

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03 MDL 1570 (GBD)
ECF Case

This document relates to:

All Cases

It is HEREBY STIPULATED AND AGREED by and between Plaintiffs and Defendants Sana-Bell, Inc. and Sanabel Al Kheer, Inc. by and through their respective undersigned counsel, that:

1. Sanabel Al Kheer, Inc. (a Virginia non-profit organization) and Sana-Bell, Inc. (which Sana-Bell, Inc. and Sanabel Al Kheer, Inc. allege is a dissolved District of Columbia non-profit organization) acknowledge that they have been properly named as defendants in all of the actions in which they are specifically named or they are named as an "AKA"
2. Sana-Bell, Inc. and Sanabel Al Kheer, Inc. acknowledge that they have been properly served by Plaintiffs in all actions in which they have been named as Defendants.
3. Defendants, Sana-Bell, Inc. and Sanabel Al Kheer, Inc. will execute a waiver of service of summons thereby waiving all affirmative defenses, objections and arguments relating to service of process during the course of this litigation for actions in which they are currently specifically named or they are named as an "AKA."
4. Plaintiffs will identify the operative pleadings as to Defendants Sana-Bell, Inc. and Sanabel Al Kheer, Inc. on or before August 20, 2010.

5. Defendant Sana-Bell, Inc. will answer by September 15, 2010, and Sanabel Al Kheer, Inc. will answer such Amended Complaints within 30 days of a ruling on its pending motion to dismiss.

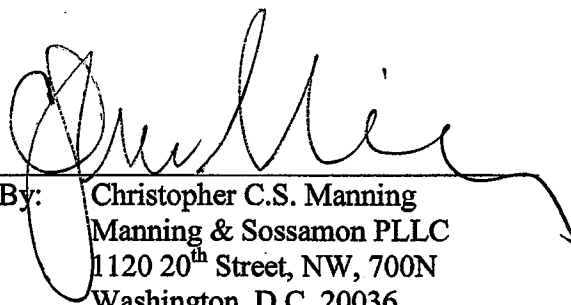
6. Nothing in the Stipulation shall be construed as a waiver of any argument that Sana-Bell, Inc. and Sanabel Al Kheer, Inc. are agents or alter-egos of any other entity, or that the activities of Sana-Bell, Inc. and Sanabel Al Kheer, Inc. are attributable to any other entity for any purpose nor will this Stipulation waive any defense related thereto.

7. Nothing in the Stipulation shall be construed to waive any default or default judgment previously entered as to Sanabil Al-Khair, an entity based on the Kingdom of Saudi Arabia.

Dated: August 16, 2010



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On behalf of the Plaintiffs Executive Committee

*On behalf of Defendants
Sana-Bell, Inc. and Sanabel Al Kheer, Inc.*

So Ordered

S.D.N.Y.