

**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 A

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

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

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, the “Dismissing Plaintiffs”) and Defendants _____ (“_____”) ¹ that, pursuant to the election of each Dismissing Plaintiff to participate in the _____, which is dated _____, and is binding on the Dismissing Plaintiffs and _____, and which has an Effective Date of _____ (a copy of which is attached as Appendix B), all claims of each Dismissing Plaintiff against _____, 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 _____ to the extent provided under that Agreement. ²

Dated: _____

Respectfully submitted,

Agreed as to form and substance:

¹ The Released Entities are set forth in Section _____ and Exhibit _____ of the _____, dated as of _____, a copy of which is attached as Appendix B.

² To the extent any Plaintiff Subdivision is inadvertently included on Appendix A, the Court retains jurisdiction to hear those disputes. In advance of raising any such issue with the Court, the Plaintiff Subdivision must meet and confer with defense counsel and Plaintiffs’ Liaison Counsel.