

EXHIBIT B

IN THE STATE OF MICHIGAN

COURT OF CLAIMS

TAMARA NAPPIER, as mother and
next friend of TAKARIE NAPPIER,
a minor child, on behalf of
TAKARIE NAPPIER and a class of all
others similarly situated,

Plaintiff,

CLASS ACTION

Case No. 16- 000071 -MM
Hon. Boonstra

vs.

RICHARD SNYDER, (individually),
DARNELL EARLEY (individually),
GERALD AMBROSE (individually),
DANIEL WYANT (individually and in his official capacity),
LIANE SHEKTER SMITH (individually and in her official capacity),
STEPHEN BUSCH (individually and in his official capacity),
PATRICK COOK (individually and in his official capacity),
MICHAEL PRYSBY (individually and in his official capacity),
BRADLEY WURFEL (individually and in his official capacity),
EDEN WELLS (individually and in her official capacity),
NICK LYON (individually and in his official capacity),
NANCY PEELER, (individually and in her official capacity), and
ROBERT SCOTT, (individually and in his official capacity),

Defendants.

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COURT OF CLAIMS
JEROME W. ZIMMER JR. CLERK

A civil action involving Defendants Rick Snyder, Darnell Earley, and Jerry Ambrose that arises out of the transactions or occurrences alleged in this complaint was previously filed and is pending in the Court of Claims. The case was assigned docket number 16-000017-MM and was assigned to the Honorable Mark T. Boonstra (P36046).

VERIFIED CLASS ACTION COMPLAINT

This is a class action lawsuit filed by Tamara Nappier ("Plaintiff"), as mother and next friend of Takarie Nappier ("Takarie") on behalf of Takarie Nappier and all others similarly situated against Richard Snyder ("Snyder"), Darnell Earley ("Earley"), Gerald Ambrose ("Ambrose"), Daniel Wyant ("Wyant"), Liane Shekter Smith ("Shekter Smith"), Stephen Busch ("Busch"), Patrick Cook ("Cook"), Michael Prysby ("Prysby"), Bradley Wurfel ("Wurfel"), Eden Wells ("Wells"), Nick Lyon ("Lyon"), Nancy Peeler ("Peeler"), and Robert Scott ("Scott") (collectively referred to as ("Defendants") and states as follows:

INTRODUCTION

A. There is No Safe Level of Lead Exposure for Children

1. This is a class action case filed on behalf of all individuals who, from April 25, 2014 through the date of trial, are or were minor children (age 17 years and younger) who are or were residing in the City of Flint, Michigan and who have been brain damaged as a result of the ingestion of lead-poisoned water from pipes and service lines that supplied water from the Flint River without the use of any corrosion control (hereinafter referred to as the "Plaintiff Class").

2. The dangers of lead exposure have been have been recognized for millennia. In the first century, Dioscorides observed in his *De Materia Medica* that "lead makes the mind give way."

3. Environmentalist René Dubos warned that the problem of childhood lead poisoning "is so well-defined, so neatly packaged, with both causes and cures known, that if we

don't eliminate this social crime, our society deserves all the disasters that have been forecast for it."

4. It is now established that there is no safe level of lead for children.

5. Children are more vulnerable to lead than adults because of their greater fractional absorption of ingested lead, because their greater lead intake on a bodyweight basis, and because development of a child's central nervous system is easily derailed in ways that result in cognitive and behavioral abnormalities.

6. Lead is a potent neurotoxin; childhood lead poisoning has an impact on many developmental and biological processes, most notably intelligence, behavior, and overall life achievement.

7. Children can absorb 40 percent to 50 percent of an oral dose of water-soluble lead compared with 3 percent to 10 percent for adults. In a dose-response relationship for children aged 1 to 5 years, for every 1 part-per-billion ("ppb") increase in water lead, blood lead increases 35 percent.

8. The greatest risk of lead in water may be to infants on reconstituted formula. Among infants drinking formula made from tap water at 10 ppb, about 25 percent would experience a blood lead level above 56 micrograms per deciliter, which the Centers for Disease Control and Prevention has defined as an elevated level.

9. Tap water may account for more than 85 percent of total lead exposure among infants consuming reconstituted formula. A known abortifacient, lead has also been implicated in increased fetal deaths and reduced birth weights.

10. With estimated societal costs in the billions, lead poisoning has a disproportionate impact on low-income and minority children.

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B. Children in Flint Have Been Exposed to Lead Due to a Change in Flint's Water Supply.

