

IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA

LENORA PERRINE and other individuals residing in West Virginia,
on behalf of herself and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.


AFFIDAVIT OF BRIAN BARR, ESQUIRE

BEFORE ME, the undersigned authority, personally appeared Brian Barr,
Esquire, who deposes and states under oath:

1. My name is Brian Barr, and I am a partner with the law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502. I have been continuously licensed to practice law in the State of Florida and my State Bar number is 0493041. I have been admitted pro hac vice in a number of jurisdictions.
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.

3. As class counsel, I have been involved in the investigation and prosecution of this case, including, but not limited to motion practice, legal research, document review, attending and participating in hearings and trial, fact and expert witness preparation, and fact and expert witness depositions. I participated in post trial and appellate proceedings and attended numerous conferences with my colleagues in preparation of the same.
4. In performing the duties detailed above, I have spent 975 hours on this matter. I have compiled time records on an ongoing basis with the assistance and oversight of the Spelter project team leader, Carol Moore.


DATED this 3th day of December, 2010



Brian Barr

STATE OF FLORIDA
COUNTY OF ESCAMBIA, to wit

The forgoing instrument was acknowledged before me this 3th day of December, 2010, by Brian Barr, Esquire.

NOTARY PUBLIC-STATE OF FLORIDA
 Laurie Mills
Commission #DD762124
Expires: MAR. 25, 2012
BONDED THRU ATLANTIC BONDING CO., INC.



Notary Public

My Commission Expires: 03.25.12

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE and other individuals residing in West Virginia,
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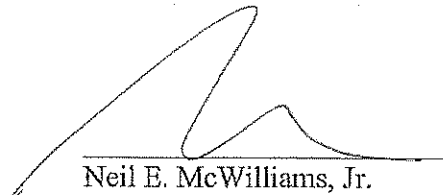
AFFIDAVIT OF ATTORNEY NEIL E. MCWILLIAMS, JR.

BEFORE ME, the undersigned authority, personally appeared Neil E. McWilliams, Jr., Attorney, and he swears and avers under oath as follows:

1. My name is Neil E. McWilliams, Jr., and I am a partner with the firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502. I have been licensed to practice law in Florida since 2005. I have also been admitted pro hac vice in a number of jurisdictions.
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.

3. As an attorney responsible for this case, I supervised numerous staff members who assisted in the preparation and prosecution of this matter. Two of the individuals identified as staff of Levin Papantonio in Plaintiffs' petition, Mr. Nathan Bess and Ms. Rita Lee, worked on this matter but are no longer employed by Levin Papantonio.
4. I supervised the work of Mr. Bess and Ms. Lee, including, but not limited to, attendance and assistance at trial, reviewing documents disclosed in discovery, preparation for depositions and hearing, assistance with expert environmental testing, investigation and research into defendants expert witnesses and assistance in responding to discovery requests.
5. Mr. Bess and Ms. Lee's hours were recorded and maintained in accordance with standard business practices and in compliance with my directions.
6. At my direction and in accordance with standard business practices Mr. Nathan Bess recorded 1,429.50 hours of work on this case.
7. At my direction and in accordance with standard business practices Ms. Rita Lee recorded 1,628 hours of work on this case.


DATED this 9th day of December, 2010

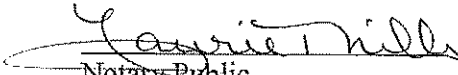


Neil E. McWilliams, Jr.

STATE OF FLORIDA
COUNTY OF ESCAMBIA

The forgoing instrument was acknowledged before me this 9 day of December, 2010,
by Neil E. McWilliams, Jr., who is personally known to me.

NOTARY PUBLIC-STATE OF FLORIDA
 Laurie Mills
Commission #DD762124
Expires: MAR. 25, 2012
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Notary Public

My Commission Expires: 03.25.12

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Defendant.

_____ /

AFFIDAVIT OF M. ROBERT BLANCHARD, ESQUIRE

BEFORE ME, the undersigned authority, personally appeared M. Robert
Blanchard, Esquire, who deposes and states under oath:

1. My name is M. Robert Blanchard, and I am a partner with the law firm of
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at
316 South Baylen Street, Pensacola, Florida, 32502. I have been
continuously licensed to practice law in the State of Florida since 1983
and my State Bar number is 0370975. I am also admitted to practice
before the United States Eleventh Circuit Court of Appeals. I have also
been admitted pro hac vice in a number of jurisdictions.
2. I am a member of the legal team representing the Plaintiff class in the
above captioned case, presently pending in the Circuit Court of Harrison

County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.

3. As class counsel, I attended numerous conferences with my colleagues concerning pre-trial issues and trial preparation matters, including legal research, motion responses, and document preparation.
4. In performing the duties detailed above, I have spent 250 hours on this matter. I have compiled time records on an ongoing basis with the assistance and oversight of the Spelter project team leader, Carol Moore.

DATED this 9th day of December, 2010



M. Robert Blanchard

STATE OF FLORIDA
COUNTY OF ESCAMBIA, to wit

The forgoing instrument was acknowledged before me this 9th day of December, 2010, by M. Robert Blanchard, Esquire.

NOTARY PUBLIC-STATE OF FLORIDA
Laurie Mills
Commission #DD762124
Expires: MAR. 25, 2012
BONDED THRU ATLANTIC BONDING CO., INC.



Notary Public

My Commission Expires: 03.25.12

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LENORA PERRINE and other individuals residing in West Virginia,
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E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.

AFFIDAVIT OF ATTORNEY VIRGINIA M. BUCHANAN

BEFORE ME, the undersigned authority, personally appeared Virginia M. Buchanan, Attorney, and she swears and avers under oath as follows:

1. My name is Virginia M. Buchanan, and I am a partner with the firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502. I have been continuously licensed to practice law in Florida since 1989, and I have been licensed to practice law in Alabama in excess of 10 years. I have also been admitted pro hac vice in a number of jurisdictions. My professional resume is attached which outlines my education, training and experience.
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison

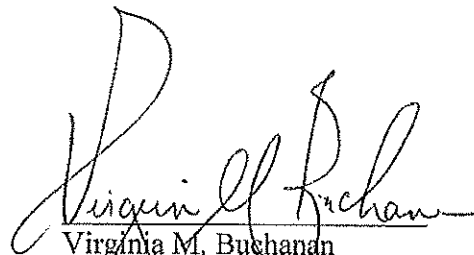
County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.

3. As class counsel, I have been involved in the investigation and prosecution of this case, including, but not limited to, motion practice, legal research, document review, attending and participating in hearings and trial, fact and expert witness preparation, defense expert witness deposition and examination of expert witnesses at trial. I have participated extensively in the medical research, medical economics development and in the presentation of evidence supporting the medical monitoring claims of the class members, including the minor class members and the proceedings that occurred post-trial in this matter. I researched and reviewed hundreds of articles regarding the effects of cadmium, arsenic and lead, developed the presentations of the literature to use in conjunction with the examination and cross-examination of expert witnesses, reviewed numerous depositions of defense expert witnesses, did background research regarding defense and plaintiff expert witnesses, federal and state case law research regarding the various issues in the case including statute of limitations, medical monitoring and requirements of cure/positive effects of monitoring, the standards of the USPS Task Force, the classification of the metals in terms of carcinogenicity, diagnosis and treatment of lung cancer, stomach cancer, lead poisoning, lead-related cancers, skin cancer, neuropsychological injury from exposure to lead, effects of lead in children, etc. I participated in the pretrial motion

practice to respond to defense motions in limine and to support plaintiff's motions. I attended numerous conferences with my colleagues on a frequent basis to prepare for status conferences, motions, hearings, trial, post trial proceedings, appellate proceedings and with respect to medical monitoring for minors.

4. In performing the duties detailed above, I have spent 3728 hours on this matter up through November 2010. I have compiled time records on an ongoing basis with the assistance and oversight of the Spelter project team leader, Carol Moore.

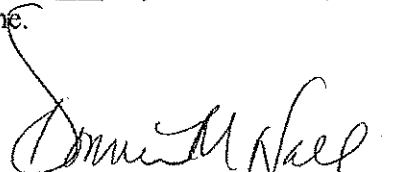
DATED this 7th day of December, 2010



Virginia M. Buchanan
LEVIN PAPANTONIO et al
316 S. Baylen Street
Suite 600
Pensacola, FL 32502
850-435-7023
Vbuchanan@levinlaw.com
850-435-6023 (Fax Line)

STATE OF FLORIDA
COUNTY OF ESCAMBIA

The forgoing instrument was acknowledged before me this 8th day of December, 2010, by Virginia M. Buchanan, who is personally known to me.



Notary Public

My Commission Expires: April 06, 2012

NOTARY PUBLIC-STATE OF FLORIDA
Donna M. Nall
Commission #DD773236
Expires: APR. 06, 2012
BONDED THRU ATLANTIC BONDING CO., INC.

CURRICULUM VITAE

Name: Virginia Marie Buchanan
191 Wynn Haven Beach Road
Mary Esther, Florida 32569

Occupation: Partner - Levin, Papantonio, Thomas, Mitchell, Echsner & Proctor, P.A.

Job Description: Handle various injury claims, including all insurance claims, trucking accidents, defective product cases, sexual assault claims, commercial trial practice, medical negligence.

