

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND,	:	
	:	
Plaintiff,	:	
v.	:	Civil Action No. 1:24-cv-03656
	:	
W.L. GORE & ASSOCIATES, INC.,	:	Hon. Richard D. Bennett
	:	
Defendant.	:	

**DEFENDANT W.L. GORE & ASSOCIATES, INC.’S AMENDED
ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF’S FIRST
AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL**

Defendant W.L. Gore & Associates, Inc. (“Gore”) by and through its undersigned counsel, for its Amended Answer and Affirmative Defenses to Plaintiff’s Amended Complaint and Demand for Jury Trial (“Complaint”) denies each and every allegation of the Amended Complaint except as expressly or otherwise responded to herein, and in response to each of the Paragraphs of the Complaint states as follows:

INTRODUCTION

1. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 1 of the Amended Complaint and therefore denies them.
2. Gore denies the allegations set forth in Paragraph 2 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.
3. Gore denies the allegations set forth in Paragraph 3 of the Amended Complaint.
4. Gore admits that Gore owns and operates multiple facilities in or around Elkton, Maryland with the same zip code (21921).
5. Gore denies the allegations set forth in Paragraph 5 of the Amended Complaint.
6. Gore denies the allegations set forth in Paragraph 6 of the Amended Complaint.

7. Gore denies the allegations set forth in Paragraph 7 of the Amended Complaint.
8. Gore denies the allegations set forth in Paragraph 8 of the Amended Complaint.
9. Gore denies the allegations set forth in Paragraph 9 of the Amended Complaint.
10. Gore denies the allegations set forth in Paragraph 10 of the Amended Complaint.

Footnote 1 is a citation to which no response is required, but to the extent a response is necessary, Gore denies the allegations.

11. Gore denies the allegations set forth in Paragraph 11 of the Amended Complaint.
12. Gore denies the allegations set forth in Paragraph 12 of the Amended Complaint.
13. Gore denies the allegations set forth in Paragraph 13 of the Amended Complaint.

Gore has been conducting an extensive investigation in full cooperation with the Maryland Department of the Environment (MDE). Gore and MDE have actively engaged with each other since at least 1990 regarding Gore's facilities in Maryland. During that time, Gore has informed MDE about its operations and obtained required permits for its manufacturing activities, and MDE has inspected Gore's facilities repeatedly and continually to confirm Gore's compliance with the applicable regulations.

14. Gore denies the allegations set forth in Paragraph 14 of the Amended Complaint.
15. Gore denies the allegations set forth in Paragraph 15 of the Amended Complaint.
16. Gore denies the allegations set forth in Paragraph 16 of the Amended Complaint.

JURISDICTION AND VENUE

17. The allegations set forth in Paragraph 17 are legal conclusions and arguments to which no response is required. To the extent Paragraph 17 alleges anything further to which a response is required, Gore denies the allegations.

18. The allegations set forth in Paragraph 18 are legal conclusions and arguments to which no response is required. To the extent Paragraph 18 alleges anything further to which a response is required, Gore denies the allegations.

19. The allegations set forth in Paragraph 19 are legal conclusions and arguments to which no response is required. To the extent Paragraph 19 alleges anything further to which a response is required, Gore denies the allegations. Footnote 3 is a citation to which no response is required, but to the extent a response is necessary, Gore denies the allegations.

20. The allegations set forth in Paragraph 20 are legal conclusions and arguments to which no response is required. To the extent Paragraph 20 alleges anything further to which a response is required, Gore denies the allegations.

PARTIES

21. The allegations set forth in Paragraph 21 are legal conclusions and arguments to which no response is required. To the extent Paragraph 21 alleges anything further to which a response is required, Gore denies the allegations.

22. The allegations set forth in Paragraph 22 are legal conclusions and arguments to which no response is required. To the extent Paragraph 22 alleges anything further to which a response is required, Gore denies the allegations.

23. The allegations set forth in Paragraph 23 are legal conclusions and arguments to which no response is required. To the extent Paragraph 23 alleges anything further to which a response is required, Gore denies the allegations.

24. The allegations set forth in Paragraph 24 are legal conclusions and arguments to which no response is required. To the extent Paragraph 24 alleges anything further to which a response is required, Gore denies the allegations.

25. The allegations set forth in Paragraph 25 are legal conclusions and arguments to which no response is required. To the extent Paragraph 25 alleges anything further to which a response is required, Gore denies the allegations.

26. The allegations set forth in Paragraph 26 are legal conclusions and arguments to which no response is required. To the extent Paragraph 26 alleges anything further to which a response is required, Gore denies the allegations.

27. The allegations set forth in Paragraph 27 are legal conclusions and arguments to which no response is required. To the extent Paragraph 27 alleges anything further to which a response is required, Gore denies the allegations.

28. The allegations set forth in Paragraph 28 are legal conclusions and arguments to which no response is required. To the extent Paragraph 28 alleges anything further to which a response is required, Gore denies the allegations.

29. The allegations set forth in Paragraph 29 are legal conclusions and arguments to which no response is required. To the extent Paragraph 29 alleges anything further to which a response is required, Gore denies the allegations.

30. The allegations set forth in Paragraph 30 are legal conclusions and arguments to which no response is required. To the extent Paragraph 30 alleges anything further to which a response is required, Gore denies the allegations.

31. Gore denies the allegations set forth in Paragraph 31 of the Amended Complaint.

32. Gore admits the allegations set forth in Paragraph 32 of the Amended Complaint.

33. Gore admits that it is a privately held, multinational material science company that develops or manufactures thousands of products across industries, from high-performance fabrics to implantable medical devices to products that reduce emissions, explore space, and solve other complex challenges. Gore denies any remaining allegations set forth in Paragraph 31 of the Complaint.

34. Gore denies the allegations set forth in Paragraph 34 of the Complaint. Gore is the owner and operator of six properties in or around Elkton, Maryland, and there are a total of thirteen facilities at those six properties.

FACTUAL ALLEGATIONS

35. Gore denies the allegations set forth in Paragraph 35 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

36. Gore denies the allegations set forth in Paragraph 36 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

37. Gore denies the allegations set forth in Paragraph 37 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

38. Gore denies the allegations set forth in Paragraph 38 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

39. Gore denies the allegations set forth in Paragraph 39 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

40. Paragraph 40 of the Amended Complaint purports to characterize EPA regulatory determinations. Gore expressly denies any statement or allegation in Paragraph 40 that misstates or mischaracterizes the referenced regulatory determinations or takes them out of context.

41. Paragraph 41 of the Amended Complaint purports to characterize EPA regulatory determinations. Gore expressly denies any statement or allegation in Paragraph 41 that misstates or mischaracterizes the referenced regulatory determination or takes it out of context.

42. Paragraph 42 of the Amended Complaint purports to characterize EPA regulatory determinations. Gore expressly denies any statement or allegation in Paragraph 42 that misstates or mischaracterizes the referenced regulatory determination or takes it out of context.

43. Paragraph 43 of the Amended Complaint purports to characterize EPA regulatory determinations. Gore expressly denies any statement or allegation in Paragraph 43 that misstates or mischaracterizes the referenced regulatory determination or takes it out of context.

44. The allegations set forth in Paragraph 44 are legal conclusions and arguments to which no response is required. To the extent Paragraph 44 alleges anything further to which a response is required, Gore denies the allegations.

45. The allegations set forth in Paragraph 45 are legal conclusions and arguments to which no response is required. To the extent Paragraph 45 alleges anything further to which a response is required, Gore denies the allegations.

46. The allegations set forth in Paragraph 46 are legal conclusions and arguments to which no response is required. To the extent Paragraph 46 alleges anything further to which a response is required, Gore denies the allegations.

47. The allegations set forth in Paragraph 47 are legal conclusions and arguments to which no response is required. To the extent Paragraph 47 alleges anything further to which a response is required, Gore denies the allegations.

48. The allegations set forth in Paragraph 48 are legal conclusions and arguments to which no response is required. To the extent Paragraph 48 alleges anything further to which a response is required, Gore denies the allegations.

49. Paragraph 49 of the Amended Complaint purports to characterize EPA regulatory determinations. Gore expressly denies any statement or allegation in Paragraph 49 that misstates or mischaracterizes the referenced regulatory determination or takes it out of context.

50. Paragraph 50 of the Amended Complaint purports to characterize EPA regulatory determinations. Gore expressly denies any statement or allegation in Paragraph 50 that misstates or mischaracterizes the referenced regulatory determination or takes it out of context.

51. To the extent that the allegations in Paragraph 51 (first instance) of the Amended Complaint relate to other industrial facilities, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph 51 (first instance) that may be reasonably construed as relating to Gore, Gore denies the allegations.

52. Gore denies the allegations set forth in Paragraph 52 (first instance) of the Amended Complaint.

51. Gore admits the allegations set forth in Paragraph 51 (second instance) of the Amended Complaint.¹

¹ The Amended Complaint includes paragraphs 51 and 52 twice. For consistency with the Amended Complaint, the Amended Answer uses this same numbering format.