11. As a soluble metal, lead leaches into drinking water via lead-based plumbing or lead particles that detach from degrading plumbing components (the word "plumbing" is derived from the Latin word for lead, "plumbum.").

12. In 2014, as a cost-saving measure, the City of Flint began taking its water from the Flint River rather than Lake Huron via the City of Detroit Water System. The corrosion-control treatments required by the Environmental Protection Agency's Lead and Copper Rule were discontinued.

13. In further exacerbation of the problem, ferric chloride was added to reduce the formation of trihalomethanes from organic matter thereby increasing the corrosivity of the Flint River water. The water reaching Takarie and the Plaintiff Class was therefore 19 times as corrosive as it had been when the source was Lake Huron.

14. The more corrosive water is, the more readily it can dissolve metals such as lead.

15. The Defendants had knowledge that the water pumped from the Flint River was toxic and not fit for use and consumption and exposed the Plaintiff Class to extreme and unsafe levels of lead.

16. Notwithstanding the Defendants' knowledge regarding the toxicity of the water, Defendants advised the Plaintiff Class to believe that the water was safe to drink, use for cooking, bathing, brushing teeth, and other personal uses.

17. As minor children, Takarie and the members of the Plaintiff Class did not know, could not know, and had no duty to know of the toxicity of the water they were drinking.

18. Defendants assured the Plaintiff Class that the water supplied from the Flint River was properly treated, monitored, tested, and was safe for use and consumption.

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19. Defendants knew and expected that the Plaintiff Class would rely upon their representations regarding the safety of the water.

20. The Plaintiff Class took comfort and reasonably relied upon Defendants' assurances and representations regarding the alleged safety and fitness of the water and consumed and used it for all purposes.

21. After changing its water source to the Flint River, the lead concentration in Flint's water began to rise. In six of nine city wards, the water in 20 to 32 percent of the homes had a lead concentration above 15 µg per liter, a concentration that triggers remedial action under the Lead and Copper Rule.

22. The 90th percentile was 25 µg per liter, and in some samples the concentration exceeded 1000 µg per liter.

23. This contamination had consequences. Published medical and scientific research reports that among children in Flint, the incidence of blood lead concentrations above the reference value of 5 µg per deciliter rose from 2.4 percent to 4.9 percent between 2013 and 2015. The increase was greatest, from 4.0 percent to 10.6 percent, among children in neighborhoods with the highest lead concentrations in water.

24. There is no safe level of lead consumption for children.

25. Irrespective of blood lead concentrations, any amount of lead consumed by children (ages 17 and under), including the Plaintiff Class, is unsafe, toxic, and causes damage to brain cells upon consumption.

26. Upon consumption of lead-contaminated water, children suffer concomitant brain damage that is permanent and without cure.

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27. The Plaintiff Class consumed lead contaminated water as a result of the Defendants' grossly negligent and/or negligent actions as alleged herein, and its members have suffered current, present, and permanent brain damage, and will continue to suffer injuries and damages as a result thereof.

JURISDICTION

28. This Court has jurisdiction over this action pursuant to MCL 600.6419 because the Defendants to the claims alleged herein are agents and officers of the State of Michigan.

29. The amount in controversy exceeds the jurisdictional limit of this Court.

PLAINTIFF AND THE PLAINTIFF CLASS

30. Plaintiff is the mother and next friend of Takarie. At all relevant times, Plaintiff has resided in the City of Flint.

31. Takarie was born on July 3, 2001 and has been a resident of the City of Flint at all relevant times. Takarie consumed water that was poisoned as a result of the circumstances alleged herein and suffered damage as a result. Blood testing has shown that Takarie's blood lead level is elevated. Takarie has suffered permanent brain damage as a result of his exposure to lead.

32. The Plaintiff Class is comprised of all individuals who, from April 25, 2014 through the date of trial, are or were minor children (age 17 years and younger) who are or were residing in the City of Flint, Michigan and who have been brain damaged as a result of the ingestion of lead poisoned water from pipes and service lines that supplied water from the Flint River without the use of any corrosion control.

33. The Plaintiff Class representative was exposed to Flint's toxic water in his home.

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34. The Plaintiff Class representative brings this action on behalf of himself and others similarly situated who sustained brain damage because of their consumption of lead laden water pumped from the Flint River at all relevant times.

