

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,

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.

DECLARATION OF DONALD I. SIEGEL, Ph.D.

I, Donald I. Siegel, Ph.D. 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 30, 2020

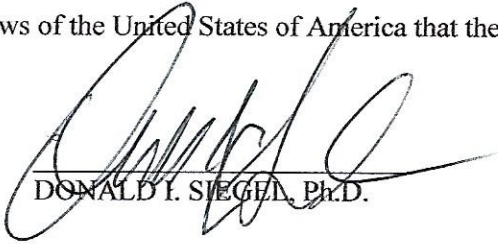

DONALD I. SIEGEL, Ph.D.

EXHIBIT A TO DECLARATION OF
DONALD I. SIEGEL, PH.D. IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION

Expert Report of Donald I. Siegel, Ph.D. and
Exhibits to Expert Report of Donald I. Siegel,
Ph.D.

(96 pages)

EXHIBIT SUBJECT TO PENDING MOTION
TO SEAL FILED ON APRIL 6, 2020