52. Gore admits the allegations set forth in Paragraph 52 (second instance) of the Amended Complaint.

53. Gore denies the allegations set forth in Paragraph 53 of the Amended Complaint.

54. Gore denies the allegations set forth in Paragraph 54 of the Amended Complaint.

55. Gore denies the allegations set forth in Paragraph 55 of the Amended Complaint.

56. Gore denies the allegations set forth in Paragraph 56 of the Amended Complaint.

57. Gore denies the allegations set forth in Paragraph 57 of the Amended Complaint.

58. Gore denies the allegations set forth in Paragraph 58 of the Amended Complaint.

59. To the extent that the allegations in Paragraph 59 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them. As to the remaining allegations in Paragraph 59 that may be reasonably construed as relating to Gore, Gore denies the allegations.

60. Because the allegations in Paragraph 60 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

61. To the extent that the allegations in Paragraph 61 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them. As to the remaining allegations in Paragraph 61 that may be reasonably construed as relating to Gore, Gore denies the allegations.

62. Because the allegations in Paragraph 62 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

63. To the extent that the allegations in Paragraph 63 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them. As to the remaining allegations in Paragraph 63 that may be reasonably construed as relating to Gore, Gore denies the allegations.

64. Gore denies the allegations set forth in Paragraph 64 of the Amended Complaint.

65. Because the allegations in Paragraph 65 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

66. Because the allegations in Paragraph 66 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

67. Because the allegations in Paragraph 67 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

68. Because the allegations in Paragraph 68 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

69. Because the allegations in Paragraph 69 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

70. Because the allegations in Paragraph 70 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

71. Because the allegations in Paragraph 71 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

72. Because the allegations in Paragraph 72 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

73. Because the allegations in Paragraph 73 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

74. Because the allegations in Paragraph 74 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

75. Because the allegations in Paragraph 75 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

76. Because the allegations in Paragraph 76 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

77. Because the allegations in Paragraph 77 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

78. To the extent that the allegations in Paragraph 78 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them. Gore denies the remaining allegations in Paragraph 78.

79. Gore denies the allegations set forth in Paragraph 79 of the Amended Complaint.

80. Gore denies the allegations set forth in Paragraph 80 of the Amended Complaint.

81. To the extent that the allegations in Paragraph 81 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph 81 that may be reasonably construed as relating to Gore, Gore denies the allegations.

82. To the extent that the allegations in Paragraph 82 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph 82 that may be reasonably construed as relating to Gore, Gore denies the allegations.

83. To the extent that the allegations in Paragraph 83 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the allegations in Paragraph 83 that may be reasonably construed as relating to Gore, Gore denies the allegations.

84. Gore denies the allegations set forth in Paragraph 84 of the Amended Complaint.

85. Because the allegations in Paragraph 85 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph 85 that may be reasonably construed as relating to Gore, Gore denies the allegations.

86. Because the allegations in Paragraph 86 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph 86 that may be reasonably construed as relating to Gore, Gore denies the allegations.

87. Because the allegations in Paragraph 87 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph 87 that may be reasonably construed as relating to Gore, Gore denies the allegations.

88. To the extent that the allegations in Paragraph 88 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information

sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph 88 that may be reasonably construed as relating to Gore, Gore denies the allegations.

89. To the extent that the allegations in Paragraph 89 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph 89 that may be reasonably construed as relating to Gore, Gore denies the allegations.

90. Gore denies the allegations set forth in Paragraph 90 of the Amended Complaint.

91. Because the allegations in Paragraph 91 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them.

92. Gore denies the allegations set forth in Paragraph 92 of the Amended Complaint.

93. The allegations set forth in Paragraph 93 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 93 alleges anything further to which a response is required, Gore denies the allegations.

94. The allegations set forth in Paragraph 94 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 94 alleges anything further to which a response is required, Gore denies the allegations.

95. The allegations set forth in Paragraph 95 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 95 alleges anything further to which a response is required, Gore denies the allegations.

96. The allegations set forth in Paragraph 96 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 96 alleges anything further to which a response is required, Gore denies the allegations.

97. The allegations set forth in Paragraph 97 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 97 alleges anything further to which a response is required, Gore denies the allegations.

98. The allegations set forth in Paragraph 98 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 98 alleges anything further to which a response is required, Gore denies the allegations.

99. The allegations set forth in Paragraph 99 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 99 alleges anything further to which a response is required, Gore denies the allegations.

100. The allegations set forth in Paragraph 100 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 100 alleges anything further to which a response is required, Gore denies the allegations.

101. The allegations set forth in Paragraph 101 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 101 alleges anything further to which a response is required, Gore denies the allegations.

102. Gore denies the allegations set forth in Paragraph 102 of the Amended Complaint.

103. Gore denies the allegations set forth in Paragraph 103 of the Amended Complaint.

104. Gore denies the allegations set forth in Paragraph 104 of the Amended Complaint.

105. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 105 of the Amended Complaint and therefore denies them.

106. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 106 of the Amended Complaint and therefore denies them.

107. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 107 of the Amended Complaint and therefore denies them.

108. Gore denies the allegations set forth in Paragraph 108 of the Amended Complaint.

109. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 109 of the Amended Complaint and therefore denies them.

110. Gore denies the allegations set forth in Paragraph 110 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

111. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 111 of the Amended Complaint and therefore denies them.

112. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 112 of the Amended Complaint and therefore denies them.

113. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 113 of the Amended Complaint and therefore denies them.

114. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 114 of the Amended Complaint and therefore denies them.

115. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 115 of the Amended Complaint and therefore denies them.

116. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 116 of the Amended Complaint and therefore denies them.

117. Gore denies the allegations set forth in Paragraph 117 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

118. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 118 of the Amended Complaint and therefore denies them.

119. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 119 of the Amended Complaint and therefore denies them.

120. Gore denies the allegations set forth in Paragraph 120 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

121. Gore denies the allegations set forth in Paragraph 121 of the Amended Complaint.

122. Gore denies the allegations set forth in Paragraph 122 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

123. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 123 of the Amended Complaint and therefore denies them.

124. Gore denies the allegations set forth in Paragraph 124 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

125. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 125 of the Amended Complaint and therefore denies them.

126. Gore denies the allegations set forth in Paragraph 126 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

127. Gore denies the allegations set forth in Paragraph 127 of the Amended Complaint.

128. Gore denies the allegations set forth in Paragraph 128 of the Amended Complaint.

129. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 129 of the Amended Complaint and therefore denies them.

130. Gore denies the allegations set forth in Paragraph 130 of the Amended Complaint.

131. Gore denies the allegations set forth in Paragraph 131 of the Amended Complaint.

132. Gore admits that it received a letter from MDE on February 16, 2023 and agreed to work with MDE to investigate PFAS contamination in the area surrounding the Cherry Hill facility, but denies the remaining allegations set forth in Paragraph 132 of the Amended Complaint.

133. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 133 of the Amended Complaint and therefore denies them.

134. Gore denies the allegations set forth in Paragraph 134 of the Amended Complaint.

135. Gore denies the allegations set forth in Paragraph 135 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

**COUNT I
PUBLIC NUISANCE**

136. Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph 136 is required, denied.

137. The allegations set forth in Paragraph 137 of the Amended Complaint are legal conclusions and arguments to which no response is required.

138. The allegations set forth in Paragraph 138 of the Amended Complaint are legal conclusions and arguments to which no response is required.

139. The allegations set forth in Paragraph 139 of the Amended Complaint are legal conclusions and arguments to which no response is required.

140. The allegations set forth in Paragraph 140 of the Amended Complaint are legal conclusions and arguments to which no response is required.

141. The allegations set forth in Paragraph 141 of the Amended Complaint are legal conclusions and arguments to which no response is required.

142. Gore denies the allegations set forth in Paragraph 142 of the Amended Complaint.

143. Gore denies the allegations set forth in Paragraph 143 of the Amended Complaint.

**COUNT II
TRESPASS**

144. Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph 144 is required, denied.

145. The allegations set forth in Paragraph 145 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 145 alleges anything further to which a response is required, Gore denies the allegations.

146. Gore denies the allegations set forth in Paragraph 146 of the Amended Complaint.

147. Gore denies the allegations set forth in Paragraph 147 of the Amended Complaint.

148. The allegations set forth in Paragraph 148 of the Amended Complaint are legal conclusions and arguments to which no response is required.

149. The allegations set forth in Paragraph 149 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 149 alleges anything further to which a response is required, Gore denies the allegations.

150. The allegations set forth in Paragraph 150 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 150 alleges anything further to which a response is required, Gore denies the allegations.

151. The allegations set forth in Paragraph 151 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 151 alleges anything further to which a response is required, Gore denies the allegations.

152. The allegations set forth in Paragraph 152 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 152 alleges anything further to which a response is required, Gore denies the allegations.

153. The allegations set forth in Paragraph 153 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 153 alleges anything further to which a response is required, Gore denies the allegations.

154. The allegations set forth in Paragraph 154 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 154 alleges anything further to which a response is required, Gore denies the allegations.

155. The allegations set forth in Paragraph 155 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 155 alleges anything further to which a response is required, Gore denies the allegations.

COUNT III NEGLIGENCE

156. Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph 156 is required, denied.

157. The allegations set forth in Paragraph 157 of the Amended Complaint are legal conclusions and arguments to which no response is required.

