

**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, February 3, ²⁰²⁰~~2019~~ in which to answer, move or otherwise respond to the Fifth Amended Complaint.

Dated: November 27, 2019

AGREED TO BY:

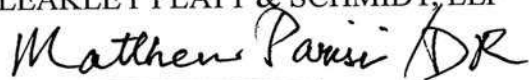
AKIN GUMP STRAUSS HAUER & FELD LLP

 / DR

KATHERINE M. KATCHEN

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

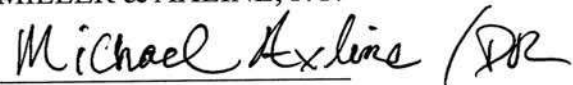
BLEAKLEY PLATT & SCHMIDT, LLP

 / DR

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.

 / DR

DUANE C. MILLER

MICHAEL AXLINE
1050 Fulton Ave., Suite 100
Sacramento, CA 95825
(916) 488-6688
Counsel for Plaintiff

 / DR

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: December 2, 2019

A handwritten signature in black ink that reads "Vernon Broderick". The signature is written in a cursive style with a large initial "V".

Vernon S. Broderick
United States District Judge