

grounds of the attorney-client privilege, work product doctrine or other immunities, or (b) to require a party to conduct such a review.

4. Nothing contained herein is intended to extend protection to documents and information for which any applicable privilege or protection has been waived by means other than production or disclosure in the Actions.

5. This Stipulation also is not intended to limit any party's right to challenge any review of Privileged Material by another party or its counsel, whether such review occurred prior to or subsequent to the entry of this Stipulation and Order.

6. Any party or counsel receiving Privileged Material that has been produced (whether inadvertently or otherwise) shall, upon request of the producing party or the producing party's counsel, promptly return all copies of such material in his, her or its possession, delete any versions thereof on any database the party receiving the Privileged Material maintains, and make no use of such material; *provided, however*, that the party or counsel returning such material shall have the right to apply to the Court for an order that such material was not protected (prior to the disclosure) by any privilege or doctrine. The failure of a producing party to demand the return of Privileged Material that has been produced shall not constitute a waiver of, or otherwise vitiate, any privilege or protection applicable to such Privileged Material or any of the producing party's rights under this Order.

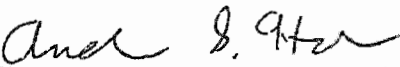
7. This Order may be executed in any number of counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

8. This Order may be executed by facsimile or by electronic Portable Document Format ("PDF"). A facsimile or electronic signature shall be deemed an original signature for purposes of this Order.

9. This Court shall retain jurisdiction over all persons subject to this Order to the extent necessary to enforce any obligations arising hereunder or to impose sanctions for any contempt thereof.

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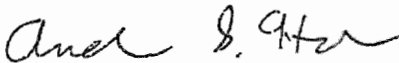
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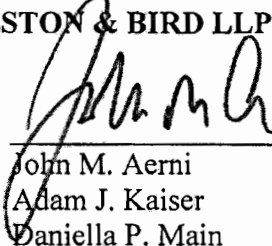
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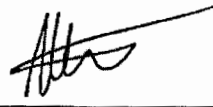
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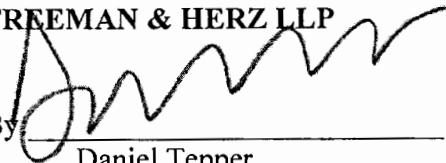
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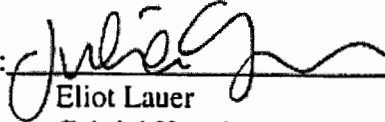
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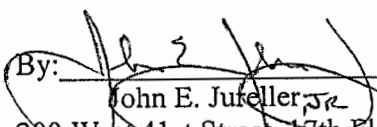
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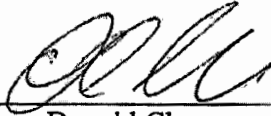
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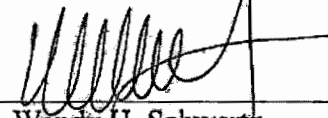
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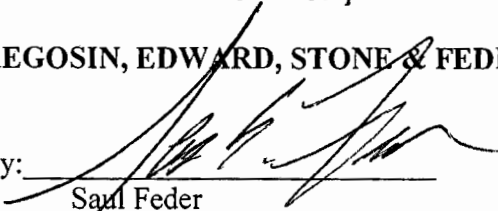
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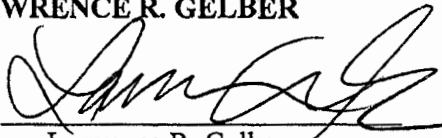
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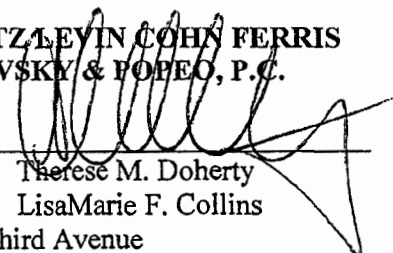
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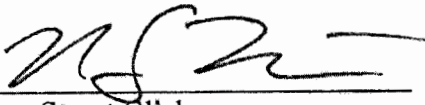
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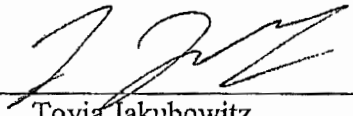
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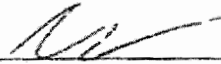
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****Subject to Defendants' preservation of, and without waiver of, any rights to object to the propriety of the foregoing trusts as identified and pled in the Complaint****

Dated: New York, New York
May 2, 2019

SO ORDERED:



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