DEFENDANTS

35. Snyder is sued in his individual capacity. Snyder has been the Governor of the State of Michigan at all relevant times. Among other things, Snyder participated in, directed, and facilitated the state's decision to transition Flint's water source from safe, treated water to untreated corrosive water that would deliver lead into Flint residents' homes. He also participated in, directed, and facilitated the state's insufficient response to protect those residents from the state's actions. Snyder's actions and omissions constitute gross negligence and/or negligence for the reasons stated herein.

36. Earley is sued in his individual capacity. Earley was Governor Snyder's Emergency Manager in Flint from November 1, 2013 through January 12, 2015. Among other things, Earley made the decision to switch to Flint River water on an impossibly reckless timeframe, preventing Flint's water treatment plant from properly analyzing and treating a new source of corrosive water. Earley made false and/or misleading statements representing that the water was safe to drink, as it poisoned thousands. Earley's actions and omissions constitute gross negligence and/or negligence for the reasons stated herein.

37. Ambrose is sued in his individual capacity. Ambrose ("Ambrose") was Snyder's Emergency Manager in Flint from January 13, 2015 through April 28, 2015. Ambrose was employed by the state as a financial advisor for Flint's financial emergency from January, 2012, through December, 2014. Among other things, he was involved and directed the state's decision to transition Flint from safe, treated water on an impossibly aggressive timeline to corrosive, untreated water from an unprepared water treatment plant. He also made false and/or misleading

statements representing that the water was safe to drink as it poisoned thousands. Ambrose's actions and omissions constitute gross negligence and/or negligence for the reasons stated herein.

38. Shekter Smith is sued in her individual capacity and in her official capacity. Shekter Smith was, at all relevant times until she was removed from her position on October 19, 2015, the Chief of the Office of Drinking Water and Municipal Assistance for the Michigan Department of Environmental Quality ("MDEQ"). Shekter Smith was grossly negligent and/or negligent in that, among other things, she knowingly participated in, approved of, and caused the decision to transition Flint's water source to a highly corrosive, inadequately studied and treated alternative. She disseminated false statements to the public that led to the continued consumption of dangerous water despite knowing or having reason to know that the water was dangerous. Shekter Smith's actions and omissions constitute gross negligence and/or negligence for the reasons stated herein.

39. Wyant is sued in his individual capacity and in his official capacity. Wyant was, at all relevant times, the Director of MDEQ until the Governor accepted his resignation on or about December 29, 2015. Among other things, Wyant participated in, directed, and oversaw the MDEQ's repeated violations of federal water quality laws, the failure to properly study and treat Flint River water, and the MDEQ's program of systemic denial, lies, and attempts to discredit honest outsiders. He disseminated false statements to the public that led to the continued consumption of dangerous water despite knowing or having reason to know that the water was dangerous. Wyant's actions and omissions constitute gross negligence and/or negligence for the reasons stated herein.

40. Busch is sued in his individual capacity and in his official capacity. Busch was, at all relevant times, the District Supervisor assigned to the Lansing District Office of the MDEQ.

Among other things, he participated in MDEQ's repeated violations of federal water quality laws, the failure to properly study and treat Flint River water, and the MDEQ's program of systemic denial, lies, and attempts to discredit honest outsiders. He personally falsely reported to the EPA that Flint had enacted an optimized corrosion control plan, providing assurances to the Plaintiff and the Putative class that the water was safe when he knew or should have known that these assurances were false, or were no more likely to be true than false. Busch's actions and omissions constitute gross negligence and/or negligence for the reasons stated herein.

41. Cook is sued in his individual capacity and in his official capacity. Cook was, at all relevant times, Water Treatment Specialist assigned to the Lansing Community Drinking Water Unit of the MDEQ. Among other things, Cook is individually liable because he, as the Lansing Community Drinking Water Unit manager, in a grossly negligent manner, participated in approved, and/or assented to the decision to allow Flint's water to be delivered to residents without corrosion control or proper study and/or testing. Cook's actions and omissions constitute gross negligence and/or negligence for the reasons stated herein.

42. Prysby is sued in his individual capacity and in his official capacity. Michael Prysby was, at all relevant times, an Engineer assigned to District 11 (Genesee County) of the MDEQ. Among other things, Prysby is liable because he, as the Engineer assigned to District 11, participated in, approved, and/or assented to the decision to switch the water source, failed to properly monitor and/or test the Flint River water, and providing assurances to the Plaintiff and the Putative class that the Flint River water was safe when he knew or should have known those statements to be untrue, or no more likely to be true than false. Prysby's actions and omissions constitute gross negligence and/or negligence for the reasons stated herein.

