

EXHIBIT S – STIPULATION OF VOLUNTARY DISMISSAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE [*MASTER DOCKET DESCRIPTION*]

**STIPULATION OF VOLUNTARY
DISMISSAL**

[*PRIMARY PLAINTIFF(S)*] and [*DERIVATIVE
PLAINTIFF(S)*],

21 MC 10_ (AKH)
__ Civ. ____ (AKH)

Plaintiff(s),

-against-

[*FIRST NAMED DEFENDANT*], et al.,

Defendant(s).

IT IS HEREBY STIPULATED AND AGREED by and between the parties that, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii):

1. The above-captioned action is voluntarily dismissed with prejudice;
2. All claims by Plaintiff(s) against all Defendant(s) or against any Defendant arising out of or relating in any way to World Trade Center-related rescue, recovery and/or debris-removal operations and/or clean-up at any location on and/or after September 11, 2001, are voluntarily dismissed with prejudice; and
3. The dismissal is without costs.

Dated: _____

Dated: _____

[*Counsel for Plaintiff(s)*]
[*Signature Block*]

[*Signature Blocks for All Defendants' Counsel*]