

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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S.W., by and through his guardian, RENEE
MARQUIS-ABRAMS; T.G., and J.L., by and through
their next friend, MILDRED DEL GROSSO; S.B. and
R.E. by and through their guardian, PATRICIA
BALDWIN; L.J. and J.G., by and through their
guardian, KEVIN HENDRICKSON; J.B., C.B., and
T.L.,

Plaintiffs,

- against -

CITY OF NEW YORK, ADMINISTRATION FOR
CHILDREN'S SERVICES, f/k/a CHILD WELFARE
ADMINISTRATION; ST. JOSEPH SERVICES FOR
CHILDREN, INC. f/k/a CATHOLIC CHILD CARE
SOCIETY OF THE DIOCESE OF BROOKLYN, INC.,
a New York corporation; HEARTSHARE HUMAN
SERVICES, f/k/a CATHOLIC GUARDIAN SOCIETY
OF THE DIOCESE OF BROOKLYN, INC., a New
York corporation; SCO FAMILY OF SERVICES, f/k/a
ST. CHRISTOPHER-OTTILIE, A New York
corporation,

Defendants.

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CITY OF NEW YORK, ADMINISTRATION FOR
CHILDREN'S SERVICES,

Third-Party Plaintiffs,

- against -

JUDITH LEEKIN, DESMOND LEEKIN,
ANTHONY VERNON LEEKIN, CAROL LEEKIN,
ISHMATTIE NAGASSAR/ASMAN, ANITA
LEZAME, DR. RALPH SQUITTERI, RHONDA
MORGAN, EDWIN GOULD SERVICES FOR
CHILDREN, SABRINA COLLINS, LYSTRA
LEWIS, MIA KARENGA, CHERYL JACK,
CLAUDETTE JACKSON, THELMA BOWES, and
VONTRELL LEEKIN,

Third-Party Defendants.

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WHEREAS, plaintiffs commenced this action by filing a complaint on April 29, 2009,
against defendants CITY OF NEW YORK, ADMINISTRATION FOR CHILDREN'S

Docket No.: 09-CV-1777

**STIPULATION AND ORDER OF
DISCONTINUANCE**

SERVICES, f/k/a CHILD WELFARE ADMINISTRATION (“City Defendants); ST. JOSEPH SERVICES FOR CHILDREN, INC. f/k/a CATHOLIC CHILD CARE SOCIETY OF THE DIOCESE OF BROOKLYN, INC., a New York corporation; HEARTSHARE HUMAN SERVICES, f/k/a CATHOLIC GUARDIAN SOCIETY OF THE DIOCESE OF BROOKLYN, INC., a New York corporation; SCO FAMILY OF SERVICES, f/k/a ST. CHRISTOPHER-OTTILIE (“Agency Defendants”), making certain allegations of liability; and,

WHEREAS, the City Defendants and Agency Defendants have denied any and all liability arising out of plaintiffs' allegations; and,

WHEREAS, the City Defendants filed a Third-Party Complaint on September 15, 2009 against, *inter alia*, RALPH SQUITTERI, a/k/a RALPH SQUITIERI (“Squitieri”) for contribution and indemnification; and,

WHEREAS, the Agency Defendants filed a Third-Party Complaint on January 7, 2010 against, *inter alia*, Squitieri for contribution and indemnification; and

WHEREAS, City Defendants and Third-Party Defendant Squitieri now desire to resolve all issues raised between them in this litigation, without further proceedings and without admitting fault or liability; and,

WHEREAS, Agency Defendants and Third-Party Defendant Squitieri now desire to resolve all issues raised between them in this litigation, without further proceedings and without admitting fault or liability; and,

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, as follows:

1. The above-captioned action is hereby dismissed against Third-Party Defendant Squitieri with prejudice, and without costs, expenses, or fees.

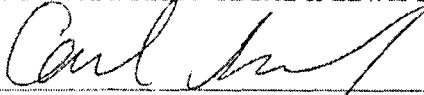
2. City Defendants and Agency Defendants agree to dismissal with prejudice of all the claims against Third-Party Defendant Squitieri, and to release all Squitieri's successors and/or assigns, and all of Squitieri's present or former representatives, or agents (collectively the "Released Parties") and do release them from any and all liability, claims, or rights or causes of action which could have been asserted by or on behalf of City Defendants or Agency Defendants against any of the Released Parties based on any act, omission, event or occurrence from the beginning of the world up to and including the date hereof, without limitation, arising out of or relating to the events contained in the Complaint or Third-Party Complaint in this action and arising from any incidents mentioned therein, including, but not limited to, any and all claims relating to the placement, foster care, adoption, or medical services, as well as all claims for costs, expenses, interest and/or attorneys' fees.

3. This Court retains jurisdiction for the purposes of enforcing this Stipulation and Order.

4. This Stipulation and Order contains all the terms and conditions agreed upon by the parties hereto and no oral agreement entered into at any time nor any written agreement entered into prior to the execution of this Stipulation and Order regarding the subject matter of the instant proceeding shall be deemed to exist, or to bind the parties hereto, or to vary the terms and conditions contained herein.

Dated: New York, New York
September 14, 2010

SCHNADER HARRISON SEGAL & LEWIS LLP

By: 
Carl J. Schaerf, Esq. (CS-5031)

Attorneys for Defendants/Third-Party Plaintiffs
CITY OF NEW YORK and ADMINISTRATION FOR
CHILDREN'S SERVICES, f/k/a CHILD WELFARE
ADMINISTRATION
140 Broadway, Suite 3100
New York, NY 10005
(212) 973-8000

Dated: New York, New York
September , 2010


CONWAY-FARRELL CURTIN & KELLY, P.C.

By: 
Robert Delmond, Esq.

Attorneys for Defendants
ST. JOSEPH SERVICES FOR CHILDREN, INC. f/k/a
CATHOLIC CHILD CARE SOCIETY OF THE DIOCESE
OF BROOKLYN, INC., a New York corporation;
HEARTSHARE HUMAN SERVICES, f/k/a CATHOLIC
GUARDIAN SOCIETY OF THE DIOCESE OF
BROOKLYN, INC., a New York corporation; SCO FAMILY
OF SERVICES, f/k/a ST. CHRISTOPHER-OTILIE, a New
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48 Wall Street, 20th Fl.
New York, NY 10005
(212) 785-2929

Dated: New York, New York
September , 2010

RALPH SQUITTERI, A/K/A
RALPH SQUITIERI

By: 
Charles Kutner, Esq.

LAW OFFICES OF CHARLES E. KUTNER LLP
Attorney for Third-Party Defendant
DR. RALPH SQUITTERI
110 E. 59th Street, 25th Floor
New York, NY 10022

SO ORDERED: /

OCT 7 2010

U.S.Ds/ENV