Education: University of Florida, College of Law,
J.D. Degree, with honors

University of Florida, Journalism College,
B.S. Degree with high honors - based upon academics, special project and committee vote
Graduated first in class

Activities: Member, American Board of Trial Advocates
Member, American Bar Association - Including: Insurance Section; Premises Liability Section; Commercial Litigation Section
Member, Academy of Florida Trial Lawyers
Member, Association of Trial Lawyers of America
Member, Florida Bar Association (Admitted to practice on 4-19-89)
Member, U.S. District Court, Middle District of Florida (Admitted to practice on 12-18-92)
Member, U.S. District Court, Northern District of Florida (Admitted to practice on 10-21-92)
Member, Subcommittee of the American Bar Association on Legislation Affecting Litigation
Member, Subcommittee of American Bar Association on Health Care
Member, Escambia-Santa Rosa Bar Association
Member, Judicial Liaison Committee of Escambia-Santa Rosa Bar Association
Member, Women's Life Center Advisory Board to the West Florida Regional Medical Center
Member, Sacred Heart Cathedral
Member, Women's Caucus Steering Committee for Academy of Florida Trial Lawyers
Chairman, Grievance Committee to Investigate Process Servers
Alumnus of University of Florida Moot Court: "Final Four" finalist;
First Runner Up - Florida Bar Annual Moot Court Competition;
Finalist in National Moot Court Competition, Chicago, IL;
Member, Women's Caucus Steering Committee, AFTL, 1996.
Member, Escambia-Santa Rosa County Bar Association, Committee on Professionalism
Member, Escambia-Santa Rosa County Bar Association, Grievance Committee

Member, Shands Hospital Shands Homecare Advisory Committee
 Member, Alabama Bar Associated (Admitted to practice 9-26-97)
 Member, United States District Court, Middle District of Alabama
 Member, 1st Circuit Fee Arbitration Committee
 Treasurer, ABOTA, January 1, 1999 to present
 Member, Chief Judge's Council for Children
 Member, Escambia-Santa Rosa Bar Foundation, 2000
 Member, United States District Court of Claims, 2000
 Member, AFTL Medical Malpractice Task Force
 Member, Science/Expert Committee of MDL for VIOXX, April 2005
 Alabama Trial Lawyers Association, Sustaining Member and Member of Board of Governors, 2006-2007
 Board Member, Women's Caucus of Florida Justice Association, January 2007
 Selected to be a member of FLORIDA SUPER LAWYERS, 2007
 Selected to be a member of FLORIDA SUPER LAWYERS, 2008
 Member, Academy of Trial Advocacy, 2008
 2008, Member, Civil Procedure Rules Committee, The Florida Bar, to serve July 1, 2008 to June 30, 2011
 Member of the Northwest Florida Association of Women Lawyers
 Selected to be a member of FLORIDA SUPER LAWYERS, 2009
 Task Force Member, *The National Athletic Trainers' Association, Inc.*, Preseason Heat-Acclimatization Guidelines for Secondary School Athletics J Athl Train. 2009 May - June; 44(3): 332 - 333
 Selected to be a member of FLORIDA SUPER LAWYERS, 2010
 Rule 1.442 (demands for judgment) subcommittee of the Florida Civil Rules Committee, 2010

Awards: Bickel Scholarship
 Scripps-Howard Scholarship
 Jurisprudence Award for Criminal Law
 Jurisprudence Award for Legal Writing
 Jurisprudence Award for Legal Ethics
 Top score on Florida Bar Examination
 Selected by faculty of University of Florida Law School as member of Order of the Coif
 2008, Nominee for the 2008 trial lawyer of the year award from the Public Justice Foundation

Publications and Presentations:

False Claims, Trial Diplomacy Journal, April 1993
Errata Sheets Aren't Just to Correct Misspellings, Summation, December 1995
 Psychology and the Law, Pensacola Junior College, 1992
 Sexual Harassment & Legal Accountability, Monsanto Corp., 1996
 Medical Negligence, Estate Planning Seminar for Physicians, 1997
 Legal Ethics & Confidentiality, 1998, 1999, 2000
 Nursing Malpractice, Association of Operating Room Nurses, 1998
 Medical Negligence, Estate Planning Seminar for Physicians, 1997

Lincoln Park Elementary School, "Be All You Can Be" 1993-1996

Article, "Jury Selection in 2002: Perils and Pitfalls; Moving Into the 21st Century Computer Software and Other Jury Selection Aids", published in the November/December 2002 edition of the AFTL Journal

Article, "When Defendants Don't Pay on Time", published in the January, 2003 edition of the AFTL Journal

"When the Hospital Has to Pay for a Doctor's Mistakes," AFTL Journal, September 2003, submitted on behalf of the Women's Caucus

Article, "Introducing The Hon. Margaret C. 'Casey' Rodgers U.S. District Court of Florida, Northern District", published in the January, 2004 issue for the AFTL Journal

"Tort Reform Overview: How it was; How It Is", speaker at Joe J. Harrell Trial Seminar, March 5, 2004

"Summary of the 2003 Medical Malpractice Legislation: Major Impacts from the Plaintiff Perspective and From the Defense Perspective", The Summation, March, 2004

Northwest Florida Paralegal Association Presentation, Professionalism and Ethics, March 2004

Presentation, April 23, 2004, Inner Circle of Investigators "The Essential Role of the Legal Investigator In The Development of Damages for Mediation and Trial."

Article, "Discovering Personnel Records: Who Can Object?", published in the August 2004 issue of the AFTL Journal

Article, "Vioxx: Once Again We Learn That Neither Manufacturers Nor The FDA Look Out For The American Public", published in the November/December 2004 issue of the AFTL Journal

Article, "A Fresh Look at Anti-Dumping Claims: Why It Is Worth Your While", published in the January 2005 issue of the AFTL Journal

Presentation: Preparing and Presenting Your Expert Witness in a Contested Liability Case, sponsored by AFTL, Tampa, Florida, July 2005

Article: "When Defendant's Seek to Recover Private Information From Plaintiff's Non-Party Family Members; What We Should Do To Fight It", AFTL Women's Caucus Article, published September, 2005.

"Kids Will Be Kids.....Legal Liability for the Misdeeds of Minors: Who Pays for Junior's Torts?", AFTL article, pending publication, April, 2006

"Welcome to Our First Resident Federal Judge in Panama City, Northern District of Florida – The Honorable John Richard Smoak", AFTL article on behalf of Women's Caucus, pending publication, April, 2006.

Article, "Judicial Misconduct - Is the Judge Misbehaving?" published in June, 2006 issue of AFTL Journal

Article, "I Always Feel Like Somebody's Watching Me...." published in September, 2006 issue of AFTL Journal (on behalf of Womens' Caucus)

Article, "The Florida Bar's Legal Fee Arbitration Program: Is it Right for You?" published February, 2006 issue of AFTL Journal (on behalf of Women's Caucus)

Article, "Jury Verdicts: Please Don't Take My Sunshine Away" published in the May, 2007 issue for the Women's Caucus of the Florida Justice Association.

Florida Justice Association seminar, speaker on "Ethical Considerations for the Paralegal", at The Breakers, Palm Beach, FL, June 14, 2007

Awarded Recognition in "Florida Super Lawyers" 2008

Article submitted to Florida Justice Assoc. on behalf of Women 's Caucus, "A Florida Injustice: Rejecting the Delayed Discovery Doctrine in Wrongful Death Cases", February 13, 2008

Medicine and Law: When Two Worlds Collide, V. Buchanan, W. R. Jones, D. Ramos, "Complications in Anesthesiology," Ed. E. B. Labato, N. Gravenstein, and R. R. Kirby, Lippincott, Williams & Wilkins, 2008.

2008, June 7, Speaker, Symposium on Medical Malpractice at University of Florida College of Medicine, Department of Anesthesia, topics included "History of Medical Malpractice," "Ways to Avoid Litigation" and "How a Plaintiff's Attorney Approaches a Medical Malpractice Case."

Awarded Recognition in "Florida Super Lawyers" 2009

Co-authored article, "Preseason Heat-Acclimatization Guidelines for Secondary School Athletics", Journal of Athletic Training, Vol. 44, Number 3, Pgs. 332-333, June 2009

Journal of the FJA, Vol. 18, No. 4, Issue 537, May-June 2009 *"Beware and Be Prepared When Malpractice Carriers Seek to Have trial Courts in Medical Negligence Cases Extend the Safe Harbor Deadlines."*

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Defendant.

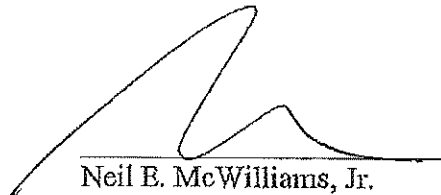
AFFIDAVIT OF ATTORNEY NEIL E. MCWILLIAMS, JR.

BEFORE ME, the undersigned authority, personally appeared Neil E. McWilliams, Jr., Attorney, and he swears and avers under oath as follows:

1. My name is Neil E. McWilliams, Jr., and I am a partner with the firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502. I have been licensed to practice law in Florida since 2005. I have also been admitted pro hac vice in a number of jurisdictions.
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.

3. As an attorney responsible for this case, I supervised numerous staff members who assisted in the preparation and prosecution of this matter. Two of the individuals identified as staff of Levin Papantonio in Plaintiffs' petition, Mr. Nathan Bess and Ms. Rita Lee, worked on this matter but are no longer employed by Levin Papantonio.
4. I supervised the work of Mr. Bess and Ms. Lee, including, but not limited to, attendance and assistance at trial, reviewing documents disclosed in discovery, preparation for depositions and hearing, assistance with expert environmental testing, investigation and research into defendants expert witnesses and assistance in responding to discovery requests.
5. Mr. Bess and Ms. Lee's hours were recorded and maintained in accordance with standard business practices and in compliance with my directions.
6. At my direction and in accordance with standard business practices Mr. Nathan Bess recorded 1,429.50 hours of work on this case.
7. At my direction and in accordance with standard business practices Ms. Rita Lee recorded 1,628 hours of work on this case.


DATED this 9th day of December, 2010

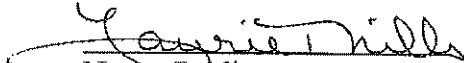


Neil E. McWilliams, Jr.

STATE OF FLORIDA
COUNTY OF ESCAMBIA

The forgoing instrument was acknowledged before me this 9 day of December, 2010,
by Neil E. McWilliams, Jr., who is personally known to me.

NOTARY PUBLIC-STATE OF FLORIDA
 Laurie Mills
Commission #DD762124
Expires: MAR. 25, 2012
BONDED THRU ATLANTIC BONDING CO., INC.


Notary Public

My Commission Expires: 03.25.12

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AFFIDAVIT OF MARTIN LEVIN, ESQUIRE

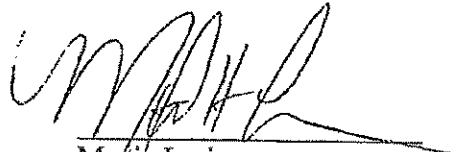
BEFORE ME, the undersigned authority, personally appeared Martin Levin,
Esquire, who deposes and states under oath:

1. My name is Martin Levin, and I am senior counsel with the law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502. I have been continuously licensed to practice law in the State of Florida since 1988 and my State Bar number is 768456
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.
3. As class counsel, I have been involved in the investigation and prosecution of this case, including, but not limited to, preparing for the second trial on

the issue of statute of limitations, drafting discovery pleadings, coordinating experts and attending and participating in the settlement conference.

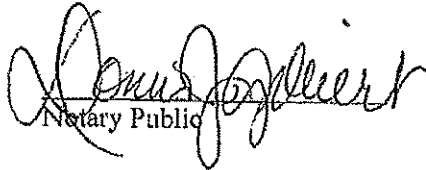
4. In performing the duties detailed above, I have spent approximately 142 hours of time in this matter since I began keeping simultaneous time records on October 18, 2010. I, however, performed at least that much time in the three month period before I began keeping simultaneous records.