158. The allegations set forth in Paragraph 158 of the Amended Complaint are legal conclusions and arguments to which no response is required.

159. The allegations set forth in Paragraph 159 of the Amended Complaint are legal conclusions and arguments to which no response is required.

160. The allegations set forth in Paragraph 160 of the Amended Complaint are legal conclusions and arguments to which no response is required.

161. The allegations set forth in Paragraph 161 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 161 alleges anything further to which a response is required, Gore denies the allegations.

162. Gore denies the allegations set forth in Paragraph 162 of the Amended Complaint.

**COUNT IV
ENVIRONMENT ARTICLE, TITLE 7, SUBTITLE 2 CLAIM**

163. Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph 163 is required, denied.

164. The allegations set forth in Paragraph 164 of the Amended Complaint are legal conclusions and arguments to which no response is required.

165. The allegations set forth in Paragraph 165 of the Amended Complaint are legal conclusions and arguments to which no response is required.

166. The allegations set forth in Paragraph 166 of the Amended Complaint are legal conclusions and arguments to which no response is required.

167. The allegations set forth in Paragraph 167 of the Amended Complaint are legal conclusions and arguments to which no response is required.

168. The allegations set forth in Paragraph 168 of the Amended Complaint are legal conclusions and arguments to which no response is required.

169. The allegations set forth in Paragraph 169 of the Amended Complaint are legal conclusions and arguments to which no response is required.

170. The allegations set forth in Paragraph 170 of the Amended Complaint are legal conclusions and arguments to which no response is required.

171. The allegations set forth in Paragraph 171 of the Amended Complaint are legal conclusions and arguments to which no response is required.

172. Gore denies the allegations set forth in Paragraph 172 of the Amended Complaint.

173. Gore denies the allegations set forth in Paragraph 173 of the Amended Complaint.

174. The allegations set forth in Paragraph 174 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 174 alleges anything further to which a response is required, Gore denies the allegations.

175. The allegations set forth in Paragraph 175 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 175 alleges anything further to which a response is required, Gore denies the allegations.

176. Gore denies the allegations set forth in Paragraph 176 of the Amended Complaint.

177. The allegations set forth in Paragraph 177 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 177 alleges anything further to which a response is required, Gore denies the allegations.

COUNT V
ENVIRONMENT ARTICLE, TITLE 9, SUBTITLE 3 CLAIM

178. Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph 178 is required, denied.

179. The allegations set forth in Paragraph 179 of the Amended Complaint are legal conclusions and arguments to which no response is required.

180. The allegations set forth in Paragraph 180 of the Amended Complaint are legal conclusions and arguments to which no response is required.

181. The allegations set forth in Paragraph 181 of the Amended Complaint are legal conclusions and arguments to which no response is required.

182. The allegations set forth in Paragraph 182 of the Amended Complaint are legal conclusions and arguments to which no response is required.

183. The allegations set forth in Paragraph 183 of the Amended Complaint are legal conclusions and arguments to which no response is required.

184. The allegations set forth in Paragraph 184 of the Amended Complaint are legal conclusions and arguments to which no response is required.

185. The allegations set forth in Paragraph 185 of the Amended Complaint are legal conclusions and arguments to which no response is required.

186. Gore denies the allegations set forth in Paragraph 186 of the Amended Complaint.

187. Gore denies the allegations set forth in Paragraph 187 of the Amended Complaint.

188. Gore denies the allegations set forth in Paragraph 188 of the Amended Complaint.

**COUNT VI
ENVIRONMENT ARTICLE, TITLE 9, SUBTITLE 4 CLAIM**

189. Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph 189 is required, denied.

190. The allegations set forth in Paragraph 190 of the Amended Complaint are legal conclusions and arguments to which no response is required.

191. The allegations set forth in Paragraph 191 of the Amended Complaint are legal conclusions and arguments to which no response is required.

192. The allegations set forth in Paragraph 192 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 192 alleges anything further to which a response is required, Gore denies the allegations.

**COUNT VII
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT, 42 U.S.C. § 9607(A)**

193. Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph 193 is required, denied.

194. The allegations set forth in Paragraph 194 of the Amended Complaint are legal conclusions and arguments to which no response is required.

195. The allegations set forth in Paragraph 195 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 195 alleges anything further to which a response is required, Gore denies the allegations.

196. The allegations set forth in Paragraph 196 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 196 alleges anything further to which a response is required, Gore denies the allegations.

197. The allegations set forth in Paragraph 197 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 197 alleges anything further to which a response is required, Gore denies the allegations.

198. The allegations set forth in Paragraph 198 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 198 alleges anything further to which a response is required, Gore denies the allegations.

**COUNT VIII
COMPREHENSIVE ENVIROMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT, 42 U.S.C. § 9613(g)**

199. Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph 199 is required, denied.

200. The allegations set forth in Paragraph 200 of the Amended Complaint are legal conclusions and arguments to which no response is required.

201. The allegations set forth in Paragraph 201 of the Amended Complaint are legal conclusions and arguments to which no response is required.

202. The allegations set forth in Paragraph 202 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 202 alleges anything further to which a response is required, Gore denies the allegations.

203. The allegations set forth in Paragraph 203 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 203 alleges anything further to which a response is required, Gore denies the allegations.

COUNT IX
RESOURCE CONSERVATION AND RECOVERY ACT (IMMINENT AND
SUBSTANTIAL ENDANGERMENT)
(As to Gore's Cherry Hill, Fair Hill, and Appleton Facilities)

204. Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph 204 is required, denied.

205. The allegations set forth in Paragraph 205 of the Amended Complaint are legal conclusions and arguments to which no response is required.

206. The allegations set forth in Paragraph 206 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 206 alleges anything further to which a response is required, Gore denies the allegations.

207. The allegations set forth in Paragraph 207 of the Amended Complaint are legal conclusions and arguments to which no response is required.

208. Gore denies the allegations set forth in Paragraph 208 of the Amended Complaint.

209. Gore denies the allegations set forth in Paragraph 209 of the Amended Complaint

210. The allegations set forth in Paragraph 210 of the Amended Complaint are legal conclusions and arguments to which no response is required.

211. The allegations set forth in Paragraph 211 of the Amended Complaint are legal conclusions and arguments to which no response is required.

**COUNT X
UNJUST ENRICHMENT**

212. Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph 212 is required, denied.

213. Gore denies the allegations set forth in Paragraph 213 of the Amended Complaint.

214. Gore denies the allegations set forth in Paragraph 214 of the Amended Complaint.

215. Gore denies the allegations set forth in Paragraph 215 of the Amended Complaint.

216. Gore denies the allegations set forth in Paragraph 216 of the Amended Complaint.

217. Gore denies the allegations set forth in Paragraph 217 of the Amended Complaint.

218. Gore denies the allegations set forth in Paragraph 218 of the Amended Complaint.

219. Gore denies the allegations set forth in Paragraph 219 of the Amended Complaint.

220. Gore denies the allegations set forth in Paragraph 220 of the Amended Complaint.

221. Gore denies the allegations set forth in Paragraph 221 of the Amended Complaint.

PRAYER FOR RELIEF

In response to Plaintiff's unnumbered "WHEREFORE" clause, Gore denies that it is liable to Plaintiff for any of the requested relief or for any relief whatsoever.

AFFIRMATIVE DEFENSES

Discovery and investigation may reveal that one or more of the following defenses and affirmative defenses will be available to Gore. Therefore, Gore gives notice it intends to rely upon any other defense or defenses that may become available including, without limitation, defenses related to the statute(s) of limitations and repose, standing, waiver, estoppel, and laches. Gore further reserves the right to amend its Answer to assert any additional defenses, whether specifically identified herein or otherwise, as further information becomes available.

Gore only undertakes the burden of proof as to those defenses deemed affirmative defenses by law regardless of how such defenses are denominated herein. Subject to the foregoing, and without assuming any burden not otherwise imposed by law, Gore asserts the following defenses to preserve its rights:

FIRST AFFIRMATIVE DEFENSE

The Amended Complaint and each cause of action contained therein fails to state a claim upon which relief can be granted, under Rule 12 of the Federal Rules of Civil Procedure.

SECOND AFFIRMATIVE DEFENSE

Plaintiff's causes of action are, or may be, barred by the applicable statute of limitations or statute of repose and/or by the equitable doctrines of waiver, estoppel, laches, unclean hands, and/or statutory and regulatory compliance.

THIRD AFFIRMATIVE DEFENSE

Gore had no duty or obligations which it owed to Plaintiff.

FOURTH AFFIRMATIVE DEFENSE

Gore did not violate any duty or obligations, to the extent there were any, to Plaintiff.

FIFTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because Gore's facilities at all times relevant hereto complied with all applicable laws and regulations to which it was subject.

SIXTH AFFIRMATIVE DEFENSE

Gore denies that exposures to any of the substances alleged in the Amended Complaint pose any potential threat to human health or the environment. To the extent it is determined at some future time to the contrary, Gore neither knew nor should have known that any of the substances alleged in the Amended Complaint constituted a reasonable or foreseeable risk of

physical harm in accordance with the prevailing state of medical, scientific, and/or industrial knowledge available at all times relevant to the claims or causes of action asserted by Plaintiff.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims fail because the Amended Complaint does not allege a legally cognizable injury.

EIGHTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, to the extent that the benefits of Gore's products and processes outweigh any known risks.

NINTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, reduced, and/or limited pursuant to applicable statutory and common law regarding limitation of non-economic damages, awards, and all caps on recovery, as well as setoffs. *See* Maryland Code § 3-2A-09; § 11-108.

TENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because the Gore processes alleged in the Amended Complaint are not abnormally dangerous and their benefits exceeded any potential associated risks.

ELEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred or diminished in whole or in part by the state-of-the-art doctrine.

TWELFTH AFFIRMATIVE DEFENSE

The causes of action set forth in the Amended Complaint fail because federal, state, and/or local governments and agencies have mandated, directed, approved, and/or ratified the alleged actions or omissions of Gore either expressly or with knowledge and acquiescence.

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred and Plaintiff is not entitled to any award of punitive damages because no act or omission that can be attributed to Gore for the purpose of imposing punitive damages was fraudulent, malicious, oppressive, willful, wanton, reckless, grossly negligent, intentional, or otherwise sufficient to warrant their imposition of punitive damages.

FOURTEENTH AFFIRMATIVE DEFENSE

Any award of punitive damages would violate Gore's rights under the Due Process Clause of the Fifth and Fourteenth Amendments of the United States Constitution; the Excessive Fines Clause of the Eighth Amendment of the United States Constitution; the Double Jeopardy Clause of the Fifth Amendment of the United States Constitution; and similar provisions in the Constitution, laws, public policies, and statutes of any State or Commonwealth of the United States whose laws might be deemed controlling in this case, insofar as such damages are awarded by a jury or other fact-finder that: (a) is not provided with a standard of sufficient clarity for determining the appropriateness, and the appropriate size, of a punitive damages award; (b) is not adequately and clearly instructed on the limits of punitive damages imposed by the applicable principles of deterrence and punishment; (c) is not expressly prohibited from awarding punitive damages, or determining the amount of an award of punitive damages, in whole or in part, on the basis of invidiously discriminatory characteristics, including the corporate status, wealth, or state of residence of Gore; (d) is permitted to award punitive damages under a standard for determining liability for such damages that is vague and arbitrary and does not define with sufficient clarity the conduct or mental state that makes punitive damages permissible; (e) is not expressly prohibited from awarding punitive damages, or

determining the amount of an award of punitive damages, based on actual or potential harm to any individual other than the particular plaintiff whose claims are being tried.

FIFTEENTH AFFIRMATIVE DEFENSE

Plaintiff's recovery of damages, if any, should be reduced by any payments by collateral sources.

SIXTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, under the doctrine of federal preemption, including without limitation, express preemption, implied preemption, and field preemption, pursuant to any applicable statutes, regulations, guidance documents, notices, governmental specifications, and policy statements, enacted and/or promulgated and/or issued by Congress, federal agencies, or the executive branch.

SEVENTEENTH AFFIRMATIVE DEFENSE

The Amended Complaint, and each alleged claim contained therein, is barred, in whole or in part, because Defendant is entitled to immunity from suit under the government contractor defense. *See Boyle v. United Techs. Corp.*, 487 U.S. 500 (1988).

EIGHTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may not be ripe and/or have been mooted.

NINETEENTH AFFIRMATIVE DEFENSE

Any injuries and/or damages sustained by Plaintiff are barred by the doctrine of intervening cause and/or superseding cause.

TWENTIETH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because Plaintiff's alleged injuries and damages were not in fact caused by the conduct or actions of Gore.

TWENTY-FIRST AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because Plaintiff's alleged injuries and damages were proximately caused by the negligence, fault, or other culpable conduct of persons or parties over which Gore had no control.

TWENTY-SECOND AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because Gore neither knew, nor should have known, that any of its products or processes posed the risks alleged by Plaintiff by virtue of the prevailing state of the medical, scientific, technical, and/or industrial knowledge available to Gore at all times relevant to the claims or causes of action asserted by Plaintiff.

TWENTY-THIRD AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because any alleged levels of contamination did not exceed any applicable standards under laws or regulations in effect at the relevant times.

TWENTY-FOURTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because federal, state, and/or local authorities authorized, ratified, or were aware of and acquiesced in actions by Gore that are the subject of Plaintiff's claims. Gore is not responsible or liable for any acts or omissions undertaken by or at the direction of any governmental authority or agency.

TWENTY-FIFTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because of consent, public necessity, private necessity, and/or privilege.

TWENTY-SIXTH AFFIRMATIVE DEFENSE

Plaintiff's damages, if any, were caused by the active, direct, and proximate negligence or actual conduct of entities or persons other than Gore, and in the event that Gore is found to be liable to Plaintiff, Gore will be entitled to indemnification, contribution, and/or appointment.

TWENTY-SEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, by the doctrines of acquiescence, accord and satisfaction, ratification, settlement, or release.

TWENTY-EIGHTH AFFIRMATIVE DEFENSE

The substances at issue in Plaintiff's Amended Complaint are not subject to RCRA.

TWENTY-NINTH AFFIRMATIVE DEFENSE

Gore denies it violated any standards or limitations imposed by RCRA.

THIRTIETH AFFIRMATIVE DEFENSE

Plaintiff's claims fail because waste containing PFOA or other perfluorinated chemicals does not meet the definitions of "solid waste" or "hazardous waste" under RCRA.

THIRTY-FIRST AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred by the doctrine of administrative exhaustion.

THIRTY-SECOND AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, from any recovery against Gore to the extent that Gore was or is operating in accordance with regulatory permits, permit representations, or other governmental authorizations and/or acting as a reasonably prudent operator would act.

THIRTY-THIRD AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, by the collateral attack and/or permit shield doctrines.

THIRTY-FOURTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, by the doctrines of primary jurisdiction and/or abstention.

THIRTY-FIFTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, by Article II, Section 1, of the U.S. Constitution.

THIRTY-SIXTH AFFIRMATIVE DEFENSE

To the extent not incorporated above, Gore raises all affirmative defenses applicable under Maryland law.

DEMAND FOR JURY TRIAL

Gore demands a trial by jury on all issues appropriate for jury determination.

Dated: May 27, 2025

Respectfully Submitted,

WILLIAMS AND CONNOLLY LLP

/s/ Liam J. Montgomery

Liam J. Montgomery (#28978)

D. Shayon Ghosh (*pro hac vice*)

Rebecca A. Carter (*admission pending*)

Sarah L. Chanski (*pro hac vice*)

WILLIAMS AND CONNOLLY LLP

680 Maine Avenue, SW

Washington, DC 20024

Telephone: (202) 434-5000

Facsimile: (202) 434-5029

lmontgomery@wc.com

sghosh@wc.com

rebeccacarter@wc.com

schanski@wc.com

(signed by D. Shayon Ghosh with permission of
Liam J. Montgomery)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

STATE OF MARYLAND,

Plaintiff,

v.

W.L. GORE & ASSOCIATES, INC.,

Defendant.

:
:
:
:
:
:
:
:
:
:

Civil Action No. 1:24-cv-03656

Hon. Richard D. Bennett

**DEFENDANT W.L. GORE & ASSOCIATES, INC.'S AMENDED
ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S FIRST
AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL**

Defendant W.L. Gore & Associates, Inc. ("Gore") by and through its undersigned counsel, for its Amended Answer and Affirmative Defenses to Plaintiff's Amended Complaint and Demand for Jury Trial ("Complaint") denies each and every allegation of the Amended Complaint except as expressly or otherwise responded to herein, and in response to each of the Paragraphs of the Complaint states as follows:

INTRODUCTION

1. Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 1 of the Amended Complaint and therefore denies them.
2. Gore denies the allegations set forth in Paragraph 2 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.
3. Gore denies the allegations set forth in Paragraph 3 of the Amended Complaint.
4. Gore admits that Gore owns and operates multiple facilities in or around Elkton, Maryland with the same zip code (21921).
5. Gore denies the allegations set forth in Paragraph 5 of the Amended Complaint.
6. Gore denies the allegations set forth in Paragraph 6 of the Amended Complaint.

7. Gore denies the allegations set forth in Paragraph 7 of the Amended Complaint.
8. Gore denies the allegations set forth in Paragraph 8 of the Amended Complaint.
9. Gore denies the allegations set forth in Paragraph 9 of the Amended Complaint.
10. Gore denies the allegations set forth in Paragraph 10 of the Amended Complaint.

Footnote 1 is a citation to which no response is required, but to the extent a response is necessary, Gore denies the allegations.

11. Gore denies the allegations set forth in Paragraph 11 of the Amended Complaint.
12. Gore denies the allegations set forth in Paragraph 12 of the Amended Complaint.
13. Gore denies the allegations set forth in Paragraph 13 of the Amended Complaint.

Gore has been conducting an extensive investigation in full cooperation with the Maryland Department of the Environment (MDE). Gore and MDE have actively engaged with each other since at least 1990 regarding Gore's facilities in Maryland. During that time, Gore has informed MDE about its operations and obtained required permits for its manufacturing activities, and MDE has inspected Gore's facilities repeatedly and continually to confirm Gore's compliance with the applicable regulations.

