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OF COUNSEL  
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April 18, 2000

Kenneth T. Wasserman, Esq.  
350 Fifth Avenue -- Suite 4810  
New York, New York 10118-0110

Re: Danger v. Combier

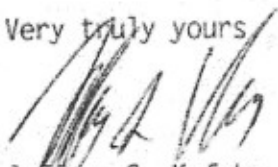
Dear Ken:

In accord with your letter of yesterday, enclosed please find two copies of the stipulation counter-executed by me.

As previously discussed, we expect service of Ms. Danger's reply to follow receipt of this letter, and as a reminder, your client's discovery responses in both this action and in the estate matter are due.

Lastly, should you have any documentation regarding the transfer of this matter to Surrogate's Court and/or the Surrogate's Court's receipt of the file, please provide me with a copy of the same.

Very truly yours

  
Jeffrey S. Kofsky

JSK/tbm  
Enclosures  
cc: Ms. Elizabeth Combier

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

-----x  
JULIA DANGER,

Plaintiff,

Index No. 606259/98

-against-

**STIPULATION**

ELIZABETH COMBIER,


Defendant.  
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**IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned attorneys for all interested parties herein that:


- 1) defendant Elizabeth Combiere hereby waives her right to assert as a defense, or to raise in any form, the allegation that Bankers Trust Company should be named as a party to this action; and
- 2) nothing herein shall be deemed to have waived any defense, offset or counterclaim which Bankers Trust Company may have had and which may be asserted derivatively by defendant, other than relating to the failure to be named as a party; and
- 3) Bankers Trust Company shall not be deemed a third-party beneficiary of this stipulation between the parties to this action.
- 4) This stipulation is entered into for the purpose of inducing plaintiff Julia Danger to refrain from adding Bankers Trust as a party defendant, which act is believed by both parties to result in needless additional cost to each of them.

Dated: New York, New York  
April 14, 2000

**LAW OFFICES OF KENNETH T. WASSERMAN**  
Attorneys for Plaintiff Julia Danger

By:   
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