DATED this 9th day of December, 2010


Martin Levin

STATE OF FLORIDA
COUNTY OF ESCAMBIA, to wit

The forgoing instrument was acknowledged before me this 9th day of December, 2010, by Martin Levin, Esquire.


Notary Public

My Commission Expires: 4-4-13

NOTARY PUBLIC-STATE OF FLORIDA
Donna J. Gilbert
Commission #DD861636
Expires: APR. 04, 2013
BONDED THRU ATLANTIC BONDING CO., INC.

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AFFIDAVIT OF ATTORNEY NEIL E. MCWILLIAMS, JR.

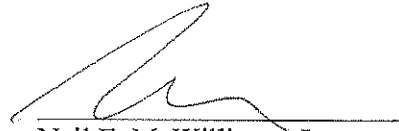
BEFORE ME, the undersigned authority, personally appeared Neil E. McWilliams, Jr., Attorney, and he swears and avers under oath as follows:

1. My name is Neil E. McWilliams, Jr., and I am a partner with the firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502. I have been licensed to practice law in Florida since 2005. I have also been admitted pro hac vice in a number of jurisdictions.
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.

3. As class counsel, I have been involved in the investigation and prosecution of this case, including, but not limited to, motion practice, legal research, document review, attending and participating in hearings and trial, fact and expert witness preparation, fact and expert witness deposition and examination of fact witnesses at trial. I have participated extensively in the discovery aspects of this case, including motion practice before the discovery commissioner, this Court as well as the West Virginia Court of Appeals. I took the lead in reviewing and organizing the voluminous production by the Defendant. I was responsible for the preparation and examination of more than 20 fact witness deponents. I was also involved or responsible for the research, preparation and deposition examination of numerous expert witnesses. I researched and reviewed hundreds of articles regarding the fate and transport of contaminants in the environment, toxicology, risk assessment, remediation, geostatistics and the historical knowledge of the environmental effects of smelters. I participated in the pretrial motion practice to respond to defense motions in limine and to support plaintiff's motions. I attended numerous conferences with my colleagues on a frequent basis to prepare for status conferences, motions, hearings, trial, post trial proceedings and appellate proceedings. At trial I was responsible for the preparation of numerous expert witnesses, including advanced 3D animations presenting complex scientific issues relating to fate and transport and risk assessment.


4. In performing the duties detailed above, I have spent 7,420 hours on this matter up through November 2010. I have compiled time records on an ongoing basis in the ordinary course of business.

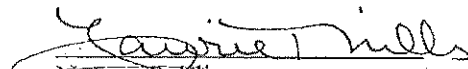
DATED this 9th day of December, 2010


Neil E. McWilliams, Jr.

STATE OF FLORIDA
COUNTY OF ESCAMBIA

The forgoing instrument was acknowledged before me this 9 day of December, 2010, by Neil E. McWilliams, Jr., who is personally known to me.

NOTARY PUBLIC-STATE OF FLORIDA
 Laurie Mills
Commission #DD762124
Expires: MAR. 25, 2012
BONDED THRU ATLANTIC BONDING CO., INC.


Notary Public

My Commission Expires: 03.25.12

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Defendant.

_____ /

AFFIDAVIT OF STEVEN A. MEDINA, ESQUIRE

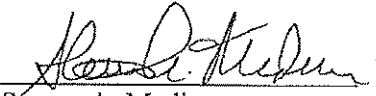
BEFORE ME, the undersigned authority, personally appeared Steven A. Medina,
Esquire, who deposes and states under oath:

1. My name is Steven A. Medina, an attorney licensed in Florida located at 322 Yacht Club Drive NE, Fort Walton Beach, Florida, 32548. I have been licensed to practice law in the State of Florida since 1983.
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.
3. As class counsel, I have been involved in the investigation and prosecution of this case, including, but not limited to motion practice, legal research, document review, attending and participating in hearings and trial, fact

and expert witness preparation, and fact and expert witness depositions. Specifically, as the project leader, I was involved in every aspect of this case. My responsibilities included assembling a legal team capable of taking on such a complex and difficult case, conducting an initial soil contamination investigation, conducting extensive historical research and drafting the complaints. Once the case was filed I assembled a team of experts in fields including risk assessment, remediation, toxicology, fate and transport, air modeling, geochemistry, property appraisal, historic standard of care, industrial hygiene and occupational medicine. I was responsible for the oversight, scoping and assignment of responsibilities to these numerous experts. I spent several weeks in the field with the experts while they collected soil and dust samples that served as the key evidence in the case. I prepared and defended the ten named class representatives in their depositions. I also reviewed thousands of documents produced in discovery as well as deposed numerous fact witnesses. I was also responsible for the investigation and examination of numerous expert witnesses disclosed by the defendant. At trial I was responsible for the preparation of numerous direct and cross examinations of expert witnesses.

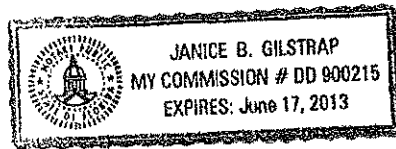
4. In performing the duties detailed above, I have spent 6,690.30 hours on this matter.

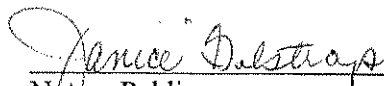
DATED this 8th day of December, 2010


Steven A. Medina

STATE OF FLORIDA
COUNTY OF OKALOOSA, to wit

The forgoing instrument was acknowledged before me this 9th day of December, 2010,
by Steven A. Medina, Esquire.




Notary Public

My Commission Expires: _____

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE and other individuals residing in West Virginia,
on behalf of herself and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.

AFFIDAVIT OF CLAY MITCHELL, ESQUIRE

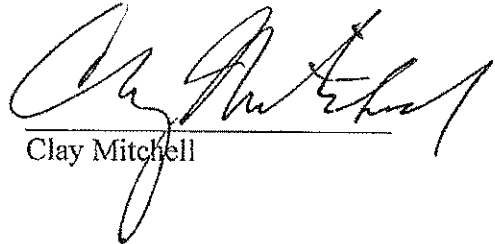
BEFORE ME, the undersigned authority, personally appeared Clay Mitchell,
Esquire, who deposes and states under oath:

1. My name is Clay Mitchell, and I am a partner with the law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502. I am licensed to practice law in the State of Florida and my State Bar number is 92491. I have been continuously licensed to practice law in Florida since 1965 and have been licensed to practice law in Montana since 1993. I have also been admitted to practice before the United States Eleventh Circuit Court of Appeals and the United States Supreme Court.
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison

County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.


3. As class counsel, I have been involved in the investigation and prosecution of this case, including fact and expert witness preparation and depositions. I also attended conferences with my colleagues concerning pre-trial issues and trial preparation.
4. In performing the duties detailed above, I have spent 156 hours on this matter. I have compiled time records on an ongoing basis with the assistance and oversight of the Spelter project team leader, Carol Moore.

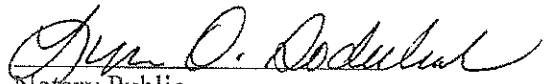
DATED this 8th day of December, 2010


Clay Mitchell

STATE OF FLORIDA
COUNTY OF ESCAMBIA, to wit

The forgoing instrument was acknowledged before me this 8th day of December, 2010, by Clay Mitchell, Esquire.

NOTARY PUBLIC-STATE OF FLORIDA
 Lynn O. Soderlind
Commission # EE018427
Expires: AUG. 24, 2014
BONDED THRU ATLANTIC BONDING CO., INC.


Notary Public

My Commission Expires: _____

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE and other individuals residing in West Virginia,
on behalf of herself and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.

AFFIDAVIT OF CAROL G. MOORE

BEFORE ME, the undersigned authority, personally appeared Carol G. Moore,
who deposes and states under oath:

1. My name is Carol E. Moore and I am employed as a paralegal/certified legal investigator at the law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502.
2. The law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. has been designated as class counsel in the above captioned case pending in the circuit court of Harrison County, West Virginia
3. As a paralegal working on this matter, I was involved in the review of documents produced in discovery and assisted attorneys in preparation for deposition, hearing and trial. I was responsible for assisting in preparation

of pleadings and in discovery requests propounded upon our clients. I assisted in providing documentation to plaintiff's experts and the service of the same. I assisted class counsel in preparation for and during hearings, status conferences, mediation, and the trial. I also assisted class counsel in post trial hearings, the post trial appeal and status conferences.


4. In performing the duties detailed above, I have spent 5,920.15 paralegal hours on this matter up through November 2010. I have compiled time records on an ongoing basis with the assistance and oversight of staff.

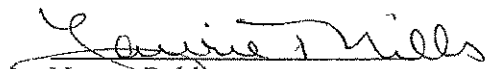
DATED this 10th day of December, 2010


Carol G. Moore

STATE OF FLORIDA
COUNTY OF ESCAMBIA, to wit

The forgoing instrument was acknowledged before me this 10th day of December, 2010, by Carol G. Moore, who is personally known to me.

NOTARY PUBLIC-STATE OF FLORIDA
 Laurie Mills
Commission #DD762124
Expires: MAR. 25, 2012
BONDED THRU ATLANTIC BONDING CO., INC.


Notary Public

My Commission Expires: 03.25.12

IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA

LENORA PERRINE and other individuals residing in West Virginia,
on behalf of herself and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.


AFFIDAVIT OF R. LARRY MORRIS, ESQUIRE

BEFORE ME, the undersigned authority, personally appeared R. Larry Morris,
Esquire, who deposes and states under oath:

1. My name is R. Larry Morris, and I am a senior partner with the law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502. I have been continuously licensed to practice law in the State of Florida since 1977 and my State Bar number is 243310.
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.


3. As class counsel, I have been involved in the investigation and prosecution of this case, including, but not limited to, attending hearings and a significant portion of the trial. I attended conferences with my colleagues to prepare for status conferences, hearings, trial, post trial proceedings and appellate proceedings. I was also significantly involved in numerous mediation sessions with the defendant.
4. In performing the duties detailed above, I have spent approximately 415 hours on this matter. My time records were compiled on an ongoing basis with the assistance and oversight of the Spelter project team leader, Carol Moore.

