

**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 Monday, December 2, 2019 in which to answer, move or otherwise respond to the Fifth Amended Complaint.

Dated: October 1, 2019

AGREED TO BY:

AKIN GUMP STRAUSS HAUER & FELD LLP

Katherine M. Katcher / AME

KATHERINE M. KATCHEN

Two Commerce Square
2001 Market Street, Suite 4100
Philadelphia, PA 19103
(215) 965-1200

Counsel for Newly-Added Lukoil Defendants

BLEAKLEY PLATT & SCHMIDT, LLP

Matthew G. Parisi / AME

MATTHEW G. PARISI

One North Lexington Avenue
White Plains, NY 10601
(914) 949-2700

Counsel for Lukoil Americas Corporation & Getty Petroleum Marketing Inc.

MILLER & AXLINE, P.C.

Michael Axline / AME

DUANE C. MILLER

MICHAEL AXLINE

1050 Fulton Ave., Suite 100
Sacramento, CA 95825
(916) 488-6688

Counsel for Plaintiff

Gwen Farley / AME

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: _____, 2019

HON. VERNON S. BRODERICK