

EXHIBIT 57

STATE OF NEW YORK
SUPREME COURT

COUNTY OF RENSSELAER

JAY BURDICK, CONNIE PLOUFFE,
EDWARD PLOUFFE, FRANK
SEYMOUR, EMILY MARPE, as parent and
natural guardian of E.B., an infant, and, G.Y.,
an infant, JACQUELINE MONETTE, WILLIAM
SHARPE, EDWARD PERROTTI-SOUSIS,
MARK DENUÉ and MEGAN DUNN,
individually, and on behalf of all similarly situated,

**AFFIDAVIT OF
JAY BURDICK**

Plaintiffs,

v.

Index No.: 00253835

TONOGA INC., (d/b/a TACONIC),

Defendant.

STATE OF NEW YORK)
COUNTY OF RENSSELAER) ss:

JAY BURDICK, being duly sworn, deposes and says:

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. I have owned property located at 55 Main Street, in Petersburg, New York since 1995. I erected a home on this property myself.

3. My family and I have obtained our drinking water from the Petersburg municipal water supply while living at the 55 Main Street address.

4. Our community was informed by public health officials in February of 2016 that tests of the Petersburg municipal water showed a PFOA levels of approximately 95 ppt and have since learned that testing has shown levels as high as 140 ppt.

5. 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, we were instructed by public health officials not to drink from our tap or use water from our tap for cooking and to limit our 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 February of 2016 until May of 2016 when we were told that a filtration system was installed and tested on the municipal water supply and instructed it was once again safe to drink and cook with the water from our tap.

7. My blood was drawn in July of 2016 and tested by the NYSDOH and found to contain 8.74 ug/L.

8. Due to my exposure to PFOA and the accumulation of PFOA in my blood, I believe that I have been injured and am now 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 would 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 the municipal wells that provide water to my home with PFOA and contamination from the air that was deposited on my property, I believe that value of my property has decreased.

10. Due to the contamination of the municipal wells that provide water to my home with PFOA and contamination 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 Defendant 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 Defendant 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 Defendant;
- c. I prepared for and testified at a deposition that took place on December 18, 2018;
- d. I have met with my lawyers many times and have been in regular telephone and email contact with them regarding this lawsuit;
- 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 and air were contaminated by Defendant 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 for 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.



JAY BURDICK

Sworn to me this 24
day of January, 2018.



Notary Public

STEPHEN G. SCHWARZ
Notary Public, State of New York
Qualified in Monroe County
Commission Expires 7-17-2019

JAY BURDICK, CONNIE PLOUFFE,
EDWARD PLOUFFE, FRANK
SEYMOUR, EMILY MARPE, as parent and
natural guardian of E.B., an infant, and, G.Y.,
an infant, JACQUELINE MONETTE, WILLIAM
SHARPE, EDWARD PERROTTI-SOUSIS,
MARK DENUE and MEGAN DUNN,
individually, and on behalf of all similarly situated,

**AFFIDAVIT OF
CONNIE PLOUFFE**

Plaintiffs,

v.

Index No.: 00253835

TONOGA INC., (d/b/a TACONIC),

Defendant.

STATE OF NEW YORK)
COUNTY OF RENSSELAER) ss:

CONNIE PLOUFFE, being duly sworn, deposes and says:

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. I have owned and resided at the home located at 26 Harold Brock Road, Petersburg, New York since 1999.
3. The drinking water at my home is provided by a privately owned well on my property.
4. My private well was tested in 2016 and found to contain PFOA at a level of as high as 3.8 parts per trillion (ppt). After I learned that my well was contaminated with PFOA, the New York State Department of Environmental Conservation (DEC) installed a POET filtration system.

5. 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. After PFOA contamination was disclosed on or around February 20, 2016, public health officials instructed residents not to drink from our taps to limit our exposure to the water from our taps. I followed those instructions and drank and cooked with bottled water from February of 2016 until May of 2016 when my 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.

7. In 2017, after my POET system was installed, I was sent the results of testing of my water indicating that prior to filtration my water continued to contain PFOA at a level of 4.5 ppt. In other words, the quantity of PFOA in my private well has increased since it was first tested.

