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 (VSB)

This Document Relates to:

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

STIPULATION AND [PROPOSED] ORDER

On or about September 28, 2018, the Court granted Plaintiffs' Unopposed Motion for

Leave to File a Fifth Amended Complaint;

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, newly-added

Defendants Lukoil North America LLC, Lukoil Pan Americas, LLC, and PJSC Lukoil

(collectively the "newly-added Lukoil Defendants"), and existing Defendants Lukoil Americas

Corporation and Getty Petroleum Marketing Inc., that the newly-added Lukoil Defendants,

Lukoil Americas Corporation and Getty Petroleum Marking Inc. shall have until September 30,

2019 in which to answer, move or otherwise respond to the Fifth Amended Complaint.

Dated: July 26, 2019

AGREED TO BY:

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KATHERINE M. KATCHEN Two Commerce Square 2001 Market Street, Suite 4100 Philadelphia, PA 19103 (215) 965-1200 Counsel for Newly-Added Lukoil Defendants

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GWEN FARLEY Deputy Attorney General New Jersey Attorney General's Office Division of Law Environmental Enforcement & Environmental Justice Section 25 Market Street, 7th floor Trenton, NJ 80625-0093 SO ORDERED,

Dated: July 29 , 2019

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Vernon S. Broderick United States District Judge