

EXHIBIT B

FITNEWS

STATE OF SOUTH CAROLINA)
)
COUNTY OF KERSHAW)
)

AFFIDAVIT of HENRY BECKHAM

I Henry Beckham, being an adult over the age of eighteen (18) and of sound mind and body and with personal knowledge of the matters set forth herein do hereby aver as follows:

1. I am a citizen and resident of Horry County, South Carolina and grew up in Kershaw County, South Carolina.
2. I was born on February 5, 1951, and am 73 years old.
3. I have personal knowledge of Lake Wateree. My family owned one of the first cabins on the Lake after the dam was constructed.
4. I would spend summer Sundays during my childhood at my family's cabin at Beaver Creek on Lake Wateree.
5. In 1968, when I was in high school, I was hired by Duke to administer the mosquito program on Lake Wateree.
6. At the time, my older brother William Beckham, was still working part-time for Duke administering the same program.
7. It was through William that I learned about the job opportunity.
8. I was one of a handful or so of summer associates and was paid more than the minimum wage at the time.
9. Mr. George Swearingen was one of my supervisors.
10. Mr. Swearingen was my supervisor during the summers of 1968, 1969, 1970, 1971, 1972, and 1973.

11. In my job, I was told to fill two 55-gallon barrels full of motor oil and burnt transformer oil into an aluminum boat and then spray that mixture all around the lake, focusing on areas of stagnant water.

12. The loading and filling station was located in Beaver Creek, Lake Wateree at a property owned and operated by Duke Energy.

13. At this property, there was a large container, which I estimate as thousands of gallons, filled with the mixture of motor oil and burnt transformer oil from which we filled the 55-gallon barrels.

14. We were supposed to spray the shoreline of the entire lake with specific attention to areas where the water appeared stagnant, especially coves and shallow areas.

15. It would take all day to put out the 110 gallons.

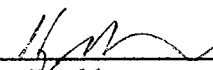
16. My supervisors specifically told me that the material I was instructed to spread across the lake contained burnt or used transformer oils.

17. Treating the lake took about five days, and we would treat the lake every week during the summer.

18. We distributed about 500 gallons of the burnt transformer oil mixture per week.

19. I worked this job every summer from 1968 through 1973.

FURTHER AFFIANT SAYETH NAUGHT.


Henry Beckham

Signed before me this day of 7-11-, 2024

Ryan Cooper, Ryan Cooper
Notary Public
My Commission Expires: 12/29/2031

