

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

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| <p>IN RE: AQUEOUS FILM-FORMING FOAMS PRODUCTS LIABILITY LITIGATION</p> | <p style="text-align:center">MDL No. 2:18-mn-2873-RMG</p> <p style="text-align:center">This Document relates to <i>Campbell v. Tyco Fire Products LP et al.</i>, No. 2:19-cv-00422-RMG</p> |
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STIPULATION REGARDING TIMELINE FOR PROPOSED SETTLEMENT

WHEREAS, by order dated January 25, 2021 (“Preliminary Approval Order”), this Court granted preliminary approval of the proposed class action settlement between the Parties;

WHEREAS, the Court also adopted and approved the Parties’ Proposed Timeline (Dkt. No. 1087-4) and Stipulation Regarding Timeline For Proposed Settlement (Dkt. No. 1188);

WHEREAS, the Parties now enter this Second Stipulation Regarding Timeline for Proposed Settlement to extend the deadline for Class Counsel to submit an application for fees and expenses as follows¹:

| Date/Deadline | Event |
|--------------------------------|---|
| January 25, 2021 | Entry of Preliminary Approval Order. |
| On or before February 15, 2021 | Deadline for Class Counsel to begin Class Notice. |
| March 9, 2021 | Deadline for Class Counsel to submit application for fees and expenses. |
| March 29, 2021 | Deadline for any Class Member to object to Settlement. |

¹ All capitalized terms below have the same meaning set forth in the Settlement Agreement that the Court has preliminarily approved.

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| March 29, 2021 | Deadline for any Class Member to opt out from Settlement. |
| April 8, 2021 | Class Counsel notifies Defendants and Court of all opt-outs and provides copies of notices of opt-out (“Opt Out Notice Package”). |
| 7 days after Court ruling on individual Class Members’ objections to the Settlement | Deadline for those Class Member(s) who filed the at-issue objection(s) to opt out from Settlement. |
| 14 days after Court ruling on any objections to the Settlement | Class Counsel notifies Defendants and Court with updated list of opt-outs and updated Opt Out Notice Package. |
| 15 business days after Defendants receipt of initial and/or updated Opt Out Notice Package | Deadline for Defendants to terminate Settlement based on Section 3.5 of Agreement (opt-out percentages). ² |
| 21 days prior to Fairness Hearing | Deadline for Class Counsel to file motion for approval of fees and expenses. |
| 21 days prior to Fairness Hearing | Class Counsel files unopposed motion seeking Final Approval Order. |
| 7 days prior to Fairness Hearing | Deadline for any objections to Class Counsel motion for approval of fees and expenses. |
| May 24, 2021 | Fairness Hearing. |
| [TBD] | Final Approval Order entered. ³ |
| [TBD] | Effective Date under Agreement. |
| 10 days after deadline to appeal Final Approval Order (10 days after Effective Date) | Payment of fees and expenses awarded to Class Counsel, minus any common benefit holdback. |

AND IT IS SO ORDERED.

s/ Richard Mark Gergel
Richard Mark Gergel
United States District Judge

February 23, 2021
Charleston, South Carolina

² Defendants may also terminate the Settlement within fifteen (15) business days of a Defendant’s receipt of written notice of objection or required material modification from any federal or state authority.

³ If any appeal of the Final Approval Order is filed, all deadlines triggered after the date of the Final Approval Order shall resume fourteen (14) days after such appeal is decided.

Dated: February 23, 2021

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