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===== Start of Answer #1 (1113 words) =====

MEMORANDUM OF POINTS AND AUTHORITIES

To: Christopher Schroeder
Fm: Applicant
Da: July 28, 2015
Re: Wilson v. Belton Company, Inc.

ARGUMENT

**III. THIS COURT SHOULD GRANT BELTON'S SUMMARY JUDGMENT
MOTION.**

**A. THERE IS NOT A TRIABLE ISSUE OF MATERIAL FACT AS TO
CAUSATION BASED ON NEGLIGENT INSULATION WORK AT THE
MARTINVILLE POWERHOUSE.**

To begin with, there is not a triable issue of material fact as to causation based on negligent insulation work at the Martinville Powerhouse.

As a general rule, the plaintiff must specifically identify that it was the defendant's equipment that caused the plaintiff's injury, that the equipment or insulation work contained or caused asbestos exposure, or that the work done by the defendant caused the release of respirable fibers into the air. Andrews. Without such evidence, there is no exposure. Ibid. Without exposure, there can be no causation. Ibid.

Even with such evidence, it may not be enough, if expert declarations amount to nothing more than speculation. Ibid.

