

attorneys, Shauna L. Friedman, Esq., Oliver T. Barry, Esq., and Gerald J. Williams, Esq.

6. I am a graduate of Rutgers University School of Law, and a member of the Bar of the State of New Jersey.
7. I am also admitted to practice law in the United States District Court for the District of New Jersey, the United States Third Circuit Court of Appeals, and the United States Supreme Court.
8. I have focused my practice of law on representing victims of catastrophic personal injuries and complex torts, including mass tort and individual cases in the field of toxic tort and environmental law, professional malpractice, products liability, and pharmaceutical litigation.
9. I have handled numerous complex litigated toxic exposure, personal injury matters and other matters, several of which have been precedent setting. Several examples of such cases include but are not limited to the following:
 - a. Bahrle v Exxon; 145 NJ 144 (1996) -co-trieed groundwater contamination case on behalf of the 30 families in Ocean County. NJ Supreme court case addressed the liability of major oil companies from independently owned but branded stations. The case also facilitated the expansion and clarification of the doctrine of judicial estoppel.
 - b. Madden v Shieldalloy; Docket W-15394-88 (Cumberland County, 3.28.2001)-represented 58 families over a period of 11 years arising out of groundwater contamination of volatile organics(case delayed by bankruptcy).
 - c. Adams v Pine Baron Realty, et al, Docket No. L-001404-89; co-trieed five month toxic tort/medical monitoring case on behalf of 36 families in Atlantic County arising out of groundwater contamination.
 - d. Carter v Reynolds, 345 NJ Super 67 (2001) expanded employer liability in this NJ Supreme Court opinion with respect to the "going and coming rule" enabling substantial recovery for seriously injured plaintiff.

- e. Galletta v New Jersey Department of Human Resources, 2003 WL 6002978; successfully resolved class action on behalf of persons denied Medicaid benefits by improperly counting certain veteran's benefits as income. Class settlement resulted in rule changes by DMAHS as to how to properly compute income requirements.
 - f. Capriotti v Buena Vista Township, et al, Docket No. ATL L-2878-19; represented 16 families arising out of groundwater contamination resulting in settlement for medical monitoring, nuisance and property diminution, as well as individual kidney cancer case.
 - g. Battista v Enviro Tech International, et al; Docket L-681-10 (Essex County) successfully established causal relationship between new unregulated solvent marketed as a safe alternative to PERC used in the dry-cleaning industry and plaintiff's development of lymphoma; case resulted in substantial seven figure settlement.
 - h. Biniek, et al v Exxon, et al, Docket L-619-00; defense of environmental /toxic tort action filed on behalf of 50 plaintiffs alleging contamination from gasoline station.
 - i. Para v Safety Kleen Systems, case No:213 cv-381-FtM-38CM; represented estate in wrongful death action arising out of exposure to Benzene in manufacturing facility.
 - j. Denson v Penn National Insurance, Docket L-731-96; NJ Spill Act Contribution action against responsible parties for contamination and dec action for insurance coverage; appellate division reversed trial court's denial of coverage; summary judgment granted after remand to trial court.
10. I am fully familiar with the factual allegations, legal theories, and scope of the proposed class, and am committed to prosecuting the within matter.
11. Accordingly, I respectfully request that this Court grant preliminary approval of this class action, and appoint me as co-lead Class Counsel.

I certify that the foregoing statements made by me are true and correct to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: January 29, 2024

WILLIAMS CEDAR, LLC

/s/ Alan H. Sklarsky

Alan H. Sklarsky, Esq.

8 Kings Highway West, Suite B

Haddonfield, NJ 08033

(856) 470-9777

asklarsky@williamscedar.com

Attorney for Plaintiffs