14. Gore denies the allegations set forth in Paragraph 14 of the Amended Complaint.
15. Gore denies the allegations set forth in Paragraph 15 of the Amended Complaint.
16. Gore denies the allegations set forth in Paragraph 16 of the Amended Complaint.

JURISDICTION AND VENUE

17. The allegations set forth in Paragraph 17 are legal conclusions and arguments to which no response is required. To the extent Paragraph 17 alleges anything further to which a response is required, Gore denies the allegations.

18. The allegations set forth in Paragraph 18 are legal conclusions and arguments to which no response is required. To the extent Paragraph 18 alleges anything further to which a response is required, Gore denies the allegations.

19. The allegations set forth in Paragraph 19 are legal conclusions and arguments to which no response is required. To the extent Paragraph 19 alleges anything further to which a response is required, Gore denies the allegations. Footnote 3 is a citation to which no response is required, but to the extent a response is necessary, Gore denies the allegations.

PARTIES

20. The allegations set forth in Paragraph 20 are legal conclusions and arguments to which no response is required. To the extent Paragraph 20 alleges anything further to which a response is required, Gore denies the allegations.

PARTIES

21. The allegations set forth in Paragraph 21 are legal conclusions and arguments to which no response is required. To the extent Paragraph 21 alleges anything further to which a response is required, Gore denies the allegations.

22. The allegations set forth in Paragraph 22 are legal conclusions and arguments to which no response is required. To the extent Paragraph 22 alleges anything further to which a response is required, Gore denies the allegations.

23. The allegations set forth in Paragraph 23 are legal conclusions and arguments to which no response is required. To the extent Paragraph 23 alleges anything further to which a response is required, Gore denies the allegations.

24. The allegations set forth in Paragraph 24 are legal conclusions and arguments to which no response is required. To the extent Paragraph 24 alleges anything further to which a response is required, Gore denies the allegations.

25. The allegations set forth in Paragraph 25 are legal conclusions and arguments to which no response is required. To the extent Paragraph 25 alleges anything further to which a response is required, Gore denies the allegations.

26. The allegations set forth in Paragraph 26 are legal conclusions and arguments to which no response is required. To the extent Paragraph 26 alleges anything further to which a response is required, Gore denies the allegations.

27. The allegations set forth in Paragraph 27 are legal conclusions and arguments to which no response is required. To the extent Paragraph 27 alleges anything further to which a response is required, Gore denies the allegations.

28. The allegations set forth in Paragraph 28 are legal conclusions and arguments to which no response is required. To the extent Paragraph 28 alleges anything further to which a response is required, Gore denies the allegations.

29. The allegations set forth in Paragraph 29 are legal conclusions and arguments to which no response is required. To the extent Paragraph 29 alleges anything further to which a response is required, Gore denies the allegations.

30. The allegations set forth in Paragraph 30 are legal conclusions and arguments to which no response is required. To the extent Paragraph 30 alleges anything further to which a response is required, Gore denies the allegations.

28.31. Gore denies the allegations set forth in Paragraph ~~29~~31 of the Amended Complaint.

28.32. Gore admits the allegations set forth in Paragraph ~~30~~32 of the Amended Complaint.

28.33. Gore admits that it is a privately held, multinational material science company that develops or manufactures thousands of products across industries, from high-performance fabrics to implantable medical devices to products that reduce emissions, explore space, and solve other complex challenges. Gore denies any remaining allegations set forth in Paragraph 31 of the Complaint.

28.34. Gore denies the allegations set forth in Paragraph ~~32~~34 of the Complaint. Gore is the owner and operator of six properties in or around Elkton, Maryland, and there are a total of thirteen facilities at those six properties.

FACTUAL ALLEGATIONS

28.35. Gore denies the allegations set forth in Paragraph ~~33~~35 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

28.36. Gore denies the allegations set forth in Paragraph ~~34~~36 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

28.37. Gore denies the allegations set forth in Paragraph ~~35~~37 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

28.38. Gore denies the allegations set forth in Paragraph 3638 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

28.39. Gore denies the allegations set forth in Paragraph 3739 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

28.40. Paragraph 3840 of the Amended Complaint purports to characterize EPA regulatory determinations. Gore expressly denies any statement or allegation in Paragraph 3840 that misstates or mischaracterizes the referenced regulatory determinations or takes them out of context.

28.41. Paragraph 3941 of the Amended Complaint purports to characterize EPA regulatory determinations. Gore expressly denies any statement or allegation in Paragraph 3941 that misstates or mischaracterizes the referenced regulatory determination or takes it out of context.

28.42. Paragraph 4042 of the Amended Complaint purports to characterize EPA regulatory determinations. Gore expressly denies any statement or allegation in Paragraph 4042 that misstates or mischaracterizes the referenced regulatory determination or takes it out of context.

28.43. Paragraph 4143 of the Amended Complaint purports to characterize EPA regulatory determinations. Gore expressly denies any statement or allegation in Paragraph 4143 that misstates or mischaracterizes the referenced regulatory determination or takes it out of context.

44. The allegations set forth in Paragraph 44 are legal conclusions and arguments to which no response is required. To the extent Paragraph 44 alleges anything further to which a response is required, Gore denies the allegations.

45. The allegations set forth in Paragraph 45 are legal conclusions and arguments to which no response is required. To the extent Paragraph 45 alleges anything further to which a response is required, Gore denies the allegations.

46. The allegations set forth in Paragraph 46 are legal conclusions and arguments to which no response is required. To the extent Paragraph 46 alleges anything further to which a response is required, Gore denies the allegations.

47. The allegations set forth in Paragraph 47 are legal conclusions and arguments to which no response is required. To the extent Paragraph 47 alleges anything further to which a response is required, Gore denies the allegations.

48. The allegations set forth in Paragraph 48 are legal conclusions and arguments to which no response is required. To the extent Paragraph 48 alleges anything further to which a response is required, Gore denies the allegations.

28.49. Paragraph 4249 of the Amended Complaint purports to characterize EPA regulatory determinations. Gore expressly denies any statement or allegation in Paragraph 4249 that misstates or mischaracterizes the referenced regulatory determination or takes it out of context.

28.50. Paragraph 4350 of the Amended Complaint purports to characterize EPA regulatory determinations. Gore expressly denies any statement or allegation in Paragraph 4350 that misstates or mischaracterizes the referenced regulatory determination or takes it out of context.

28.51. To the extent that the allegations in Paragraph 4451 (first instance) of the Amended Complaint relate to other industrial facilities, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies

them. As to the remaining allegations in Paragraph ~~44~~51 (first instance) that may be reasonably construed as relating to Gore, Gore denies the allegations.

~~28.52.~~ Gore denies the allegations set forth in Paragraph ~~45~~52 (first instance) of the Amended Complaint.

~~50.51.~~ Gore admits the allegations set forth in Paragraph ~~46~~51 (second instance) of the Amended Complaint.¹

~~50.52.~~ Gore admits the allegations set forth in Paragraph ~~47~~52 (second instance) of the Amended Complaint.

~~50.53.~~ Gore denies the allegations set forth in Paragraph ~~48~~53 of the Amended Complaint.

~~50.54.~~ Gore denies the allegations set forth in Paragraph ~~49~~54 of the Amended Complaint.

~~50.55.~~ Gore denies the allegations set forth in Paragraph ~~50~~55 of the Amended Complaint.

~~50.56.~~ Gore denies the allegations set forth in Paragraph ~~51~~56 of the Amended Complaint.

~~50.57.~~ Gore denies the allegations set forth in Paragraph ~~52~~57 of the Amended Complaint.

~~50.58.~~ Gore denies the allegations set forth in Paragraph ~~53~~58 of the Amended Complaint.

¹ The Amended Complaint includes paragraphs 51 and 52 twice. For consistency with the Amended Complaint, the Amended Answer uses this same numbering format.

~~50.59.~~ To the extent that the allegations in Paragraph ~~54~~59 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them. As to the remaining allegations in Paragraph ~~54~~59 that may be reasonably construed as relating to Gore, Gore denies the allegations.

~~50.60.~~ Because the allegations in Paragraph ~~55~~60 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.61.~~ To the extent that the allegations in Paragraph ~~56~~61 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them. As to the remaining allegations in Paragraph ~~56~~61 that may be reasonably construed as relating to Gore, Gore denies the allegations.

~~50.62.~~ Because the allegations in Paragraph ~~57~~62 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.63.~~ To the extent that the allegations in Paragraph ~~58~~63 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them. As to the remaining allegations in Paragraph ~~58~~63 that may be reasonably construed as relating to Gore, Gore denies the allegations.

~~50.64.~~ Gore denies the allegations set forth in Paragraph ~~59~~64 of the Amended Complaint.

