UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, Administrator, ET ALS :

-VS- :C.A.NO.04-312L

JEFFREY DERDERIAN, ET ALS :

PLAINTIFFS' OBJECTION TO DEFENDANTS'
LEGGETT & PLATT, INCORPORATED AND
L&P FINANCIAL SERVICES CO.
RULE 12(b)(6) MOTION TO DISMISS ALL
PLAINTIFFS' FIRST AMENDED MASTER COMPLAINT

Now come the Plaintiffs in the above entitled cause and herein object to Defendants', Leggett & Platt, Incorporated and L&P Financial Services Co. Rule 12(b)(6) Motion to Dismiss All Plaintiffs' First Amended Master Complaint and incorporates Gray's Memorandum in response to Defendants' Motions to Dismiss.

Respectfully submitted,
Plaintiffs
By their Attorneys,

BY: _____
RONALD J. RESMINI, ESQ. #0484
155 South Main St., Suite 400
Providence, Rhode Island
DATED: February 17, 2005
(401)751-8855

352

CERTIFICATION

I hereby certify that on this 17th day of February, 2005 I mailed a copy of the within Objection by regular mail, postage prepaid to the following:

Thomas C. Angelone, Esq.
One Turks Heal Place
Suite 1050
Prov., RI 02903

C. Russell Bengtson, Esq.
One Turks Head Place
Suite 400
Prov., RI 02903

Gregory Boyer, Esq.
170 Westminster St.
Suite 200
Prov., RI 02903

Steven Breggia, Esq.
395 Smith St.
Prov., RI 02908

Joseph B. Burns, Esq.
One State St.
Hartford, CT 06103

Mark D. Cahill, Esq.
Exchange Place
53 State St.
Boston, MA 02109

Joseph Cavanagh, Esq.
30 Exchange Terrace
Prov., RI 02903

Edward Crane, Esq.
333 West Wacker Drive
Chicago, Illinois 60606

Brian Cunha, Esq.
904 Broadway
East Prov., RI 02914

Michael DeLuca, Esq.
One Turks Head Place
Suite 900
Prov., RI 02903

Anthony F. DeMarco, Esq.
170 Westminster St.
Suite 900
Prov., RI 02903

Gerald DeMaria, Esq.
123 Dyer St.
Prov., RI 02903

Marc DeSisto, Esq.
211 Angell St.
Prov., RI 02906

Stefanie DiMaio, Esq.
215 Broadway
Prov., RI 02903

Mark P. Dolan, Esq.
170 Westminster St.
Suite 900
Prov., RI 02903

Christopher Fallon, Esq.
1900 Market St.
Philadelphia, PA 19103

Stephen Fogerty, Esq.
315 Post Road West
Westport, CT 06880

Mark Hadden, Esq.
68 Keneddy Plaza
Prov., RI 02903

Carl A. Henlein, Esq.
400 West Market St.-32nd Fl.
Louisville, KY 40202

Edward T. Hinchey, Esq.
3 Center Plaza
Boston, MA 02108

Daniel J. Horgan, Esq.
111 Huntington, St.
New London, CT 06320

Patrick T. Jones, Esq.
21 Custom House St.
Boston, MA 02110

Howard Julian, Esq.
570 Shermantown Rd.
No. Kingstown, RI 02874

Bruce P. Keller, Esq.
919 Third Ave.
New York, NY 10022

Fred A. Kelly, Esq.
30 Cottage St.
Brockton, MA 02310

Donna Lamontagne, Esq.
40 Westminster St.
Suite 201
Prov., RI 02903

Ronald Langlois, Esq.
One State Street
Suite 40
Prov., RI 02903

Faith LaSalle, Esq.
One Turks Head Place
Suite 1010
Prov., RI 02903

James R. Lee, Esq.
150 South Main St.
Prov., RI 02903

