

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
CIVIL DIVISION

Civil Division

Case No. GD _____

Plaintiff(s)

Vs.

Defendant(s)

STIPULATION OF COUNSEL

AND NOW, this _____ day of _____, 20____, the undersigned counsel for the parties hereby STIPULATE as follows:

The parties hereby STIPULATE that any and all allegations of recklessness including but not limited to allegations of recklessness in Paragraphs ____ of the Plaintiff's Complaint are hereby STRICKEN from the Complaint without prejudice to Plaintiff to reassert said allegations of recklessness should discovery reveal facts to support said allegations of recklessness. Should the Plaintiff seek to reassert allegations of recklessness pursuant hereto, the Plaintiff may do so by way of motion with proper notice to the Defendant's attorneys while the above captioned case is pending. Defendant agrees to waive any Statute of Limitations defense regarding any attempt by the Plaintiff to reassert allegations of recklessness that have been dismissed by Stipulation but retains all other applicable defenses available.

Counsel for Plaintiff

Counsel for Defendant

BY THE COURT:

J.