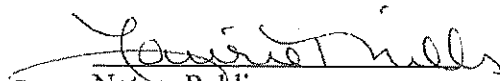
DATED this 9th day of December, 2010


R. Larry Morris

STATE OF FLORIDA
COUNTY OF ESCAMBIA, to wit

The forgoing instrument was acknowledged before me this 9 day of December, 2010,
by R. Larry Morris, Esquire.

NOTARY PUBLIC-STATE OF FLORIDA
 Laurie Mills
Commission # DD762124
Expires: MAR. 25, 2012
BONDED THRU ATLANTIC BONDING CO., INC.


Notary Public

My Commission Expires: 03.25.12

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE and other individuals residing in West Virginia,
on behalf of herself and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.

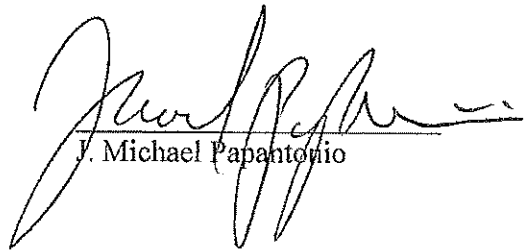
AFFIDAVIT OF J. MICHAEL PAPANTONIO, ESQUIRE

BEFORE ME, the undersigned authority, personally appeared J. Michael Papantonio, Esquire, who deposes and states under oath:

1. My name is J. Michael Papantonio, and I am a senior partner with the law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502. I have been continuously licensed to practice law in the State of Florida since 1981 and my State Bar number is 335924.
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.

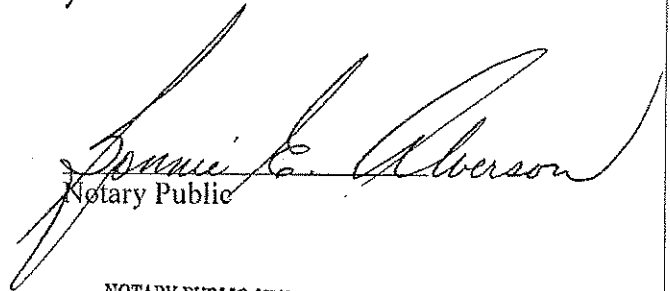
3. As class counsel, I have been involved in the investigation and prosecution of this case, including, but not limited to, overall case strategy, conducting numerous depositions, attending numerous hearings and served as lead trial counsel at the trial. I also attended various conferences with my colleagues to prepare for status conferences, hearings, trial, post trial proceedings and appellate proceedings.
4. In performing the duties detailed above, I have spent approximately 2,563.80 hours on this matter. My time records were compiled on an ongoing basis with the assistance and oversight of the Spelter project team leader, Carol Moore.

DATED this 3th day of December, 2010


J. Michael Papantonio

STATE OF FLORIDA
COUNTY OF ESCAMBIA, to wit

The forgoing instrument was acknowledged before me this 3rd day of December, 2010, by J. Michael Papantonio, Esquire.


Notary Public

My Commission Expires: 05/26/2011

NOTARY PUBLIC-STATE OF FLORIDA
Bonnie E. Alverson
Commission #DD659648
Expires: MAY 26, 2011
BONDED THRU ATLANTIC BONDING CO., INC.

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE and other individuals residing in West Virginia,
on behalf of herself and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.

_____ /

AFFIDAVIT OF MIRANDA PHILLIPS

BEFORE ME, the undersigned authority, personally appeared Miranda Phillips,
who deposes and states under oath:

1. My name is Miranda Phillips and I am employed as a paralegal at the law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502.
2. The law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. is designated as class counsel in the above captioned case pending in the Circuit Court of Harrison County, West Virginia.
3. As a paralegal working on this matter, I was involved in the review of documents produced in discovery and assisted attorneys in their preparation for hearings. I was responsible for obtaining, organizing and maintaining client records. I also assisted the attorneys in responding to

discovery requests propounded upon our clients, and preparing and filing various pleadings. Finally, I was responsible for reviewing and summarizing various deposition transcripts.


4. In performing the duties detailed above, I have spent 525 hours on this matter up through November 2010. I have compiled time records on an ongoing basis with the assistance and oversight of staff.

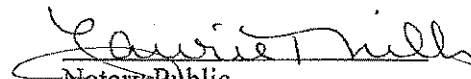
DATED this 9th day of December, 2010


Miranda Phillips

STATE OF FLORIDA
COUNTY OF ESCAMBIA, to wit

The forgoing instrument was acknowledged before me this 9th day of December, 2010, by Miranda Phillips.

NOTARY PUBLIC-STATE OF FLORIDA
 Laurie Mills
Commission #DD762124
Expires: MAR. 25, 2012
BONDED THRU ATLANTIC BONDING CO., INC.


Notary Public

My Commission Expires: 03.25.12

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE and other individuals residing in West Virginia,
on behalf of herself and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.

AFFIDAVIT OF ROBERT PRICE

BEFORE ME, the undersigned authority, personally appeared Robert Price, who
deposes and states under oath:

1. My name is Robert Price and I was employed as a paralegal at the law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502.
2. The law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. is designated as class counsel in the above captioned case pending in the Circuit Court of Harrison County, West Virginia.
3. As a paralegal working on this matter, I was involved in the review of documents produced in discovery, assisted attorneys in their preparation for depositions and hearings and assisted experts in obtaining site access necessary for environmental testing. I was responsible for obtaining,

organizing and maintaining client records. I was assisted the attorneys in responding to discovery requests propounded upon our clients.


4. In performing the duties detailed above, I have spent 567.33 hours on this matter up through November 2010. I have compiled time records on an ongoing basis with the assistance and oversight of staff.

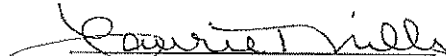
DATED this 7th day of December, 2010


Robert Price

STATE OF FLORIDA
COUNTY OF ESCAMBIA, to wit

The forgoing instrument was acknowledged before me this 7th day of December, 2010, by Robert Price.

NOTARY PUBLIC-STATE OF FLORIDA
 Laurie Mills
Commission #DD762124
Expires: MAR. 25, 2012
BONDED THRU ATLANTIC BONDING CO., INC.


Notary Public

My Commission Expires: 03.25.12

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE and other individuals residing in West Virginia,
on behalf of herself and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.

AFFIDAVIT OF MARK J. PROCTOR, ESQUIRE

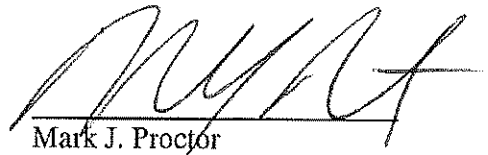
BEFORE ME, the undersigned authority, personally appeared Mark J. Proctor,
Esquire, who deposes and states under oath:

1. My name is Mark J. Proctor, and I am the president and senior partner of the law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502. I am licensed to practice law in the State of Florida.
2. I am designated class counsel in the above captioned case pending in the Circuit Court of Harrison County, West Virginia.
3. As class counsel, I have been involved in the investigation and prosecution of this case, including, but not limited to, attending hearings and a significant portion of the trial. I attended conferences with my colleagues to prepare for status conferences, hearings, trial, post trial proceedings and

appellate proceedings. I was also significantly involved in numerous mediation sessions with the defendant.

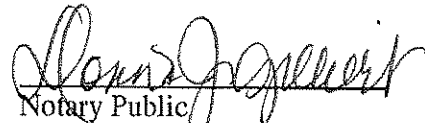
4. In performing the duties detailed above, I have spent 1,312 hours on this matter up through November 2010. I have compiled time records on an ongoing basis with the assistance and oversight of staff.

DATED this 9th day of December, 2010


Mark J. Proctor

STATE OF FLORIDA
COUNTY OF ESCAMBIA, to wit

The forgoing instrument was acknowledged before me this 9th day of December, 2010, by Mark J. Proctor, Esquire.


Notary Public

My Commission Expires: 4-4-13

NOTARY PUBLIC-STATE OF FLORIDA
Donna J. Gilbert
Commission # DD861636
Expires: APR. 04, 2013
BONDED THRU ATLANTIC BONDING CO., INC.

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE and other individuals residing in West Virginia,
on behalf of herself and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.

AFFIDAVIT OF KARLA A. SHIVERS

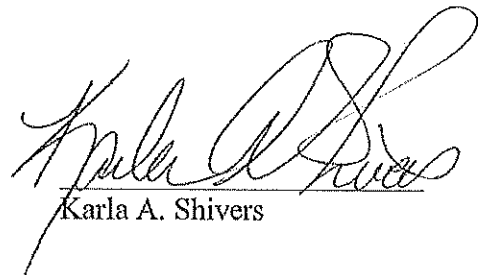
BEFORE ME, the undersigned authority, personally appeared Karla A. Shivers,
who deposes and states under oath:

1. My name is Karla A. Shivers and I am employed as a paralegal at the law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502.
2. The law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. is designated as class counsel in the above captioned case pending in the Circuit Court of Harrison County, West Virginia.
3. As a paralegal working on this matter, I was involved in the review of documents produced in discovery, assisted attorneys in their preparation for depositions and hearings. I managed our discovery database consisting of more than 30,000 documents. I organized, drafted and maintained our

deposition and trial exhibit lists, which consisted of approximately 3,000 documents. I assisted in the drafting and filing of pleadings. I was assisted the attorneys in responding to discovery requests propounded upon our clients and experts.


4. In performing the duties detailed above, I have spent 5,114 hours on this matter up through November 2010. I have compiled time records on an ongoing basis with the assistance and oversight of staff.

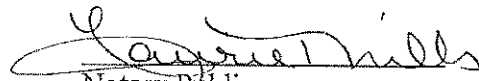
DATED this 9th day of December, 2010


Karla A. Shivers

STATE OF FLORIDA
COUNTY OF ESCAMBIA, to wit

The forgoing instrument was acknowledged before me this 9th day of December, 2010, by Karla A. Shivers.

NOTARY PUBLIC-STATE OF FLORIDA
 Laurie Mills
Commission # DD762124
Expires: MAR. 25, 2012
BONDED THRU ATLANTIC BONDING CO., INC.


Notary Public

My Commission Expires: 03.25.12

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE and other individuals residing in West Virginia,
on behalf of herself and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.

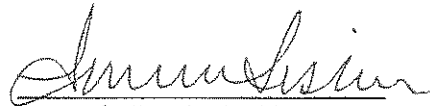
AFFIDAVIT OF AMANDA R. SLEVINSKI, ESQUIRE

BEFORE ME, the undersigned authority, personally appeared Amanda R. Slevinski, Esquire, who deposes and states under oath:

1. My name is Amanda R. Slevinski, and I am with the law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. located at 316 South Baylen Street, Pensacola, Florida, 32502. I am licensed to practice law in the State of Florida and my State Bar number is 0027041. I have also been admitted pro hac vice in a number of jurisdictions.
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.