~~50.65.~~ Because the allegations in Paragraph ~~60~~65 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.66.~~ Because the allegations in Paragraph ~~61~~66 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.67.~~ Because the allegations in Paragraph ~~62~~67 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.68.~~ Because the allegations in Paragraph ~~63~~68 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.69.~~ Because the allegations in Paragraph ~~64~~69 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.70.~~ Because the allegations in Paragraph ~~65~~70 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.71.~~ Because the allegations in Paragraph ~~66~~71 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.72.~~ Because the allegations in Paragraph ~~67~~72 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.73.~~ Because the allegations in Paragraph ~~68~~73 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.74.~~ Because the allegations in Paragraph ~~69~~74 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.75.~~ Because the allegations in Paragraph ~~70~~75 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.76.~~ Because the allegations in Paragraph ~~71~~76 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.77.~~ Because the allegations in Paragraph ~~72~~77 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them.

~~50.78.~~ To the extent that the allegations in Paragraph ~~73~~78 of the Amended Complaint relate to companies other than Gore, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations, and therefore denies them. Gore denies the remaining allegations in Paragraph ~~73~~78.

~~50.79.~~ Gore denies the allegations set forth in Paragraph ~~74~~79 of the Amended Complaint.

~~50.80.~~ Gore denies the allegations set forth in Paragraph ~~75~~80 of the Amended Complaint.

~~50.81.~~ To the extent that the allegations in Paragraph ~~76~~81 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph ~~76~~81 that may be reasonably construed as relating to Gore, Gore denies the allegations.

~~50.82.~~ To the extent that the allegations in Paragraph ~~77~~82 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph ~~77~~82 that may be reasonably construed as relating to Gore, Gore denies the allegations.

~~50.83.~~ To the extent that the allegations in Paragraph ~~78~~83 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the allegations in Paragraph ~~78~~83 that may be reasonably construed as relating to Gore, Gore denies the allegations.

~~50.84.~~ Gore denies the allegations set forth in Paragraph ~~79~~84 of the Amended Complaint.

~~50.85.~~ Because the allegations in Paragraph ~~80~~85 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient

to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph ~~80~~85 that may be reasonably construed as relating to Gore, Gore denies the allegations.

~~50-86.~~ Because the allegations in Paragraph ~~81~~86 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph ~~81~~86 that may be reasonably construed as relating to Gore, Gore denies the allegations.

~~50-87.~~ Because the allegations in Paragraph ~~82~~87 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph ~~82~~87 that may be reasonably construed as relating to Gore, Gore denies the allegations.

~~50-88.~~ To the extent that the allegations in Paragraph ~~83~~88 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph ~~83~~88 that may be reasonably construed as relating to Gore, Gore denies the allegations.

~~50-89.~~ To the extent that the allegations in Paragraph ~~84~~89 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them. As to the remaining allegations in Paragraph ~~84~~89 that may be reasonably construed as relating to Gore, Gore denies the allegations.

~~50.90.~~ Gore denies the allegations set forth in Paragraph ~~85~~90 of the Amended Complaint.

~~50.91.~~ Because the allegations in Paragraph ~~86~~91 of the Amended Complaint relate to other companies or records of other companies, Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of those allegations and therefore denies them.

~~50.92.~~ Gore denies the allegations set forth in Paragraph ~~87~~92 of the Amended Complaint.

~~50.93.~~ The allegations set forth in Paragraph ~~88~~93 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~88~~93 alleges anything further to which a response is required, Gore denies the allegations.

~~50.94.~~ The allegations set forth in Paragraph ~~89~~94 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~89~~94 alleges anything further to which a response is required, Gore denies the allegations.

~~50.95.~~ The allegations set forth in Paragraph ~~90~~95 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~90~~95 alleges anything further to which a response is required, Gore denies the allegations.

~~50.96.~~ The allegations set forth in Paragraph ~~91~~96 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~91~~96 alleges anything further to which a response is required, Gore denies the allegations.

~~50.97.~~ The allegations set forth in Paragraph ~~92~~97 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~92~~97 alleges anything further to which a response is required, Gore denies the allegations.

~~50.98.~~ The allegations set forth in Paragraph ~~93~~98 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~93~~98 alleges anything further to which a response is required, Gore denies the allegations.

~~50.99.~~ The allegations set forth in Paragraph ~~94~~99 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~94~~99 alleges anything further to which a response is required, Gore denies the allegations.

~~50.100.~~ The allegations set forth in Paragraph ~~95~~100 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~95~~100 alleges anything further to which a response is required, Gore denies the allegations.

~~50.101.~~ The allegations set forth in Paragraph ~~96~~101 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~96~~101 alleges anything further to which a response is required, Gore denies the allegations.

~~50.102.~~ Gore denies the allegations set forth in Paragraph ~~97~~102 of the Amended Complaint.

~~50.103.~~ Gore denies the allegations set forth in Paragraph ~~98~~103 of the Amended Complaint.

104. Gore denies the allegations set forth in Paragraph 104 of the Amended Complaint.

~~50.105.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~99~~105 of the Amended Complaint and therefore denies them.

~~50.106.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~100~~106 of the Amended Complaint and therefore denies them.

~~50.107.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~101~~107 of the Amended Complaint and therefore denies them.

~~50.108.~~ Gore denies the allegations set forth in Paragraph ~~102~~108 of the Amended Complaint.

~~50.109.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~103~~109 of the Amended Complaint and therefore denies them.

~~50.110.~~ Gore denies the allegations set forth in Paragraph ~~104~~110 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

~~50.111.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~105~~111 of the Amended Complaint and therefore denies them.

~~50.112.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~106~~112 of the Amended Complaint and therefore denies them.

~~50.113.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~107~~113 of the Amended Complaint and therefore denies them.

~~50.114.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~108~~114 of the Amended Complaint and therefore denies them.

~~50.115.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~109~~115 of the Amended Complaint and therefore denies them.

~~50.116.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~110~~116 of the Amended Complaint and therefore denies them.

~~50.117.~~ Gore denies the allegations set forth in Paragraph ~~111~~117 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

~~50.118.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~112~~118 of the Amended Complaint and therefore denies them.

~~50.119.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~113~~119 of the Amended Complaint and therefore denies them.

~~50.120.~~ Gore denies the allegations set forth in Paragraph ~~114~~120 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

~~50.121.~~ Gore denies the allegations set forth in Paragraph ~~115~~121 of the Amended Complaint.

~~50.122.~~ Gore denies the allegations set forth in Paragraph ~~116~~122 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

~~50.123.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~117~~123 of the Amended Complaint and therefore denies them.

~~50.124.~~ Gore denies the allegations set forth in Paragraph ~~118~~124 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

~~50.125.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~119~~125 of the Amended Complaint and therefore denies them.

~~50.126.~~ Gore denies the allegations set forth in Paragraph ~~120~~126 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

~~50.127.~~ Gore denies the allegations set forth in Paragraph ~~121~~127 of the Amended Complaint.

~~50.128.~~ Gore denies the allegations set forth in Paragraph ~~122~~128 of the Amended Complaint.

~~50.129.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~123~~129 of the Amended Complaint and therefore denies them.

~~50.130.~~ Gore denies the allegations set forth in Paragraph ~~124~~130 of the Amended Complaint.

~~50.131.~~ Gore denies the allegations set forth in Paragraph ~~125~~131 of the Amended Complaint.

~~50.132.~~ Gore admits that it received a letter from MDE on February 16, 2023 and agreed to work with MDE to investigate PFAS contamination in the area surrounding the Cherry Hill facility, but denies the remaining allegations set forth in Paragraph ~~126~~132 of the Amended Complaint.

~~50.133.~~ Gore lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph ~~127~~133 of the Amended Complaint and therefore denies them.

~~50.134.~~ Gore denies the allegations set forth in Paragraph ~~128 of 134~~ of the Amended Complaint.

~~50.135.~~ Gore denies the allegations set forth in Paragraph ~~129~~135 of the Amended Complaint as incomplete and/or incorrect statements of complex scientific and technical matters.

COUNT I PUBLIC NUISANCE

~~50.136.~~ Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph ~~130~~136 is required, denied.

~~50.137.~~ The allegations set forth in Paragraph ~~131~~137 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.138.~~ The allegations set forth in Paragraph ~~132~~138 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.139.~~ The allegations set forth in Paragraph ~~133~~139 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.140.~~ The allegations set forth in Paragraph ~~134~~140 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.141.~~ The allegations set forth in Paragraph ~~135~~141 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.142.~~ Gore denies the allegations set forth in Paragraph ~~136~~142 of the Amended Complaint.

~~50.143.~~ Gore denies the allegations set forth in Paragraph ~~137~~143 of the Amended Complaint.

**COUNT II
TRESPASS**

~~50.144.~~ Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph ~~138~~144 is required, denied.

~~50.145.~~ The allegations set forth in Paragraph ~~139~~145 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~139~~145 alleges anything further to which a response is required, Gore denies the allegations.

~~50.146.~~ Gore denies the allegations set forth in Paragraph ~~140~~146 of the Amended Complaint.

~~50.147.~~ Gore denies the allegations set forth in Paragraph ~~141~~147 of the Amended Complaint.

~~50.148.~~ The allegations set forth in Paragraph ~~142~~148 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.149.~~ The allegations set forth in Paragraph ~~143~~149 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~143~~149 alleges anything further to which a response is required, Gore denies the allegations.

~~50.150.~~ The allegations set forth in Paragraph ~~144~~150 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~144~~150 alleges anything further to which a response is required, Gore denies the allegations.

