UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, Administrator of the Estate of Derek J. Gray, et al *Plaintiffs*	:	
vs.	:	C.A. No.: 04-312 L
HIGH TECH SPECIAL EFFECTS, INC., et al *Defendants*	:	

ANSWER OF DEFENDANT
HIGH TECH SPECIAL EFFECTS, INC.
TO PLAINTIFFS' MASTER COMPLAINT

First Defense

The plaintiffs' complaint is barred for the lack of personal jurisdiction over this defendant, a Tennessee corporation.

Second Defense

1.-226. Defendant High Tech Special Effects, Inc. (hereinafter "Defendant High Tech") is without sufficient information to form a belief as to the truth of the matters alleged in Paragraph 1 through 226 of the plaintiffs' Master Complaint and leaves the plaintiffs to their proof thereof.

(Plaintiffs have reserved Paragraphs 227 through 270 as set forth in the Master Complaint.)

General Allegations As to All Defendants

271. Defendant High Tech denies the allegations contained in Paragraph 271 of plaintiffs' Master Complaint.

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Jeffrey Derderian

272.-279. No response is required of defendant High Tech to Paragraphs 272 through 279 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count I – Jeffrey Derderian – Negligence

280. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

281. No response is required of defendant High Tech to Paragraph 281 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count II – Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

282. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

283. No response is required of defendant High Tech to Paragraph 283 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Michael Derderian

284. –286. No response is required of defendant High Tech to Paragraphs 284-286 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count III – Michael Derderian – Negligence

287. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

288. No response is required of defendant High Tech to Paragraph 288 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count IV – Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

289.-290. No response is required of defendant High Tech to Paragraphs 289 through 290 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Derco, LLC

291.-293. No response is required of defendant High Tech to Paragraphs 291 through 293 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count V – Derco, LLC – Negligence

294. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

295. No response is required of defendant High Tech to Paragraph 295 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

296. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

297. No response is required of defendant High Tech to Paragraph 2970 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Howard Julian

298.-299. No response is required of defendant High Tech to Paragraphs 298 through 299 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count VI – Howard Julian – Negligence

300. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

301. No response is required of defendant High Tech to Paragraph 301 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

302. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

303. No response is required of defendant High Tech to Paragraph 303 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Triton Realty Limited Partnership

304.-307. No response is required of defendant High Tech to Paragraphs 304 through 307 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count VIII – Triton Realty Limited Partnership – Negligence

308. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

309. No response is required of defendant High Tech to Paragraph 309 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count IX - Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

310. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

311. No response is required of defendant High Tech to Paragraph 311 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Triton Realty, Inc.

312.-315. No response is required of defendant High Tech to Paragraphs 312 through 315 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count X – Triton Realty, Inc. - Negligence

316. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

317. No response is required of defendant High Tech to Paragraph 317 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XI - Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

318. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

319. No response is required of defendant High Tech to Paragraph 319 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Raymond J. Villanova

320.-323. No response is required of defendant High Tech to Paragraphs 320 through 323 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XII - Raymond J. Villanova - Negligence

324. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

325. No response is required of defendant High Tech to Paragraph 325 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XIII - Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

326. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

327. No response is required of defendant High Tech to Paragraph 327 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Jack Russell

328.-331. No response is required of defendant High Tech to Paragraphs 328 through 331 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XIV - Jack Russell - Negligence

332. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

333. No response is required of defendant High Tech to Paragraph 333 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XV - Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

334. No response is required of defendant High Tech to Paragraph 334 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Jack Russell Touring, Inc.

335.-339. No response is required of defendant High Tech to Paragraphs 335 through 339 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XVI - Jack Russell Touring - Negligence

340. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

341. No response is required of defendant High Tech to Paragraph 341 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XVII - Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

342. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

343. No response is required of defendant High Tech to Paragraph 343 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Paul Woolnough

344.-347. No response is required of defendant High Tech to Paragraphs 344 through 347 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XVIII - Paul Woolnough – Negligence

348. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

349. No response is required of defendant High Tech to Paragraph 349 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XIX - Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

350. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

351. No response is required of defendant High Tech to Paragraph 351 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Manic Music Management, Inc.

