

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: WELDING ROD PRODUCTS
LIABILITY LITIGATION

Case No. 1:03-CV-17000

MDL Docket No. 1535

This Document Relates to All Actions

Honorable Kathleen M. O'Malley

**MOTION TO EXCLUDE ALL TESTIMONY THAT EXPOSURE TO
WELDING FUMES CAUSES PARKINSON'S DISEASE**

Now come Defendants, *A.O. SMITH CORPORATION, AVESTA POLARIT WELDING, INC., THE BOC GROUP, INC., F/K/A AIRCO, INC., ESAB GROUP, INC., EUTECTIC CORP., HOBART BROTHERS COMPANY, LINCOLN ELECTRIC COMPANY, PRAXAIR, INC., SANDVIK, INC., TDY INDUSTRIES, INC., UNION CARBIDE CORPORATION, UNION CARBIDE CORPORATION IN ITS CAPACITY AS SUCCESSOR IN INTEREST TO UNION CARBIDE CHEMICALS & PLASTICS COMPANY, INC., VIACOM, INC. AND VIACOM, INC. AS SUCCESSOR BY MERGER TO CBS CORPORATION F/K/A WESTINGHOUSE ELECTRIC CORP.*, by and through counsel, and hereby move this Honorable Court for an Order excluding all testimony that exposure to welding fumes causes Parkinson's Disease. The bases for this Motion are more fully set forth in the attached Memorandum.

Respectfully submitted,

/s/ R. Eric Kennedy

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CARBIDE CORPORATION IN ITS CAPACITY
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VIACOM, INC. AS SUCCESSOR BY MERGER
TO CBS CORPORATION F/K/A
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