

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

DAVID DAGGETT, individually, and as a representative of a Class of Participants and Beneficiaries of the Waters Employee Investment Plan,

Plaintiff

v.

WATERS CORPORATION, ET AL.,  
Defendants.

Case No. 1:23-cv-11527

**DECLARATION OF DAVID DAGGETT IN SUPPORT OF PLAINTIFF’S MOTION FOR  
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, David Daggett, declare and state as follows:

1. I am the named class representative in the above-captioned action. I held many jobs in my career at Waters from 1984-2019, including Senior Manager, Global Service Support and Development (2014 – 2019); Manager, Global Service Support (2007 – 2014); and Senior Engineer, Global Service Support (1998 – 2007). My employment took place at the Waters facility in Milford, Massachusetts.

2. I am fully aware of my duties as a class representative. I am not aware of any conflicts of interest between myself and other Class Members.

3. I take my duties as a class representative seriously, and I have attempted to fulfill those duties throughout the course of the litigation. Among other things, I have (1) reviewed the allegations in the Complaint and Amended Complaint; (2) provided information and documents to

counsel to assist in the prosecution of the action; and (3) reviewed the Settlement Agreement in its entirety and communicated with counsel regarding the negotiation of the Settlement.

4. I am fully informed of the terms of the Settlement. I understand that I am a member of the Settlement Class, and I am satisfied with the terms that were reached.

5. I believe the \$800,000 monetary recovery represents a fair recovery for myself and the other Settlement Class Members, and I agree with the Plan of Allocation.

6. In my opinion, the Settlement is fair, reasonable, and adequate, both as to me and as to the other Settlement Class members. I approve the Settlement in this case and encourage the Court to approve the Settlement as well.

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

Dated: 9/27/2024

DocuSigned by:  
*David Daggett*  
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David Daggett