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FILED
SEP 15 2011
BRIAN R. MARTINOTTI, J.S.C.

*Attorneys for Plaintiffs in Actions
Listed on the Schedule Attached Hereto*

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

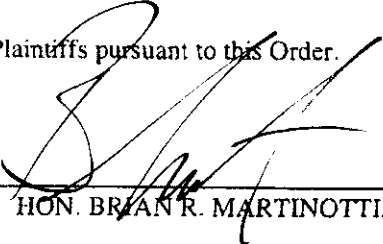
#13

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,

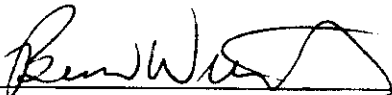
ORDERED that:

- 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:

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

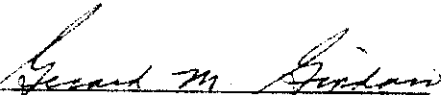
The undersigned hereby consent to the form, content, and entry of the within Consent Order for Leave to Amend Complaints and Demands for Jury Trial:

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

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:

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

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:

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

Schedule

List of Actions

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