceed in this litigation by the Bankruptcy Court. *See Hutt v. Md. Cas. Co. (In re W.R. Grace*, 2016 Bankr. LEXIS 3754 (Bankr. D. Del. 2016)).

Respectfully submitted this 2nd day of March, 2018.

By: /s/ Roger Sullivan  
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