

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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*In Re: Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability Litigation*

**Master File No. 1:00 – 1898  
MDL 1358 (VSB)**

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**This Document Relates to:**

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

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**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 Marketing Inc. shall have until Friday, April 3, 2020 in which to answer, move or otherwise respond to the Fifth Amended Complaint.

Dated: January 31, 2020

AGREED TO BY:

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Trenton, NJ 80625-0093

SO ORDERED,

Dated: February 4, 2020

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