3. As class counsel, I have been involved in the investigation and prosecution of this case, including, but not limited to motion practice, legal research, document review, attending and participating in hearings and trial, fact and expert witness preparation, and fact and expert witness deposition. I attended numerous conferences with my colleagues on a frequent basis to prepare for status conferences, motions, hearings, trial, post trial proceedings and appellate proceedings.
4. In performing the duties detailed above, I have spent 1, 959 hours on this matter. I maintained time records on an ongoing basis throughout my involvement in this matter.


DATED this 9th day of December, 2010


Amanda R. Slevinski

STATE OF FLORIDA
COUNTY OF ESCAMBIA, to wit

The forgoing instrument was acknowledged before me this 9th day of December, 2010, by Amanda R. Slevinski, Esquire.

NOTARY PUBLIC-STATE OF FLORIDA
 Laurie Mills
Commission # DD762124
Expires: MAR. 25, 2012
BONDED THRU ATLANTIC BONDING CO., INC.


Notary Public

My Commission Expires: 03.25.12

IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated

Plaintiffs,

vs.

E.I. DU PONT DE NEMOURS AND
a Delaware corporation doing business as

Defendants.

No. 04-C-296-2
Thomas A. Bedell

AFFIDAVIT OF ASHLEY (ADDERHOLD) PAGNI

COMES NOW the affiant, Ashley (Adderhold) Pagni, after having been duly sworn and states as follows.

1. My name is Ashley Pagni. I have worked as a legal assistant for the law firm of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., since October 2004. I hereby attest and affirm that I worked at least 117.20 hours on the above styled case.
2. My primary responsibilities included review of discovery production and depositions. I assisted counsel in gathering and maintaining exhibits for pretrial and trial proceedings. In addition, I worked closely with counsel through the jury selection process to ensure proper organization and analyzing of the juror questionnaires.

3. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours, showing the dates, times, and tasks I performed in the above-styled matter. These records are kept in the regular course of Cochran, Cherry, Givens, Smith, Lane & Taylor's law practice and can be made available for the Court's inspection should the Court so desire.
4. I hereby attest and affirm that I performed more than 117.20 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.


Ashley Pagni

Sworn to and subscribed before me
this 14 day of December, 2010.


NOTARY PUBLIC

Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

AFFIDAVIT OF ALEXIS ARMSTRONG

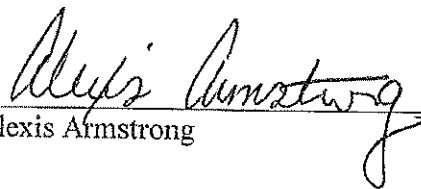
COMES NOW the affiant, Alexis Armstrong, after having been duly sworn and states as follows.

1. My name is Alexis Armstrong. I have worked as a paralegal for the law firm of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., since January 2003. I am a certified paralegal. I hereby attest and affirm that I worked at least 145.90 hours on the above styled case.
2. My primary responsibilities included gathering and maintaining exhibits for pretrial and trial proceedings. I also have assisted counsel in review of discovery production and depositions.
3. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours, showing the dates, times, and

tasks I performed in the above-styled matter. These records are kept in the regular course of Cochran, Cherry, Givens, Smith, Lane & Taylor's law practice and can be made available for the Court's inspection should the Court so desire.

4. I hereby attest and affirm that I performed more than 145.90 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.



Alexis Armstrong

Sworn to and subscribed before me
this 10 day of December, 2010.



NOTARY PUBLIC

Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

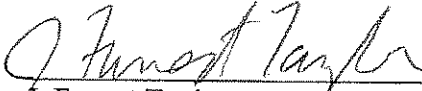
AFFIDAVIT OF ATTORNEY J. FARREST TAYLOR

COMES NOW the affiant, J. Farrest Taylor, after having been duly sworn and states as follows.


1. My name is J. Farrest Taylor and I am a partner with the firm of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., located at 163 West Main Street, Dothan, AL 36301. I was first admitted to the Alabama State Bar in 1991, and I am currently licensed to practice law in state and federal courts in Alabama, Virginia and West Virginia. I was admitted pro hac vice to appear in the above styled case in 2004. I was later admitted to the West Virginia State Bar as a full member.
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.

3. As an attorney responsible for this case, I supervised numerous staff members who assisted in the preparation and prosecution of this matter. Three of the individuals identified as staff of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., in Plaintiffs' petition, are no longer employed by our firm and were not accessible to complete an Affidavit for the hours they worked on this case. These individuals are: Christian Campbell, Cara Morales and Jenny Stripling.
4. I supervised the work of these individuals, including, but not limited to, attendance and assistance at hearings, reviewing documents disclosed in discovery, preparation for depositions and hearings, preparation of pleadings for filing with the court and assistance in responding to discovery requests.
5. These individuals' hours were recorded and maintained in accordance with standard business practices and in compliance with my directions.
6. At my direction and in accordance with standard business practices Ms. Christian Campbell recorded 558.50 hours of work on this case.
7. At my direction and in accordance with standard business practices Ms. Cara Morales recorded 60.25 hours of work on this case.
8. At my direction and in accordance with standard business practices Ms. Jenny Stripling recorded 22.00 hours of work on this case.

FURTHER, AFFIANT SAITH NOT.


J. Farrest Taylor

Sworn to and subscribed before me
this 13 day of December, 2010.


NOTARY PUBLIC
Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

_____ /

AFFIDAVIT OF JUDI CASSIDY

COMES NOW the affiant, Judi Cassidy, after having been duly sworn and states
as follows.

1. My name is Judi Cassidy. I worked as a paralegal for the law firm of Cochran,
Cherry, Givens, Smith, Lane & Taylor, P.C., from January 2003 to January 2010.
I no longer work with this firm. I hereby attest and affirm that I worked at least
279.57 hours on the above styled case.
2. My primary responsibilities included assisting counsel in review of discovery
production and depositions. In addition, I gathered and maintained exhibits for
pretrial and trial proceedings. Through the pretrial process, I prepared pleadings
for filing with the court.

3. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours, showing the dates, times, and tasks I performed in the above-styled matter. These records are kept in the regular course of Cochran, Cherry, Givens, Smith, Lane & Taylor's law practice and can be made available for the Court's inspection should the Court so desire.
4. I hereby attest and affirm that I performed more than 279.57 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.


Judi Cassidy

Sworn to and subscribed before me
this 10 day of December, 2010.


NOTARY PUBLIC

Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

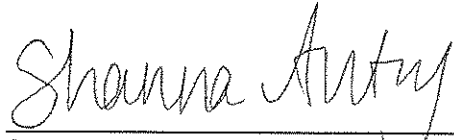
AFFIDAVIT OF SHANNA (CONRAD) AUTRY

COMES NOW the affiant, Shanna (Conrad) Autry, after having been duly sworn
and states as follows.

1. My name is Shanna Autry. I worked as a legal assistant for the law firm of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., from September 2006 to August 2008. I no longer work with this firm. I hereby attest and affirm that I worked at least 283.70 hours on the above styled case.
2. My primary responsibilities included gathering and maintaining exhibits for pretrial and trial proceedings. Through the pretrial process, I prepared pleadings for filing with the court. I worked closely with counsel through the jury selection process to ensure proper organization and analyzing of the juror questionnaires. In addition, I assisted counsel in review of discovery production and depositions.

3. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours, showing the dates, times, and tasks I performed in the above-styled matter. These records are kept in the regular course of Cochran, Cherry, Givens, Smith, Lane & Taylor's law practice and can be made available for the Court's inspection should the Court so desire.
4. I hereby attest and affirm that I performed more than 283.70 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.


Shanna Autry

Sworn to and subscribed before me
this 9 day of December, 2010.


NOTARY PUBLIC

Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

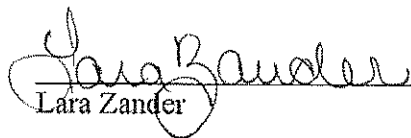
AFFIDAVIT OF LARA (ECCLES) ZANDER

COMES NOW the affiant, Lara (Eccles) Zander, after having been duly sworn
and states as follows.

1. My name is Lara Zander. I have worked as a legal assistant and paralegal for the law firm of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., since April 2006. I am a certified paralegal. I hereby attest and affirm that I worked at least 340.50 hours on the above styled case.
2. My primary responsibilities included gathering and maintaining exhibits for pretrial, trial and appellate proceedings. I prepare pleadings for filing with the Court as well as discovery requests for service on Defendants. In addition to these tasks, I also have assisted counsel in review of discovery production and depositions.

3. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours, showing the dates, times, and tasks I performed in the above-styled matter. These records are kept in the regular course of Cochran, Cherry, Givens, Smith, Lane & Taylor's law practice and can be made available for the Court's inspection should the Court so desire.
4. I hereby attest and affirm that I performed more than 340.50 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.


Lara Zander

Sworn to and subscribed before me
this 13th day of December, 2010.


NOTARY PUBLIC

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

AFFIDAVIT OF WESLEY FAIN

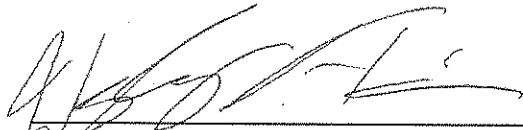
COMES NOW the affiant, Wesley Fain, after having been duly sworn and states
as follows.

1. My name is Wesley Fain. I worked as a law clerk for the law firm of Cochran,
Cherry, Givens, Smith, Lane & Taylor, P.C., from December 2006 to August
2007. I no longer work with this firm. I hereby attest and affirm that I worked at
least 150.60 hours on the above styled case.
2. My primary responsibilities included reviewing depositions and preparing
summaries of the transcripts for counsel.
3. I kept up with my hours in the regular course of my work and am prepared to
provide the Court with an accounting of my hours, showing the dates, times, and
tasks I performed in the above-styled matter. These records are kept in the

regular course of Cochran, Cherry, Givens, Smith, Lane & Taylor's law practice
and can be made available for the Court's inspection should the Court so desire.

4. I hereby attest and affirm that I performed at least 150.60 hours of legal work
related to the above styled case.

FURTHER, AFFIANT SAITH NOT.


Wesley Fain

Sworn to and subscribed before me
this 10 day of December, 2010.