8. My blood was collected by the NYSDOH on June 18, 2016, approximately 4 months after I stopped consuming water from my well, tested and found to contain 0.937 ug/L of PFOA.

9. Due to the contamination of my property with PFOA, and the contamination of other properties in Petersburg with PFOA, I believe that value of my property has decreased.

10. Due to the contamination of my property with PFOA, 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 Defendant 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 Defendant 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 Defendant;
- c. I prepared for and testified at a deposition that took place on January 25, 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 and air were contaminated by Defendant 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 for 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.

Connie Plouffe

CONNIE PLOUFFE

Sworn to me this 3
day of February, 2018.

JAMES BILSBORROW
NOTARY PUBLIC-STATE OF NEW YORK
No. 02816365426

Qualified to Receive Oaths
NOTARY PUBLIC
My Commission Expires 10-10-2021

JAY BURDICK, CONNIE PLOUFFE,
EDWARD PLOUFFE, FRANK
SEYMOUR, EMILY MARPE, as parent and
natural guardian of E.B., an infant, and, G.Y.,
an infant, JACQUELINE MONETTE, WILLIAM
SHARPE, EDWARD PERROTTI-SOUSIS,
MARK DENUE and MEGAN DUNN,
individually, and on behalf of all similarly situated,

**AFFIDAVIT OF
EDWARD PLOUFFE**

Plaintiffs,

v.

Index No.: 00253835

TONOGA INC., (d/b/a TACONIC),

Defendant.

STATE OF NEW YORK)
COUNTY OF RENSSELAER) ss:

EDWARD PLOUFFE, being duly sworn, deposes and says:

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. I have owned and resided at the home located at 26 Harold Brock Road, Petersburg, New York since 1999.

3. The drinking water at my home is provided by a privately owned well on my property.

4. My private well was tested in 2016 and found to contain PFOA at a level of as high as 3.8 parts per trillion (ppt). After I learned that my well was contaminated with PFOA, the New York State Department of Environmental Conservation (DEC) installed a POET filtration system.

5. 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. After PFOA contamination was disclosed on or around February 20, 2016, public health officials instructed residents not to drink from our taps to limit our exposure to the water from our taps. I followed those instructions and drank and cooked with bottled water from February of 2016 until May of 2016 when my 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.

7. In 2017, after my POET system was installed, I was sent the results of testing of my water indicating that prior to filtration my water continued to contain PFOA at a level of 4.5 ppt. In other words, the quantity of PFOA in my private well has increased since it was first tested.

8. My blood was collected by the NYSDOH on June 18, 2016, approximately 4 months after I stopped consuming water from my well, tested and found to contain 2.69 ug/L of PFOA.

9. Due to the contamination of my property with PFOA, and the contamination of other properties in Petersburg with PFOA, I believe that value of my property has decreased.

10. Due to the contamination of my property with PFOA, 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 Defendant 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 Defendant 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 Defendant;
- c. I prepared for and testified at a deposition that took place on January 24, 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 and air were contaminated by Defendant 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 for 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.


EDWARD PLOUFFE

Sworn to me this 3
day of February, 2018.

JAMES BILSBORROW
NOTARY PUBLIC-STATE OF NEW YORK

No. 02816385425
NOTARY PUBLIC
Qualified in Kings County
My Commission Expires 10-10-2021

JAY BURDICK, CONNIE PLOUFFE,
EDWARD PLOUFFE, FRANK
SEYMOUR, EMILY MARPE, as parent and
natural guardian of E.B., an infant, and, G.Y.,
an infant, JACQUELINE MONETTE, WILLIAM
SHARPE, EDWARD PERROTTI-SOUSIS,
MARK DENUE and MEGAN DUNN,
individually, and on behalf of all similarly situated,

**AFFIDAVIT OF
FRANK SEYMOUR**

Plaintiffs,

v.

Index No.: 00253835

TONOGA INC., (d/b/a TACONIC),

Defendant.

