

EXHIBIT L.1

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

.....	:	
ANNE ANDERSON, et al.,	:	
	:	
Plaintiffs,	:	
	:	CIVIL ACTION
v.	:	No. 82-1672-S
	:	
W.R. GRACE & CO., et al.,	:	
	:	
Defendants.	:	
.....	:	

JOINT MOTION FOR ORDER APPROVING SETTLEMENT

The plaintiffs in this action (collectively, "Plaintiffs") and defendant W.R. Grace & Co. ("Grace") hereby move that this Court:

- (1) approve the Settlement Agreement (the "Settlement Agreement") and the Joint Tortfeasor Releases and Indemnities given pursuant to Section 4 of the Contribution Among Joint Tortfeasors Act, M.G.L. c. 231B, §4 (the "Releases"), copies of which are filed herewith and which Plaintiffs propose to execute in settlement of this action;
- (2) determine that the Settlement Agreement and the Releases are in good faith; and

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Filed in open Court 9-22-86

*returned.
9/22/86
W.R. Grace, et al.*

(3) determine that the Settlement Agreement is fair and reasonable with respect to all of the parties, including minor plaintiffs, under Rule 17(c), F.R.C.P., and the rule of Nagle v. O'Brien, 337 Mass. 80 (1958). A proposed form of Order is filed herewith.

As grounds for their motion, Plaintiffs and Grace state:

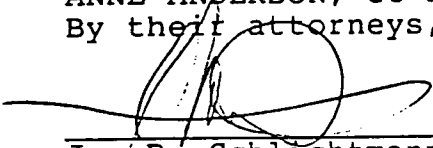
1. some of the parties to the Settlement Agreement are minors represented by their next friends;
2. The Settlement Agreement is made and the Releases executed in good faith and the settlement is fair and reasonable;
3. Exercise of the Court's authority under Rule 17(c), F.R.C.P., and the rule of Nagle v. O'Brien, supra, to approve the Settlement Agreement as being fair and reasonable ensures that the Settlement Agreement will have a final and binding effect upon all parties, including those who are minors; and
4. A determination that the Settlement Agreement and Releases are given in good faith will effectuate the purposes of giving the Releases pursuant to section 4 of the contribution Among Joint Tortfeasors Act, M.G.L. c. 231B, §4.

Plaintiffs and Grace further submit that the most expeditious way to determine the good faith and the fairness and

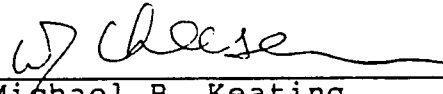
reasonableness of the Settlement Agreement and the Releases is upon a hearing in chambers, at which confidential aspects of the settlement may be discussed.

ANNE ANDERSON, et al.
By their attorneys,

W.R. GRACE & CO.
By its attorneys,



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Dated: September 22, 1986