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43. Wurfel is sued in his individual capacity and in his official capacity. Wurfel was, at all relevant times, the Director of Communications for MDEQ. Wurfel resigned his position on December 29, 2015. Among other things, Wurfel served as the MDEQ's principal means of public deception, repeatedly denying the increasingly obvious disaster as it unfolded and attempting to discredit the only reliable people in the picture. Wurfel would eventually be relieved of his duties for his "persistent [negative] tone and derision" and his "aggressive dismissal, belittlement and attempts to discredit the individuals involved in [conducting independent studies and tests]." Wurfel repeatedly made public statements that created, increased, and prolonged the risks and harms facing Plaintiff and the Putative class. Wurfel's actions and omissions constitute gross negligence and/or negligence for the reasons stated herein.

44. Wells is sued in her individual capacity and in her official capacity. Wells was, at all relevant times, Chief Medical Executive within the Population Health and Community Services Department of the Michigan Department of Health and Human Services ("MDHHS"). Among other things, Wells participated in, directed, and/or oversaw the department's efforts to hid information to save face, and to obstruct the efforts of outside researchers. Further, Wells knew as early as 2014 of problems with lead contamination in Flint's water and instead of fulfilling her duty to protect and notify the public, she participated in hiding this information. Wells' actions and omissions constitute gross negligence and/or negligence for the reasons stated herein.

45. Lyon is sued in his individual capacity and in his official capacity. Lyon was, at all relevant times, Director of MDHHS. Among other things, he participated in, directed, and/or oversaw the department's efforts to hid information to save face, and to obstruct the efforts of outside researchers. He knew as early as 2014 of problems with lead contamination in Flint's

water and instead of fulfilling her duty to protect and notify the public, she participated in hiding this information. Lyon's actions and omissions constitute gross negligence and/or negligence for the reasons stated herein.

46. Peeler is sued in her individual capacity and in her official capacity. Peeler was, at all relevant times, a MDHHS employee in charge of its childhood lead poisoning prevention program. Among other things, she participated in, directed, and/or oversaw the department's efforts to hid information to save face, and to obstruct the efforts of outside researchers. Even when her own department had data that verified outside evidence of a lead contamination problem, she continued trying to generate evidence to the contrary. Peeler's actions and omissions constitute gross negligence and/or negligence for the reasons stated herein.

47. Scott is sued in his individual capacity and in his official capacity. Scott was, at all relevant times, Data Manager for MDHHS' Healthy Homes and Lead Prevention Program. Among other things, Wells participated in, directed, and/or oversaw the department's efforts to hid information to save face, and to obstruct the efforts of outside researchers. Even when his own department had data that verified outside evidence of a lead contamination problem, she continued trying to generate evidence to the contrary. He also served a key role in withholding and/or delaying disclosure of data that outside researchers needed to protect the people of Flint. Scott's actions and omissions constitute gross negligence and/or negligence for the reasons stated herein.

48. To the extent the Defendants' conduct was inconsistent with or contrary to their respective job responsibilities they acted outside the scope of their employment and are thus individually liable.

**FACTUAL BACKGROUND REGARDING
DEFENDANTS' GROSS NEGLIGENCE AND/OR NEGLIGENCE**

49. Shortly after switching to the Flint River water supply, Defendants began receiving concerns and complaints from residents about the color, taste and odor of the water.

50. By August, 2014, Flint water tested positive for E. coli. and several "boil water" advisories were issued by the City of Flint through September, 2014.

51. These "boil water" instructions were relied upon and followed by Plaintiff and other Plaintiff Class members.

52. Unbeknownst to the Plaintiff Class, including Plaintiff, boiling water worsens lead concentrations in the water thereby making it more dangerous to consume.

53. For the next several months after the water supply change, resident protests regarding the water increased, but were disregarded by the Defendants in a grossly negligent and/or negligent manner despite their knowledge of the dangers and dire consequences of continuing to use the water.

54. Defendants continued to falsely reassure the public, including Plaintiff and the Plaintiff Class members, and insisted that the water was safe despite their knowledge that the foul taste, odor and appearance was highly likely the result of using the corrosive Flint River water, untreated with the proper anti-corrosive agents, which caused particulate lead to contaminate the water.

55. After the Flint River became the primary source of water for the Flint users, Defendants were also on actual notice of that the levels of Trihalomethanes ("TTHM"), a disinfectant byproduct that can cause liver and kidney problems, had exceeded federal limits.

