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Attorneys for Plaintiff Dorine E. Norko,  
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Estate of Lawrence P. Manlapit, III

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

LAWRENCE P. MANLAPIT, JR.,  
individually as father of LAWRENCE P.  
MANLAPIT, III, DECEASED,

Plaintiff,

vs.

Lead Case No. CV01-19-06625  
(Consolidated with Case Nos.  
CV01-19-23246, CV01-20-00653,  
CV01-20-02624, CV01-20-07803 and  
CV01-20-08172)

KRUJEX FREIGHT TRANSPORT CORP.;  
KRUJEX TRANSPORTATION CORP.;  
KRUJEX TRANSPORTATION SYSTEMS,  
LLC; KRUJEX LOGISTICS, INC.;  
ALBERTSON’S COMPANIES;  
CORNELIEU VISAN; DANIEL VISAN;  
LIGRA VISAN; STATE OF IDAHO; STATE  
OF IDAHO DEPARTMENT OF  
TRANSPORTATION; IDAHO STATE  
POLICE; PENHALL COMPANY;  
PARAMETRIX, INC.; SPECIALTY  
CONSTRUCTION SUPPLY LLC; and DOES  
1 through 150, inclusive,

Defendants.

AND ALL CONSOLIDATED ACTIONS.

**MANLAPIT/JOHNSON PLAINTIFFS’  
JOINT MOTION FOR LEAVE TO  
AMEND COMPLAINTS TO ADD A  
CLAIM FOR PUNITIVE DAMAGES  
AGAINST DEFENDANTS  
ALBERTSON’S COMPANIES AND  
KRUJEX FREIGHT TRANSPORT  
CORPORATION**

COME NOW Plaintiffs Lawrence P. Manlapit, Jr. and Dorine E. Norko, individually and in their capacity as Co-Administrators of the Estate of Lawrence P. Manlapit, III (“Manlapit Plaintiffs”), as well as Plaintiff Daisy Johnson, by and through their undersigned counsel, and hereby respectfully move this Court, pursuant to Rule 15 of the Idaho Rules of Civil Procedure and Idaho Code § 6-1604, and relevant case law, for leave to amend their Complaints filed in the following five cases: (1) CV01-2019-06625, filed by Mr. Manlapit on behalf of his son, Lawrence Manlapit, III; (2) CV01-2019-23246, filed by Ms. Norko on behalf of her son, Lawrence Manlapit, III; (3) CV01-2020-02624, filed by Mr. Manlapit and Ms. Norko as co-administrators of the Estate of Lawrence Manlapit, III; (4) CV01-2020-00653, filed by Ms. Johnson on behalf of her son, Carlos Johnson, and (5) CV01-20-20819 filed on behalf of C.J., a minor, to state a claim for punitive damages against Defendants Albertson’s Companies and Krujex Freight Transport Corporation. In addition, Plaintiffs Kimberly and Michael Westall, by and through their undersigned counsel, hereby respectfully join in this motion as it pertains to Defendant Krujex Freight Corporation and move this Court, pursuant to Rule 15 of the Idaho Rules of Civil Procedure and Idaho Code § 6-1604, and relevant case law, for leave to amend their Complaint filed in CV01-

2020-08172 on behalf of their daughter, Karlie Westall, to state a claim for punitive damages against Defendant Krujex Freight Transport Corporation.

This motion is supported by the *Memorandum in Support of Manlapit/Johnson Plaintiffs' Joint Motion for Leave to Amend Complaints to Add a Claim for Punitive Damages Against Defendants Albertson's Companies and Krujex Freight Transport Corporation*, Declaration of Thomas M. Corsi, Ph.D., Declaration of V. Paul Herbert, and Declaration of Clay Robbins, III filed concurrently herewith, as well as upon the pleadings and documents on file herein.

ORAL ARGUMENT IS REQUESTED.

DATED this 6th day of July, 2021.

BAUM HEDLUND ARISTEI & GOLDMAN PC

By:     /s/ Clay Robbins, III      
Clay Robbins, III  
-and-  
Kurt D. Holzer  
HEPWORTH HOLZER, LLP  
Attorneys for Plaintiff, Lawrence P. Manlapit,  
Jr., Individually and as Co-Administrator of the  
Estate of Lawrence P. Manlapit, III

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minor

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By       /s/ Jason R.N. Monteleone        
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Westall