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 MDL 1358 M21-88

This Document Relates to:

New Jersey Department of Environmental Protection, et al. v. Atlantic Richfield Co., et al. No. 1:08-cv-00312

STIPULATION AND [PROPOSED] ORDER

On January 2, 2019, Plaintiffs, New Jersey Department of Environmental Protection, *et al.*, filed a Motion to Remand. Civil No. 1:08-CV-312, ECF No. 563. On January 16, 2019, Defendants filed an Opposition to the Motion to Remand on behalf of ExxonMobil Corp., ExxonMobil Oil Corp., and the defendants listed on Exhibit A, attached to the Opposition. Civil No. 1:08-CV-312, ECF No. 567.

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs and Defendants that Plaintiffs shall have until January 28, 2019 in which to file a Reply in support of the Motion to Remand.

AGREED TO BY:

Dated: January 22, 2019

MILLER & AXLINE, P.C.

MICHAEL AXLINE

1050 Fulton Ave., Suite 100

Sacramento, CA 95825

Special Counsel for Plaintiffs New Jersey Department of Environmental Prot., et at.

Dated: January 22, 2019

McDERMOTT WILL & EMERY LLP

JAMES A. PARDO

LISA GERSON

340 Madison Avenue

New York, New York 10173

Counsel for Defendants Exxon Mobil

Corporation and ExxonMobil Oil

Corporation, and on behalf of all defendants listed on Exhibit A of the Opposition to the

Motion to Remand.

SO ORDERED:

DATED: January , 2019.

Hon. Vernon S. Broderick, U.S.D.J.