Donald A. Soutar, Esq.
Attorney I.D. No. 024521999
WEITZ & LUXENBERG, P.C.
A New York Professional Corporation
700 Broadway
New York, New York10003
Telephone: (212) 558-5785
Facsimile: (646) 293-7929

Attorneys for Plaintiffs in Actions Listed on the Schedule Attached Hereto

FILED
OCT 09 2013
BRIAN R. MARTINOTTI, J.S.C.

In Re Alleged Environmental Contamination of PomptonLakes	SUPERIOR COURT OF NEWJERSEY LAW DIVISION: BERGENCOUNTY CM CASE NO. 290 Hon. Brian R.Martinotti Civil Action CONSENT ORDER FOR LEAVE TO AMEND CERTAIN COMPLAINTS AND DEMANDS FOR JURY TRIAL

THIS MATTER having been brought before the Court by Weitz & Luxenberg, P.C., counsel for the plaintiffs in the matters listed on the attached schedule (the "Subject Plaintiffs"), and for the proposed new plaintiffs (the "Proposed Plaintiffs"), who are also listed on the attached schedule, for an Order pursuant to *R.* 4:9-1 granting leave to amend the Complaints and Demands for Jury Trial of the Subject Plaintiffs; and defendant E.I. duPont de Nemours and Company, by its counsel, McElroy, Deutsch, Mulvaney& Carpenter, LLP, having consented to the relief sought herein; and the Court having considered the matter and acknowledged the consent of the parties; and for good cause shown;

IT IS on this 9th day of October, 2013,

ORDERED that:

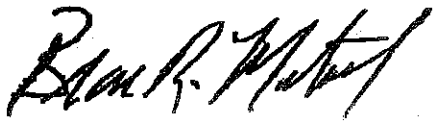
1) Leave be, and the same hereby is, granted for the filing of amended Complaints and Demands for Jury Trial on behalf of the Subject Plaintiffs, substantially in the form previously provided to and consented to by counsel; provided, however, that by consenting to the filings by the Subject Plaintiffs, defendant does not waive any defenses or rights it may have, including defenses such as release, statute of limitations, laches, and the like, nor does defendant agree that any amendment "relates back" under Rule 4:9-3;

2) The Proposed Plaintiffs shall provide a Plaintiff Fact Sheet, including all required record authorizations, no later thanNovember 29, 2013;

3) Counsel for the Proposed Plaintiffs shall file with the Clerk of the Superior Court, Law Division, Bergen County, and serve upon counsel for the defendant, within 7 days of the receipt of this Order, the amended Complaints and Demands for Jury Trial on behalf of the Proposed Plaintiffs;

4) Counsel for the Proposed Plaintiffs shall serve a copy of this Order on counsel for defendantwithin 7 days of receipt thereof; and

5) Defendant shall have 45 days from the date of service of each amended Complaint in which to answer or otherwise respond thereto.



HON. BRIAN R. MARTINOTTI, J.S.C.

BRIAN R. MARTINOTTI, J.S.C.

The undersigned hereby consent to the form, content, and entry of the within Consent Order for Leave to Amend Certain Complaints and Demands for Jury Trial:

WEITZ & LUXENBERG, P.C. Attorneys for Plaintiffs By: _____ DONALD A. SOUTAR Dated: October 2, 2013	MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP Attorneys for Defendant E.I. duPont deNemours and Company By: _____ JOHN DWYER Dated: October 1, 2013

Schedule

List of Actions and Proposed New Plaintiffs

10629-10	Genova, Daniel, *et al.* v. E.I. DuPont DeNemours and Company, Inc. New Plaintiffs: Lorraine Genova
1230-12	Kizilkaya, Yalcin, *et al.* v. E.I. DuPont DeNemours and Company, Inc. New Plaintiff: Kayla Leoni Kizilkaya, a minor
10577-10	Lindsay, Timothy v. E.I. DuPont DeNemours and Company, Inc. New Plaintiffs: Tracy Lindsay Kelly Lindsay, a minor Timothy Lindsay, Jr., a minor
10590-10	Nichols, Richard, *et al.* v. E.I. DuPont DeNemours and Company, Inc. New Plaintiffs: Lorraine Nichols Giulia Nichols, a minor James Nichols, a minor
10565-10	Struble, Glenn v. E.I. DuPont DeNemours and Company, Inc. New Plaintiff: James Struble, Executor of the Estate of Glenn Struble, (substituted for Glenn Struble, now deceased) Glenn Struble, Jr., a minor