~~50.151.~~ The allegations set forth in Paragraph ~~145~~151 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~145~~151 alleges anything further to which a response is required, Gore denies the allegations.

~~50.152.~~ The allegations set forth in Paragraph ~~146~~152 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~146~~152 alleges anything further to which a response is required, Gore denies the allegations.

~~50.153.~~ The allegations set forth in Paragraph ~~147~~153 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~147~~153 alleges anything further to which a response is required, Gore denies the allegations.

~~50.154.~~ The allegations set forth in Paragraph ~~148~~154 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~148~~154 alleges anything further to which a response is required, Gore denies the allegations.

~~50.155.~~ The allegations set forth in Paragraph ~~149~~155 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~149~~155 alleges anything further to which a response is required, Gore denies the allegations.

COUNT III NEGLIGENCE

~~50.156.~~ Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph ~~150~~156 is required, denied.

~~50.157.~~ The allegations set forth in Paragraph ~~151~~157 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.158.~~ The allegations set forth in Paragraph ~~152~~158 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.159.~~ The allegations set forth in Paragraph ~~153~~159 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.160.~~ The allegations set forth in Paragraph ~~154~~160 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.161.~~ The allegations set forth in Paragraph ~~155~~161 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~155~~161 alleges anything further to which a response is required, Gore denies the allegations.

~~50.162.~~ Gore denies the allegations set forth in Paragraph ~~156~~162 of the Amended Complaint.

**COUNT IV
ENVIRONMENT ARTICLE, TITLE 7, SUBTITLE 2 CLAIM**

~~50.163.~~ Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph ~~157~~163 is required, denied.

~~50.164.~~ The allegations set forth in Paragraph ~~158~~164 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.165.~~ The allegations set forth in Paragraph ~~159~~165 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.166.~~ The allegations set forth in Paragraph ~~160~~166 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.167.~~ The allegations set forth in Paragraph ~~161~~167 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.168.~~ The allegations set forth in Paragraph ~~162~~168 of the Amended Complaint are legal conclusions and arguments to which no response is required.

50.169. The allegations set forth in Paragraph ~~163~~169 of the Amended Complaint are legal conclusions and arguments to which no response is required.

50.170. The allegations set forth in Paragraph ~~164~~170 of the Amended Complaint are legal conclusions and arguments to which no response is required.

50.171. The allegations set forth in Paragraph ~~165~~171 of the Amended Complaint are legal conclusions and arguments to which no response is required.

50.172. Gore denies the allegations set forth in Paragraph ~~166~~172 of the Amended Complaint.

50.173. Gore denies the allegations set forth in Paragraph ~~167~~173 of the Amended Complaint.

50.174. The allegations set forth in Paragraph ~~168~~174 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~168~~174 alleges anything further to which a response is required, Gore denies the allegations.

50.175. The allegations set forth in Paragraph ~~169~~175 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~169~~175 alleges anything further to which a response is required, Gore denies the allegations.

50.176. Gore denies the allegations set forth in Paragraph ~~170~~176 of the Amended Complaint.

50.177. The allegations set forth in Paragraph ~~171~~177 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~171~~177 alleges anything further to which a response is required, Gore denies the allegations.

COUNT V
ENVIRONMENT ARTICLE, TITLE 9, SUBTITLE 3 CLAIM

50.178. Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph 172.178 is required, denied.

50.179. The allegations set forth in Paragraph 173.179 of the Amended Complaint are legal conclusions and arguments to which no response is required.

50.180. The allegations set forth in Paragraph 174.180 of the Amended Complaint are legal conclusions and arguments to which no response is required.

50.181. The allegations set forth in Paragraph 175.181 of the Amended Complaint are legal conclusions and arguments to which no response is required.

50.182. The allegations set forth in Paragraph 176.182 of the Amended Complaint are legal conclusions and arguments to which no response is required.

50.183. The allegations set forth in Paragraph 177.183 of the Amended Complaint are legal conclusions and arguments to which no response is required.

50.184. The allegations set forth in Paragraph 178.184 of the Amended Complaint are legal conclusions and arguments to which no response is required.

50.185. The allegations set forth in Paragraph 179.185 of the Amended Complaint are legal conclusions and arguments to which no response is required.

50.186. Gore denies the allegations set forth in Paragraph 180.186 of the Amended Complaint.

50.187. Gore denies the allegations set forth in Paragraph 181.187 of the Amended Complaint.

~~50.188.~~ Gore denies the allegations set forth in Paragraph ~~182~~188 of the Amended Complaint.

**COUNT VI
ENVIRONMENT ARTICLE, TITLE 9, SUBTITLE 4 CLAIM**

~~50.189.~~ Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph ~~183~~189 is required, denied.

~~50.190.~~ The allegations set forth in Paragraph ~~184~~190 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.191.~~ The allegations set forth in Paragraph ~~185~~191 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.192.~~ The allegations set forth in Paragraph ~~186~~192 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~186~~192 alleges anything further to which a response is required, Gore denies the allegations.

**COUNT VII
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT, 42 U.S.C. § 9607(A)**

~~50.193.~~ Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph ~~187~~193 is required, denied.

~~50.194.~~ The allegations set forth in Paragraph ~~188~~194 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.195.~~ The allegations set forth in Paragraph ~~189~~195 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~189~~195 alleges anything further to which a response is required, Gore denies the allegations.

~~50.196.~~ The allegations set forth in Paragraph ~~190~~196 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~190~~196 alleges anything further to which a response is required, Gore denies the allegations.

~~50.197.~~ The allegations set forth in Paragraph ~~191~~197 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~191~~197 alleges anything further to which a response is required, Gore denies the allegations.

~~50.198.~~ The allegations set forth in Paragraph ~~192~~198 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~192~~198 alleges anything further to which a response is required, Gore denies the allegations.

**COUNT VIII
COMPREHENSIVE ENVIROMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT, 42 U.S.C. § 9613(g)**

~~50.199.~~ Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph ~~193~~199 is required, denied.

~~50.200.~~ The allegations set forth in Paragraph ~~194~~200 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.201.~~ The allegations set forth in Paragraph ~~195~~201 of the Amended Complaint are legal conclusions and arguments to which no response is required.

~~50.202.~~ The allegations set forth in Paragraph ~~196~~202 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~196~~202 alleges anything further to which a response is required, Gore denies the allegations.

~~50.203.~~ The allegations set forth in Paragraph ~~197203~~ of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph ~~197203~~ alleges anything further to which a response is required, Gore denies the allegations.

COUNT IX
RESOURCE CONSERVATION AND RECOVERY ACT (IMMINENT AND
SUBSTANTIAL ENDANGERMENT)
(As to Gore's Cherry Hill, Fair Hill, and Appleton Facilities)

204. Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph 204 is required, denied.

205. The allegations set forth in Paragraph 205 of the Amended Complaint are legal conclusions and arguments to which no response is required.

206. The allegations set forth in Paragraph 206 of the Amended Complaint are legal conclusions and arguments to which no response is required. To the extent Paragraph 206 alleges anything further to which a response is required, Gore denies the allegations.

207. The allegations set forth in Paragraph 207 of the Amended Complaint are legal conclusions and arguments to which no response is required.

208. Gore denies the allegations set forth in Paragraph 208 of the Amended Complaint.

209. Gore denies the allegations set forth in Paragraph 209 of the Amended Complaint

210. The allegations set forth in Paragraph 210 of the Amended Complaint are legal conclusions and arguments to which no response is required.

211. The allegations set forth in Paragraph 211 of the Amended Complaint are legal conclusions and arguments to which no response is required.

COUNT X
UNJUST ENRICHMENT

212. Gore incorporates by reference its responses to the preceding paragraphs of the Amended Complaint. To the extent any further response to Paragraph 212 is required, denied.

213. Gore denies the allegations set forth in Paragraph 213 of the Amended Complaint.

214. Gore denies the allegations set forth in Paragraph 214 of the Amended Complaint.

215. Gore denies the allegations set forth in Paragraph 215 of the Amended Complaint.

216. Gore denies the allegations set forth in Paragraph 216 of the Amended Complaint.

217. Gore denies the allegations set forth in Paragraph 217 of the Amended Complaint.

218. Gore denies the allegations set forth in Paragraph 218 of the Amended Complaint.

219. Gore denies the allegations set forth in Paragraph 219 of the Amended Complaint.

220. Gore denies the allegations set forth in Paragraph 220 of the Amended Complaint.

221. Gore denies the allegations set forth in Paragraph 221 of the Amended Complaint.

PRAYER FOR RELIEF

In response to Plaintiff's unnumbered "WHEREFORE" clause, Gore denies that it is liable to Plaintiff for any of the requested relief or for any relief whatsoever.

AFFIRMATIVE DEFENSES

Discovery and investigation may reveal that one or more of the following defenses and affirmative defenses will be available to Gore. Therefore, Gore gives notice it intends to rely upon any other defense or defenses that may become available including, without limitation, defenses related to the statute(s) of limitations and repose, standing, waiver, estoppel, and laches. Gore further reserves the right to amend its Answer to assert any additional defenses, whether specifically identified herein or otherwise, as further information becomes available.