56. In June 24, 2015, EPA representative Miguel Del Toral wrote a detailed memo outlining numerous dangerous problems with the water being pumped from the Flint River

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including unacceptable levels of lead. This report was shared with, among others, Shekter-Smith, Cook, Busch, and Prysby.

57. Nonetheless, Defendants failed to undertake any measures to effectively address any of the dangers identified by EPA Agent Del Toral.

58. By July 2015, Defendants had actual notice of high lead exposure in the Flint water.

59. Yet, Wurfel appeared on public radio on July 10, 2015, and advised listeners that Flint water was safe and that it was not causing “any broad problem” with lead leaching into residential water.

60. On July 22, 2015, Snyder’s Chief of Staff, Dennis Muchmore, admitted in an email to MDHHS officials that “I’m frustrated by the water issue in Flint . . . I really don’t think people are getting the benefit of the doubt. Now they are concerned and rightfully so about the lead level studies they are receiving . . . These folks are scared and worried about the health impacts and they are basically getting blown off by us (as a state we’re not sympathizing with their plight.)”

61. On July 24, 2015, Wurfel responded to Mr. Muchmore’s concerns, saying, “In terms of near-future issues, the bottom line is that residents of Flint do not need to worry about lead in their water supply, and DEQ’s recent sampling does not indicate an imminent health threat from lead or copper.”

62. By late 2014 or early 2015, the MDHHS was aware from its own data that there was dramatic increase in the percentage of Flint children with elevated blood lead level readings from blood drawn during the second and third quarters of 2014.

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63. The MDHHS knew that these elevated blood lead levels correlated with the introduction of the corrosive Flint River water into the Flint water distribution system.

64. These conditions created a Health Emergency. The MDHHS failed to report to the MDEQ, Governor's Office, EPA, or the Flint community that it had discovered a Health Emergency in its own data.

65. In the summer of 2015, Dr. Mona Hanna-Attisha MD, ("Dr. Hanna-Attisha"), a pediatrician from Hurley Hospital in Flint, using data available to her from Hurley Hospital, observed an increase in the percentage of Flint children with elevated blood lead levels from blood drawn in the second and third quarter of 2014. She published her study in an effort to alert the community about the health risks associated with drinking Flint River water.

66. Defendants were aware of Dr. Hanna-Attisha's findings, but rejected them as false and inaccurate.

67. The MDHHS re-evaluated its own data and ultimately admitted that Dr. Hanna-Attisha's data and conclusions were correct and that its own data confirmed Dr. Hanna-Attisha's conclusion.

68. By early 2015, Defendants knew that Flint residents were being exposed to particulate lead on a daily basis and were on actual notice that inaccurate test results were providing false assurance to residents, including Plaintiff and the Plaintiff Class, about the true lead levels in the water.

69. On March 30, 2015, MDEQ notified the Flint Water Treatment Plant ("FWTP") of the first of two consecutive six-month lead/copper sampling results showing that the lead action levels were unacceptably elevated.

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70. These lead levels, according to the first round of the six-month sampling results, were above 5 ppb and therefore exceeded acceptable and safe levels.

71. On October 1, 2015, faced with overwhelming evidence that the water was unsafe to use and a source of lead poisoning for the children of Flint, including Plaintiff and the Plaintiff Class members, Genesee County Health Officials issued a public health emergency advising Flint residents not to drink the tap water.

72. On October 16, 2015, Detroit City Water began to flow to Flint water users once again.

73. However, based on information and belief, due to the prolonged exposure of contaminated water without adequate anti-corrosive agents, Plaintiff and Plaintiff Class members were further exposed to toxic water, which exposure continues until such time that pipes and services lines that were damaged by corrosive water from the Flint River can be replaced.

COUNT I
GROSS NEGLIGENCE AND/OR NEGLIGENCE

74. Plaintiff re-alleges incorporates by reference all prior paragraphs as though fully set forth herein.

75. Defendants owed duties to Plaintiff and the Class of children he seeks to represent, including but not limited to the following:

- a. To refrain from providing lead contaminated water;
- b. To ensure that appropriate corrosive control measures were implemented to prevent lead from leaching into the water supply;
- c. To timely and adequately test the water supply to ensure that it was safe and sound for use and consumption;
- d. To timely and appropriately inspect the water system;
- e. To ensure that the water supply met federal, state and other applicable requirements;

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- f. To timely and appropriately warn of the dangers in the lead contaminated water;
- g. To timely and appropriately advise to refrain from drinking the water due to lead contamination;
- h. To timely and adequately respond to information, studies, tests and concerns regarding the excessive lead concentrations in the water supply;
- i. To timely and adequately respond to information, studies, tests and concerns regarding the excessive lead concentrations in the blood tests of the children exposed to the lead tainted water supply;
- j. To refrain from providing false, misleading, inaccurate and otherwise inappropriate information and assurances regarding the safety of the water supply; and

k. Other duties as uncovered through discovery.

