

S218176

IN THE  
SUPREME COURT OF CALIFORNIA

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

v.

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

SUPREME COURT  
FILED


FEB 17 2015

Frank A. McGuire Clerk  
Deputy

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

 JOINDER BY DEFENDANT AND RESPONDENT  
SCHORR METALS, INC. TO THE REPLY BRIEF  
FILED BY DEFENDANT AND RESPONDENT ALCOA  
INC.

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ALCOA INC.**

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Pursuant to California Rules of Court, rule 8.200(a)(5), Defendant and Respondent Schorr Metals, Inc., respectfully joins the arguments presented in the Reply Brief filed by Defendant and Respondent Alcoa Inc.

Both Alcoa Inc. and Schorr Metals, Inc. are identified by Appellants as suppliers of raw materials used in manufacturing at Plaintiff Flavio Ramos' place of employment. The factual basis, legal authority, and argument set forth by Respondent Alcoa Inc. in its Reply Brief apply equally to Schorr Metals, Inc.

Schorr Metals, Inc. joins Alcoa's Reply Brief because, like Alcoa's aluminum product, the sole product supplied by Schorr Metals, Inc. to which

Appellant Flavio Ramos claims exposure – aluminum – is a raw material to which the component parts doctrine/raw material supplier doctrine applies.

Respondent Schorr Metals, Inc. respectfully incorporates by reference, as though set forth in full, Alcoa Inc.'s Reply Brief and all other papers filed by Alcoa, Inc. before this Court. For the reasons stated, Schorr Metals, Inc. requests that the Court reverse the ruling by Division Four of the Second Appellate District as it improperly expands the duties of raw material suppliers based on mistakes of law and fact.

February 12, 2015

**GORDON & REES LLP**

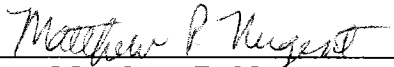
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**CERTIFICATE OF WORD COUNT**  
**(Cal. Rules of Court, rule 8.520(c).)**

The text of this brief consists of 190 words as counted by the Microsoft Word version 2010 word processing program used to generate the brief.

Dated: February 12, 2015

  
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Matthew P. Nugent

*Ramos, et al. v. Brenntag, et al.*  
Supreme Court of California  
California Court of Appeal, Second Dist., Div.4, Case No. B248038  
Los Angeles County Superior Court Case No. BC449958

**PROOF OF SERVICE**

I, the undersigned, say: I am over 18 years of age, employed in the County of San Diego, California, in which the within-mentioned service occurred; and that I am not a party to the subject cause. My business address is Gordon & Rees LLP, 101 West Broadway, Ste. 2000, San Diego, CA 92101. On February 12, 2015, I served true and correct copy of the following document(s):

**JOINDER BY DEFENDANT AND RESPONDENT SCHORR METALS, INC. IN THE REPLY BRIEF FILED BY DEFENDANT AND RESPONDENT ALCOA, INC.**

- ( X ) **BY FIRST CLASS MAIL** (C.C.P. §1013a, et seq.): I caused said document(s) to be deposited in the United States mail in a sealed envelope with postage fully prepaid at San Francisco, California, following the ordinary practice at my place of business of collection and processing of mail with the U.S. Postal Service on the same day as shown on this declaration (**SEE SERVICE LIST**):
- ( X ) **BY FEDERAL EXPRESS SERVICE CARRIER** (C.C.P. §1013(c), et seq.; and CRC 8.25(b)(3)(A)): I caused said document(s) to be deposited with an express service carrier in a sealed envelope designed by the carrier, with fees and postage prepaid at San Diego, California, on the same day as shown on this declaration (**TO THE SUPREME COURT ONLY**)
- ( ) **BY PERSONAL SERVICE**. I caused said document(s) to be hand-delivered to the addressee pursuant to Code of Civil Procedure §1011. (**TO THE SUPREME COURT ONLY**)

**SEE ATTACHED SERVICE LIST**

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

Executed on February 12, 2015, at San Diego, California.

  
\_\_\_\_\_  
Denise A. Arviso

**SERVICE LIST**

**Ramos, Flavio, et al. v. Brenntag Specialties, Inc., et al.**

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