UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re: Methyl Tertiary Butyl Ether ("MTBE") Products Liability Litigation	Master File No. 1:00-1898 (SAS) MDL 1358

This document relates to:

Commonwealth of Pennsylvania v. Exxon Mobil Corporation, et al., Case No. 14-cv-06228

> USDC SDNY
> DOCUMENT
> ELECTRONICALLY FILED
> DOC #: _____
> DATE FILED: _12/31/15_

[PROPOSED] STIPULATED ORDER

WHEREAS, Defendants named in the First Amended Complaint ("FAC Defendants") currently have a deadline to answer or otherwise respond to the Second Amended Complaint ("SAC") on January 5, 2016;

WHEREAS, certain FAC Defendants intend to file a motion to dismiss portions of the SAC and, therefore, will not be filing an Answer at this time;

WHEREAS, Plaintiff has requested additional time to respond to Defendants' pre-motion letters; and

WHEREAS, the SAC has added certain new Defendants ("SAC Defendants"), many of which have not yet been served;

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Defendants in the above-captioned action, through undersigned counsel, that all FAC Defendants' time to move to dismiss the SAC shall be extended by three days, to January 8, 2016;

IT IS FURTHER STIPULATED AND AGREED that all FAC Defendants' time to answer the SAC shall be adjourned *sine die*, with an answer date to be set following the Court's decision on the forthcoming Certain Defendants' Motion to Dismiss; and

IT IS FURTHER STIPULATED AND AGREED that the SAC Defendants' time to answer or otherwise respond to the SAC shall be ~~the later of: 60 days following service, as stated in the Court's November 17, 2015 order, or~~ the date to be set for the FAC Defendants.   SAS
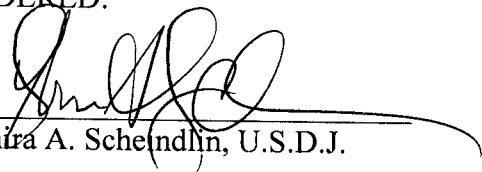
AGREED TO BY:

_s/ Michael Axline_____	_s/ James A. Pardo_____
Michael Axline, Esq.	James A. Pardo, Esq.
Counsel for Plaintiff	*Counsel for Exxon Mobil Corporation and as Liaison Counsel for Defendants*

SO ORDERED:

_____
Hon. Shira A. Scheindlin, U.S.D.J.

12/31/15
_____
Date