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COURT OF APPEALS, DIVISION I  
STATE OF WASHINGTON

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No. 62996-4-I

COURT OF APPEALS, DIVISION I  
OF THE STATE OF WASHINGTON

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MICHAEL FARROW and LIDIA FARROW,

Appellants,

v.

LESLIE CONTROLS, INC., *et al.*

Respondents.

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**RESPONSE BRIEF OF RESPONDENT WARREN PUMPS, LLC –  
RAP 10.1(g) JOINDER**

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**I. INTRODUCTION – JOINDER PURSUANT TO RAP 10.1(g)**

Pursuant to RAP 10.1(g), and to avoid repetitive briefing, Warren Pumps, LLC hereby joins, and adopts by reference as though fully stated herein, all portions of the Response Briefs filed by Respondents Crane Co., Garlock Sealing Technologies, Inc., Fairbanks Morse Pump Corporation, Coltec Industries, and McWane Inc. (collectively the “Crane Brief”), and Leslie Controls, Inc. and ITT Corporation (collectively the “Leslie Controls Brief”).

**II. CONCLUSION**

For the reasons set forth in the Crane Brief and the Leslie Controls Brief, the Order Granting Warren Pumps, LLC’s Joinder in Defendant IMO Industries, Inc.’s Motion for Summary Judgment should be affirmed.

Respectfully submitted this 8<sup>th</sup> day of September, 2009.

Respectfully submitted,

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MICHAEL FARROW and LIDIA  
FARROW,

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Appeal No.: 62996-4-I

DECLARATION OF SERVICE

The undersigned declares under penalty of perjury under the laws of the State of Washington as follows:

1. I am an employee of Rizzo Mattingly Bosworth PC, over the age of 18, not party to this action and competent to make the following statements:
2. The parties in this action have an agreement whereby service may be made by electronic mail delivery (e-mail) so long as a hard copy is also sent via first class U.S. Mail.

3. On September 9, 2009, copies of Response Brief of Respondent Warren Pumps, LLC – RAP 10.1(g) Joinder and this Declaration of Service were served upon the attorneys of record for the respondent by having said copies sent via e-mail and first class U.S. Mail to the addresses listed below:

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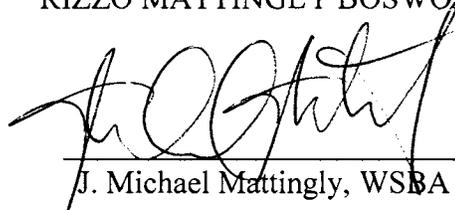
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I declare under penalty of perjury under the laws of the state of Washington  
that the foregoing is true and correct.

Respectfully submitted this day of 8<sup>th</sup> day of September, 2009.

RIZZO MATTINGLY BOSWORTH PC



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