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WILLIAM T. WALSH
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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE ROYAL DUTCH/SHELL TRANSPORT SECURITIES LITIGATION)))))	Civ. No. 04-374 (JAP) (Consolidated Cases) Hon. Joel A. Pisano <i>(Document electronically filed)</i>
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**JOINT PROPOSED ORDER DISMISSING
INDIVIDUAL DEFENDANTS WITH PREJUDICE**

WHEREAS, these consolidated securities law class actions were filed in this Court on behalf of a worldwide putative class of all persons and entities who, between April 8, 1999 and March 18, 2004, purchased securities issued by defendants N.V. Koninklijke Nederlandsche Petroleum Maatschappij, a Dutch corporation headquartered in The Netherlands, and The "Shell" Transport and Trading Company, p.l.c., an English corporation headquartered in England (collectively, "Shell"); and

WHEREAS, also named as defendants are former Shell officials Sir Philip Watts and Judith Boynton; and

WHEREAS, former Shell official Walter van de Vijver and Shell's current Chief Executive Officer Jeroen van der Veer had been previously dismissed from the case without prejudice; and

WHEREAS, Lead Plaintiffs are willing to dismiss Jeroen van der Veer, Sir Philip Watts, Walter van de Vijver, and Judith Boynton (the "Dismissed Defendants") from this action with prejudice under the terms and conditions described in this Order; and

WHEREAS, the Dismissed Defendants have agreed that each of them will respond to discovery requests and be available for trial as if he or she still were a party to the action (while preserving any defenses he or she would have had as a named defendant in the action); and

WHEREAS, Shell has agreed to assume all liability that might be attributed to the Dismissed Defendants in the event that a final adverse judgment is rendered against Shell or any of the Dismissed Defendants is found at fault.


IT IS HEREBY ORDERED THAT:

1. The Dismissed Defendants are dismissed from this action with prejudice, and without costs or fees to any party.
2. The Court retains continuing jurisdiction over the Dismissed Defendants in this action to ensure by any appropriate remedy that each of them will respond to discovery requests and be available for trial as if he or she still were a party to the action (while preserving any defenses he or she would have had as a named defendant in the action).

3. The Court retains continuing jurisdiction over Shell to ensure that Shell assumes all liability that might be attributed to the Dismissed Defendants in the event that a final adverse judgment is rendered against Shell or any of the Dismissed Defendants is found at fault.

4. The Dismissed Defendants may continue to have access to discovery materials subsequent to their dismissal, which access will be governed by the Court's August 15, 2005 Stipulation and Order Governing Confidential Information.


SO ORDERED this 4th day of Feb, 2008.



The Honorable Joel A. Pisano
United States District Judge

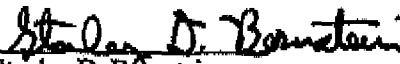
AGREED:

ON BEHALF OF SHELL AND
JEROEN VAN DER VEER



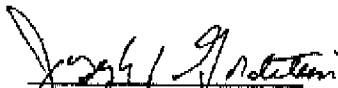
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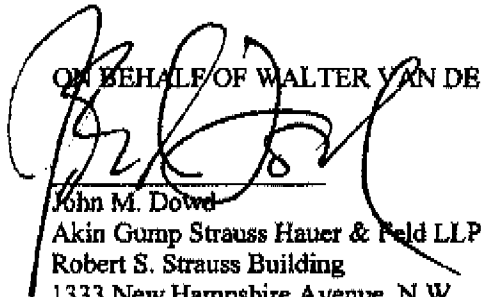
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