STATE OF NEW YORK)
COUNTY OF RENSSELAER) ss:

FRANK SEYMOUR, being duly sworn, deposes and says:

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. I have owned and resided at the home located at 8541 Miller Hill Road, Averill Park, New York since 2010. Prior to purchasing this property, I rented a home that was owned by Defendant located at 6 Russell Road in Petersburg, New York.
3. The drinking water at my home at the Russell Road address was provided by a privately owned well on the property.

4. Between approximately 2007 and 2010, employees of Taconic instructed my family not to use the well water at 6 Russell Road for drinking or cooking, but no Taconic employee ever told me why.

5. Taconic supplied our household with bottled water on a regular basis from approximately 2007 to 2010.

6. In 2016, I learned that the New York State Department of Environmental Conservation (DEC) tested the well at 6 Russell Road, and found it to contain PFOA at a level in excess of 1,000 parts per trillion (ppt).

7. 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.

8. My blood was collected by the NYSDOH on July 12, 2016, approximately 6 years after I moved away from my Russell Road address and stopped consuming water from that well. At this time, my blood was found contain 88.6 ug/L of PFOA.

9. Due to my exposure to PFOA and the accumulation of PFOA in my blood, I believe that I have been injured and am now 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 would benefit from medical monitoring and surveillance for conditions and illnesses associated with PFOA exposure so that early diagnosis and treatment can occur.

10. I understand that I am being proposed as a representative for a class of individuals suing the Defendant in this case under state law, 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.

11. 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 Defendant 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 Defendant;
- c. I have not yet testified at a deposition but I anticipate doing so;
- d. I have met with my lawyers many times; 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.

12. I brought this lawsuit on behalf of myself and all other similarly situated individuals whose water and air were contaminated by Defendant with PFOA.

13. 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.

14. 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.

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

16. 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.

17. I understand that the Class Representatives are not required to pay for 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.


FRANK SEYMOUR

Sworn to me this 3
day of February, 2018.

JAMES BILSBORROW
NOTARY PUBLIC-STATE OF NEW YORK
No. 02BI6365426

~~NOTARY PUBLIC~~
My Commission Expires 10-10-2021

JAY BURDICK, CONNIE PLOUFFE,
EDWARD PLOUFFE, FRANK
SEYMOUR, EMILY MARPE, as parent and
natural guardian of E.B., an infant, and, G.Y.,
an infant, JACQUELINE MONETTE, WILLIAM
SHARPE, EDWARD PERROTTI-SOUSIS,
MARK DENUE and MEGAN DUNN,
individually, and on behalf of all similarly situated,

**AFFIDAVIT OF
EMILY MARPE**

Plaintiffs,

v.

Index No.: 00253835

TONOGA INC., (d/b/a TACONIC),

Defendant.

STATE OF NEW YORK)
COUNTY OF RENSSELAER) ss:

EMILY MARPE, being duly sworn, deposes and says:

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. My children, infant plaintiffs E.B. and G.Y., are 17 years old and 12 years old, respectively.
3. The infant plaintiffs resided with me at a home located at 19105 State Route 22, in Petersburg, New York from October of 2011 to April of 2017.
4. While living at 19105 State Route 22 my children obtained their drinking water from a privately owned well on the property.

5. Our private well at 19105 State Route 22 was tested and found to contain PFOA at a level of 2,100 ppt.

6. My two children, the infant plaintiffs, regularly drank water from my tap, consumed food cooked with this water, drank other beverages made with this water, bathed and showered in the water. We also watered our lawn and gardens with this water.

7. Due to the contamination of our drinking water supply, we were instructed by public health officials not to drink from our tap or use water from our tap for cooking and to limit our exposure to the water while bathing until a filtration system could be installed to remove or reduce the amount of PFOA in our drinking water. As a result, we followed those instructions and drank and cooked with bottled water from February of 2016 until May of 2016 when our POET filtration system was installed and tested and we were instructed it was once again safe to drink and cook with the water from our tap.

8. Blood was drawn from my children in March of 2016 by the NYSDOH and our blood was tested for PFOA. E.B.'s blood contained 103 ug/L (ppb) and G.Y.'s blood contained 207 ug/L (ppb) of PFOA.

