

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 MAIN-LINGENER; 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 CHARLES  
CARR IN SUPPORT  
OF PLAINTIFFS' MOTION FOR CLASS  
CERTIFICATION**

I, Charles Carr, 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. Since 1993, I have owned and resided at the home located at [REDACTED] LOCAL RULE 8.1, in Hoosick Falls, New York.

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 of 420 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 and gardens.

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 beginning in late 2015 or early 2016. I continue to use bottled water for cooking and to drink.

7. My blood was tested and found to contain 186 ug/L of PFOA.

8. Due to my exposure to PFOA and the accumulation of PFOA in my blood, I believe I have been injured and am at 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 12, 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 properties were 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 will be paid out of the recovery.

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

Dated: March 17, 2020

  
Charles Carr III