

STATE OF MINNESOTA  
COUNTY OF RAMSEY

DISTRICT COURT  
SECOND JUDICIAL DISTRICT

Clifford L. Whitaker, and Michael V. Mucci, on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

3M Company,

Defendant.

Court File No. 62-C4-04-012239

[T. Warner]

**AFFIDAVIT OF  
ALTON BENNETT**

[Class Action]

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After first being duly sworn, I, Alton Bennett, state the following:

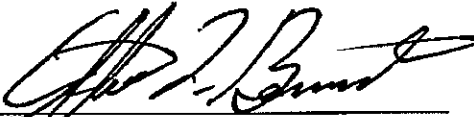
1. On or about November 18, 2004, my boss, John LaPrairie, the manager of my IT group, called me into his office. A woman from 3M's Human Resources Department, whose first name was Sue, was also in Mr. LaPrairie's office. I was told that my job would be eliminated in sixty (60) days. I was told that I would be offered a severance package which would be conditioned on my signing a document releasing all claims I might have against 3M. I was told that I was leaving 3M whether or not I accepted the severance package, but that if I wanted to leave with any kind of financial package, I had to sign the release.

2. I did not sign the release or other separation papers until my last day on the job at 3M, which was Friday, January 14, 2005. At no time did anyone at 3M tell me about the existence of the age discrimination case captioned *Whitaker, et al. v. 3M*. I was not told that claims relating to age discrimination in promotions, performance evaluations, compensation, training and terminations were being brought on behalf of a class of employees over the age of 45. I was not given the identity of plaintiffs' counsel

or information that would allow me to contact them or obtain information that would tell me about whether and how I could participate in or benefit from the lawsuit. I was not told that signing the release may prevent me from participating in the *Whitaker* lawsuit and obtaining money damages, reinstatement to my job or other remedies in the lawsuit.

FURTHER AFFIANT SAITH NOT.

Dated: 5/23/, 2005

  
Alton Bennett

Subscribed to and sworn before me  
this 23 day of May, 2005.

Leslie A. Rusnacko.  
Notary Public

My commission expires 1/31/2008.