9. Due to the infant plaintiffs' exposure to PFOA and the accumulation of PFOA in their blood, I believe that they have been injured and are now at increased risk of developing certain illnesses and cancers associated with PFOA exposure. As a result, I believe that my children and other class members similarly exposed would benefit from medical monitoring and surveillance for conditions and illnesses associated with PFOA exposure so that early diagnosis and treatment can occur.

10. I understand that I am being proposed as a representative for a class of individuals suing the Defendant in this case under state law for which the infant plaintiffs have a claim, and that we are seeking a class wide medical monitoring program.

11. 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 Defendant 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 Defendant;
- c. I prepared for and am to testify at a deposition that is scheduled for January 24, 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.

12. I brought this lawsuit on behalf of my children and all other similarly situated individuals whose water and air were contaminated by Defendant with PFOA.

13. 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.

14. As a Class Representative, I will always consider the interests of Class Members just as I would consider my children's interests, and in some cases I understand I must put the interests of Class Members before my children's individual interests.

15. I have participated in and will continue to actively participate in the lawsuit as necessary, and help in any way I can. I was one of the people who sought out counsel to bring claims against Defendant for the contamination of our community and I encouraged others to become involved.

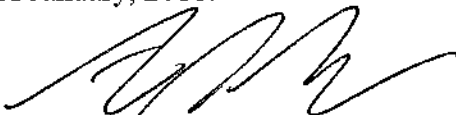
16. I recognize and accept that any resolution of this lawsuit is subject to court approval and must be designed in the best interest of the Class as a whole.

17. I understand that the Class Representatives are not required to pay for 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.



EMILY MARPE

Sworn to me this 23rd
day of January, 2018.



Notary Public

STEPHEN G. SCHWARZ
Notary Public, State of New York
Qualified in Monroe County
Commission Expires 7-17-2019

JAY BURDICK, CONNIE PLOUFFE,
EDWARD PLOUFFE, FRANK
SEYMOUR, EMILY MARPE, as parent and
natural guardian of E.B., an infant, and, G.Y.,
an infant, JACQUELINE MONETTE, WILLIAM
SHARPE, EDWARD PERROTTI-SOUSIS,
MARK DENUÉ and MEGAN DUNN,
individually, and on behalf of all similarly situated,

**AFFIDAVIT OF
JACQUELINE MONETTE**

Plaintiffs,

v.

Index No.: 00253835

TONOGA INC., (d/b/a TACONIC),

Defendant.

STATE OF NEW YORK)
COUNTY OF RENSSELAER) ss:

JACQUELINE MONETTE, being duly sworn, deposes and says:

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. I have owned and resided at the home located at 44 Hewitt Road, Petersburg, New York since 2004.
3. The drinking water at my home is provided by a privately owned well on my property.
4. My private well was tested and found to contain PFOA at a level of as high as 1,500 ppt.
5. 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 from February of 2016 until May of 2016 when my 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.

7. In June of 2017 after my POET system was installed, I was sent the results of testing of my water indicating that *after* filtration my water continued to contain PFOA at a level of 14 ppt.

8. My blood was collected by the NYSDOH on June 18, 2016, approximately 4 months after I stopped consuming water from my well, tested and found to contain 224 ug/L.

9. Due to my exposure to PFOA and the accumulation of PFOA in my blood, I believe that I have been injured and am now 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 would benefit from medical monitoring and surveillance for conditions and illnesses associated with PFOA exposure so that early diagnosis and treatment can occur.

10. Due to the contamination of my property with PFOA I believe that value of my property has decreased.

11. Due to the contamination of my property with PFOA, 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.

12. I understand that I am being proposed as a representative for a class of individuals suing the Defendant 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.

13. 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 Defendant 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 Defendant;
- c. I prepared for and testified at a deposition that took place on January 25, 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.

14. I brought this lawsuit on behalf of myself and all other similarly situated individuals whose water and air were contaminated by Defendant with PFOA.

15. 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.

16. 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.

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

18. 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.

19. I understand that the Class Representatives are not required to pay for 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.


JACQUELINE MONETTE

Sworn to me this 25th
day of January, 2018.



