



News

Craig Liljestrand's CDLB Column: Plaintiffs' Asbestos Evidence Does Not Satisfy Illinois' Substantial Factor Test

February 7, 2020

Hinshaw's Craig Liljestrand has published his latest *Chicago Daily Law Bulletin* (CDLB) column. Titled "Plaintiffs fail to supply sufficient asbestos evidence to keep verdict," the article examines the recent Fourth District Appellate Court of Illinois decision in *Krumwiede v. Tremco*, 220 IL App (4th) 180434, Jan. 21, 2020 (4th Dist.).

The case involved claims that a decedent had been exposed to two asbestos-containing products manufactured by Tremco while working as a window glazier. Liljestrand explains the appellate court's application of the "frequency, regularity and proximity" test, and its holding that Tremco was entitled to a judgment notwithstanding the verdict.

Read "[Plaintiffs fail to supply sufficient asbestos evidence to keep verdict,](#)" (PDF)

You can also read "[Plaintiffs fail to supply sufficient asbestos evidence to keep verdict,](#)" published by the *Chicago Daily Law Bulletin* on February 4, 2020 on the CDLB website (*subscription required*)

Attorneys

Craig T. Liljestrand

Service Areas

Complex Tort & General
Casualty

Offices

Chicago