

# EXHIBIT 41.

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STATE OF NEW YORK  
SUPREME COURT

COUNTY OF RENSSELAER

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Index No.:  
00253835

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,

Plaintiffs,

-v-

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

Defendant.  
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\*\*CONFIDENTIAL\*\*

VIDEOTAPED EXAMINATION BEFORE TRIAL of  
SUZANNE SEYMOUR, held on August 7, 2018, beginning  
at 10:21 a.m., at the law offices of Bond,  
Schoeneck & King, PLLC, 22 Corporate Woods  
Boulevard, Suite 501, Albany, New York; before  
Katherine D. Nichols, Registered Professional  
Reporter and Notary Public of the State of New  
York.

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(Confidential - Suzanne Seymour)

to your attorney?

MR. BILSBORROW: You may answer yes or no.

A. Yes.

Q. Did any of those documents refresh your recollection about things that happened in the past?

A. Yes.

Q. Which documents were those?

A. The document that -- it was an email that Andy Kawczak had sent to his file stating that he had had a conversation with me about providing our home on Russell Road with bottled water.

I was confused before that as to the date, and that had the date that was -- we received water.

Q. Do you remember the date?

A. I remember that it was in 2009.

Q. Did you receive bottled water from Taconic prior to 2009?

A. Apparently not.

Q. Did you think you had?

A. I wasn't sure of the timing. Andy

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(Confidential - Suzanne Seymour)

Kawczak told me that -- I guess after the testing, that there was contamination in our well water.

And I asked him if it was something that I should worry about it, and he said no, because I was an old hen, which is probably why that conversation stuck with me. But he said he was concerned about my daughter Lori who was living on Coonbrook Road at the time.

So that happened before 2009, because she moved out of -- off Coonbrook Road in 2008.

Q. Did you have a good relationship with Andy Kawczak?

A. Yes.

Q. Did you take offense to his comment about you being old?

A. No.

I interpreted it by meaning that I was no longer of childbearing age, but my daughter was, and that apparently was what PFOA affected. That's how I interpreted what he told me.

Q. Did Andy Kawczak tell you at any time that PFOA affected women's ability to have children?

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(Confidential - Suzanne Seymour)

A. No. No, he didn't. That was the only real comment he made to me about contamination.

Q. Have you read anything that says that PFOA affects women's ability to have children?

A. I read online about some of the steps DuPont took back -- I don't know when it was, in the '60s, '70s, possibly '80s or '90s. But they moved, I believe pregnant women and women who wanted to get pregnant, out of any production area where PFOA was. I believe I read that.

Q. News articles? Magazine articles?

MR. BILSBORROW: Object to form. You can answer.

A. It was something I found on the internet when it went through the different steps that DuPont had taken over the years. I don't know specifically what website it was.

Q. You said you had a good relationship with Andy Kawczak; is that right?

A. Yes.

Q. Did you respect Andy?

A. Yes.

Q. Did you think he was a good environmental manager?