NOTARY PUBLIC

NOTARY PUBLIC STATE OF ALABAMA AT LARGE
MY COMMISSION EXPIRES: Oct 28, 2014
BONDED THRU NOTARY PUBLIC UNDERWRITERS

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

_____ /

AFFIDAVIT OF KAROL L. FLEMING

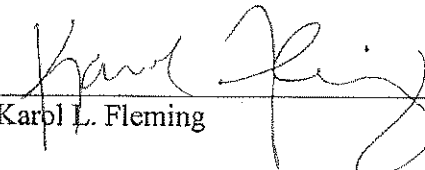
COMES NOW the affiant, Karol L. Fleming, after having been duly sworn and
states as follows.

1. My name is Karol L. Fleming. I was first admitted to the Alabama Bar in
September 2008. I am currently licensed to practice law in state and federal courts
in Alabama.
2. I began working for the law firm of Cochran, Cherry, Givens, Smith, Lane &
Taylor, P.C., in April 2010. From that date to the present, I have performed legal
work related to this case totaling 104.25 hours.
3. My primary responsibility was conducting case law research as well as reviewing
the case to prepare draft versions of briefs. I attended a number of conferences

with counsel regarding retrial strategy as well as meeting with class members regarding the status of the case.

4. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours showing the dates, times and tasks I performed in the above-styled matter. These records are kept in the regular course of my law practice and can be made available for the Court's inspection should the Court so desire.
5. I hereby attest and affirm that I performed 104.25 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.


Karl L. Fleming

Sworn to and subscribed before me
this 13 day of December, 2010.


NOTARY PUBLIC

Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

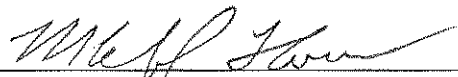
AFFIDAVIT OF MCDAVID FLOWERS

COMES NOW the affiant, McDavid Flowers, after having been duly sworn and
states as follows.

1. My name is McDavid Flowers. I was first admitted to the Alabama Bar in
September 2010. I am currently licensed to practice law in state and federal courts
in Alabama.
2. I began working for the law firm of Cochran, Cherry, Givens, Smith, Lane &
Taylor, P.C., in October 2010. From that date to the present, I have performed
legal work related to this case totaling 5.20 hours.
3. Specifically, I attended a number of conferences with counsel regarding retrial
strategy as well as reviewing discovery production.

4. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours showing the dates, times and tasks I performed in the above-styled matter. These records are kept in the regular course of my law practice and can be made available for the Court's inspection should the Court so desire.
5. I hereby attest and affirm that I performed 5.20 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.



McDavid Flowers

Sworn to and subscribed before me
this 13 day of December, 2010.



NOTARY PUBLIC

Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

AFFIDAVIT OF J. KEITH GIVENS

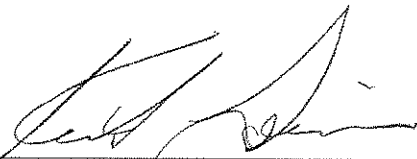
COMES NOW the affiant, J. Keith Givens, after having been duly sworn and
states as follows.

1. My name is J. Keith Givens. I was first admitted to the Alabama Bar in 1981, the Florida Bar in 1982 and the Georgia Bar in 1983. I am currently licensed to practice law in state and federal courts in Alabama, Florida and Georgia. I was admitted pro hac vice to appear in the above styled case in 2004.
2. I have served as counsel for the Plaintiffs in this matter since the filing of the lawsuit. From that date to the present, I have performed legal work related to this case totaling over 1,355.26 hours.
3. Specifically, I attended a number of status conferences, assisted in pretrial discovery including defending depositions, and participated in trial and the

appellate process. My primary responsibility at trial was preparing and reviewing juror questionnaires and selecting the jury. I undertook a similar role in preparation for the trial scheduled for March 2011 including working with a jury consultant to arrange focus groups. I was present for and participated in the extended settlement negotiations between counsel.

4. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours showing the dates, times and tasks I performed in the above-styled matter. These records are kept in the regular course of my law practice and can be made available for the Court's inspection should the Court so desire.
5. I hereby attest and affirm that I performed more than 1,355.26 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.



J. Keith Givens

Sworn to and subscribed before me
this 13 day of December, 2010.



NOTARY PUBLIC

Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

AFFIDAVIT OF JOSEPH D. LANE

COMES NOW the affiant, Joseph D. Lane, after having been duly sworn and states as follows.

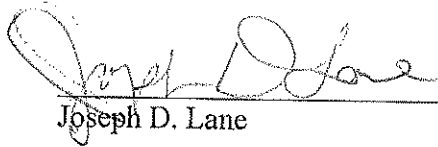
1. My name is Joseph D. Lane. I was first admitted to the bar in 1991, and I am currently licensed to practice law in all state courts in Florida and Alabama, as well as federal various trial and appeals courts in Alabama, Florida, New York, Georgia, Colorado, and Washington D.C. I was admitted pro hac vice to appear in the above styled case in 2006.
2. I have served as one of numerous trial counsel in this matter since January 2006. From that date to the present, I have performed legal work related to this case totaling over 1195.28 hours. Specifically, I was responsible for preparing for and attending a number of discovery hearings, status conferences, and depositions, as

well as drafting, reviewing and editing numerous pleadings at both the trial and appellate court levels. I participated in the class certification hearing, discovery, discovery disputes, summary judgments hearings, depositions, and trial. More specifically at the pre-verdict stage, for example, I participated in class representative meetings discussing trial issues; creation of and editing of power point presentations for use at depositions, class certification hearing witness testimony and trial testimony, opening and closing statements for both class certification hearing as well as various trial phases; review of expert analysis reports, data, and other expert witness file materials; preparation for and examination of expert witnesses in depositions, class certification hearing, and various trial phases. Drafting, review, editing and arguing of pre-trial and trial motions and briefs. I also had significant involvement in the post-trial and appellate proceedings, including, but not limited to, participation in research, writing and editing of briefs, numerous conferences concerning the various appellate issues, and preparation of counsel for oral argument.

3. I kept up with my hours in the regular course of my work on this case, and am prepared to provide the Court with an accounting of my hours, showing in line item fashion the dates, times, and tasks I performed in the above-styled matter. These records are kept in the regular course of my law practice and can be made available for the Court's inspection should the Court so desire. My hours, however, are *underreported* to the extent that I did not record all hours worked throughout the entire pre-trial or post-trial and appellate process.

4. I hereby attest and affirm that I performed more than 1195.28 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.


Joseph D. Lane

Sworn to and subscribed before me
this 10 day of December, 2010.


NOTARY PUBLIC

Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

AFFIDAVIT OF J. HEATH LOFTIN

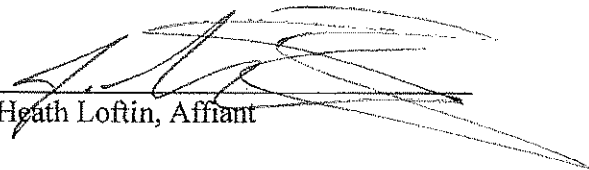
COMES NOW the affiant, J. Heath Loftin, after having been duly sworn and
states as follows.

1. My name is J. Heath Loftin. I worked as a law clerk for the law firm of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., from May 2005 to September 2007 while I attended law school at Cumberland School of Law at Samford University in Birmingham, Alabama, as well as after graduating in May 2007. I hereby attest and affirm that I worked at least 263.50 hours on the above styled case.
2. My primary responsibilities included drafting jury instructions and motions in limine. I also assisted with gathering and maintaining exhibits for pretrial and trial proceedings. I completed legal research for counsel. In addition to these tasks, I also have assisted counsel in review of discovery production and depositions.

3. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours, showing the dates, times, and tasks I performed in the above-styled matter. These records are kept in the regular course of Cochran, Cherry, Givens, Smith, Lane & Taylor's law practice and can be made available for the Court's inspection should the Court so desire.
4. I hereby attest and affirm that I performed more than 263.50 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.




J. Heath Loftin, Affiant

Sworn to and subscribed before me
this 10th day of December, 2010.


NOTARY PUBLIC

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

AFFIDAVIT OF ANGELA J. MASON

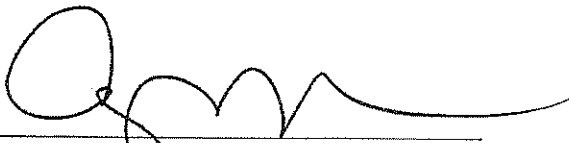
COMES NOW the affiant, Angela J. Mason, after having been duly sworn and states as follows.

1. My name is Angela J. Mason. I was first admitted to the bar in 1996, and I am currently licensed to practice law in state and federal courts in Alabama, Georgia and Washington D.C. I was admitted pro hac vice to appear in the above styled case in 2006.
2. I have served as trial counsel in this matter since January 2006. From that date to the present, I have performed legal work related to this case for over 2,784 hours. Specifically, I was responsible for preparing for and attending a number of discovery hearings, status conferences, and depositions, as well as drafting numerous pleadings at both the trial and appellate court levels. I participated in

the class certification hearing, discovery, discovery disputes, summary judgments hearings, depositions, and trial. I was also extensively involved in the post-trial and appellate proceedings.

3. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours, showing the dates, times, and tasks I performed in the above-styled matter. These records are kept in the regular course of my law practice and can be made available for the Court's inspection should the Court so desire. My hours, however, are *underreported* to the extent that I did not record all hours worked throughout the entire post-trial and appellate process from 2008 to 2010.
4. I hereby attest and affirm that I performed more than 2,784.23 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.



Angela J. Mason

Sworn to and subscribed before me
this 14 day of December, 2010.



NOTARY PUBLIC

Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

_____ /

AFFIDAVIT OF CONNIE MELTON

COMES NOW the affiant, Connie Melton, after having been duly sworn and
states as follows.

1. My name is Connie Melton. I have worked as a legal assistant for the law firm of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., since October 2004. I hereby attest and affirm that I worked at least 51.00 hours on the above styled case.
2. My primary responsibilities included working closely with counsel through the jury selection process to ensure proper organization and analyzing of the juror questionnaires.
3. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours, showing the dates, times, and

tasks I performed in the above-styled matter. These records are kept in the regular course of Cochran, Cherry, Givens, Smith, Lane & Taylor's law practice and can be made available for the Court's inspection should the Court so desire.

4. I hereby attest and affirm that I performed more than 51.00 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.



Connie Melton

Sworn to and subscribed before me
this 10 day of December, 2010.


NOTARY PUBLIC

Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.


