

Michael Akselrud (SBN 285033)
Michael.Akselrud@lanierlawfirm.com
THE LANIER LAW FIRM, P.C.
2829 Townsgate Rd., Ste. 100
Westlake Village, California 91361
Telephone: (310) 277-5100
Facsimile: (310) 277-5103

W. Mark Lanier (*pro hac vice*)
WML@lanierlawfirm.com
Alex J. Brown (*pro hac vice*)
Alex.Brown@lanierlawfirm.com
Ryan D. Ellis (*pro hac vice*)
Ryan.Ellis@lanierlawfirm.com
Alex Abston (*pro hac vice*)
Alex.Abston@lanierlawfirm.com
Megan Waida (*pro hac vice*)
Megan.Waida@lanierlawfirm.com
(*pro hac vice*)
THE LANIER LAW FIRM, P.C.
10940 W. Sam Houston Pkwy N
Houston, Texas 77064
Telephone: (713) 659-5200
Facsimile: (713) 659-2204

David P. Page (*pro hac vice*)
dpage@eenradvocates.com
**ENVIRONMENTAL ENERGY &
NATURAL RESOURCES ADVOCATES,
PLLC**
1921 S Boston Ave.
Tulsa, Oklahoma 74119
Telephone: (918) 764-8984

Christopher T. Nidel (*pro hac vice*)
chris@nidellaw.com
Jonathan Nace (*pro hac vice*)
jon@nidellaw.com
Thomas Sims (SBN 264174)
thomas@nidellaw.com
William W. Cowles (*pro hac vice*)
will@nidellaw.com
Zachary A. Kelsay (*pro hac vice*)
zach@nidellaw.com
NIDEL & NACE, P.L.L.C.
One Church Street, Suite 802
Rockville, MD 20850
Telephone: (202) 780-5153

Gideon Kracov (SBN 179815)
gk@gideonlaw.net
LAW OFFICE OF GIDEON KRACOV
801 S. Grand Ave., 11th Floor
Los Angeles, CA 90017
Telephone: (213) 700-4448

Attorneys for Plaintiffs and Class Members

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

JED and ALISA BEHAR, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

NORTHROP GRUMMAN CORPORATION
AND NORTHROP GRUMMAN SYSTEMS
CORPORATION,

Defendants

Case No. 21-cv-03946-HDV-SK

CLASS ACTION

**DECLARATION OF RYAN D. ELLIS IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY SETTLEMENT APPROVAL**

Hearing:

Date: July 16, 2026

Time: 10:00 a.m.

Place: Courtroom 5B, 5th Floor

350W. 1st Street

Los Angeles, CA 90012

Judge: Hon. Hernán D. Vera

DECLARATION OF RYAN D. ELLIS

I, RYAN D. ELLIS, declare:

1. I am an attorney at law, admitted to practice before this Court *pro hac vice*. I am admitted to practice before all courts of the State of Texas. I am an attorney in at The Lanier Law Firm, P.C., attorneys of record for Plaintiffs herein, and am one of the attorneys responsible for the day-to-day management of this case. Unless otherwise stated, the following facts are within my personal knowledge and, if called and sworn as a witness, I could and would competently testify to the following.

2. I make this declaration in support of Plaintiffs' Motion for Preliminary Settlement Approval.

3. As part of formal discovery, Defendants produced, and Plaintiffs processed and reviewed over three million pages of documents related to site history, complex hydrogeologic analyses and testing related to releases from the Site into the Class Area, and testing related to vapor intrusion in homes within the Class Area.

1 4. Plaintiffs retained a hydrogeologist and geologist (Dr. Laton), vapor intrusion expert (Dr.
2 Kram), toxicologist (Dr. Ryer-Powder), hydrogeologist and groundwater modeler (Dr. Tonkin), industrial
3 historian (Dr. Gorman), and real estate economist (Dr. Boyle) that submitted reports and supplemental
4 reports reflecting their opinions. These experts also sat for depositions.

5 5. Defendants retained a groundwater contamination expert, vapor intrusion expert,
6 epidemiologist, toxicologist, health risks expert, real estate damages experts, and a source of
7 contamination and historical site operations expert that submitted reports and supplemental reports
8 reflecting their opinions.

9 6. Plaintiffs took approximately 10 fact and 13 expert depositions during the discovery
10 process and defended against approximately 15 depositions noticed by Defendants.

11 7. The Parties participated in an initial mediation on January 28, 2022, before Hon. Suzanne
12 Segal, but were unable to reach resolution at that time.

13 8. As litigation progressed through discovery, class certification, and trial preparation, the
14 Parties continued to evaluate their respective positions in light of the evolving factual record and legal
15 rulings.

16 9. A second, full-day, in-person mediation was conducted on October 1, 2025, before
17 mediator Antonio Piazza. The parties were unable to reach resolution at that time but subsequently
18 continued their settlement discussions both with and without Mr. Piazza.

19 10. These efforts ultimately resulted in an agreement in principle reached during trial,
20 reflecting the Parties' informed assessment of the risks and uncertainties of continued litigation.

21 11. The material terms of the Settlement were memorialized in a Memorandum of
22 Understanding executed on March 30, 2026. The Parties thereafter promptly finalized and executed a
23 comprehensive Settlement Agreement on April 2, 2026.

24 12. A list of homeowner names and mailing addresses will be obtained from the Los Angeles
25 County Assessor's Office and provided to the Class Administrator.

26 13. Throughout this litigation, class members have been represented by Environmental Energy
27 & Natural Resources Advocates, Law Office of Gideon Kracov, PLLC, Nidel & Nace, P.L.L.C., and The
28

1 Lanier Law Firm, P.C. Each of these firms has extensive experience in environmental, consumer and/or
2 class action litigation.

3 14. Attorney Christopher Nidel of Nidel & Nace, P.L.L.C., is an M.I.T.-educated chemical
4 engineer, and has also served as lead counsel in several environmental and class action cases.

5 15. Attorney Mark Lanier and other attorneys at The Lanier Law Firm have served as class
6 counsel in numerous consumer and environmental class actions.

7 16. Attorney David Page has represented both plaintiffs and defendants in environmental
8 litigation for over 40 years.

9 17. Attorney Gideon Kracov has extensive experience with environmental litigation and
10 regulatory practice, chaired the California Department of Toxic Substances Control Board Independent
11 Review Panel, and served as a member of both the California Air Resources Board and South Coast Air
12 Quality Management District Governing Board.

13 18. Plaintiffs propose a Final Approval Hearing take place 100 days following the mailing of
14 the Settlement Notice.

15 19. Attached as **Exhibit 1** hereto is a true and correct copy of the redacted version of the Class
16 Action Settlement Agreement and Release executed on April 2, 2026. This version will be filed publicly
17 and also posted on the settlement website.

18 20. Attached as **Exhibit 1A** hereto is a true and correct copy of the unredacted version of the
19 Class Action Settlement Agreement and Release executed on April 2, 2026. This version is subject to a
20 motion to file under seal, and will be filed under seal pending order of the Court.

21 21. Attached as **Exhibit 2** hereto is a true and correct copy of map of settlement zones.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed this 1st day of June, 2026, at Austin, Texas.

24
25 /s/ Ryan D. Ellis
26 Ryan D. Ellis, Declarant
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