Gore only undertakes the burden of proof as to those defenses deemed affirmative defenses by law regardless of how such defenses are denominated herein. Subject to the foregoing, and without assuming any burden not otherwise imposed by law, Gore asserts the following defenses to preserve its rights:

FIRST AFFIRMATIVE DEFENSE

The Amended Complaint and each cause of action contained therein fails to state a claim upon which relief can be granted, under Rule 12 of the Federal Rules of Civil Procedure.

SECOND AFFIRMATIVE DEFENSE

Plaintiff's causes of action are, or may be, barred by the applicable statute of limitations or statute of repose and/or by the equitable doctrines of waiver, estoppel, laches, unclean hands, and/or statutory and regulatory compliance.

THIRD AFFIRMATIVE DEFENSE

Gore had no duty or obligations which it owed to Plaintiff.

FOURTH AFFIRMATIVE DEFENSE

Gore did not violate any duty or obligations, to the extent there were any, to Plaintiff.

FIFTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because Gore's facilities at all times relevant hereto complied with all applicable laws and regulations to which it was subject.

SIXTH AFFIRMATIVE DEFENSE

Gore denies that exposures to any of the substances alleged in the Amended Complaint pose any potential threat to human health or the environment. To the extent it is determined at some future time to the contrary, Gore neither knew nor should have known that any of the substances alleged in the Amended Complaint constituted a reasonable or foreseeable risk of

physical harm in accordance with the prevailing state of medical, scientific, and/or industrial knowledge available at all times relevant to the claims or causes of action asserted by Plaintiff.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims fail because the Amended Complaint does not allege a legally cognizable injury.

EIGHTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, to the extent that the benefits of Gore's products and processes outweigh any known risks.

NINTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, reduced, and/or limited pursuant to applicable statutory and common law regarding limitation of non-economic damages, awards, and all caps on recovery, as well as setoffs. *See* Maryland Code § 3-2A-09; § 11-108.

TENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because the Gore processes alleged in the Amended Complaint are not abnormally dangerous and their benefits exceeded any potential associated risks.

ELEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred or diminished in whole or in part by the state-of-the-art doctrine.

TWELFTH AFFIRMATIVE DEFENSE

The causes of action set forth in the Amended Complaint fail because federal, state, and/or local governments and agencies have mandated, directed, approved, and/or ratified the alleged actions or omissions of Gore either expressly or with knowledge and acquiescence.

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred and Plaintiff is not entitled to any award of punitive damages because no act or omission that can be attributed to Gore for the purpose of imposing punitive damages was fraudulent, malicious, oppressive, willful, wanton, reckless, grossly negligent, intentional, or otherwise sufficient to warrant their imposition of punitive damages.

FOURTEENTH AFFIRMATIVE DEFENSE

Any award of punitive damages would violate Gore's rights under the Due Process Clause of the Fifth and Fourteenth Amendments of the United States Constitution; the Excessive Fines Clause of the Eighth Amendment of the United States Constitution; the Double Jeopardy Clause of the Fifth Amendment of the United States Constitution; and similar provisions in the Constitution, laws, public policies, and statutes of any State or Commonwealth of the United States whose laws might be deemed controlling in this case, insofar as such damages are awarded by a jury or other fact-finder that: (a) is not provided with a standard of sufficient clarity for determining the appropriateness, and the appropriate size, of a punitive damages award; (b) is not adequately and clearly instructed on the limits of punitive damages imposed by the applicable principles of deterrence and punishment; (c) is not expressly prohibited from awarding punitive damages, or determining the amount of an award of punitive damages, in whole or in part, on the basis of invidiously discriminatory characteristics, including the corporate status, wealth, or state of residence of Gore; (d) is permitted to award punitive damages under a standard for determining liability for such damages that is vague and arbitrary and does not define with sufficient clarity the conduct or mental state that makes punitive damages permissible; (e) is not expressly prohibited from awarding punitive damages, or

determining the amount of an award of punitive damages, based on actual or potential harm to any individual other than the particular plaintiff whose claims are being tried.

FIFTEENTH AFFIRMATIVE DEFENSE

Plaintiff's recovery of damages, if any, should be reduced by any payments by collateral sources.

SIXTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, under the doctrine of federal preemption, including without limitation, express preemption, implied preemption, and field preemption, pursuant to any applicable statutes, regulations, guidance documents, notices, governmental specifications, and policy statements, enacted and/or promulgated and/or issued by Congress, federal agencies, or the executive branch.

SEVENTEENTH AFFIRMATIVE DEFENSE

The Amended Complaint, and each alleged claim contained therein, is barred, in whole or in part, because Defendant is entitled to immunity from suit under the government contractor defense. *See Boyle v. United Techs. Corp.*, 487 U.S. 500 (1988).

EIGHTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may not be ripe and/or have been mooted.

NINETEENTH AFFIRMATIVE DEFENSE

Any injuries and/or damages sustained by Plaintiff are barred by the doctrine of intervening cause and/or superseding cause.

TWENTIETH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because Plaintiff's alleged injuries and damages were not in fact caused by the conduct or actions of Gore.

TWENTY-FIRST AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because Plaintiff's alleged injuries and damages were proximately caused by the negligence, fault, or other culpable conduct of persons or parties over which Gore had no control.

TWENTY-SECOND AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because Gore neither knew, nor should have known, that any of its products or processes posed the risks alleged by Plaintiff by virtue of the prevailing state of the medical, scientific, technical, and/or industrial knowledge available to Gore at all times relevant to the claims or causes of action asserted by Plaintiff.

TWENTY-THIRD AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because any alleged levels of contamination did not exceed any applicable standards under laws or regulations in effect at the relevant times.

TWENTY-FOURTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because federal, state, and/or local authorities authorized, ratified, or were aware of and acquiesced in actions by Gore that are the subject of Plaintiff's claims. Gore is not responsible or liable for any acts or omissions undertaken by or at the direction of any governmental authority or agency.

TWENTY-FIFTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, because of consent, public necessity, private necessity, and/or privilege.

TWENTY-SIXTH AFFIRMATIVE DEFENSE

Plaintiff's damages, if any, were caused by the active, direct, and proximate negligence or actual conduct of entities or persons other than Gore, and in the event that Gore is found to be liable to Plaintiff, Gore will be entitled to indemnification, contribution, and/or appointment.

TWENTY-SEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred, in whole or in part, by the doctrines of acquiescence, accord and satisfaction, ratification, settlement, or release.

~~TWENTY EIGHT~~TWENTY-EIGHT AFFIRMATIVE DEFENSE

The substances at issue in Plaintiff's Amended Complaint are not subject to RCRA.

TWENTY-NINTH AFFIRMATIVE DEFENSE

Gore denies it violated any standards or limitations imposed by RCRA.

THIRTIETH AFFIRMATIVE DEFENSE

Plaintiff's claims fail because waste containing PFOA or other perfluorinated chemicals does not meet the definitions of "solid waste" or "hazardous waste" under RCRA.

THIRTY-FIRST AFFIRMATIVE DEFENSE

Plaintiff's claims are or may be barred by the doctrine of administrative exhaustion.

THIRTY-SECOND AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, from any recovery against Gore to the extent that Gore was or is operating in accordance with regulatory permits, permit representations, or other governmental authorizations and/or acting as a reasonably prudent operator would act.

THIRTY-THIRD AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, by the collateral attack and/or permit shield doctrines.

THIRTY-FOURTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, by the doctrines of primary jurisdiction and/or abstention.

THIRTY-FIFTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, by Article II, Section 1, of the U.S. Constitution.

THIRTY-SIXTH AFFIRMATIVE DEFENSE

To the extent not incorporated above, Gore raises all affirmative defenses applicable under Maryland law.

DEMAND FOR JURY TRIAL

Gore demands a trial by jury on all issues appropriate for jury determination.

Dated: ~~January 29~~May 27, 2025

Respectfully Submitted,

WILLIAMS AND CONNOLLY LLP

/s/ Liam J. Montgomery

Liam J. Montgomery (#28978)

D. Shayon Ghosh (*pro hac vice*)

Rebecca A. Carter (*admission pending*)

Sarah L. Chanski (*pro hac vice*)

WILLIAMS AND CONNOLLY LLP

680 Maine Avenue, SW

Washington, DC 20024

Telephone: (202) 434-5000

Facsimile: (202) 434-5029

lmontgomery@wc.com

sghosh@wc.com

rebeccacarter@wc.com

schanski@wc.com

(signed by D. Shayon Ghosh with permission of
Liam J. Montgomery)

Summary report:	
Litera Compare for Word 11.6.0.100 Document comparison done on	
5/27/2025 6:03:36 PM	
Style name: Default Style	
Intelligent Table Comparison: Active	
Original filename: 2025.01.29 Final - Answer.docx	
Modified filename: 2025.05.22 Draft Amended Answer(11923442.3).docx	
Changes:	
<u>Add</u>	658
<u>Delete</u>	387
<u>Move From</u>	0
<u>Move To</u>	0
<u>Table Insert</u>	0
<u>Table Delete</u>	0
<u>Table moves to</u>	0
<u>Table moves from</u>	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	1045