

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ROBERT J. LONGO, :

Plaintiff, :

- against - :

ALLEN B. GOTTLIEB, ALLEN B. :
GOTTLIEB, P.C., KENNETH R. LAGONIA, :
AMERICREDIT INTERNATIONAL LIMITED, :
MICHAEL KONDRATIEV-KEIGH, KEIGH & :
ASSOCIATES, AND ROBERT BARDEY :

Defendants. :

-----x
ALLEN B. GOTTLIEB, ALLEN :
B. GOTTLIEB, P.C., KENNETH R. :
LAGONIA, and AMERICREDIT :
INTERNATIONAL LIMITED, :

Third-Party Plaintiffs, :

- against - :

ROBERT J. LONGO, WILLIAM A. :
FELDMAN, and W.G. "WALLY" :
STEWART, :

Third-Party Defendants. :
-----x

Index No. 94 Civ. 3034
(LAP)

STIPULATION AND
ORDER DISMISSING
THE ACTIONS

WHEREAS, plaintiff Robert J. Longo ("Longo") by his Amended
Complaint, dated August 26, 1994, (the "Action") has asserted
certain claims against the defendants Allen B. Gottlieb, Allen B.
Gottlieb, P.C., Kenneth R. Lagonia, and AmeriCredit International
Limited (collectively, the "Gottlieb-Lagonia defendants"); and

WHEREAS, the Gottlieb-Lagonia defendants, by their
Counterclaim and Third Party Complaint, dated January 25, 1995,
asserted certain claims against plaintiff Longo and against third

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party defendants William A. Feldman ("Feldman") and W.G. "Wally" Stewart ("Stewart") (collectively, the "Third Party Action"); and

WHEREAS, by Stipulation and Order of this Court dated June 3, 1994, the sum of one million two hundred seventy five thousand dollars (\$1,275,000.00) was deposited by the Gottlieb-Lagonia defendants into a Trust Account, no. 46810148, at Citibank, N.A., ("the Citibank Trust Account"), whereby such Citibank Trust Account funds plus interest accruing thereon were restrained to secure any judgment obtained by the plaintiff Longo against the Gottlieb-Lagonia defendants or any of them; and

WHEREAS, plaintiff Longo, third party defendant Feldman and the Gottlieb-Lagonia defendants desire to settle and resolve their respective claims against one another; and

WHEREAS, neither plaintiff Longo and third party defendant Feldman, nor the Gottlieb-Lagonia defendants, admits any fault or liability relating to any allegations contained in the Action or the Third Party Action, respectively; and

WHEREAS, the plaintiff Longo, third party defendant Feldman and the Gottlieb-Lagonia defendants have entered into a separate settlement agreement pursuant to which (a) the plaintiff Longo agreed to discontinue, with prejudice and without costs, the action against the defendants Allen B. Gottlieb, Allen B. Gottlieb, P.C., Kenneth R. Lagonia and AmeriCredit International Limited, and (b)

counter-claimant and third party plaintiffs Allen B. Gottlieb, Allen B. Gottlieb, P.C., Kenneth R. Lagonia, and AmeriCredit International Limited agreed to discontinue, with prejudice and without costs, the Third Party Action and Counterclaims against third party defendants Robert J. Longo, William A. Feldman and W.G. "Wally" Stewart; it is hereby

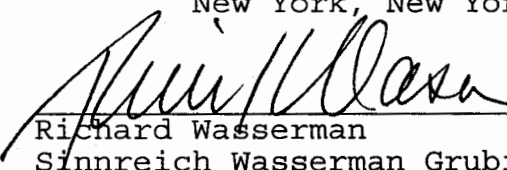
ORDERED that Citibank, N.A. shall release the funds in the Citibank Trust Account, (Trust Account No. 46810148), pursuant to written directions which will be given to Citibank and which must be signed by both (a) Richard Wasserman, Esq., attorney for the plaintiff Robert J. Longo and Third Party Defendant William A. Feldman and (b) Susan R. Necheles, Esq., attorney for the Gottlieb-Lagonia defendants; and it is further

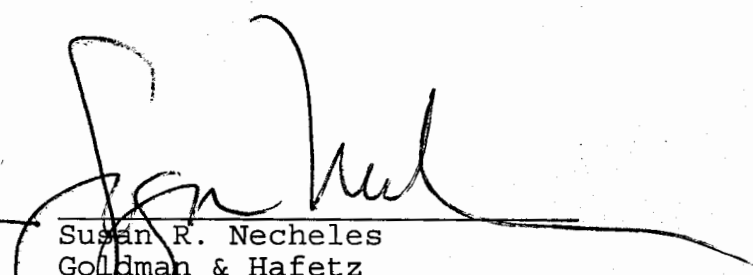
ORDERED that, upon release of the Citibank Trust Account funds, (a) the Action against the defendants Allen B. Gottlieb, Allen B. Gottlieb, P.C., Kenneth R. Lagonia and AmeriCredit International Limited is dismissed with prejudice and without costs and (b) the Third Party Action and Counterclaims against Third Party Defendants Robert J. Longo, William A. Feldman and W.G. "Wally" Stewart are dismissed with prejudice and without costs; and it is further

ORDERED that the terms of this settlement, at the request of the parties, will be held confidential and that each of the parties, their principals and employees, and their attorneys are

bound not to disclose the terms of the settlement to any third party unless required to do so pursuant to a subpoena and defendants are given 10 days notice by plaintiff, or ordered by a court of competent jurisdiction.

Dated: July 7, 1995
New York, New York


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Longo and Third-Party
Defendant Feldman
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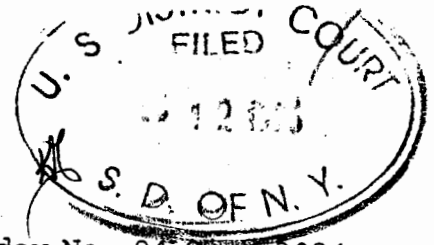
So Ordered:


Loretta A. Preska U.S.D.J.

July 26, 1995

Case closed

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



ROBERT J. LONGO,

Plaintiff,

- against -

ALLEN B. GOTTLIEB, ALLEN B.
GOTTLIEB, P.C., KENNETH R. LAGONIA,
AMERICREDIT INTERNATIONAL LIMITED,
MICHAEL KONDRATIEV-KEIGH, KEIGH &
ASSOCIATES, AND ROBERT BARDEY

Defendants.

Index No. 94 CIV. 3034
(LAP)

STIPULATION OF
DISMISSAL

IT IS HEREBY STIPULATED, by and between the Attorneys for the undersigned parties, that whereas the undersigned parties are the only parties remaining in the litigation that have appeared, the above entitled action be, and hereby is, dismissed, with prejudice and without costs.

Dated: New York, New York
~~November~~ ^{December} 6, 1996

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December 10, 1996

2058-00\STIP.end

The Clerk of the Court shall mark this action closed
So ordered
Loretta A. Preslia
USOJ