

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

**EARL PARRIS, JR., Individually,
and on Behalf of a Class of Persons
Similarly Situated,**

Plaintiff,

**City of SUMMERVILLE,
GEORGIA,**

Intervenor-Plaintiff,

v.

3M COMPANY, *et al.*,

Defendants.

Case No.: 4:21-cv-00040-TWT

DECLARATION OF GARY A. DAVIS

I, Gary A. Davis, being competent to provide this Declaration, do declare as follows:

1. That I make this Declaration, pursuant to the Court's final approval of the Settlement between Plaintiff and the Class Members and Huntsman International, LLC, pursuant to Rule 23(e)(1).

2. My firm and the Causby firm have been involved for over four years in the litigation of this case on behalf of Plaintiff and the Class Members. We have spent over 4,500 hours in our representation, successfully opposing multiple motions to dismiss; propounding discovery on Defendants and responding to their discovery

propounded to Plaintiff (6 sets of interrogatories with 92 total responses, 4 sets of requests for production with 72 total responses, and 3 sets of requests for admission with 31 total responses); taking dozens of depositions (including those who were deposed multiple days); evaluating millions of pages of documents; coordinating the reports of nine expert witnesses retained by Plaintiff; and participating in the depositions of several of Defendants' 21 expert witnesses.

3. At a reasonable hourly rate for experienced attorneys in this field, even if we could somehow determine hours specifically spent in litigating against Huntsman, the lodestar would significantly exceed the fee requested in the Settlement.


4. We have incurred \$20,000 in fees and expenses billed by the Settlement Administrator for serving the Class Notice on Class Members, as set out in the Declaration of Edgar C. Gentle, III.

5. We have incurred \$7,583.40 in litigation expenses, including mediation fees, travel expenses, and deposition expenses in the prosecution of this case, in addition to those expenses already recovered with the Pulcra Settlement. We are seeking recovery of half of these additional expenses, \$3,791.70, for the Huntsman Class Settlement, and half, \$3,791.70, for the Mount Vernon Mills, Inc. and Town of Trion, Georgia, Class Settlements. We would be happy to provide the Court with a detailed accounting of these expenses if the Court would like to review them.

6. We will continue to incur time and expenses related to the prosecution of the case against the other Defendants.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

This the 22nd of May 2025.



Gary A. Davis