

S218176

SUPREME COURT  
FILED

FEB 17 2015

Frank A. McGuire Clerk

Deputy

IN THE  
SUPREME COURT OF CALIFORNIA

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FLAVIO RAMOS et al.,  
*Plaintiffs and Appellants,*

v.

BRENNTAG SPECIALTIES, INC. et al.,  
*Defendants and Respondents.*

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AFTER A DECISION BY THE COURT OF APPEAL,  
SECOND APPELLATE DISTRICT, DIVISION FOUR, CASE NO. B248038

151  
DEFENDANT AND RESPONDENT CENTURY KENTUCKY,  
INC.'S JOINDER IN THE REPLY BRIEF ON THE MERITS OF  
DEFENDANT AND RESPONDENT ALCOA, INC.

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**IN THE  
SUPREME COURT OF CALIFORNIA**

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**FLAVIO RAMOS et al.,**  
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**DEFENDANT AND RESPONDENT CENTURY  
KENTUCKY, INC.'S JOINDER IN THE REPLY  
BRIEF ON THE MERITS OF DEFENDANT AND  
RESPONDENT ALCOA, INC.**

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Defendant and Respondent Century Kentucky, Inc. hereby joins in the Reply Brief on the Merits filed by defendant and respondent Alcoa, Inc. This joinder is filed pursuant to California Rules of Court, rule 8.200(a)(5), to avoid duplication and needless waste of paper, and yet to protect the interests of Defendant and Respondent Century Kentucky, Inc..

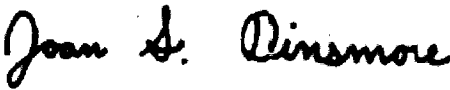
By this joinder, Respondent Century Kentucky, Inc. hereby joins in and incorporates by reference the entire Reply Brief on the Merits. Century Kentucky, Inc. is similarly situated to Alcoa, Inc. in that plaintiffs make identical allegations as to each defendant. Century Kentucky, Inc., like Alcoa, Inc., supplied the raw material of aluminum for a manufacturing process undertaken by plaintiff's

employer, who exercised total control over the process that allegedly gave rise to plaintiff's claimed injuries. The grounds set forth in the Opening Brief on the Merits are equally available to Century Kentucky, Inc.

For all of the reasons stated in Alcoa, Inc.'s Opening Brief on the Merits and Century Kentucky, Inc.'s Joinder thereto, as well as Alcoa, Inc.'s Reply Brief on the Merits, the Court should reverse the Court of Appeal and uphold the trial court's sustaining of the demurrer and dismissal of plaintiffs' claims with prejudice.

February 12, 2015

McGuireWoods LLP  
Diane P. Flannery  
Joan S. Dinsmore

By:   
\_\_\_\_\_  
Joan S. Dinsmore

Attorneys for Defendant and  
Respondent Century Kentucky, Inc.

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 1800 Century Park East, 8th Floor, Los Angeles, CA 90067-1501.

On February 12, 2015, I served the following document(s) described as **DEFENDANT AND RESPONDENT CENTURY KENTUCKY INC.'S JOINDER IN THE REPLY BRIEF ON THE MERITS OF DEFENDANT AND RESPONDENT ALCOA, INC.** on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes addressed as follows:

**SEE ATTACHED LIST**

- BY MAIL:** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing with the United States Postal Service. Under that practice, it would be deposited with the United States Postal Service that same day in the ordinary course of business. Such envelope(s) were placed for collection and mailing with postage thereon fully prepaid at Los Angeles, CA, on that same day following ordinary business practices. (C.C.P. § 1013 (a) and 1013a(3))
- BY OVERNIGHT DELIVERY:** I deposited such document(s) in a box or other facility regularly maintained by the overnight service carrier, or delivered such document(s) to a courier or driver authorized by the overnight service carrier to receive documents, in an envelope or package designated by the overnight service carrier with delivery fees paid or provided for, addressed to the person(s) served hereunder. (C.C.P. § 1013(d)(e))
- BY HAND DELIVERY:** I delivered such envelope(s) by hand to the office of the addressee(s). (C.C.P. § 1011(a)(b))

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 12, 2015, at Los Angeles, CA.

  
\_\_\_\_\_  
Sherlynn Hicks

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Case No. B248038