AFFIDAVIT OF ATTORNEY J. FARREST TAYLOR

COMES NOW the affiant, J. Farrest Taylor, after having been duly sworn and states as follows.

1. My name is J. Farrest Taylor and I am a partner with the firm of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., located at 163 West Main Street, Dothan, AL 36301. I was first admitted to the Alabama State Bar in 1991, and I am currently licensed to practice law in state and federal courts in Alabama, Virginia and West Virginia. I was admitted pro hac vice to appear in the above styled case in 2004. I was later admitted to the West Virginia State Bar as a full member.
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.

3. As an attorney responsible for this case, I supervised numerous staff members who assisted in the preparation and prosecution of this matter. Three of the individuals identified as staff of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., in Plaintiffs' petition, are no longer employed by our firm and were not accessible to complete an Affidavit for the hours they worked on this case. These individuals are: Christian Campbell, Cara Morales and Jenny Stripling.
4. I supervised the work of these individuals, including, but not limited to, attendance and assistance at hearings, reviewing documents disclosed in discovery, preparation for depositions and hearings, preparation of pleadings for filing with the court and assistance in responding to discovery requests.
5. These individuals' hours were recorded and maintained in accordance with standard business practices and in compliance with my directions.
6. At my direction and in accordance with standard business practices Ms. Christian Campbell recorded 558.50 hours of work on this case.
7. At my direction and in accordance with standard business practices Ms. Cara Morales recorded 60.25 hours of work on this case.
8. At my direction and in accordance with standard business practices Ms. Jenny Stripling recorded 22.00 hours of work on this case.

FURTHER, AFFIANT SAITH NOT.


J. Farrest Taylor

Sworn to and subscribed before me
this 13 day of December, 2010.


NOTARY PUBLIC
Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

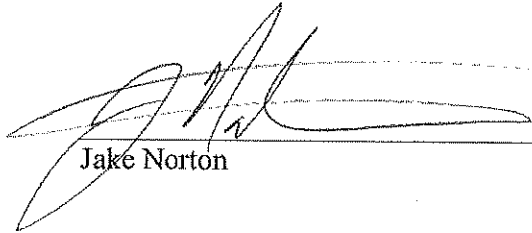
AFFIDAVIT OF JAKE NORTON

COMES NOW the affiant, Jake Norton, after having been duly sworn and states
as follows.

1. My name is Jake Norton. I was first admitted to the Alabama Bar in September 2005. I am currently licensed to practice law in state and federal courts in Alabama.
2. I worked for the law firm of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., from August 2005 to September 2010. During this time, I performed legal work related to this case totaling 428.90 hours.
3. My primary responsibility was conducting case law research and preparing draft versions of briefs. In addition, I reviewed discovery production, depositions and prepared summaries of the transcripts for counsel.


4. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours showing the dates, times and tasks I performed in the above-styled matter. These records are kept in the regular course of my law practice and can be made available for the Court's inspection should the Court so desire.
5. I hereby attest and affirm that I performed 428.90 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.



Jake Norton

Sworn to and subscribed before me
this 13 day of December, 2010.



NOTARY PUBLIC

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

AFFIDAVIT OF HALEY (STARLING) REARDON

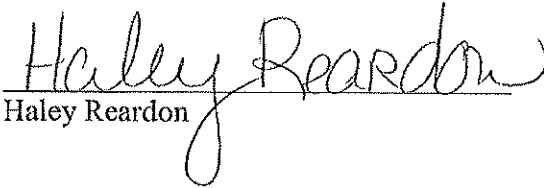
COMES NOW the affiant, Haley (Starling) Reardon, after having been duly sworn and states as follows.

1. My name is Haley Reardon. I worked as a legal assistant and paralegal for the law firm of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., from October 2006 to September 2010. I no longer work with this firm. I hereby attest and affirm that I worked at least 75.50 hours on the above styled case.
2. My primary responsibilities included gathering and maintaining exhibits for pretrial and trial proceedings. In addition, I assisted counsel in review of discovery production and depositions.
3. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours, showing the dates, times, and


tasks I performed in the above-styled matter. These records are kept in the regular course of Cochran, Cherry, Givens, Smith, Lane & Taylor's law practice and can be made available for the Court's inspection should the Court so desire.

4. I hereby attest and affirm that I performed more than 75.50 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.


Haley Reardon

Sworn to and subscribed before me
this 13 day of December, 2010.


NOTARY PUBLIC

Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

AFFIDAVIT OF TESSIE STEVERSON

COMES NOW the affiant, Tessie Steverson, after having been duly sworn and states as follows.

1. My name is Tessie Steverson. I have worked as a legal assistant for the law firm of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., since June of 2003. I hereby attest and affirm that I worked at least 6.25 hours on the above styled case.
2. My primary responsibilities included gathering and maintaining exhibits for pretrial, trial and appellate proceedings. I also prepared pleadings for filing with the Court.
3. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours, showing the dates, times, and tasks I performed in the above-styled matter. These records are kept in the

regular course of Cochran, Cherry, Givens, Smith, Lane & Taylor's law practice
and can be made available for the Court's inspection should the Court so desire.

4. I hereby attest and affirm that I performed more than 6.25 hours of legal work
related to the above styled case.

FURTHER, AFFIANT SAITH NOT.

Tessie Stevenson
Tessie Stevenson

Sworn to and subscribed before me
this 10 day of December, 2010.

Jana Zander
NOTARY PUBLIC

Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

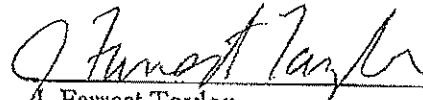
AFFIDAVIT OF ATTORNEY J. FARREST TAYLOR

COMES NOW the affiant, J. Farrest Taylor, after having been duly sworn and states as follows.

1. My name is J. Farrest Taylor and I am a partner with the firm of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., located at 163 West Main Street, Dothan, AL 36301. I was first admitted to the Alabama State Bar in 1991, and I am currently licensed to practice law in state and federal courts in Alabama, Virginia and West Virginia. I was admitted pro hac vice to appear in the above styled case in 2004. I was later admitted to the West Virginia State Bar as a full member.
2. I am a member of the legal team representing the Plaintiff class in the above captioned case, presently pending in the Circuit Court of Harrison County, West Virginia before the Honorable Thomas A. Bedell, Circuit Judge.

3. As an attorney responsible for this case, I supervised numerous staff members who assisted in the preparation and prosecution of this matter. Three of the individuals identified as staff of Cochran, Cherry, Givens, Smith, Lane & Taylor, P.C., in Plaintiffs' petition, are no longer employed by our firm and were not accessible to complete an Affidavit for the hours they worked on this case. These individuals are: Christian Campbell, Cara Morales and Jenny Stripling.
4. I supervised the work of these individuals, including, but not limited to, attendance and assistance at hearings, reviewing documents disclosed in discovery, preparation for depositions and hearings, preparation of pleadings for filing with the court and assistance in responding to discovery requests.
5. These individuals' hours were recorded and maintained in accordance with standard business practices and in compliance with my directions.
6. At my direction and in accordance with standard business practices Ms. Christian Campbell recorded 558.50 hours of work on this case.
7. At my direction and in accordance with standard business practices Ms. Cara Morales recorded 60.25 hours of work on this case.
8. At my direction and in accordance with standard business practices Ms. Jenny Stripling recorded 22.00 hours of work on this case.

FURTHER, AFFIANT SAITH NOT.


J. Farrest Taylor

Sworn to and subscribed before me
this 13 day of December, 2010.


NOTARY PUBLIC
Commission Expires:
February 23, 2014

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

AFFIDAVIT OF J. FARREST TAYLOR

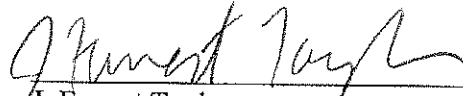
COMES NOW the affiant, J. Farrest Taylor, after having been duly sworn and states as follows.

1. My name is J. Farrest Taylor. I was first admitted to the Alabama State Bar in 1991, and I am currently licensed to practice law in state and federal courts in Alabama, Virginia and West Virginia. I was admitted pro hac vice to appear in the above styled case in 2004. I was later admitted to the West Virginia State Bar as a full member.
2. I have served as counsel for the Plaintiffs in this matter since the filing of the lawsuit. From that date to the present, I have performed legal work related to this case totaling over 3,271.93 hours. Specifically, I was responsible for preparing for and attending a number of discovery hearings, status conferences, and

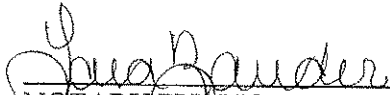
depositions, as well as drafting numerous pleadings at both the trial and appellate court levels. I drafted the petition for class certification, participated in the class certification hearing, discovery, discovery disputes, summary judgments hearings, depositions, and trial. During the pendency of this litigation, I researched numerous complex legal issues.

3. During trial I examined and cross examined numerous witnesses and prepared other attorneys for examination of other witnesses. I participated in every day of the five week trial in some capacity. I was also extensively involved in the post-trial and appellate proceedings. I have also spent many hours preparing for the potential retrial of this matter scheduled for March 2011.
4. I kept up with my hours in the regular course of my work and am prepared to provide the Court with an accounting of my hours showing the dates, times and tasks I performed in the above-styled matter. These records are kept in the regular course of my law practice and can be made available for the Court's inspection should the Court so desire. Some of the time has not been recorded; therefore, the time represented in this affidavit under-represents the actual time I spent on this matter.
5. I hereby attest and affirm that I performed more than 3,271.93 hours of legal work related to the above styled case.

FURTHER, AFFIANT SAITH NOT.


J. Farrest Taylor

Sworn to and subscribed before me
this 13 day of December, 2010.


NOTARY PUBLIC

Commission Expires:
February 23, 2014

IN THE CIRCUIT COURT OF HARRISON COUNTY, WEST VIRGINIA

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

AFFIDAVIT OF JERALD E. JONES

COMES NOW the affiant, Jerald E. Jones, after having been duly sworn and
states as follows:

1. My name is Jerald E. Jones and I am with the Law Firm of West & Jones,
located at 360 Washington Avenue, Clarksburg, West Virginia.
2. I am designated class counsel in the above captioned case currently pending
in the Circuit Court of Harrison County, West Virginia.
3. As class counsel, I have been involved in the investigation and prosecution of
this case, including but not limited to preparation and filing of pleadings,
attending and participating in hearings, trial and depositions.
4. In performing the duties detailed above, I have spent 94.50 hours on this
matter.