Thomas Lyons, Esq.
222 Richmond St.
Suite 208
Prov., RI 02903

Richard MacAdams, Esq.
10 Dyer St.
Suite 400
Prov., RI 02903

4

John Mahoney, Esq.
155 South Main St. - 2nd. Fl.
Prov., RI 02903

Eva Mancusco, Esq.
387 Atwells Ave.
Prov., RI 02909

Mark S. Mendell, Esq.
One Park Row
Prov., RI 02903

W. Thomas McGough, Esq.
435 Sixth Ave.
Pittsburgh, PA 15219

Edwin McPherson, Esq.
1801 Century Park East - 24th Fl.
Los Angeles, CA 90067

Matthew Medeiros, Esq.
71 Pine St.
Prov., RI 02903

Howard A. Merten, Esq.
20 Washington Place
Prov., RI 02903

Steven A. Minicucci, Esq.
373 Elmwood Ave.
Prov., RI 02907

Ralph Monaco, Esq.
38 Huntington St.
New London, CT 06320

James T. Murphy, Esq.
146 Westminster St.
Prov., RI 02903

John T. Nazzaro, Esq.
164 Hempstead St.
New London, CT 06320

Mark T. Nugent, Esq.
121 South Main St.
Suite 600
Prov., RI 02903

J. Rhenn Olenn, Esq.
530 Greenwich Ave.
Warwick, RI 02886

Mark Ostrowski, Esq.
One Constitution Plaza
Hartford, CT 06103

Robert Reardon, Esq.
160 Hempstead St.
New London, CT 06320

Stephen Prignano, Esq.
2800 Financial Plaza
Prov., RI 02903

Charles Redihan, Esq.
91 Friendship St.
Prov., RI 02903

James Reilly, Esq.
146 Westminster St.
Suite 500
Prov., RI 02903

Michael St. Pierre, Esq.
946 Centerville Road
Warwick, RI 02886

Mark D. Tourges, Esq.
1193 Tioque Ave.
Coventry, RI 02816

Andrew Trevelise, Esq.
2500 Liberty Place
Philadelphia, PA 19103

Scott Tucker, Esq.
3 School St.
Boston, MA 02108

6

Earl H. Walker, Esq.
1401 McKinney
Suite 1900
Houston, Texas 77010

George E. Wolf, Esquire
One Kansas City Place
1200 Main St.
Kansas City, MO 64105

Max Wistow, Esq.
61 Weybosset St.
Prov., RI 02903

Elaine M. Grasini

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, Administrator, ET ALS :

-VS- :C.A.NO.04-312L

JEFFREY DERDERIAN, ET ALS :

PLAINTIFFS' MEMORANDUM IN OPPOSITION TO DEFENDANTS' LEGGETT & PLATT, INCORPORATED AND L&P FINANCIAL SERVICES CO. RULE 12(b)(6)MOTION TO DISMISS ALL PLAINTIFFS' FIRST AMENDED MASTER COMPLAINT

Now come the Plaintiffs in the above entitled cause and herein incorporate Gray's Memorandum in Opposition to Defendants,' Leggett & Platt, Incorporated and L&P Financial Services Co. Rule 12(b)(6) Motion to Dismiss All Plaintiffs' First Amended Master Complaint and as grounds thereof refer to and incorporate the previously filed objection submitted by the Plaintiffs in Gray, et al v. Derderian, et al, C.A. No. 04-3121-L.

Respectfully submitted,
Plaintiffs,
By their Attorneys,

BY: _____
RONALD J. RESMINI, ESQ.#0484
155 South Main St.-Suite 400
Providence, RI 02903
DATED: February 17, 2005
(401)751-8855

CERTIFICATION

I hereby certify that on this 17th day of February, 2005 I mailed a copy of the within Memorandum by regular mail, postage prepaid to the following:

Thomas C. Angelone, Esq.
One Turks Heal Place
Suite 1050
Prov., RI 02903

C. Russell Bengtson, Esq.
One Turks Head Place
Suite 400
Prov., RI 02903

Gregory Boyer, Esq.
170 Westminster St.
Suite 200
Prov., RI 02903

Steven Breggia, Esq.
395 Smith St.
Prov., RI 02908

Joseph B. Burns, Esq.
One State St.
Hartford, CT 06103

Mark D. Cahill, Esq.
Exchange Place
53 State St.
Boston, MA 02109

Joseph Cavanagh, Esq.
30 Exchange Terrace
Prov., RI 02903

Edward Crane, Esq.
333 West Wacker Drive
Chicago, Illinois 60606

Brian Cunha, Esq.
904 Broadway
East Prov., RI 02914

Michael DeLuca, Esq.
One Turks Head Place
Suite 900
Prov., RI 02903

Anthony F. DeMarco, Esq.
170 Westminster St.
Suite 900
Prov., RI 02903

Gerald DeMaria, Esq.
123 Dyer St.
Prov., RI 02903

Marc DeSisto, Esq.
211 Angell St.
Prov., RI 02906

Stefanie DiMaio, Esq.
215 Broadway
Prov., RI 02903

Mark P. Dolan, Esq.
170 Westminster St.
Suite 900
Prov., RI 02903

Christopher Fallon, Esq.
1900 Market St.
Philadelphia, PA 19103

Stephen Fogerty, Esq.
315 Post Road West
Westport, CT 06880

Mark Hadden, Esq.
68 Keneddy Plaza
Prov., RI 02903

Carl A. Henlein, Esq.
400 West Market St.-32nd Fl.
Louisville, KY 40202

Edward T. Hinchey, Esq.
3 Center Plaza
Boston, MA 02108

Daniel J. Horgan, Esq.
111 Huntington, St.
New London, CT 06320

Patrick T. Jones, Esq.
21 Custom House St.
Boston, MA 02110

Howard Julian, Esq.
570 Shermantown Rd.
No. Kingstown, RI 02874

Bruce P. Keller, Esq.
919 Third Ave.
New York, NY 10022

Fred A. Kelly, Esq.
30 Cottage St.
Brockton, MA 02310

Donna Lamontagne, Esq.
40 Westminster St.
Suite 201
Prov., RI 02903

Ronald Langlois, Esq.
One State Street
Suite 40
Prov., RI 02903

Faith LaSalle, Esq.
One Turks Head Place
Suite 1010
Prov., RI 02903

James R. Lee, Esq.
150 South Main St.
Prov., RI 02903

Thomas Lyons, Esq.
222 Richmond St.
Suite 208
Prov., RI 02903

Richard MacAdams, Esq.
10 Dyer St.
Suite 400
Prov., RI 02903

John Mahoney, Esq.
155 South Main St. - 2nd. Fl.
Prov., RI 02903

Eva Mancusco, Esq.
387 Atwells Ave.
Prov., RI 02909

Mark S. Mendell, Esq.
One Park Row
Prov., RI 02903

W. Thomas McGough, Esq.
435 Sixth Ave.
Pittsburgh, PA 15219

Edwin McPherson, Esq.
1801 Century Park East - 24th Fl.
Los Angeles, CA 90067

Matthew Medeiros, Esq.
71 Pine St.
Prov., RI 02903

Howard A. Merten, Esq.
20 Washington Place
Prov., RI 02903

Steven A. Minicucci, Esq.
373 Elmwood Ave.
Prov., RI 02907

Ralph Monaco, Esq.
38 Huntington St.
New London, CT 06320

James T. Murphy, Esq.
146 Westminster St.
Prov., RI 02903

John T. Nazzaro, Esq.
164 Hempstead St.
New London, CT 06320

Mark T. Nugent, Esq.
121 South Main St.
Suite 600
Prov., RI 02903

J. Rhenn Olenn, Esq.
530 Greenwich Ave.
Warwick, RI 02886

Mark Ostrowski, Esq.
One Constitution Plaza
Hartford, CT 06103

Robert Reardon, Esq.
160 Hempstead St.
New London, CT 06320

Stephen Prignano, Esq.
2800 Financial Plaza
Prov., RI 02903

Charles Redihan, Esq.
91 Friendship St.
Prov., RI 02903

James Reilly, Esq.
146 Westminster St.
Suite 500
Prov., RI 02903

Michael St. Pierre, Esq.
946 Centerville Road
Warwick, RI 02886

Mark D. Tourges, Esq.
1193 Tioque Ave.
Coventry, RI 02816

Andrew Trevelise, Esq.
2500 Liberty Place
Philadelphia, PA 19103

Scott Tucker, Esq.
3 School St.
Boston, MA 02108

Earl H. Walker, Esq.
1401 McKinney
Suite 1900
Houston, Texas 77010

George E. Wolf, Esquire
Shook, Hardy & Bacon, LLP
One Kansas City Place
1200 Main St.
Kansas City, MO 64105-2118

Max Wistow, Esq.
61 Weybosset St.
Prov., RI 02903

Elaine M. Osseni