

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

WENDY CAMLIN,

Plaintiff,

v.

THE OFFICE OF THE COMMISSIONER OF
BASEBALL, d/b/a MAJOR LEAGUE
BASEBALL, PITTSBURGH ASSOCIATES,
LP, d/b/a THE PITTSBURGH PIRATES;
SPORTS & EXHIBITION AUTHORITY OF
PITTSBURGH AND ALLEGHENY
COUNTY,

Defendants,

v.

PROMATS ATHLETICS, LLC

Additional Defendant.

CIVIL DIVISION

No. GD-16-3545

Code:

**STIPULATION FOR VOLUNTARY
DISCONTINUANCE AS TO LESS THAN
ALL DEFENDANTS AND TO MODIFY
CASE CAPTION**

Filed on behalf of Plaintiff:
WENDY CAMLIN

Counsel of Record for
This Party:

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DEPT OF COURT RECORDS
CIVIL/FAMILY DIVISION
ALLEGHENY COUNTY PA

18 AUG 24 AM 9:50

FILED

JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

WENDY CAMLIN,)	CIVIL DIVISION
)	
Plaintiff,)	No. GD-16-3545
)	
v.)	
)	
THE OFFICE OF THE COMMISSIONER OF)	
BASEBALL, d/b/a MAJOR LEAGUE)	
BASEBALL, PITTSBURGH ASSOCIATES,)	
LP, d/b/a THE PITTSBURGH PIRATES;)	
SPORTS & EXHIBITION AUTHORITY OF)	
PITTSBURGH AND ALLEGHENY)	
COUNTY,)	
)	
Defendants,)	
)	
v.)	
)	
PROMATS ATHLETICS, LLC)	
)	
Additional Defendant)	

STIPULATION FOR VOLUNTARY DISCONTINUANCE AS TO LESS THAN ALL DEFENDANTS AND TO MODIFY CASE CAPTION

AND NOW, come all parties, by and through their undersigned counsel of record, and hereby file this Stipulation for Voluntary Discontinuance as to Less Than All Defendants and to Modify Case Caption as follows:

1. Defendant, The Pittsburgh Associates LP d/b/a The Pittsburgh Pirates stipulate that it shall not contend at trial, nor introduce evidence at trial, or argue in any potential dispositive motion, and hereby waives any and all affirmative defenses that Original Defendant, The Office of the Commissioner of Baseball d/b/a Major League Baseball was responsible for

the design, installation, maintenance, and/or testing for efficacy of the backstop netting present behind home plate at PNC Park on the date of plaintiff's incident, on or about April 20, 2015.

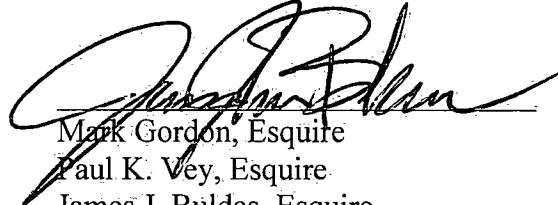
2. Additional Defendant, Promats Athletics hereby consents and also stipulates that it shall not contend at trial, nor introduce evidence at trial, or argue in any potential dispositive motion, and hereby waives any and all affirmative defenses that Original Defendant, The Office of the Commissioner of Baseball d/b/a Major League Baseball was responsible for the design, installation, maintenance, and/or testing for efficacy of the backstop netting present behind home plate at PNC Park on the date of plaintiff's incident, on or about April 20, 2015.

3. Pursuant to Pa.R.C.P. 229, the parties hereby stipulate and agree that based on the agreement set forth above Original Defendant, The Office of the Commissioner of Baseball d/b/a Major League Baseball shall be voluntarily dismissed, with prejudice, as to all claims asserted in this matter. Furthermore, all claims of The Office of the Commissioner of Baseball d/b/a Major League also shall be voluntarily dismissed, with prejudice.

4. The parties also hereby stipulate that the case caption shall be modified to reflect the dismissal of the above identified original defendant.

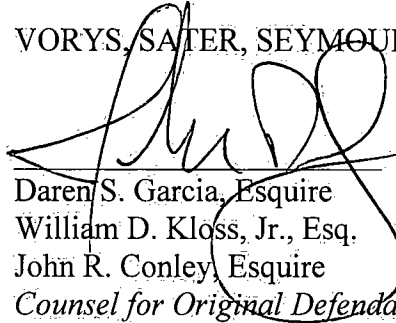
WHEREFORE, the parties hereby move this Honorable Court to grant their Joint Stipulation and to discontinue this matter, with prejudice, as to Original Defendant, The Office of the Commissioner of Baseball d/b/a Major League Baseball.

PIETRAGALLO GORDON ALFANO BOSICK RASPANTI,
LLP & RASPANTI, LLP



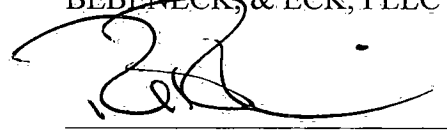
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