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Attorneys for Plaintiffs in Actions Listed on the Schedule Attached Hereto

FILED
SEP 15 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 CERTAIN COMPLAINTS AND DEMANDS FOR JURY TRIAL

#13

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 15 day of September, 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 October 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 until November 21, 2011 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: September 6, 2011	MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP Attorneys for Defendant E.I. duPont de Nemours and Company By:_____ JOHN DWYER Dated: September ____, 2011
JEFFER, HOPKINSON & VOGEL Attorneys for Defendants Royle Systems Group, LLC and Alrabwah, Inc. By:_____ DAVID H. ALTMAN Dated: September____, 2011	COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A. Attorneys for Defendant Valbruna Stainless, Inc. By:_____ GERARD M. GIORDANO Dated: September ____, 2011

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: September ____, 2011	MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP Attorneys for Defendant E.I. duPont de Nemours and Company By:_____ JOHN DWYER Dated: September 6, 2011
JEFFER, HOPKINSON & VOGEL Attorneys for Defendants Royle Systems Group, LLC and Alrabwah, Inc. By:_____ DAVID H. ALTMAN Dated: September____, 2011	COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A. Attorneys for Defendant Valbruna Stainless, Inc. By:_____ GERARD M. GIORDANO Dated: September ____, 2011

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: September ____, 2011	MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP Attorneys for Defendant E.I. duPont de Nemours and Company By:_____ JOHN DWYER Dated: September ____, 2011
JEFFER, HOPKINSON & VOGEL Attorneys for Defendants Royle Systems Group, LLC and Alrabwah, Inc. By:_____ DAVID H. ALTMAN Dated: September 6, 2011	COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A. Attorneys for Defendant Valbruna Stainless, Inc. By:_____ GERARD M. GIORDANO Dated: September ____, 2011

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: September ____, 2011	MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP Attorneys for Defendant E.I. duPont de Nemours and Company By:_____ JOHN DWYER Dated: September ____, 2011
JEFFER, HOPKINSON & VOGEL Attorneys for Defendants Royle Systems Group, LLC and Alrabwah, Inc. By:_____ DAVID H. ALTMAN Dated: September____, 2011	COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A. Attorneys for Defendant Valbruna Stainless, Inc. By: Gerard M. Giordano GERARD M. GIORDANO Dated: September 6, 2011

Schedule

List of Actions

10801-10	Cogura, Vojo, *et al.* v. E.I. DuPont DeNemours and Company, Inc., *et al.*
10607-10	Oeler, Dieter, *et al.* v. E.I. DuPont DeNemours and Company, Inc., *et al.*
10596-10	Riti, Nina, *et al.* v. E.I. DuPont DeNemours and Company, Inc., *et al.*
10720-10	Tirch, John, *et al.* v. E.I. DuPont DeNemours and Company, Inc., *et al.*