

4) the Property Damage – Alternative Subclass.

5) As more fully explained in the accompanying Plaintiffs’ Memorandum of Law in Support of Motion for Class Certification (“MOL”) with exhibits, these classes should be certified because:

- a. the Plaintiffs have proved by a preponderance of the evidence all of the requirements of Fed. R. Civ. Pro. 23(a) with respect to all four classes;
- b. the Plaintiffs have proved by a preponderance of the evidence all of the requirements of Fed. R. Civ. Pro. 23(b)(3) with respect to all classes; and
- c. the Plaintiffs have also proved by a preponderance of the evidence all of the requirements of Fed. R. Civ. Pro. 23(b)(2) with respect to the medical monitoring classes.

6) The following Exhibits are attached hereto in support of the Motion for Class Certification:

Exhibit 1 - the proposed class boundary map for Medical Monitoring Class.

Exhibit 2 - proposed class boundary map for Medical Monitoring - Alternate Subclass

Exhibit 3 - proposed class boundary map for the Property Damage Classes

Exhibit 4 - Rule 26 Report of Plaintiffs’ expert, John B. Robertson, PG

Exhibit 5 - Rule 26 Report of Plaintiffs’ expert, Paul E. Rosenfeld, Ph.D.

Exhibit 6 – Rule 26 Report of Plaintiffs’ expert, W. Richard Laton, Ph.D.

Exhibit 7 - Rule 26 Report of Plaintiffs’ expert, Kevin J. Boyle, Ph.D.

Exhibit 8 - Rule 26 Report of Plaintiffs’ expert, Richard C. Bost, PE, PG

Exhibit 9 - Rule 26 Report of Plaintiffs’ expert, Tee L. Guidotti, M.D., MPH, DABT

Exhibit 10 - Transcript of the deposition of proposed class representative Christopher
Blades, with exhibits

Exhibit 11 - Transcript of the deposition of proposed class representative Laurie
Franks, with exhibits

Exhibit 12 - Transcript of the deposition of proposed class representative Mary Ellen
Ginty, with exhibits

Exhibit 13 - Transcript of the deposition of proposed class representative Patricia
Glueckert, with exhibits

Exhibit 14 - Transcript of the deposition of proposed class representative Bella
Kholodny, with exhibits

Exhibit 15 - Transcript of the deposition of proposed class representative Jacob
Kholodny, with exhibits

Exhibit 16 - Transcript of the deposition of proposed class representative Teresa
Meade, with exhibits

Exhibit 17 - Transcript of the deposition of proposed class representative Arlene
Meadow, with exhibits

Exhibit 18 - Transcript of the deposition of proposed class representative Ross
Meadow, with exhibits

Exhibit 19 - Transcript of the deposition of proposed class representative Rosalie
Romano, with exhibits

Exhibit 20 - Transcript of the deposition of proposed class representative John
Schlosser, with exhibits

Exhibit 21 - Declaration of Gregory Cade, Esq. in Support of Plaintiffs' Motion for
Class certification

Exhibit 22 - Declaration of Paul J. Napoli, Esq. in Support of Plaintiffs' Motion for
Class Certification

Exhibit 23 - Rule 26 Report of Plaintiffs' expert, Matthew Garretson, Esq.

For the reasons stated in the Third Amended Complaint, the annexed Plaintiffs' Memorandum of Law, and all the reports and exhibits attached hereto, Plaintiffs request that the Motion for Class Certification be granted, as well as such other and further relief that this Court may deem proper and just.

Dated: Melville, New York
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Respectfully submitted,

*Counsel for Plaintiffs and
the Proposed Classes*

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