

EXHIBIT "A"

DECLARATION OF COUNSEL

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

IN RE: 3M COMBAT ARMS)	Case No. 3:19-md-02885
EARPLUG PRODUCTS LIABILITY)	
LITIGATION)	Judge M. Casey Rodgers
)	
)	Magistrate Judge Hope T. Cannon
This Document Relates to:)	
All Cases)	
_____)	

**DECLARATION OF CAE COUNSEL
PURSUANT TO IDENTIFICATION ORDER**

1. My name is [INSERT NAME OF CAE COUNSEL], and I am an attorney at [INSERT NAME OF LAW FIRM] (collectively “CAE Counsel”).

2. I submit this Declaration in accordance with the Combat Arms Settlement Agreement and the Court’s Identification Order on behalf of myself and my firm.

3. Attached hereto is the chart that identifies all Eligible Claimants in which I or my firm are Primary Counsel, as defined in the Master Settlement Agreement. The attached chart will be timely served in both hard copy and in EXCEL format to MDL-Centrality in conformance with the Identification Order, and contains, to the best of my knowledge, the required demographic and contact information regarding my firms’ Eligible Clients in which I or my firm are Primary Counsel.

4. I understand that the obligation to identify all Eligible Claimants in which I or my firm is Primary Counsel applies regardless of whether the Eligible Claimants intend to participate in the Settlement, and I understand that the Court-appointed Settlement Administrator may contact these clients to provide relevant settlement information copying myself and/or a duly authorized representative at my firm at the email address listed below.
5. Each identified Eligible Claim is in compliance with the obligations imposed by the Identification Order.
6. I understand that to comply with the MSA and the Court's Identification Order, this Declaration must be submitted to the Court via MDL Centrality by the Reference Date, which deadline is fourteen (14) days after the Identification Order was issued.
7. I understand and agree that my failure to identify all Eligible Claimants in which I or my firm is Primary Counsel is a violation of Identification Order and will result in: (a) dismissal with prejudice of any CAE claims in which I or my firm is Primary Counsel that were not identified; (b) potential sanctions and other penalties as may be determined by the Court, either pursuant to a motion of a Party or *sua sponte*.
8. I have/my firm has ceased advertising, solicitation, or involvement in any way with the advertising or solicitation for CAE Claims as of the Settlement Date.

9. I swear under penalty of perjury that the foregoing is true and correct.

DATE: [MONTH] [DAY], [YEAR]

/s/

[NAME OF CAE COUNSEL]

[NAME OF LAW FIRM]

[ADDRESS]

[ADDRESS]

[ADDRESS]

[TELEPHONE NUMBER]

[EMAIL ADDRESS]

IDENTIFICATION OF CAE CLAIMANTS

PRIMARY COUNSEL	PRIMARY COUNSEL E-MAIL ADDRESS	CLAIMANT NAME (FIRST)	CLAIMANT NAME (LAST)	FULL SSN	CLAIMANT EMAIL ADDRESS	CLAIMANT CELL# (including area code)	CLAIMANT ADDRESS	DOB (00/00/0000) (mm/dd/year)	Court Of Filing	Docket Number	MDL-C Plaintiff ID
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