

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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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,

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.

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**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

  
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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