

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

IN RE: NEW YORK COUNTY
ASBESTOS LITIGATION

This Document Relates to:

[JOHN DOE]

NYCAL
I.A.S. Part 30
(Heitler, J.)

Index No: [000000/00]

**NO OPPOSITION SUMMARY
JUDGMENT MOTION AND ORDER**

WHEREFORE, defendant [ABC Corporation] hereby requests summary judgment in the above-entitled case, pursuant to Civil Practice Law and Rules Section 3212, dismissing plaintiff's complaint against defendant [ABC Corporation] with prejudice, and there being no opposition thereto,

ORDERED, that upon notice to all co-defendants, all claims and cross claims against defendant [ABC Corporation] be and the same are hereby dismissed with prejudice and without costs.

Dated: New York, New York

[date]

Charles Ferguson, Esq.
WEITZ & LUXENBERG, P.C.
Attorneys for Plaintiff
700 Broadway
New York, NY 10038
(212) 558-5500

Craig Blau, Esq.
DARGER ERRANTE YAVITZ & BLAU LLP
Attorneys for [ABC Corporation]
116 East 27th Street, 12th Floor
New York, NY 10016
(212) 452-5300

SO ORDERED,

Hon. Sherry K. Heitler