

**EXHIBIT T – STIPULATED ORDER OF DISMISSAL WITH PREJUDICE
PURSUANT TO FINAL SETTLEMENT AGREEMENT**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE [*MASTER DOCKET DESCRIPTION*]

**STIPULATED ORDER OF DISMISSAL
WITH PREJUDICE PURSUANT TO
FINAL SETTLEMENT AGREEMENT**

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

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

Plaintiff(s),

-against-

[*SETTLING DEFENDANTS*], et al.,

Defendant(s).

IT IS HEREBY STIPULATED AND AGREED by and between the Plaintiff(s) and [*List all settling defendants, including all Insureds listed on Exhibit A to the Final Settlement Agreement, or reference all such settling defendants on an appended list*] (“Settling Defendants”) that:

1. Plaintiff(s) and Settling Defendants have entered into a settlement agreement resolving all claims by Plaintiff(s) against Settling Defendants in the above-captioned action.

2. Plaintiff(s) has (have) executed releases and covenants not to sue in which Plaintiff(s) has (have) released the Settling Defendants and each of them from any and all obligations and liability to Plaintiff(s) for past, present, and future injuries 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. Accordingly,

Plaintiff(s)' claim(s) against the Settling Defendants and each of them shall be dismissed, and hereby is (are) dismissed, with prejudice;

3. Plaintiff(s) also has (have) executed before a notary public document(s) evidencing their understanding that they are foreclosed from suing the Settling Defendants or any of them in the future for currently unknown, future injuries 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, regardless of whether such currently unknown, future injuries arise out of or relate in any way to the injury(ies) Plaintiff has pleaded in this action. Such understanding shall be, and hereby is, judicially noticed.

Dated: _____

Dated: _____

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

[*Signature Blocks for Settling Defendants'*
Counsel]

SO ORDERED, this ____ day of _____, 201__.

ALVIN K. HELLERSTEIN
United States District Judge