

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: DOMESTIC DRYWALL
ANTITRUST LITIGATION

MDL NO. 2437
13-MD-2437

THIS ACTION RELATES TO:
ALL ACTIONS

**STIPULATION TO AMEND PRESERVATION ORDER TO ACCOMMODATE
TRANSFER OF TIN INC. DOCUMENTS AND DATA TO GEORGIA-PACIFIC LLC AS
PART OF SALE OF TIN GYPSUM BUSINESS ASSETS**

WHEREAS, on January 9, 2013, the Court entered an Order Setting Initial Conference ("January 9 Order"), which provided, among other things:

Preservation of Records. Each party shall preserve all documents and other records containing information potentially relevant to the subject matter of this litigation, and shall document their activities in this regard for possible production during discovery, or for the benefit of the court. Each party shall also preserve any physical evidence and shall not conduct any testing that alters physical evidence that may be useful in these cases.

WHEREAS, defendants TIN Inc. ("TIN") and Georgia-Pacific LLC ("GP") announced in December 2012 that TIN would be selling certain of its assets relating to its building products group (including the assets relating to its gypsum business) to GP (the "Sale Transaction") and TIN will no longer be in the gypsum board business after the closing of the Sale Transaction;

WHEREAS, TIN desires to have the Court's preservation order amended to make clear that the order does not prevent TIN from transferring documents and data to GP as part of the Sale Transaction; and

WHEREAS, TIN has notified Co-Lead Counsel for Direct Purchaser Plaintiffs and Co-Lead Counsel for Indirect Purchaser Plaintiffs of the preservation plan described below and Plaintiffs' Counsel have no objection to it;

NOW, THEREFORE, Direct Purchaser Plaintiffs, Indirect Purchaser Plaintiffs, TIN and GP agree as follows and ask the Court to enter an order reflecting the following:

1. As part of the Sale Transaction, TIN has undertaken or will undertake to image, copy or create a back-up of certain documents and data related to the TIN gypsum business for preservation purposes. This preservation shall satisfy TIN's preservation obligations as to those documents, data and other records being transferred to GP.

2. The fact that TIN has preserved these documents and data shall not be treated as an admission or agreement by TIN that the documents and data are relevant, potentially relevant or discoverable in the litigation. Nor shall the fact that TIN has captured the documents from a particular employee be treated as an admission or agreement by TIN that the person is an appropriate custodian for document production purposes. TIN and GP reserve all their rights and objections as to any request for production of these documents and data, including all objections as to relevance, discoverability, burden, cost and the appropriateness of cost shifting to the party requesting the documents or data.

3. The January 9 Order should be amended as follows: "The transfer of gypsum business assets by defendant TIN Inc. to defendant Georgia-Pacific LLC in connection with the

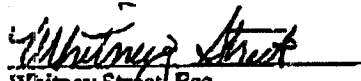
publicly announced transaction between those entities is not a violation of the preservation requirements under this Court's January 9, 2013 Order. This amendment to the January 9 Order only addresses those documents and data that TIN is transferring to GP in connection with the Sale Transaction. The preservation provisions of the January 9 Order remain applicable to potentially relevant documents and data that TIN is not transferring to GP."

AGREED TO THIS 12th DAY OF June, 2013



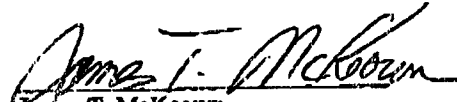
H. Laddie Montague, Jr.
BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, PA 19103
Tel: (215) 875-3000
Email: hlmontague@bm.net

Co-lead Counsel for Direct Purchaser Plaintiffs



Whitney Street, Esq.
Block & Leviton LLP
155 Federal Street, Suite 1303
Boston, MA 02110
T. 617.398.5600
Email: whitney@blockesq.com

Co-Lead Counsel for Indirect Purchaser Plaintiffs



James T. McKeown
Foley & Lardner LLP
777 East Wisconsin Avenue
Milwaukee, WI 53202
Telephone: (414) 297-5530
E-mail: jmckeown@foley.com
Attorney for Defendant TIN INC.



David Debold
Gibson, Dunn & Crutcher LLP
1050 Connecticut Ave. N.W.
Washington, D.C. 20036
Telephone: (202) 955-8551
E-mail: ddebold@gibsondunn.com
Attorney for Defendant Georgia-Pacific LLC