NOTARY PUBLIC

STEPHEN G. SCHWARZ
Notary Public, State of New York
Qualified in Monroe County
Commission Expires 7-17-2019

JAY BURDICK, CONNIE PLOUFFE,
EDWARD PLOUFFE, FRANK
SEYMOUR, EMILY MARPE, as parent and
natural guardian of E.B., an infant, and, G.Y.,
an infant, JACQUELINE MONETTE, WILLIAM
SHARPE, EDWARD PERROTTI-SOUSIS,
MARK DENUE and MEGAN DUNN,
individually, and on behalf of all similarly situated,

**AFFIDAVIT OF
WILLIAM SHARPE**

Plaintiffs,

v.

Index No.: 00253835

TONOGA INC., (d/b/a TACONIC),

Defendant.

STATE OF NEW YORK)
COUNTY OF RENSSELAER) ss:

WILLIAM SHARPE, being duly sworn, deposes and says:

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. I have owned property located at 19103 NY Rt. 22, Petersburg, New York since 1992. I began building my home on this property in 2002 and built the home myself over a 10 year period.

3. The drinking water at my home is provided by a privately owned well located on my property that was drilled at the end of 1998. I started consuming water from this well shortly thereafter, and have done so continuously since that time until the contamination was discovered.

4. My private well was tested and found to contain PFOA at a level of as high as 500 ppt.

5. 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, we were 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 February of 2016 until May of 2016 when my 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.

7. My blood was collected by the NYSDOH on July 23, 2016, approximately 5 months after I stopped consuming water from my well, tested and found to contain 60.6 ug/L.

8. Due to my exposure to PFOA and the accumulation of PFOA in my blood, I believe that I have been injured and am now 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 would benefit from medical monitoring and surveillance for conditions and illnesses associated with PFOA exposure so that early diagnosis and treatment can occur.

9. I do not currently have private health insurance and do not regularly visit any physicians.

10. Due to the contamination of my property with PFOA I believe its market value has decreased.

11. Due to the contamination of my property with PFOA, 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.

12. I understand that I am being proposed as a representative for a class of individuals suing the Defendant 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.

13. 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 Defendant 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 Defendant;
- c. I prepared for and testified at a deposition that took place on December 19, 2017;
- d. I have met with my lawyers many times and have been in regular telephone 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.

14. I brought this lawsuit on behalf of myself and all other similarly situated individuals whose water and air were contaminated by Defendant with PFOA.

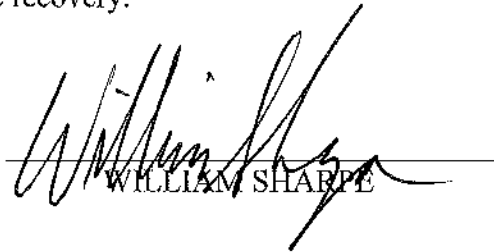
15. I do not believe I have interests that are inconsistent with the interests of the Class Members I seek to represent, and believe that I will adequately represent those class members.

16. 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.

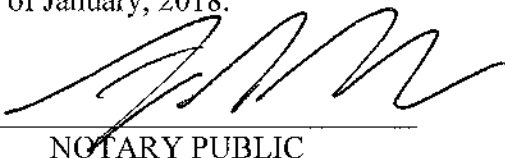
17. I have participated in and will continue to actively participate in the lawsuit as necessary, and help in any way I can.

18. 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.

19. I understand that the Class Representatives are not required to pay for 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.


WILLIAM SHARPE

Sworn to me this 24
day of January, 2018.


NOTARY PUBLIC

STEPHEN G. SCHWARZ
Notary Public, State of New York
Qualified in Monroe County
Commission Expires 7-17-2019

JAY BURDICK, CONNIE PLOUFFE,
EDWARD PLOUFFE, FRANK
SEYMOUR, EMILY MARPE, as parent and
natural guardian of E.B., an infant, and, G.Y.,
an infant, JACQUELINE MONETTE, WILLIAM
SHARPE, EDWARD PERROTTI-SOUSIS,
MARK DENUE and MEGAN DUNN,
individually, and on behalf of all similarly situated,

**AFFIDAVIT OF
EDWARD PERROTTI-
SOUSIS**

Plaintiffs,

v.

