

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,

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

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.,

Defendants.

DECLARATION OF HYEONG-MOO SHIN, Ph.D.

I, Hyeong-Moo Shin, declare and state as follows:

1. I prepared the Expert Report attached as Exhibit A to this Declaration.
2. Each of the opinions in the Expert Report is stated to a reasonable degree of scientific certainty and was arrived at using reliable and generally accepted scientific methods.
3. If called as a witness, I will testify competently to the matters stated in this Expert Report.
4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 13, 2020



HYEONG-MOO SHIN, Ph.D.

EXHIBIT A TO DECLARATION OF
HYEONG-MOO SHIN, PH.D. IN SUPPORT
OF PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION

Expert Report of Hyeong-Moo Shin, Ph.D. and
Exhibits to Report of Hyeong-Moo Shin, Ph.D.
(32 pages)

EXHIBIT SUBJECT TO PENDING MOTION
TO SEAL FILED ON APRIL 6, 2020