

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

MICHELE BAKER; CHARLES CARR; ANGELA CORBETT; PAMELA FORREST; MICHAEL HICKEY, individually and as parent and natural guardian of O.H., infant; KATHLEEN MAINLINGENER; KRISTIN MILLER, as parent and natural guardian of K.M., infant; JENNIFER PLOUFFE; SILVIA POTTER, individually and as parent and natural guardian of C.P, infant; and DANIEL SCHUTTIG, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

SAINT-GOBAIN PERFORMANCE PLASTICS CORP., HONEYWELL INTERNATIONAL INC. f/k/a ALLIED-SIGNAL INC. and/or ALLIEDSIGNAL LAMINATE SYSTEMS, INC., E.I. DUPONT DE NEMOURS AND COMPANY and 3M CO.,

Civ. No. 1:16-CV-917 (LEK/DJS)

**DECLARATION OF ANGELA CORBETT IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

I, Angela Corbett, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a Named Plaintiff in this lawsuit. I make this affidavit in support of the Plaintiffs' request for this case to proceed as a class action. I make the statements in this affidavit based on my own personal knowledge.
2. From 1992 until 2020, I owned and resided at the home located at [REDACTED] LOCAL RULE 8.1, in Hoosick Falls, New York. I presently continue to own this property, but my son resides there.
3. My family obtains its drinking water from a privately owned well on our property.
4. My private well was tested and found to contain PFOA at a level as high as 520 parts per trillion.
5. My family and I regularly drank water from my tap, used water to cook and make other beverages, bathed and showered in the water, and watered my lawn.

6. Due to the contamination of my drinking water supply, I was instructed by public health officials not to drink from my tap or use water from my tap for cooking and to limit my exposure to the water while bathing until a filtration system could be installed to remove or reduce the amount of PFOA in my drinking water. As a result, I followed those instructions and drank and cooked with bottled water from early 2016 until approximately April of 2016 when a POET filtration system was installed and tested and I was instructed it was once again safe to drink and cook with the water from my tap. To this day, however, I continue to drink from bottled water.

7. My blood was tested and found to contain 22.2 ug/L.

8. Due to my exposure to PFOA and the accumulation of PFOA in my blood, I believe I have an increased risk of developing certain illnesses and cancers associated with PFOA exposure. As a result, I believe that I and other class members similarly exposed will benefit from medical monitoring and surveillance for conditions and illnesses associated with PFOA exposure so that early diagnosis and treatment can occur.

9. Due to the contamination of my private well that is the sole source of water for my home with PFOA and PFOA from the air that was deposited on my property, I believe that value of my property has decreased.

10. Due to the contamination of my private well that is the sole source of water for my home with PFOA and PFOA from the air that was deposited on my property, I was not and still am not able to use and enjoy my property in the same way I did before the contamination was discovered.

11. I understand that I am being proposed as a representative for a class of individuals suing the Defendants in this case under state law for which we have a claim, and that we are seeking a class wide medical monitoring program and damages for diminution in the value of property and loss of use and enjoyment of our property.

12. I understand the responsibilities of being a Class Representative, including that I am seeking to represent all members of the classes for which I am proposed. To date, I have performed a number of tasks as a Class Representative, including:

- a. I reviewed notices my counsel sent me regarding documents requested by Defendants I had to collect and provide to my counsel and searched for and provided those documents;
- b. With the assistance of my counsel, I reviewed and responded to written questions asked by Defendants;
- c. I prepared for and testified at a deposition that took place on July 13, 2018;
- d. I have met with my lawyers many times and have been in regular telephone and email contact with them regarding this lawsuit; and
- e. I have discussed the claims alleged in this suit, I understand those claims and why they are being raised, and I believe those claims have merit.

13. I brought this lawsuit on behalf of myself and all other similarly situated individuals whose water source and property was contaminated by Defendants with PFOA.

14. I do not believe I have interests that are inconsistent with the interests of the Class Members I seek to represent, and believe that I will adequately represent those class members.

15. As a Class Representative, I will always consider the interests of Class Members just as I would consider my own interests, and in some cases I understand I must put the interests of Class Members before my own interests.

16. I have participated in and will continue to actively participate in the lawsuit as necessary, and help in any way I can.

17. I recognize and accept that any resolution of this lawsuit is subject to court approval and must be designed in the best interest of the Class as a whole.

18. I understand that the Class Representatives are not required to pay of the costs of the lawsuit upfront, but that if the case is resolved favorably for the Class, the costs and attorneys' fees with by paid out of the recovery.

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

Dated: March 20, 2020

  
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Angela Corbett