76. Defendants breached all duties set forth herein.

77. Defendants conduct and/or failures constitute negligence and/or gross negligence as their actions were so reckless so as to demonstrate a substantial lack of concern for whether injury would result.

78. Defendants conduct and/or failures were the direct and proximate cause of injury to Takarie and the Plaintiff Class.

79. Defendants are liable to Takarie and all those similarly situated for the brain damage they suffered as a result of their consumption of lead contaminated water.

COUNT II CLASS ACTION ALLEGATIONS

80. Plaintiff re-alleges incorporates by reference all prior paragraphs as though fully set forth herein.

81. This action is brought by the named Plaintiff, as next friend of Takarie, on behalf of individuals who, from April 25, 2014 through the date of trial, are or were minor children (age 17 years and younger) who are or were residing in the City of Flint, Michigan and who have

been brain damaged as a result of the ingestion of lead poisoned water from pipes and service lines that supplied water from the Flint River without the use of any corrosion control.

82. The number of class members is sufficiently numerous to make class action status the most practical method for Plaintiff to secure redress for injuries sustained.

83. There are questions of law and fact that are common to, and typical of, those raised by the Class he seeks to represent.

84. The violations of law and resulting harms alleged by the named Plaintiff are typical of the legal violations and harms suffered by all Class members.

85. Plaintiff will fairly and adequately protect the interests of the Plaintiff Class members. Plaintiff's counsel are unaware of any conflicts of interest between the class representative and absent class members with respect to the matters at issue in this litigation.

86. Plaintiff is represented by attorneys with substantial experience and expertise in complex and class action and environmental litigation involving personal injury and damages.

87. Plaintiff's attorneys have investigated all claims in this action and have committed sufficient resources to represent the Class.

88. The maintenance of the action as a class action will be superior to other available methods of adjudication and will promote the convenient administration of justice. Moreover, the prosecution of separate actions by individual members of the Class could result in inconsistent or varying adjudications with respect to individual members of the Class and/or one or more of the Defendants.

WHEREFORE, Plaintiff requests that the Court grant the following relief:

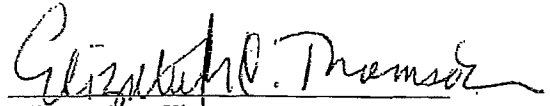
- a. An order certifying the Plaintiff Class pursuant to MCR 3.501;
- b. An order declaring the Defendants liable to Plaintiff and the Plaintiff Class;

- c. Compensatory and exemplary damages;
- d. Attorney fees and litigation expenses;
- e. Any and other relief this Court may deem fair and reasonable.

Respectfully submitted,

HERTZ SCHRAM PC

By:



Elizabeth C. Thomson (P53579)

Patricia A. Stamler (P35905)

Matthew J. Turchyn (P76482)

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Dated: March 23, 2016

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DESIGNATION OF INSTITUTIONS OF THE STATE INVOLVED IN CLAIM

Pursuant to MCL 600.6431(1), Plaintiff designates the following institutions or agencies of the state "involved in connection" with this claim:

Office of the Governor of the State of Michigan

Michigan Department of Environmental Quality

Michigan Department of Health and Human Services

SIGNATURE AND VERIFICATION OF COMPLAINT BY PLAINTIFF

Pursuant to MCL 600.6431(1), Plaintiff hereby signs and verifies this Class Action Complaint before an officer authorized to administer oaths:

Signed: Tamara Nappier
Tamara Nappier, as mother and Next Friend of Takarie Nappier

CERTIFICATE OF ACKNOWLEDGMENT OF NOTARY PUBLIC

State of: Michigan

County of: Oakland

The foregoing instrument was acknowledged before me this 23rd day of March 2016 by Tamara Nappier.

Signature of Notary Public:

Title or Rank:

My Commission Expires:

Debi Chartier
DEBI CHARTIER
NOTARY PUBLIC, STATE OF MI
COUNTY OF OAKLAND
MY COMMISSION EXPIRES Nov 28, 2017
ACTING IN COUNTY OF Oakland