Index No.: 00253835

TONOGA INC., (d/b/a TACONIC),

Defendant.

STATE OF NEW YORK)
COUNTY OF RENSSELAER) ss:

EDWARD PERROTTI-SOUSIS, being duly sworn, deposes and says:

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. I have owned and resided at the home located at 426 Potter Hill Road, Petersburg, New York since 2015.
3. The drinking water at my home is provided by a privately owned well on my property.
4. My private well was tested in 2016 and found to contain PFOA at a level of 22 parts per trillion (ppt). After I learned that my well was contaminated with PFOA, the New York State

Department of Environmental Conservation (DEC) installed a point-of-entry treatment filtration system.

5. 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. After the PFOA contamination in Petersburg's water was disclosed on or around February 20, 2016, public health officials instructed residents not to drink from our taps to limit our exposure to the water from our taps. I followed those instructions and drank and cooked with bottled water from February of 2016 until approximately June 2016 when my 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.

7. My blood was collected by the NYSDOH on June 28, 2016, approximately 4 months after I stopped consuming water from my well, tested, and was found to contain 1.16 ug/L of PFOA.

8. Due to the contamination of my property with PFOA, and the contamination of other properties in Petersburg with PFOA, I believe that value of my property has decreased.

9. Due to the contamination of my property with PFOA, my use and enjoyment of my property was negatively impacted.

10. I understand that I am being proposed as a representative for a class of individuals suing the Defendant in this case under state law, and that we are seeking damages for diminution in the value of property and loss of use and enjoyment of our property.

11. 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 Defendant 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 Defendant;
- c. I prepared for and testified at a deposition that took place on January 26, 2018;
- d. I have met with my lawyers many times; 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.

12. I brought this lawsuit on behalf of myself and all other similarly situated individuals whose water and air were contaminated by Defendant with PFOA.

13. 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.

14. 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.

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

16. 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.

17. I understand that the Class Representatives are not required to pay for 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.



EDWARD PERROTTI-SOUSIS

Sworn to me this 3
day of February, 2018.

JAMES BILSBORROW
NOTARY PUBLIC-STATE OF NEW YORK
No. 02B16365425

NOTARY PUBLIC
My Commission Expires 10-10-2021

JAY BURDICK, CONNIE PLOUFFE,
EDWARD PLOUFFE, FRANK
SEYMOUR, EMILY MARPE, as parent and
natural guardian of E.B., an infant, and, G.Y.,
an infant, JACQUELINE MONETTE, WILLIAM
SHARPE, EDWARD PERROTTI-SOUSIS,
MARK DENUÉ and MEGAN DUNN,
individually, and on behalf of all similarly situated,

**AFFIDAVIT OF
MARK DENUÉ**

Plaintiffs,

v.

Index No.: 00253835

TONOGA INC., (d/b/a TACONIC),

Defendant.

STATE OF NEW YORK)
COUNTY OF RENSSELAER) ss:

MARK DENUÉ, being duly sworn, deposes and says:

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. I have owned and resided at the home located at 68 Hewitt Road, Petersburg, New York since 1999.
3. The drinking water at my home is provided by a privately owned well on my property.
4. My private well was tested in 2016 and found to contain PFOA at a level of 900 parts per trillion (ppt). After I learned that my well was contaminated with PFOA, the New York State

Department of Environmental Conservation (DEC) installed a point-of-entry treatment filtration system.

5. 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. After the PFOA contamination in Petersburg's water was disclosed on or around February 20, 2016, public health officials instructed residents not to drink from our taps to limit our exposure to the water from our taps. I followed those instructions and drank and cooked with bottled water from February of 2016 until approximately June 2016 when my 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.

7. In July 2017, after my POET system was installed, I was sent the results of testing of my water indicating that prior to filtration my water continued to contain PFOA at a level of 810 ppt.

8. My blood was collected by the NYSDOH on June 18, 2016, approximately 4 months after I stopped consuming water from my well, tested, and was found to contain 170 ug/L of PFOA.

9. Due to my exposure to PFOA and the accumulation of PFOA in my blood, I believe that I have been injured and am now 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 would benefit from medical monitoring and surveillance for conditions and illnesses associated with PFOA exposure so that early diagnosis and treatment can occur.

