

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

_____)
IN RE URETHANE ANTITRUST LITIGATION)
_____)
THIS DOCUMENT RELATES TO:)
POLYETHER POLYOL CASES)
_____)

Case No. 04-md-1616-JWL-JPO

**UNOPPOSED MOTION BY THE DOW CHEMICAL COMPANY
FOR ENTRY OF STIPULATED STAY ORDER**

Pursuant to Fed. R. Civ. P. 62(b)(3) and the agreement reached by the parties, The Dow Chemical Company moves the Court to enter the attached proposed order staying any execution on the judgment (Dkt. 2880) until at least 14 days after the later of the Court’s ruling on (a) plaintiffs’ motion to amend the judgment (Dkt. 2885) or (b) Dow’s motion for a stay of execution (Dkt. 2887). The parties have stipulated to the language of the proposed order.

This motion does not replace or limit Dow’s pending request for a stay of execution throughout the post-trial and any appellate process, or its right to make any request for a stay in the future. Nor does it limit Dow’s right to make its own motion to amend the judgment and any related motion for stay. Rather, Dow makes this request to ensure that the stay currently in place due to Rule 62(a) continues without interruption until the motions referenced in the first paragraph above are resolved, and arrangements are finalized by agreement, order or otherwise for a stay through the duration of the post-trial and any appellate review process.

Respectfully submitted,

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Certificate of Service

On May 29, 2013, I caused a copy of this document to be filed with the Court through the ECF system, which provides electronic service of the filing to all counsel of record who have registered for ECF notification in this matter.

s/ Brian R. Markley

Attorney for The Dow Chemical Company