



**HANK NAUGHTON  
PARTNER**

## PFAS Cost Recovery Project

I hope this finds you and all close to you, family, friends and colleagues, safe and healthy as we all look to 2021 with hope.

After spending twenty-six years in the Massachusetts House, I am proud to have joined Napoli Shkolnik PLLC (Napoli) as Managing Partner of both the Public Client Practice Group and our PFAS Cost Recovery Program. I am also in the process of opening our firm's Massachusetts office.

Napoli, with over 30 years of experience, has the capability to successfully advise and represent your utility. Our firm has demonstrated, through national leadership roles in numerous mass tort and class action cases, that we have both the financial resources and the legal, human, intellectual, and technological capital to successfully pursue and obtain substantial results to benefit its clients in this PFAS Cost Recovery Program. Notable examples of this expertise include leadership in the current AFFF litigation (Aqueous Film Forming Foam), as well as in Opioid and other related drug and device cases. Our firm is able and prepared, as necessary, to advance and invest millions of dollars in time and out-of-pocket expenses, with the firm's recovery contingent upon a successful outcome, in the pursuit of the claims in PFAS contamination matters.

The legal team Napoli has committed to this litigation is comprised of five partners (including myself), eighteen associates, as well as paralegal and technology support staff. We maintain low rates of turnover, assuring consistency in our work. Napoli attorneys have been recognized by some of the most prestigious publications, including the "Top 100 Trial Lawyers" and "Top 40 Under 40" by National Trial Lawyers. We have also been included in the invitation-only Multi-Million Dollar Advocates Forum® for the numerous multi-million-dollar verdicts and settlements we have been able to secure on behalf of our clients.

Fortune Magazine has recognized Napoli as "America's Premier Lawyers," and our firm was included in the 2012-2016 Legal 500 U.S. editions. We have also been named in the LawDragon™ 500 Leading Lawyers in America. In all, our team is not just able to demonstrate consistency and stability in practice, but rather, exceeding this requirement by demonstrating a stellar track record that would be instrumental in representing Towns in this PFAS Cost Recovery Action and progress.

Please let me provide you a few specifics about this firm I've been proud to join. Mr. Paul Napoli will be serving as our primary attorney in this litigation and is nationally renowned for his leadership in the area of environmental mass tort, complex liability cases, and representing municipalities, with more than 25 years of experience. Notably, and specifically important in this case, Paul's most recent appointment is as Co-Lead Counsel in the In re: Aqueous Film-Forming Foams (AFFF) Products Liability Multi District Litigation (MDL) 2873 by Judge Richard M. Gergel, the District Judge in the District of South Carolina overseeing the AFFF MDL. In short, Paul has been and will be at the table for every significant decision, procedure and activity in this case. This will mean that our ability to represent the interests of your utility will be front and center.

Mr. Napoli and our team of attorneys tackling this litigation have significant experience in environmental litigation, and is organized to address PFOA contamination, environmental hazards, air pollution, pesticides, hazardous waste, oil spills, water contamination disease clusters, fracking and energy exploration and soil contamination.

Napoli Shkolnik PLCC has the capacity to successfully represent your utility in this cost recovery litigation. We are able and prepared, as necessary, to advance and invest considerable resources in time and out-of-pocket expenses necessary for proposed representation cost recovery program. In recent years our firm has successfully resolved and self-funded the following mass litigations:

1. \$816.45 million settlement for World Trade Center recovery workers.
2. \$1.2 billion settlement of pharmaceutical litigation.
3. \$52 million settlement of an MTBE environmental litigation.
4. \$28 million supplemental settlement for World Trade Center recovery workers;
5. \$10 million+ awarded for asbestos victims.

Our firm has the significant resources required to handle the voluminous motion practice and discovery demands which will be required in this lawsuit. We are committed and prepared to fund this complex and expansive litigation leveraging our significant experience in litigating mass tort and class action matters which normally require the receipt, organization, and analysis of millions of documents. I ask that you take a moment to consider our success in the past as evidence of our ability to produce an outstanding result for your utility this case.

#### References:

The below client list is included as documentation of the vast experience Napoli has in representing governmental entities and water and wastewater utilities. In the AFFF MDL, Napoli currently represents over one hundred counties, cities, private and public water district providers, other governmental entities and is Counsel to the National Rural Water Association, and organization with over 31,000 members. A list of some of these entities with references is below:

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Nassau County	Jared A. Kasschau, Esq.	Nassau County Attorney	(516) 571-3056	One West Street Mineola, NY 11501
Hicksville Water District	Nicholas Brigandi	Chairman of the Board	(516) 931-01844	4 Dean Street Hicksville, NY 11801
Town of Southampton	Jay Schneiderman	Supervisor	(631) 287-5740	116 Hampton Road Southampton, NY 11968
City of Dayton	John C. Musto	Chief Trial Counsel, Department of Law, Civil Division	(937) 333-4116	101 West 3 <sup>rd</sup> Street Dayton, OH 45401
City of Tucson	Mike Rankin		(520) 791-4221 <a href="mailto:mike.rankin@tucsonaz.gov">mike.rankin@tucsonaz.gov</a>	255 W Alameda Street Tucson, AZ 85701

Town of Marana	Frank Cassidy	City Attorney Town of Marana Legal Department	<a href="mailto:fcassidy@maranaaz.gov">fcassidy@maranaaz.gov</a>	11555 W Civic Center Dr Bldg A3 Marana, Arizona, 85653-7006
Hampton Bays Water District	James Burke	Town Hall	(631) 287-3065 <a href="mailto:jburke@southamptontownny.gov">jburke@southamptontownny.gov</a>	116 Hampton Road, Southampton, NY 11968
Southside Water Works and Sewer Board	Brandon Sewell	Maintenance Superintendent	(256) 442-8707	3001 AL-77 Southside, AL 35907
Weirton Water Board	Butch Mastrantoni		(304) 797-8591	200 Municipal Plaza Weirton, WV 26062

**Other Environmental Clients past and present relevant to this project include the following:**

Albertson Water District	Bethpage Water District	City of Glen Cove Water District  Freon Contamination of Supply Wells (2010-2015)	Greenlawn Water District  VOC contamination for supply wells (Present)	Manhasset-Lakeville Water District
Aqua NY of Sea Cliff	Carle Place Water District	Garden City Park Water District	Hampton Bays Water District	Oyster Bay Water District
Town of Huntington/Dix Hills Water District  VOC contamination for supply wells (Present)	Town of Southampton	Village of Garden City	Village of Mineola	Tampa Bay Water District (Florida)
Pascoag Utility District (Rhode Island)	National Rural Water Association Sam Wade, CEO Emeritus	Hicksville Water District  1,4- Dioxane Contamination of Supply Well #4	Alligator Water and Sewer District (South Carolina)  DBCP and EDB pesticide	Methyl Tertiary Butyl Ether (MTBE) Contamination Clients (2001-2014)

Manhasset-Lakeville Water District	Plainview Water District	South Huntington Water District	Tampa Bay Water District (Florida)	City of Crystal River (Florida)
Oyster Bay Water District	South Farmingdale Water District	Town of East Hampton	Homosassa Water District (Florida)	Village of Westbury
Town of Riverhead Water District	Village of Hempstead	Village of West Hempstead Water District		

I want to again thank you for taking the time to consider registering and allowing Napoli Shkolnik to represent you in this litigation.

Please feel free to call me at 978 852 3643 with any questions and I truly hope we can speak soon.

All the best,  
**Hank Naughton**  
Partner