



## One Step Forward, One Step Back: 8th District Court of Appeals Decides Schwartz Case

**JUNE 2016**

On May 26, 2016, the 8th District Court of Appeals (Cuyahoga County, Ohio) issued an opinion in *Schwartz v. Honeywell Internatl., Inc.*, 8th Dist. App. No. 103377, 2016-Ohio-3175, permitting a thinly veiled “each and every” exposure theory of causation in asbestos cases, thus opening the door for more claims to reach juries. Read the client alert [here](#).

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