

IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA

Filez, LLC, :
 :
Plaintiff, :
 : CIVIL ACTION FILE NO.
v. : 2017-CV-297869
 :
 :
City of Atlanta, Georgia, a municipal :
Corporation, :
 :
 :
Defendant :

AFFIDAVIT OF GLENN LONG

Personally appeared before the undersigned attesting officer duly authorized to administer oaths, Glenn Long, who being duly sworn, deposes and says the within statements are true and correct.

1.

I am over the age of eighteen (18) and otherwise competent to give this affidavit. I have personal knowledge of the matters contained in this affidavit.

2.

I am aware that this affidavit will be used by the Plaintiff in the above-referenced civil matter.

3.

My name is Glenn Long. I recall and have personal knowledge of the area around the location of Mack Dr NW Atlanta Ga. 30318 and Gun Club Rd NW Atlanta Ga. 30318 as I once lived there from early 1960s to early 1970s. My home address during that time was 2190 Mack Dr NW Atlanta Ga 30318.

4.

The City of Atlanta had only one entry gate, Guard Shack and weigh scales located off Gun Club Rd NW right in front of Mrs Pinckney's house 1341 Gun Club Rd NW Atlanta, Ga 30318. I remember Mrs Pinckey because we played with her kids. This entry was the only way to enter into the area the City of Atlanta was dumping in from approximately 8 am to 9 pm Monday thru Friday. There is no other way to access this area.

GLK
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I remember how bad the smell was all the years I lived there, I used to play this area with my friends who also lived next to this dump site.

6.

On one occasion I got into trouble by throwing a rock at the City's dump truck which broke the truck window, the trucks had the City's emblem which they still have today.

7.

I witnessed all types of dumping by the City of Atlanta occurring over the years I lived on Mack Dr NW, including large steel drums, appliances, cans and everything else. The City would cover this waste with a layer of dirt after the waste was dumped, then we used to play on mounds afterwards.

8.

I witnessed for years the City's bull dozers, dump trucks, tractors move this waste and bury it in this area just outside the fence of Perry homes housing project

[SIGNATURE ON FOLLOWING PAGE]

9.

My Uncle had a home right in front of the City of Atlanta's entry gate on Gun Club Rd, NW we used to live with him for a few years.

10.

On January 27, 2019 I met with Jerry Brow who showed me a Survey map of a CH2MHILL Methane Monitoring Plan, based upon this survey plan map the only area I witnessed the City dump in was in the area called the Baby Gun Club Landfill area. The Gun Club Landfill area was never dumped in by the city when I lived there.

FURTHER AFFIANT SAYETH NOT.

The Undersigned affiant swears that the information given herein is true and correct and understands that a false answer to any item contained within may result in a criminal charge of false swearing.

Glenn Long
Glenn Long, Affiant

License #: 052257237

Sworn to and subscribed before me this
20th day of January, 2019.

Michelle Osborne
Notary Public or Attorney



My Commission Expires: April 6, 2020