

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

MATTHEW O'REILLY

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Plaintiff,

*

v.

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Civil Action No. GLR-18-3622

ADAM TSOTTLES, et al.

*

Defendants.

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AFFIDAVIT OF ADAM TSOTTLES

I, Adam Tsottles, am above the age of majority and am competent to testify as follows:

1. I am a Senior Route Manager for Waste Management of Maryland, Inc.
2. Roy Palmer is a driver of a collection truck for Waste Management of Maryland, Inc. for one of the routes I managed in 2017.

3. Mr. Palmer took a cell phone video of a portion of the October 16, 2017 incident.

4. A true and correct copy of this cell phone video is attached as Exhibit A to Defendants Waste Management, Inc. and Adam Tsottles' Reply Memorandum of Law In Further Support of Their Motion to Dismiss Plaintiff's Amended Complaint.

I **SOLEMNLY AFFIRM** under the penalties of perjury and upon personal knowledge that the contents of the foregoing paper are true.

Dated: June 24, 2019



Adam Tsottles