

EXHIBIT J

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re FLINT WATER CASES

Civil Action No. 5:16-cv-10444-JEL-
MKM (consolidated)

Hon. Judith E. Levy
Mag. Mona K. Majzoub

**DECLARATION OF VINCENT J. WARD
IN SUPPORT OF CLASS PLAINTIFFS' MOTION FOR CERTIFICATION
OF A SETTLEMENT CLASS**

I, Vincent J. Ward, make this declaration pursuant to **28 U.S.C. § 1746**. I hereby declare under penalty of perjury that the following is true and correct:

1. I am a partner at Freedman, Boyd, Hollander, Goldberg, Urias & Ward, and was appointed by the Court as Interim Subclass Settlement Counsel for an Adult Injury Subclass. **Dkt. No. 929**. Pursuant to this appointment, I have been an active participant in the settlement negotiation process.

2. After my appointment in August 2019, I familiarized myself with the factual and legal issues relevant to an adult injury subclass and the nature and extent of its members' injuries by speaking with the subclass representative, as well as by reviewing the pleadings and orders filed in this case. I also met with members of the subclass, spoke with medical and other experts, analyzed data concerning the impact

of lead exposure on adults in Flint, and engaged in several meetings with liaison, class, and other subclass counsel.

3. I have played an active role in settlement discussions between putative Class Plaintiffs and the State of Michigan, City of Flint, and individual governmental defendants (together, “Settling Defendants”). These were arm’s-length negotiations that occurred under the supervision of Court-appointed Special Master Deborah Greenspan and Court-appointed mediators the Honorable Pamela Harwood and Senator Carl Levin.

4. In my role as Interim Subclass Counsel for the Adult Injury Subclass I vigorously advocated on behalf of adult residents of Flint, Michigan that suffered injuries due to the lead-contaminated water in the City of Flint and negotiated on their behalf with respect to how an aggregate settlement amount paid by the Settling Defendants would be allocated between the various proposed subclasses.

5. I provided input on and reviewed the Flint Water Cases Qualified Settlement Fund Categories, Monetary Awards, and Required Proofs Grid that will be used in the claims administration process to determine the amounts of any given monetary award to a residential property damage claimant. The Grid clearly sets forth the requirements for an adult class member to be eligible for a monetary award and the proof he or she must submit in support of a claim so as to ensure a fair administration of claims.

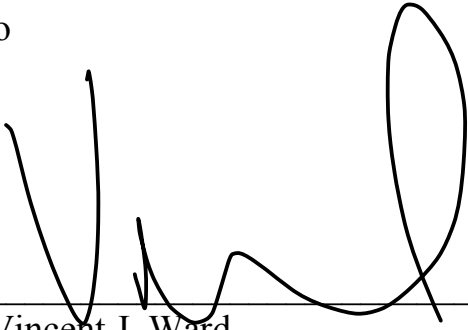
6. Under the agreement, damages for adult injuries are available for adults who were exposed to Flint water and had demonstrated elevated blood lead levels during a specified period; suffered physical injuries from lead exposure; contracted Legionnaire's disease; or suffered a miscarriage during a specified period. The Grid attached as an Exhibit to the Settlement agreement explains the required proofs for each of these separate categories, which proofs including blood or bone tests and/or medical records. These are objective requirements that will apply equally to all potential adult claimants.

7. I have independently determined that the settlement agreement reached between putative Class and Individual Plaintiffs and the Settling Defendants is fair and in the best interests of the Adult Injury claimants participating in the settlement. The agreement is the product of months of vigorous negotiation between the parties before three different Court-appointed neutrals; provides clear guidelines for monetary awards such that all Flint businesses participating in the settlement will be on equal footing when filing their claims; and will provide much-needed relief far sooner than would be the case if this matter were litigated through trial.

8. This settlement is further in the best interest of adults participating in the settlement because it avoids the costs and inherent risks associated with continued litigation, as well as the further delays that would be caused by any appeal.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed: Albuquerque, New Mexico
November 16, 2020



Vincent J. Ward