

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

All Cases Noted on Attached Exhibit

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND [PROPOSED] ORDER
DISMISSING WITH PREJUDICE CLAIMS
PURSUANT TO NATIONAL SETTLEMENT AGREEMENTS**

IT IS HEREBY STIPULATED AND AGREED, by and between the Plaintiff Subdivisions identified in Appendix A (collectively, the “Dismissing Plaintiffs”) and Defendants _____ (collectively and together with their Released Entities, the “_____ Defendants”¹) that, pursuant to the election of each Dismissing Plaintiff to participate in the _____ Settlement Agreement, which was announced on _____, 2022 and is now binding on the Dismissing Plaintiffs and the _____ Defendants, (a copy of which is attached as Appendix B), all claims of each Dismissing Plaintiff against any _____ Defendant, including any entity identified on the attached Appendix C, are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs. The Court shall retain jurisdiction with respect to the Janssen Settlement Agreement to the extent provided under that Agreement.

¹ The Released Entities are each and every entity of any of the _____ Defendants that is a “Released Entity” as set forth in Section ____ and Exhibit ____ of the _____ Settlement Agreement, a copy of which is attached as Appendix B. Appendix C, also attached hereto, represents a good faith effort by the _____ Defendants to list all Released Entities that may be individually named in any of the Dismissing Plaintiffs’ complaints. Appendix C is not intended to limit the scope of Released Entities, and to the extent that Dismissing Plaintiffs or _____ Defendants subsequently identify any Released Entity that should have been included on Appendix C, they will inform the Clerk of the Court.

January 25, 2023

Respectfully submitted,

Agreed as to form and substance:

SO ORDERED this __ day of _____, 2023.

Hon. Dan Aaron Polster
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.