FURTHER AFFIANT SAYETH NAUGHT


STATE OF WEST VIRGINIA

COUNTY OF HARRISON:

Jerald E. Jones, affiant named in the foregoing Affidavit, who, after first being duly sworn, upon his oath, deposes and says that the facts and allegations set forth in said Affidavit are true to the best of his knowledge and belief, except where stated to be upon information and belief, and where so stated he believes them to be true.

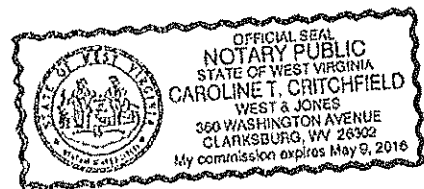

Jerald E. Jones

Taken, subscribed and sworn before me by Jerald E. Jones this 14th
day of December, 2010.


Notary Public

My commission expires:

May 9, 2016



IN THE CIRCUIT COURT OF HARRISON COUNTY, WEST VIRGINIA

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendants.

AFFIDAVIT OF PERRY B. JONES

COMES NOW the affiant, Perry B. Jones, after having been duly sworn and states as follows:

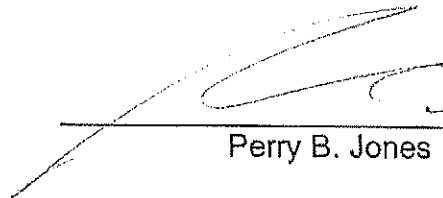
1. My name is Perry B. Jones and I am with the Law Firm of West & Jones, located at 360 Washington Avenue, Clarksburg, West Virginia.
2. I am designated class counsel in the above captioned case currently pending in the Circuit Court of Harrison County, West Virginia.
3. As class counsel, I have been involved in the investigation and prosecution of this case, including but not limited to preparation and filing of pleadings, attending and participating in hearings, trial and depositions.
4. In performing the duties detailed above, I have spent 1,157.90 hours on this matter.

FURTHER AFFIANT SAYETH NAUGHT

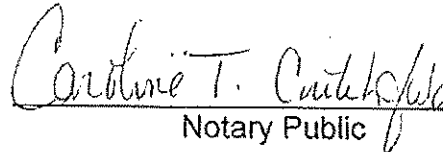
STATE OF WEST VIRGINIA

COUNTY OF HARRISON:

Perry B. Jones, affiant named in the foregoing Affidavit, who, after first being duly sworn, upon his oath, deposes and says that the facts and allegations set forth in said Affidavit are true to the best of his knowledge and belief, except where stated to be upon information and belief, and where so stated he believes them to be true.

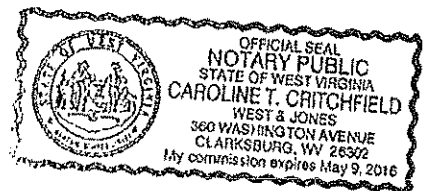

Perry B. Jones

Taken, subscribed and sworn before me by Perry B. Jones this 14th day of December, 2010.


Notary Public

My commission expires:

May 9, 2016



IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA

LENORA PERRINE and other individuals residing
In West Virginia, on behalf of herself and all
others similarly situated,
Plaintiffs,

vs.

Case No. 04-C-296-2
(Hon. Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.

AFFIDAVIT OF DANIEL E. ESTRIN, ESQUIRE

BEFORE ME, the undersigned authority, personally appeared Daniel E. Estrin,
Esquire, who deposes and states under oath:

1. My name is Daniel E. Estrin and I was Special Counsel to the law firm of Kennedy & Madonna, LLP, which currently has its offices at 48 Dewitt Mills Road, Hurley, New York 12443, from July 2001 through August 2006. I am licensed to practice law in the States of New York (admitted in 1994) and New Jersey (admitted in 1993). My state bar numbers, respectively, are 2591022 and 033781993.
2. During my tenure as Special Counsel at Kennedy & Madonna, LLP, I performed legal work in the above captioned case that included, but was not limited to, motion practice, legal research and discovery (including document review, subpoenaing witnesses and participating in depositions).

3. I spent 191.6 hours in total performing legal work in this matter as described above and in more detail in my timesheet.

DATED this 9th day of December, 2010



Daniel E. Estrin

STATE OF NEW YORK
COUNTY OF WESTCHESTER, to wit

The forgoing instrument was acknowledged before me this 9th day of December, 2010, by Daniel E. Estrin, Esquire.


Notary Public

My Commission Expires: 4/02/11

JENNIFER A. RUHLE
Notary Public, State of New York
No. 01RU6163738
Qualified in Westchester County
Commission Expires April 02, 2011

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE and other individuals residing
In West Virginia, on behalf of herself and all
others similarly situated,
Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

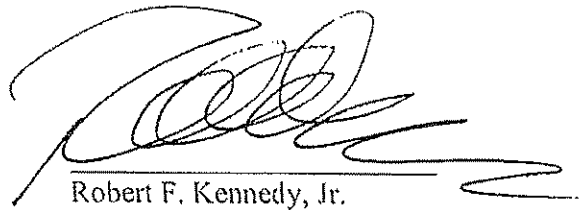
Defendant.

AFFIDAVIT OF ROBERT F. KENNEDY, JR., ESQUIRE

BEFORE ME, the undersigned authority, personally appeared Robert F. Kennedy, Jr., Esquire, who deposes and states under oath:

1. My name is Robert F. Kennedy, Jr. and I am a partner in the law firm Kennedy & Madonna, LLP located at 48 Dewitt Mills Road, Hurley, New York 12443. I am licensed to practice law in the State of New York and my State Bar number is 1999994.
2. I am designated class counsel in the above captioned case pending in the Circuit Court of Harrison County, West Virginia.
3. As class counsel, I have been involved in the investigation and prosecution of this case, including, but not limited to attending and participating in hearings and trial, and fact and expert witness deposition.
4. In performing the duties detailed above, I have spent 218.50 hours on this matter.

DATED this ^{9th}~~1st~~ day of December, 2010

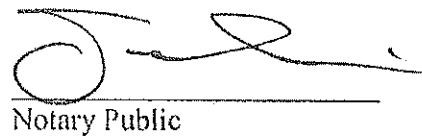


Robert F. Kennedy, Jr.

STATE OF NEW YORK
COUNTY OF WESTCHESTER, to wit

The forgoing instrument was acknowledged before me this ^{9th} day of December, 2010,
by Robert F. Kennedy, Jr., Esquire.

DANIEL E. ESTRIN
Notary Public, State of New York
No. 02885033066
Qualified in Westchester County
Commission Expires Sept. 28, 2014



Notary Public

My Commission Expires: _____

**IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA**

LENORA PERRINE and other individuals residing
In West Virginia, on behalf of herself and all
others similarly situated,
Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.

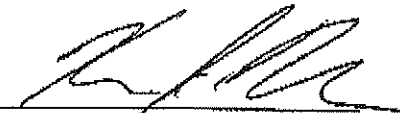
AFFIDAVIT OF KEVIN J. MADONNA, ESQUIRE

BEFORE ME, the undersigned authority, personally appeared Kevin J. Madonna,
Esquire, who deposes and states under oath:

1. My name is Kevin J. Madonna and I am a partner in the law firm Kennedy & Madonna, LLP located at 48 Dewitt Mills Road, Hurley, New York 12443. I am licensed to practice law in the State of New York and my State Bar number is 2981181.
2. I am designated class counsel in the above captioned case pending in the Circuit Court of Harrison County, West Virginia.
3. As class counsel, I have been involved in the investigation and prosecution of this case, including, but not limited to motion practice, legal research, document review, attending and participating in hearings and trial and fact and expert witness depositions.

4. In performing the duties detailed above, I have spent 1,028.10 hours on this matter.

DATED this 8th day of December, 2010


Kevin J. Madonna

STATE OF NEW YORK
COUNTY OF ULSTER, to wit

The forgoing instrument was acknowledged before me this 8th day of December, 2010,
by Kevin J. Madonna, Esquire.



VICTORIA E. MADONNA
Notary Public, State of New York
No. 02MA6003111
Qualified in Columbia County
~~Commission Expires Feb. 23, 2014~~
Notary Public

My Commission Expires: 2/23/14

IN THE CIRCUIT COURT OF HARRISON COUNTY, WEST VIRGINIA

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCA MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in
West Virginia, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

CIVIL ACTION NO. 04-C-296-2
(Judge Bedell)

E. I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,

Defendant.

AFFIDAVIT OF ATTORNEY R. EDISON HILL

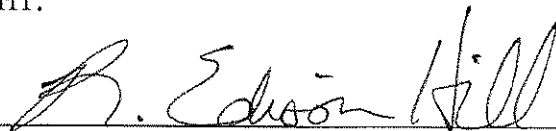
BEFORE ME, the undersigned authority, personally appeared Attorney R. Edison Hill, and
he swears and avers under oath as follows:

1. I, R. Edison Hill, am a partner with the law firm of HILL, PETERSON, CARPER, BEE & DEITZLER, PLLC, located in NorthGate Business Park, 500 Tracy Way, Charleston, West Virginia 25311. I have been continuously licensed to practice law in West Virginia since 1976; I have been admitted pro hac vice in a number of jurisdictions; and I have represented thousands of plaintiffs in numerous class actions.
2. I am a member of the legal team representing the Plaintiff class in the above-captioned case, presently pending in the Circuit Court of Harrison County, West Virginia, before The Honorable Thomas A. Bedell, Circuit Judge.
3. As class counsel, I became involved in this case after the jury verdicts were rendered in November 2007. I have provided professional service including legal research,

document and brief preparation, document review, and oral argument before the Supreme Court of Appeals of West Virginia. I have worked with various experts on behalf of Plaintiffs. I have attended numerous conferences with co-counsel and have participated in preparing for status conferences, motions, hearings, preparation for retrial on the statute of limitations issue, and participated in mediation and settlement discussions resulting in a proposed settlement of pending claims.

4. In performing the duties detailed above, I have spent 841 hours through November 2010. I have compiled time records on an ongoing basis which have been kept and maintained in the normal course of business of my law firm.

FURTHER AFFIANT SAITH NAUGHT.


R. Edison Hill (WVSB #1734)
HILL, PETERSON, CARPER, BEE & DEITZLER, PLLC
NorthGate Business Park
500 Tracy Way
Charleston, WV 25311-1261
(304) 345-5667
(304) 345-1519 (fax)
rehill@hpcbd.com

STATE OF WEST VIRGINIA,

COUNTY OF KANAWHA, to wit:

Taken, subscribed, and sworn to before the undersigned authority this 13th day of December 2010.

My commission expires: January 31, 2016


NOTARY PUBLIC

