

EXHIBIT H

**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 SARAH R. LONDON
IN SUPPORT OF CLASS PLAINTIFFS' MOTION TO CERTIFY
SETTLEMENT CLASS**

I, Sarah R. London, 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 Lief Cabraser Heimann & Bernstein, LLP, and was appointed by the Court as Interim Subclass Settlement Counsel for a Property Damage Subclass. **Dkt. No. 929**. Pursuant to this appointment, I have been a participant in portions of the settlement negotiation process.

2. After my appointment in August 2019, I familiarized myself with the factual and legal issues relevant to the Property Damage subclass and the nature and extent of its members' injuries by gathering information from the subclass representative, speaking with subject matter experts, reviewing expert reports and analyses, and reviewing the pleadings and orders filed in this case..

3. I have played an active role in several 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 Property Damage Subclass I vigorously advocated on behalf of Flint property owners that suffered losses 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 received 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 a residential property claimant to be eligible for a monetary award and the proof it must submit in support of a claim so as to ensure administration of claims.

6. Under the agreement, a property damage claimant must provide evidence of residential property ownership or lease. Once eligibility is established

through such proof, the amount of an award to a property damage claimant will depend in part upon the number of claimants seeking awards, subject to the limitation that no award for property damage will exceed \$1,000.

7. 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 residential property claimants 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 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: San Francisco, California
November 16, 2020



Sarah R. London

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