

# **EXHIBIT 3**

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

MATTHEW O'REILLY

\*

Plaintiff,

\*

v.

\*

Civil Action No. GLR-18-3622

ADAM TSOTTLES, et al.

\*

Defendants.

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\* \* \* \* \*

**AFFIDAVIT OF COURTNEY TIPPY IN SUPPORT OF DEFENDANTS  
WASTE MANAGEMENT, INC. AND ADAM TSOTTLES'  
MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

I, Courtney Tippy, am above the age of majority and am competent to testify as follows:

1. I am the Corporate Secretary of Waste Management, Inc. I am familiar with the general organization and corporate structure of Waste Management, Inc.

2. I submit this Affidavit in support of Defendants Waste Management, Inc. and Adam Tsottles' Motion to Dismiss Plaintiff's Amended Complaint.

3. Waste Management, Inc. is a publicly-held corporation duly organized and existing under and by virtue of the laws of the State of Delaware, with its principal place of business at 1001 Fannin Street, Houston, Texas.

4. Waste Management, Inc. is a holding company and the sole shareholder and parent company of Waste Management Holdings, Inc., which is a Delaware corporation headquartered in Houston, Texas. Subsidiaries of Waste Management Holdings, Inc. are engaged in providing waste collection, transfer and disposal services, and recycling and resource recovery. The subsidiary legal entities owned by Waste Management Holdings, Inc. are separate and distinct

corporate entities, each of which has its own officers and directors. The operating companies also maintain separate books and records. The corporate minutes and records of Waste Management, Inc. and Waste Management Holdings, Inc. are not intermingled with the corporate minutes or records of any of their subsidiaries.

5. Intra-company transactions between Waste Management, Inc. and any of its subsidiaries are done at arm's length with full regard for maintaining the formalities of such transactions.

6. Waste Management, Inc. does not transact, conduct, or solicit business in the State of Maryland.

7. Waste Management, Inc. is not registered or licensed to do business in the State of Maryland.

8. Waste Management, Inc. does not maintain an office, mailing address, or bank account in the State of Maryland.

9. Waste Management, Inc. does not have a registered agent authorized to accept service of process in the State of Maryland and none of its subsidiaries, or anyone associated or retained by those subsidiaries, is authorized to accept service of process for Waste Management, Inc. in Maryland.

10. Waste Management, Inc. does not have a direct interest in any real or personal property located in Maryland. Its only such interest is as the ultimate shareholder as described above.

11. With regard to the allegations contained in the Complaint, Waste Management, Inc. does not employ Defendant Adam Tsottles, Mr. Roy Palmer, or Mr. Henry Prioleau.

12. Defendant Adam Tsottles, Mr. Roy Palmer, and Mr. Henry Prioleau are employed

by Waste Management of Maryland, Inc.

13. Waste Management of Maryland, Inc. is an indirect, wholly owned subsidiary of Waste Management, Inc.

14. Waste Management of Maryland, Inc. is a direct, wholly owned subsidiary of Waste Management Holdings, Inc.

15. Waste Management of Maryland, Inc. was incorporated and is qualified to do business in the State of Maryland.

16. Waste Management of Maryland, Inc. is engaged in providing waste collection, transfer and disposal services, and recycling and resource recovery in the State of Maryland.

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

Dated: May 13, 2019

  
Courtney Tippy, Corporate Secretary  
Waste Management, Inc.