NO. FBT CV 15 6048103 S	**:**	**SUPERIOR COURT**
DONNA L. SOTO, ADMINISTRATRIX OF THE ESTATE OF VICTORIA L. SOTO, ET AL	**:**	**JUDICIAL DISTRICT OF FAIRFIELD**
V.	**:**	**AT BRIDGEPORT**
BUSHMASTER FIREARMS INTERNATIONAL, LLC, a/k/a, ET AL	**:**	**OCTOBER 31, 2016**

MOTION FOR JUDGMENT

Plaintiffs hereby move the Court to enter judgment, as further set forth below.

Plaintiffs seek the entry of judgment in order to perfect the record for appeal, and thereby to secure appellate review of the Court's ruling granting the Motions to Strike of the Remington Defendants, the Camfour Defendants and defendant David LaGuercia.[1] Practice Book Section 10-44 empowers the Court to enter such judgment once the fifteen day period for filing a substitute pleading has expired; thus the Court may enter such judgment on or after November 1, 2016. Plaintiffs accordingly request that the Court enter judgment in favor of the Remington Defendants, the Camfour Defendants and defendant David LaGuercia, so that plaintiffs may proceed to appeal the Court's ruling striking the First Amended Complaint as against those defendants.

[1] Insofar as the case against defendant Riverview Sales, Inc. is stayed, the Court correctly made no ruling concerning Riverview Sales, Inc. DN 243, at p. 54 n.32. By the same token, the judgment entered should pertain only to the stricken claims, leaving plaintiffs' stayed claims against Riverview Sales, Inc. pending in the Superior Court.

THE PLAINTIFFS,

By _____

JOSHUA D. KOSKOFF
ALINOR C. STERLING
KATHERINE MESNER-HAGE
jkoskoff@koskoff.com
asterling@koskoff.com
khage@koskoff.com
KOSKOFF KOSKOFF & BIEDER
350 FAIRFIELD AVENUE
BRIDGEPORT, CT 06604
PHONE: (203) 336-4421
FAX: (203) 368-3244
JURIS #32250

CERTIFICATION

This is to certify that a copy of the foregoing has been mailed, postage prepaid, and emailed this day to all counsel of record, to wit:

For Bushmaster Firearms International LLC, a/k/a;
Freedom Group, Inc., a/k/a;
Bushmaster Firearms, a/k/a;
Bushmaster Firearms, Inc., a/k/a;
Bushmaster Holdings, Inc., a/k/a
Remington Arms Company, LLC, a/k/a;
Remington Outdoor Company, Inc., a/k/a

Jonathan P. Whitcomb, Esq.
Scott M. Harrington, Esq.
Diserio Martin O'Connor & Castiglioni, LLP
One Atlantic Street
Stamford, CT 06901
jwhitcomb@dmoc.com
TEL: (203) 358-0800
FAX: (203) 348-2321

For Remington Arms Company, LLC, a/k/a;
Remington Outdoor Company, Inc., a/k/a

Andrew A. Lothson, Esq.
James B. Vogts, Esq.
Swanson Martin & Bell, LLP
330 North Wabash, #3300
Chicago, IL 60611
alothson@smbtrials.com
jvogts@smbtrials.com
TEL: (312) 321-9100
FAX: (312) 321-0990

For Camfour, Inc.;
Camfour Holding, LLP, a/k/a

Scott Charles Allan, Esq.
Christopher Renzulli, Esq.
Renzulli Law Firm, LLP
81 Main Street, #508
White Plains, NY 10601
sallan@renzullilaw.com
TEL: (914) 285-0700
FAX: (914) 285-1213

For David LaGuercia;
Peter Matthew Berry, Esq.
Berry Law LLC
107 Old Windsor Road, 2nd Floor
Bloomfield, CT 06002
firm@berrylawllc.com
TEL: (860) 242-0800
FAX: (860) 242-0804

JOSHUA D. KOSKOFF
ALINOR C. STERLING
KATHERINE MESNER-HAGE