

AFFIDAVIT OF DR. BARBARA SINGER

STATE OF Ohio, COUNTY OF Fairfield, SS:

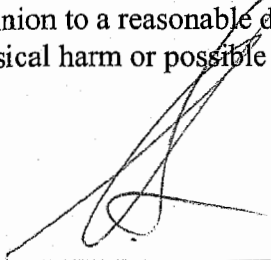
The Affiant, after duly sworn and cautioned, states the following information is true and correct as she verily believes.

1. My name is Dr. Barbara Singer, and my address is 4773 Carroll Cemetery Rd., Carroll, OH 43112.
2. Cynthia Madej is a patient that suffers from severe chronic chemical sensitivity resulting from toxic exposure. She presents with a wide array of symptoms caused by organ and neurological damage and has limitations that require non-standard level of care and special considerations in handling and treatment. She has been legally disabled since 1997. She also currently suffers from a life-threatening anemic condition as evidenced by very low hemoglobin levels and severe vitamin B12 deficiency, as well as extreme weight loss and cardiometabolic decompensation. She is in a precarious state and even small exposures to chemical stressors create a serious hazard for her.
3. Ms. Madej requires limited exposure or avoidance of many common materials and chemicals which include but are not limited to:
 - diesel, jet and other fuels,
 - exhaust
 - tar and asphalt
 - oil
 - herbicides and pesticides
 - smoke.
4. Roadway construction and maintenance activities are of particular concern. Exposures, even in small amounts, to numerous volatile organic compounds found in petrochemical products like tar (e.g. anthracene, benzene, and phenols), many of which outgas for months are dangerous and even life-threatening for Cynthia. Potential impacts include:
 - Difficulty breathing
 - Heart attack
 - Paralysis
 - Migraines
 - Neurologic stress and damage.
5. Avoiding exposure is crucial. Cynthia is unable to relocate from her home due to the severity and breadth of her sensitivities and the specialized living environment she requires. She does not receive adequate protection from closing windows and doors, due to the severity of her illness. In addition, this patient's sensitivities limit her ability to receive administration of standard medical care. Strong

reactions may occur from many plastic-based materials (e.g. oxygen masks and tubing) and most pharmaceuticals.

6. If Cynthia's road has a chip and seal or asphalt surface (or other surfacing that contains volatile organic compounds or toxins to which she is sensitive) especially while she is already in a weakened state from her anemia condition, weight loss, and cardiometabolic decompensation it is my opinion to a reasonable degree of medical certainty that she will suffer serious physical harm or possible death.

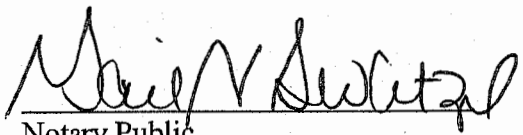
Further, Affiant sayeth naught.



Dr. Barbara Singer

Sworn to before me and subscribed in my presence this 15th day of September,
2015.

S E A L



Notary Public
GAIL M. SWATZEL
NOTARY PUBLIC, STATE OF OHIO
My Commission Expires 1/9/2017