

November 27, 2023

**VIA EMAIL AND UPS OVERNIGHT MAIL**

In re: Aqueous Film-Forming Foams Products Liability Litigation  
c/o 3M Notice Administrator  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
PFASSettlement@AngeionGroup.com

RE: Request for Exclusion from Settlement Agreement in *City of Camden, et al. v. 3M Company*, Case No. 2:23-cv-03147-RMG (*In re: Aqueous Film-Forming Foams Products Liability Litigation*, MDL No. 2-18-mn-2873-RMG)

Dear 3M Notice Administrator:

My name is Matt Mueller and I am the Town Manager of the Town of Little Elm, Texas ("Town"). The Town is a treated water customer of the North Texas Municipal Water District ("District"); the District provides treated water to the Town for which the Town is charged rates and fees; and the Town does not own or operate any water treatment facilities or own and operate a public water system. The Town hereby formally requests to be excluded from the Settlement Agreement in the above-referenced matter. The attached Affidavit provides the pertinent information requested by the Notice of Proposed Class Action and Settlement. The Affidavit further provides that I have the requisite legal authority to make this request on behalf of the Town.

By this request, the Town understands that it will be waiving the ability to participate in the settlement of the above-referenced case, and all benefits and obligations contained therein.

If you have any questions about this request for exclusion, please contact the Town's attorney:

Robert F. Brown  
Brown & Hofmeister, L.L.P.  
740 E. Campbell Road, Suite 800  
Richardson, Texas 75081  
214/747- 6100 (Main)  
214/747-6111 (Fax)

Sincerely,



Matt Mueller  
Town Manager

Attachment: Affidavit in Support of Request for Exclusion

Request for Exclusion from Settlement Agreement

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cc: Service as required by Settlement Agreement (via electronic mail and overnight courier, delivery confirmation requested):

Special Master Matthew Garretson  
Wolf/Garretson LLC  
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Park City, UT 84060  
[Matt@WolfGarretson.com](mailto:Matt@WolfGarretson.com)

AFFF Public Water System Claims  
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[info@pfaswatersettlement.com](mailto:info@pfaswatersettlement.com)

Kevin H. Rhodes  
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Legal Affairs Officer  
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Clerk  
U.S. District Court for the District of South Carolina  
85 Broad Street  
Charleston, SC 29401

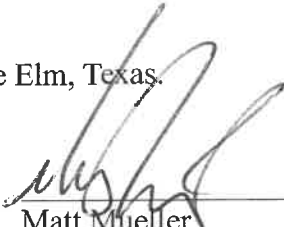
**AFFIDAVIT IN SUPPORT OF REQUEST BY THE TOWN OF LITTLE ELM, TEXAS,  
FOR EXCLUSION FROM SETTLEMENT AGREEMENT**

***City of Camden, et al. v. 3M Company, Case No. 2:23-cv-03147-RMG (In re: Aqueous Film-Forming Foams Products Liability Litigation, MDL No. 2-18-mn-2873-RMG)***

1. My name is Matt Mueller. I am over 21 years of age, have never been convicted of a felony or a crime of dishonesty or moral turpitude, and am competent to make this Affidavit. I am the Town Manager of the Town of Little Elm, Texas ("Town"). The Town is a treated water customer of the North Texas Municipal Water District ("District"); the District provides treated water to the Town for which the Town is charged rates and fees; and the Town does not own or operate any water treatment facilities or own and operate a public water system. As the Town Manager of the Town, under the specific legal authority granted to me by the Town Council of the Town, the Town hereby formally requests to be excluded from the Settlement Agreement between Public Water Systems and 3M Company.
2. The Town's address is 100 W. Eldorado Parkway, Little Elm, TX 75068, telephone number 214-975-0406. My address is the same, my email address is MMueller@littleelm.org. and I may be telephoned at 214-975-0406. For fax purposes, documents may be forwarded to me and to the Town at my email address.
3. As Town Manager of the Town of Little Elm, Texas, I have authority to execute this Affidavit and am legally authorized to request to exclude the Town as a Settlement Class Member, from the 3M Settlement Agreement. At this time, I am formally requesting that the Town be excluded from the 3M Settlement Agreement in the case of *City of Camden, et al. v. 3M Company*, Case No. 2:23-cv-03147-RMG, in the AFFF MDL, *In re: Aqueous Film-Forming Foams Products Liability Litigation*, MDL No. 2-18-mn-2873-RMG.

I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 27<sup>th</sup> day of November, 2023, at Little Elm, Texas.

  
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Matt Mueller