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Attorneys for Plaintiffs in Actions Listed on the Schedule Attached Hereto

FILED

JUL 1 2 2011

BRIAN R. MARTINOTTI, J.S.C.

In Re Alleged Environmental Contamination of Pompton Lakes	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: BERGEN COUNTY CM CASE NO. 290 Hon. Brian R. Martinotti Civil Action CONSENT ORDER FOR LEAVE TO AMEND COMPLAINTS AND DEMANDS FOR JURY TRIAL #82

THIS MATTER having been brought before the Court by Bernard A. Weintraub, Esq., counsel for the plaintiffs listed on the attached schedule (the "Subject Plaintiffs"), 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 defendants E.I. duPont de Nemours and Company, by its counsel, McElroy, Deutsch, Mulvaney & Carpenter, LLP, Royle Systems Group, LLC and Alrabwah, Inc., by their counsel, Jeffer, Hopkinson & Vogel, and Valbruna Stainless, Inc., by its counsel, Cole, Schotz, Meisel, Forman & Leonard, P.A., 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 12th day of July, 2011,

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, in the form previously provided to and consented to by counsel for each of the defendants; provided, however, that by consenting to the filings by the Subject Plaintiffs, defendants do not waive any defenses or rights they have, including defenses such as release, statute of limitations, laches, and the like, nor do defendants agree that any amendments "relate back" under Rule 4:9-3;

2) The Subject Plaintiffs shall provide Plaintiff Fact Sheets (or amended Plaintiff Fact Sheets, where applicable), including all required record authorizations, no later than July 31, 2011, it being understood that, notwithstanding Paragraph 2 to Exhibit 1 to Case Management Order No. 4 in this matter (February 15, 2011) to the contrary, a total of 50 new Plaintiff Fact Sheets (inclusive of any new Plaintiff Fact Sheets required by this Paragraph 2) shall be submitted by Plaintiffs no later than July 31, 2011;

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

4) Counsel for the Subject Plaintiffs shall serve a copy of this Order on counsel for defendants within 3 days of receipt thereof; and

5) Defendants shall have 45 days from the date of service of the Amended Complaints in which to answer or otherwise respond to the Amended Complaints by the Subject Plaintiffs pursuant to this Order.

HON. 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 Complaints and Demands for Jury Trial:

WEITZ & LUXENBERG, P.C. Attorneys for the Subject Plaintiffs By: _____ BERNARD WEINTRAUB Dated: July 11, 2011	MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP Attorneys for Defendant E.I. duPont de Nemours and Company By: _____ JOHN DWYER Dated: July 7, 2011
JEFFER, HOPKINSON & VOGEL Attorneys for Defendants Royle Systems Group, LLC and Alrabwah, Inc. By: _____ DAVID H. ALTMAN Dated: July 5, 2011	COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A. Attorneys for Defendant Valbruna Stainless, Inc. By: _____ GERARD M. GIORDANO Dated: July 8, 2011

Schedule

List of Actions

10552-10	Aburomi, Jamil v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10749-10	Alvarez, Brian, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10601-10	Black, Joseph v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10646-10	Brautigan, Carol, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10731-10	Coda, Richard, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10801-10	Cogura, Vojo, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
11172-10	Cortese, Debra, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10732-10	Curran, James, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
12339-10	Dnistran, John, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10578-10	Donahue, Michael v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10779-10	Donohue, John P., *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10733-10	Gambino, Leonard, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10652-10	Garbe, Michael, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10603-10	Gaveglio, Thomas v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.

10725-10	Gilgar, Anna Maria v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10567-10	Hannan, Margaret v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10769-10	Intintola, Joseph, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10625-10	Jaconetta, Barbara, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10662-10	Kuser, Karen, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10568-10	Lipsett, Carol Ann, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10722-10	Magee, Michael, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10724-10	Magliaro, Joseph, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; and Royle Systems Group, LLC
10712-10	Martino, Alessio v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10744-10	Mastrofilippo, Joseph, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; and Alrabwah, Inc.
10791-10	McDonald, Scott, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10657-10	Mertis, Thomas, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10670-10	Monico, Joseph, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10775-10	Morrell, Valerie v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10784-10	Palombi, Ann Marie v. E.I. DuPont DeNemours and Company, Inc.; and Royle Systems Group, LLC
10709-10	Roesch, David v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10705-10	Roesch, Jeffrey v. E.I. DuPont DeNemours and Company, Inc.; and Royle Systems Group, LLC
10583-10	Rubino, Diana v. E.I. DuPont DeNemours and Company, Inc.;

	Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10649-10	Shafer, David, *et al.* v. DuPont, *et al.*
10702-10	Sisco, Jo-Ann v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
12344-10	Stursberg, Edward L. v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10785-10	Toll, Daniel v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; and Alrabwah, Inc.
10606-10	Van Deursen, Craig, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc..
10776-10	Weiss, Carly, *et al.* v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.
10763-10	Westlin, June v. E.I. DuPont DeNemours and Company, Inc.; Royle Systems Group, LLC; Alrabwah, Inc.; and Valbruna Stainless, Inc.

PROPOSED "BI PLAINTIFF" DISCOVERY SCHEDULE

Date	Deadline
July 31, 2011	Plaintiffs provide Plaintiff Fact Sheets (or amended Plaintiff Fact Sheets, as applicable), including applicable authorizations for medical records for all personal injury plaintiffs.
September 30, 2011	Current deadline under Case Management Order #4 for plaintiffs to provide to defendants the last of completed Plaintiff Fact Sheets and applicable medical authorizations for all plaintiffs.
November 1, 2011	Deadline for plaintiffs to amend complaints as to any matters of which plaintiffs or their counsel are or should be aware, subject to their rights under applicable pleading rules.
December 15, 2011	Defendants complete discovery on the first 5 personal injury plaintiffs.
April 20, 2012	Defendants complete discovery on the remaining personal injury plaintiffs (for whom plaintiffs will provide completed PFSs by July 31, 2011).