

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SEVERA, et al.,	:	
	:	
Plaintiffs,	:	Case No.: 1:20-cv-6906
	:	
v.	:	Civil Action
SOLVAY, et al.,	:	
	:	
Defendants	:	

**Certification of Gerald J. Williams, Esq. in Support of Motion
for Preliminary Approval of Class Action Settlement**

I, Gerald J. Williams, Esq., hereby certifies to the Court as follows:

1. I am an attorney at law admitted to the New Jersey Bar, and the United States District Court for the District of New Jersey.
2. I am co-counsel for Plaintiffs in the above-captioned matter.
3. I am personally familiar with the facts of this matter, am make this certification based on my personal knowledge.
4. I am providing this certification in support of my appointment as co-lead Class Counsel.
5. As described in more detail in Shauna L. Friedman's certification in support of the Motion for Preliminary Approval of the Class Action Settlement, this case involves allegations of the groundwater pollution and well contamination. Given the facts set forth below, I hold myself out as being qualified to be appointed as Class Counsel in this matter, along with the other proposed

attorneys, Shauna L. Friedman, Esq., Alan H. Sklarsky, Esq., and Oliver T. Barry, Esq.

6. I am a graduate of Temple University School of Law, and a member of the Bar of the State of New Jersey, the Commonwealth of Pennsylvania, and the State of New York.
7. I am also admitted to practice law in the United States District Court for the District of New Jersey, the United States District Court for the Eastern District of Pennsylvania, the United States District Court for the Middle District of Pennsylvania, the United States Third Circuit Court of Appeals, and the United States Supreme Court.
8. I have won significant verdicts and settlements for Plaintiffs in civil rights and environmental tort cases in many courts including Merry v. Westinghouse (1:18-cv-1673), which established medical monitoring as a remedy under Pennsylvania common law, and Ambrogi v. Gould (1:91-cv-1403), the first case to hold medical monitoring available under Pennsylvania's Hazardous Sites Cleanup Act.
9. I have been lead or co-lead counsel in the handling of dozens of complex cases including but not limited to:
 - a. Arbogast v. Owens; 1:cv-91-1403 - A certified class action case involving Eighth Amendment violations and prisoner's rights;
 - b. Tracy v. Aamco, Phila, CCP; Oct. Term, 1990; No. 4840 - A certified class action case involving consumer protection;
 - c. Snodgradd v. Mayerfield, et al.; SLM-L-250-91 - A certified class action case involving real estate fraud and toxic torts;
 - d. Mauger v. Home Shopping Network; Berks County 91-9698-14-1 - A certified class action case involving consumer protection;
 - e. Fry v. Leech Tool & Dye Co.; Crawford County 1990-403 - A certified class action case involving water well contamination;
 - f. Slioupkidis v. CVS; Cumberland County 1990-403 - A

certified class action case involving consumer protection;

- g. Vadino v. American Home Products Corp.; MID-L-425-98 - A certified class action case involving product liability.
- h. Burdick v. Tonoga, Inc.; Index No. 253835 - An environmental tort case involving polyfluorinated compounds similar, related or identical to those involved in the present case. It was certified as a class action by the court for the Third Department of the Supreme Court of New York, and settled with court approval.
- i. Baker v. St. Gobain Performance Plastics, et al.; 19-mc-181 - A certified class action brought on behalf of residents in and around Hoosick Falls, New York who asserted claims arising from drinking water contamination with polyfluorinated compounds similar, related, or identical to those involved in this case. A settlement with 3 of 4 defendants has been approved by the U.S. District Court for the Northern District of New York, with ongoing litigation of claims against the 4th defendant on a class basis.
- j. Nobles, et al. v. Anderson, et al.; HNT-L-145-19 - A class action against the State of New Jersey for a case involving sexual abuse and harassment perpetrated against female inmates.

10. I have also handled hundreds of cases all over the country representing victims of institutional child sexual abuse.

11. I have never been the subject of any disciplinary action.

12. I am fully familiar with the factual allegations, legal theories, and scope of the proposed class, and am committed to prosecuting the within matter.

13. 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/ Gerald J. Williams

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