

EXHIBIT S131 TO DECLARATION OF
STEPHEN G. SCHWARZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF NEW YORK

3 _____
4 MICHELE BAKER, et al., individually and on
5 behalf of all others similarly situated,
6 Plaintiffs,
7

-against-

Case No.:

8 1:16-CV-917 LEK/DJS
9

10 SAINT-GOBAIN PERFORMANCE
11 PLASTICSCORP.CORP., and HONEYWELL
12 INTERNATIONAL INC. f/k/a ALLIED-SIGNAL, INC.,
13 Defendants.
14

15 _____
16 Videotaped Deposition Of MICHAEL HICKEY
17 (Plaintiff)

18 DATE: September 12, 2018
19 TIME: 9:13 a.m. - 4:29 p.m.
20 Job No. 2990204

21 HELD: Hilton Garden Inn
22 235 Hoosick Street
23 Troy, New York

24 BEFORE: Brenda J. O'Connor-Marello, CSR,
25 Certified Shorthand Reporter and
Notary Public in and for the
State of New York.

1 correct.

2 Well, that was 2001 I was in
3 college. So yeah, that's correct.

4 Q. Okay. Do you currently own any of the
5 properties listed on page 3 of Exhibit 1?

6 A. I do not.

7 Q. And each of these properties is on the
8 Hoosick Falls municipal water system?

9 A. Correct.

10 Q. Is it your belief that each of these
11 properties listed on Exhibit 1 was on the
12 Hoosick Falls municipal water system at
13 the time you lived there?

14 A. Yes.

15 MR. COHN: Object to form.

16 BY MS. PREHEIM:

17 Q. To your knowledge, was any environmental
18 testing conducted on any of the properties
19 listed on Exhibit 1?

20 MR. COHN: Object to form.

21 A. To my knowledge, yes.

22 Q. Which properties?

23 A. [REDACTED LOCAL RULE 8.1] and [REDACTED LOCAL RULE 8.1].

24 Q. And what environmental testing are you
25 referring to?

1 A. Water tests.

2 Q. And when were these water tests conducted?

3 A. They were conducted in -- sorry. I was
4 trying to figure out the date.

5 Q. Take your time.

6 A. 2000 -- September, October 2014.

7 Q. Okay. And who conducted the water tests?

8 A. I did.

9 Q. Any other environmental testing that --

10 A. No.

11 Q. -- to your knowledge --

12 Wait until I finish my question.

13 A. Sorry.

14 Q. That's fine.

15 Any other environmental testing, to
16 your knowledge, that was conducted on any
17 of these properties listed on Exhibit 1?

18 A. No.

19 Q. To your knowledge, there's been no soil
20 testing at any of these properties?

21 A. I believe -- I know -- actually

22 LOCAL RULE 8.1 did.

23 Q. And when was the soil testing done at

24 LOCAL RULE 8.1 ?

25 A. I'm not 100 percent sure. I think it was

1 in 2016. It was done by the state at that
2 point.

3 Q. And what were they testing for?

4 MR. COHN: Object to form.

5 BY MS. PREHEIM:

6 Q. To your knowledge, what were they testing
7 for?

8 A. I believe PFOA at that point.

9 Q. Okay. Any other properties that you
10 believe underwent soil testing?

11 A. Not that I know of.

12 Q. Did any -- was there radon testing on any
13 of the properties listed on Exhibit 1?

14 MR. COHN: Object to form.

15 A. Not that I know of.

16 Q. And aside from the water testing that you
17 conducted, was there any water testing
18 done at any of the properties on
19 Exhibit 1?

20 MR. COHN: Object to form.

21 A. Not that I'm aware of.

22 Q. Okay. At any of the properties listed on
23 Exhibit 1, was PFOA tested for in the air
24 or dust?

25 MR. COHN: Object to form.