10. Due to the contamination of my property with PFOA, and the contamination of other properties in Petersburg with PFOA, I believe that value of my property has decreased.

11. Due to the contamination of my property with PFOA, my use and enjoyment of my property was negatively impacted.

12. I understand that I am being proposed as a representative for a class of individuals suing the Defendant in this case under state law, 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.

13. 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 Defendant 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 Defendant;
- c. I prepared for and testified at a deposition that took place on January 23, 2018;
- d. I have met with my lawyers many times; 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.

14. I brought this lawsuit on behalf of myself and all other similarly situated individuals whose water and air were contaminated by Defendant with PFOA.

15. 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.

16. 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.

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

18. 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.

19. I understand that the Class Representatives are not required to pay for 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.



MARK DENUE

Sworn to me this 3
day of February, 2018.

JAMES BILSBORROW
NOTARY PUBLIC-STATE OF NEW YORK
No. 02818385426

NOTARY PUBLIC
My Commission Expires 10-10-2021

JAY BURDICK, CONNIE PLOUFFE,
EDWARD PLOUFFE, FRANK
SEYMOUR, EMILY MARPE, as parent and
natural guardian of E.B., an infant, and, G.Y.,
an infant, JACQUELINE MONETTE, WILLIAM
SHARPE, EDWARD PERROTTI-SOUSIS,
MARK DENUE and MEGAN DUNN,
individually, and on behalf of all similarly situated,

**AFFIDAVIT OF
MEGAN DUNN**

Plaintiffs,

v.

Index No.: 00253835

TONOGA INC., (d/b/a TACONIC),

Defendant.

STATE OF NEW YORK)
COUNTY OF RENSSELAER) ss:

MEGAN DUNN, being duly sworn, deposes and says:

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. Along with my spouse, I have resided at the home located at 68 Hewitt Road, Petersburg, New York since 1999, and have been an owner of that property since 2006.
3. The drinking water at my home is provided by a privately owned well on my property.
4. My private well was tested in 2016 and found to contain PFOA at a level of 900 parts per trillion (ppt). After I learned that my well was contaminated with PFOA, the New York State

Department of Environmental Conservation (DEC) installed a point-of-entry treatment filtration system.

5. 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. After the PFOA contamination in Petersburg's water was disclosed on or around February 20, 2016, public health officials instructed residents not to drink from our taps to limit our exposure to the water from our taps. I followed those instructions and drank and cooked with bottled water from February of 2016 until approximately June 2016 when my 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.

7. In July 2017, after my POET system was installed, I was sent the results of testing of my water indicating that prior to filtration my water continued to contain PFOA at a level of 810 ppt.

8. My blood was collected by the NYSDOH on June 18, 2016, approximately 4 months after I stopped consuming water from my well, tested, and was found to contain 345 ug/L of PFOA.

9. Due to my exposure to PFOA and the accumulation of PFOA in my blood, I believe that I have been injured and am now 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 would benefit from medical monitoring and surveillance for conditions and illnesses associated with PFOA exposure so that early diagnosis and treatment can occur.

10. Due to the contamination of my property with PFOA, and the contamination of other properties in Petersburg with PFOA, I believe that value of my property has decreased.

11. Due to the contamination of my property with PFOA, my use and enjoyment of my property was negatively impacted.

12. I understand that I am being proposed as a representative for a class of individuals suing the Defendant in this case under state law, 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.

13. 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 Defendant 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 Defendant;
- c. I prepared for and testified at a deposition that took place on January 23, 2018;
- d. I have met with my lawyers many times; 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.

14. I brought this lawsuit on behalf of myself and all other similarly situated individuals whose water and air were contaminated by Defendant with PFOA.

15. 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.

16. 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.

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

18. 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.

19. I understand that the Class Representatives are not required to pay for 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.


MEGAN DUNN

Sworn to me this 3
day of February, 2018.

JAMES BILSBORROW
NOTARY PUBLIC-STATE OF NEW YORK
No. 02B16365425

NOTARY PUBLIC
My Commission Expires 10-10-2021