NYSCEF DOC. NO. 1

INDEX NO. 190206/2020

RECEIVED NYSCEF: 08/07/2020

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK GEORGIOS PETER GIANAKOUROS, INDEX No.: Plaintiffs. -against AIW-2010 Wind Down Corp. et al., Defendants. NOTICE OF FILING DURING THE COVID-19 PUBLIC HEALTH **EMERGENCY** Please check one of the following: [X] This case has been previously approved as an "essential matter" during the COVID-19 Public Health Emergency as described in UCS Administrative Order AO-78-20, Exh. A(E) – (include method of prior approval) Plaintiff suffers from mesothelioma, a fatal cancer. Such cases have been deemed essential by the Honorable M. Mndez. OR [] This filing contains an application to designate this case as an "essential matter" during the COVID-19 Public Health Emergency as described in UCS Administrative Order AO-78-20, Exh. A (E), and includes papers supporting the request for such designation. OR [] This filing is being made pursuant to specific direction of the Court/Judge (include Court/Judge and direction) Dated: August 7, 2020 _____Signature Keith W. Binder, Esq., LEVY KONIGSBERG, LLP 800 Third Avenue – 11 Fl. New York, NY 10022 Attorney for: Plaintiffs



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SUPREME COURT OF THE STATE OF NEW YORK ALL COUNTIES WITHIN THE CITY OF NEW YORK

IN RE: NEW YORK CITY ASBESTOS LITIGATION

11GA11ON

GEORGIOS PETER GIANAKOUROS,

Plaintiff,

- against –

The basis for venue is defendants' place of business

Plaintiff designates New York County as the place of trial

Index No.: DOF:8/7/20

SUMMONS

AIW-2010 Wind Down Corp.,
ALCATEL-LUCENT USA INC.,
ALCO INDUSTRIES, INC.,
AT&T CORPORATION, individually and as
successor-in-interest to Western Electric Company,
CYTEC INDUSTRIES INC.,
DUREZ CORPORATION,
GENERAL CABLE CORPORATION,
GENERAL ELECTRIC COMPANY,
LUCENT TECHNOLOGIES, INC.,

NOKIA CORPORATION, as successor-in-interest to
Alcatel-Lucent USA, Inc.,
PLASTICS ENGINEERING COMPANY,
ROGERS CORPORATION,
RSCC WIRE & CABLE, LLC,
SOLAR COMPOUNDS CORPORATION,
SPAULDING COMPOSITES, INC.,
UNION CARBIDE CORP., and
WYETH HOLDINGS LLC f/k/a American Cynamid
Company, individually and as successor-in-interest

Defendants.

TO THE ABOVE NAMED DEFENDANTS

to Shulton, Inc.,

YOU ARE HEREBY SUMMONED and required to serve upon Plaintiffs' attorney, at the address stated below, an answer to the attached complaint within twenty (20) days after the service of this summons, exclusive of the day of service, or within thirty (30) days after service is complete if this summons was not personally delivered to you within the State of New York; upon your failure to answer, judgment will be taken against you by default for the relief



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demanded in the complaint.

Dated: New York, New York

August 7, 2020

LEVY KONIGSBERG, LLP Attorneys for Plaintiffs

By: Keith W. Binder

KEITH W. BINDER 800 Third Avenue, 11th FL New York, New York 10022 kbinder@levylaw.com (212) 605-6200

To:

ALCATEL-LUCENT USA INC.

BCL 306

ALCO INDUSTRIES, INC.

BCL 306

AT&T CORPORATION, individually and as successor-in-interest to Western Electric

Company **BCL 306**

LUCENT TECHNOLOGIES, INC.

BCL 306

NOKIA CORPORATION, as successor-in-interest to Alcatel-Lucent USA,

BCL 306

Inc.

AIW-2010 Wind Down Corp. c/o Corporation Service Company 2711 Centerville Rd., Suite 100 Wilmington, DE 19801

CYTEC INDUSTRIES INC. c/o CT Corporation System 80 State Street Albany, NY 12207

DUREZ CORPORATION c/o CT Corporation 28 Liberty Street New York, NY 10005 GENERAL CABLE CORPORATION

c/o CT Corporation System 28 Liberty Street

New York, NY 10005

GENERAL ELECTRIC COMPANY

Henry J. King, Jr., Esq. 75 Sam Fonzo Drive Beverly, MA 01915

PLASTICS ENGINEERING COMPANY

c/o Michael R. Brotz 3518 Lakeshore road Sheboygan, WI 53082

RSCC WIRE & CABLE, LLC

c/o Corporation Service Company

80 State Street

Albany, NY 12207-2543

ROGERS CORPORATION

c/o CT Corporation System 67 Burnside Avenue East Hartford, CT 06108

SOLAR COMPOUNDS CORPORATION

c/o H.N. Bockus Jr. 1201 West Blancke St. Linden, NJ 07036

SPAULDING COMPOSITES, INC.

c/o Lawyers Incorporating Service

10 Ferry Street, Suite 313

Concord, NH 03301



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UNION CARBIDE CORP. c/o CT Corporation 28 Liberty Street New York, NY 10005

WYETH HOLDINGS LLC f/k/a American Cynamid Company, individually and as successor-in-interest to Shulton, Inc. c/o The Corporation Trust Company 820 Bear Tavern Road West trenton, NJ 08628



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SUPREME COURT OF THE STATE OF NEW YORK
ALL COUNTIES WITHIN THE CITY OF NEW YORK
Asbestos Litigation

IN RE: NEW YORK CITY

ASBESTOS LITIGATION

GEORGIOS PETER GIANAKOUROS,

Index No.:

DOF: August 7, 2020

Plaintiff,

COMPLAINT

- against –

Trial by Jury Demanded by Plaintiff

AIW-2010 Wind Down Corp.,
ALCATEL-LUCENT USA INC.,
ALCO INDUSTRIES, INC.,
AT&T CORPORATION, individually and as
successor-in-interest to Western Electric Company,
CYTEC INDUSTRIES INC..

CYTEC INDUSTRIES INC., DUREZ CORPORATION,

GENERAL CABLE CORPORATION,

GENERAL ELECTRIC COMPANY,

LUCENT TECHNOLOGIES, INC.,

NOKIA CORPORATION, as successor-in-interest to

Alcatel-Lucent USA, Inc.,

PLASTICS ENGINEERING COMPANY,

ROGERS CORPORATION,

RSCC WIRE & CABLE, LLC,

SOLAR COMPOUNDS CORPORATION,

SPAULDING COMPOSITES, INC.,

UNION CARBIDE CORP., and

WYETH HOLDINGS LLC f/k/a American Cynamid

Company, individually and as successor-in-interest to Shulton, Inc.,

Defendants.

TO THE ABOVE NAMED DEFENDANTS:

Plaintiff, by his attorneys, LEVY KONIGSBERG, LLP, for his Complaint, respectfully alleges as follows:

- 1. Plaintiff repeats and re-alleges Levy Konigsberg LLP's Standard Asbestos Complaint for Personal Injury dated May 11, 2018 as if fully incorporated herein.
 - 2. Plaintiff is currently a resident of the state of South Carolina.



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