352.-355. No response is required of defendant High Tech to Paragraphs 352 through 355 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XX – Manic Music Management, Inc. – Negligence

356. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

357. No response is required of defendant High Tech to Paragraph 357 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXI - Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

358. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

359. No response is required of defendant High Tech to Paragraph 359 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Knight Records, Inc.

360.-363. No response is required of defendant High Tech to Paragraphs 360 through 363 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXII – Knight Records, Inc. – Negligence

364. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

365. No response is required of defendant High Tech to Paragraph 356 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXIII - Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

366. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

367. No response is required of defendant High Tech to Paragraph 367 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Daniel Biechele

368.-371. No response is required of defendant High Tech to Paragraphs 368 through 371 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXIV – Daniel Biechele - Negligence

372. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

373. No response is required of defendant High Tech to Paragraph 373 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXV - Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

374. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

375. No response is required of defendant High Tech to Paragraph 375 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Anheuser-Busch, Incorporated and Anheuser-Busch Companies, Incorporated

376.-384. No response is required of defendant High Tech to Paragraphs 376 through 384 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Anheuser-Busch - Negligence

385. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

386. No response is required of defendant High Tech to Paragraph 386 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

McLaughlin & Moran

387.-392. No response is required of defendant High Tech to Paragraphs 387 through 392 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

McLaughlin & Moran, Inc. - Negligence

393. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

394. No response is required of defendant High Tech to Paragraph 394 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

WHJY, Inc.

395.-401. No response is required of defendant High Tech to Paragraphs 395 through 401 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

WHJY, Inc. - Negligence

402. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

403. No response is required of defendant High Tech to Paragraph 403 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Clear Channel Broadcasting, Inc.

404.-407. No response is required of defendant High Tech to Paragraphs 404 through 407 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXVI – Clear Channel Broadcasting, Inc. – Negligence

408. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

409. No response is required of defendant High Tech to Paragraph 409 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Denis P. Larocque, Anthony Bettencourt and Diane Deruosi
in her capacity as Treasurer of the Town of West Warwick

410.-424. No response is required of defendant High Tech to Paragraphs 410 through 424 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXVII - Diane Deruosi in her capacity as Treasurer
of the Town of West Warwick - Negligence

425. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

426. No response is required of defendant High Tech to Paragraph 426 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXVIII – Denis P. Larocque, Fire Inspector - Negligence

427. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

428. No response is required of defendant High Tech to Paragraph 428 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXIX - Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

429. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

430. No response is required of defendant High Tech to Paragraph 430 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXX – Anthony Bettencourt - Negligence

431. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

432. No response is required of defendant High Tech to Paragraph 432 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

State of Rhode Island and Irving J. Owens, Fire Marshal

433.-435. No response is required of defendant High Tech to Paragraphs 433 through 435 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXXI – State of Rhode Island – Negligence

436. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

437. No response is required of defendant High Tech to Paragraph 437 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXXII – Irving J. Owens – Negligence

438. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

439. No response is required of defendant High Tech to Paragraph 439 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Brian Butler

440.-443. No response is required of defendant High Tech to Paragraphs 440 through 443 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXXIII – Brian Butler – Negligence

444. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

445. No response is required of defendant High Tech to Paragraph 445 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

LIN Television Corporation

446.-449. No response is required of defendant High Tech to Paragraphs 446 through 449 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXXIV – LIN Television Corporation – Negligence

450. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

451. No response is required of defendant High Tech to Paragraph 451 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

CBS Broadcasting, Inc., d/b/a WPRI – Channel 12

452.-455. No response is required of defendant High Tech to Paragraphs 452 through 455 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXXV – CBS Broadcasting, Inc., d/b/a WPRI – Negligence

456. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

457. No response is required of defendant High Tech to Paragraph 457 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Barry H. Warner

458.-463. No response is required of defendant High Tech to Paragraphs 458 through 463 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXXVI – Barry H. Warner – Negligence

464. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

465. No response is required of defendant High Tech to Paragraph 465 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXXVII - Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

466. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

467. No response is required of defendant High Tech to Paragraph 467 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Luna Tech, Inc. – Negligence

468.-471. No response is required of defendant High Tech to Paragraphs 468 through 471 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXXVIII – Luna Tech, Inc. – Strict Liability

472. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

473.-476. No response is required of defendant High Tech to Paragraphs 473 through 476 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XXXIX – High Tech Special Effects, Inc. – Negligence

477.-480. Defendant High Tech denies the allegations contained in Paragraphs 477 through 480 of plaintiffs' Master Complaint and leaves the plaintiffs to their proof thereof.

Count XL – High Tech Special Effects, Inc. – Strict Liability

481. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

482.-485. Defendant High Tech denies the allegations contained in Paragraphs 482 through 485 of plaintiffs' Master Complaint and leaves the plaintiffs to their proof thereof.

Count XLI – American Foam Corporation – Negligence

486. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

487.-491. No response is required of defendant High Tech to Paragraphs 487 through 491 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XLII – American Foam Corporation – Strict Liability

492. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

493.-496. No response is required of defendant High Tech to Paragraphs 493 through 496 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XLIII – Leggett & Platt Incorporated – Negligence

497. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

498.-501. No response is required of defendant High Tech to Paragraphs 498 through 501 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XLIV – Leggett & Platt Incorporated – Strict Liability

502. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

503.-506. No response is required of defendant High Tech to Paragraphs 503 through 506 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XLV – L & P Financial Services Co. - Negligence

507. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

508.-510. No response is required of defendant High Tech to Paragraphs 508 through 510 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XLVI – L & P Financial Services Co. – Strict Liability

511. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

512.-515. No response is required of defendant High Tech to Paragraphs 512 through 515 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XLVII – General Foam Corporation - Negligence

516. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

517.-519. No response is required of defendant High Tech to Paragraphs 517 through 519 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XLVIII – General Foam Corporation – Strict Liability

520. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

521.-524. No response is required of defendant High Tech to Paragraphs 521 through 524 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count XLIX – GFC Foam, LLC – Negligence

525. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

526.-529. No response is required of defendant High Tech to Paragraphs 526 through 529 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count L – GFC Foam, LLC – Strict Liability

530. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

531.-534. No response is required of defendant High Tech to Paragraphs 531 through 534 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count LI – Foamex LP – Successor Liability for General Foam Corporation

535. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

536. No response is required of defendant High Tech to Paragraph 536 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count LII – Foamex International, Inc. – Negligence

537. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

538.-541. No response is required of defendant High Tech to Paragraphs 538 through 541 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count LIII – Foamex International, Inc. – Strict Liability

542. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

543.-546. No response is required of defendant High Tech to Paragraphs 543 through 546 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count LV – FMXI, Inc. – Liability as General Partner

547. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

548.-549. No response is required of defendant High Tech to Paragraphs 548 through 549 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count LV – PMC, Inc.

550. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

551.-552. No response is required of defendant High Tech to Paragraphs 551 through 552 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count LVI – PMC Global, Inc.

553. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

554.-555. No response is required of defendant High Tech to Paragraphs 554 through 555 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

JBL Incorporated, f/k/a James B. Lansing Sound, Incorporated, d/b/a JBL Professional - Negligence

556.-564. No response is required of defendant High Tech to Paragraphs 556 through 564 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count LVII – JBL Incorporated – Strict Liability

565. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

566.-569. No response is required of defendant High Tech to Paragraphs 566 through 569 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Essex Insurance Company, Multi-State Inspections, Inc. and High Caliber Inspections, Inc.

570. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

571.-575. No response is required of defendant High Tech to Paragraphs 571 through 575 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Essex Insurance Company – Negligence

576. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

577. No response is required of defendant High Tech to Paragraph 577 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count LVIII – Multi-State Inspections, Inc. - Negligence

578. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

579. No response is required of defendant High Tech to Paragraph 579 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count LIX – High Caliber Inspections Inc. – Negligence

580. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

581. No response is required of defendant High Tech to Paragraph 581 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Underwriters At Lloyd's, London and Gresham & Associates of R.I., Inc.

582.-587. No response is required of defendant High Tech to Paragraphs 582 through 587 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Underwriters At Lloyd's, London - Negligence

588. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

589. No response is required of defendant High Tech to Paragraph 589 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count LX – Gresham & Associates of R.I., Inc. – Negligence

590. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

591. No response is required of defendant High Tech to Paragraph 591 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Four Seasons Coach Leasing, Inc.

592.-595. No response is required of defendant High Tech to Paragraphs 592 through 595 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count LXI – Four Seasons Coach Leasing, Inc. - Negligence

596. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

597. No response is required of defendant High Tech to Paragraph 597 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count LXII - Violation of Rhode Island General Laws Title 9, Chapter 1, Section 2

598. Defendant High Tech restates and incorporates by reference herein its response to all prior paragraphs of this Master Complaint as if fully set forth herein.

599. No response is required of defendant High Tech to Paragraph 599 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Count LXIII "John Doe" Defendants – Negligence
and
Count LIV "John Doe" Defendants – Strict Liability

600.-610. No response is required of defendant High Tech to Paragraphs 600 through 610 of the plaintiffs' Master Complaint, but to the extent that any of said allegations pertain to this defendant, the same is denied.

Third Defense

The plaintiffs' complaint is barred for a lack of subject matter jurisdiction as a matter of law.

Fourth Defense

This defendant affirmatively pleads the defense of contributory negligence.

Fifth Defense

This defendant affirmatively pleads the defense of assumption of the risk.

Sixth Defense

This defendant affirmatively pleads the defense of that the applicable product was used in an inappropriate and/or unintended manner for which this defendant is not responsible.

Seventh Defense

This defendant affirmatively pleads that the applicable product was altered and/or modified and therefore this defendant is not responsible

Eighth Defense

If the plaintiffs were injured or damaged as alleged, which is denied, the same was due to the acts or omission of others for whom this defendant is not responsible.

Ninth Defense

The plaintiffs' action is barred by the applicable statute of limitations.

Tenth Defense

This defendant was not negligent.

WHEREFORE, this defendant prays that this Court:

a. Enter judgment for the defendant, dismissing all claims;

b. Award the defendant costs, expenses and attorneys' fees; and

c. Grant such further relief as the Court may deem just.

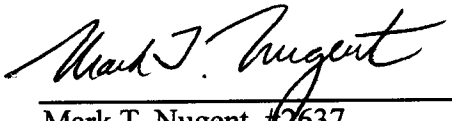
Jury Demand

Defendant High Tech Special Effects, Inc. hereby demands a jury trial as to all triable issues of right and designates Mark T. Nugent as trial counsel.

HIGH TECH SPECIAL EFFECTS, INC.

By its Attorneys,

MORRISON MAHONEY LLP



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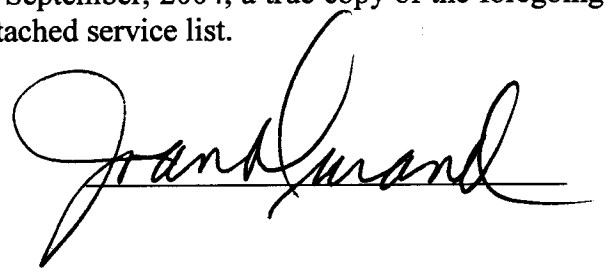
CERTIFICATION

I hereby certify that on this 1st day of September, 2004, a true copy of the foregoing was mailed, postage pre-paid, to counsel on the attached service list.



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