

Stipulation of Settlement (HP 6086/2020)

Document: Stipulation of Settlement (HP 6086/2020)

Color: White | **Icon:** Paperclip | **Page Count:** TBD | **Version:** v1.0 | **Updated:** 2026-03-23

DocID: WEB-stipulation-source

URL Slug: /vol07-white/stipulation-of-settlement/

Layer: 3 -- Volume Entry Page

GUARDRAIL: ORIENTATION ONLY

This page provides **navigation and counsel-facing orientation** to the Stipulation of Settlement. It does not create new facts, calculations, or strategy.

- **Facts** trace to White Vol 07 (WT-106B and related tabs)
- **Strategy** lives in the [Stipulation Release & Vacatur Strategy](#) page
- **Compliance analysis** lives in WT-118

Primary Source Document

[View Stipulation of Settlement \(PDF\)](#) -- 12-page court-filed stipulation (HP 6086/2020, NYSCEF Doc #10).

PART A -- What This Document Is

The Stipulation of Settlement in **HP 6086/2020** is the SO-ordered agreement between Christian Gray (Tenant-Petitioner) and American Package Company, Inc. (Owner-Respondent) that governs mold remediation at G21 (97 Green Street, Brooklyn). It was filed on NYSCEF as Doc #10 on June 29, 2021 and SO-ordered by J.H.C. (Jack Stoller, probable).

The stipulation contains 17 paragraphs covering remediation work requirements, expert verification procedures, forfeiture deadlines, a mutual release, and procedural terms. It also includes Exhibit 1 -- a 6-page scope of work with floor plan (dated December 8, 2020) containing 8 margin comments by Jack Glass (JG1-JG8) that are part of the court-filed document.

Why it matters: This is the single most-referenced court filing in the binder. Every volume cites it. It establishes the remediation obligations, the verification framework that was allegedly not followed, the forfeiture clause cited in the Motion to Restore proceedings, and the mutual release language that threatens pre-stipulation damage claims.

PART B -- Key Provisions (Orientation Summary)

These are the provisions most frequently cited across the binder. For full paragraph-by-paragraph documentation, see WT-106B.

Provision	Paragraph	What It Does	Where It Matters
Remediation scope	1 + Exhibit 1	Defines the court-ordered work (10-item scope, gut demo of studios)	Blue Vol 05; WT-106; WT-108A
Expert verification	4-5	ALC reports first; Olmsted inspects within 5 days of delivery	WT-108; WT-109; WT-110
Forfeiture clause	5	If Olmsted misses the inspection/testing deadline, petitioner forfeits the right to inspect/test and to restore or challenge ALC's report or remediation completion	WT-118; Orange B001
Disagreement / restore	7	Either party may restore by motion if experts cannot agree on completion	WT-117 (Smith decision)
Restoration limitation	9	Proceeding may only be restored for stipulation compliance enforcement	Vacatur Strategy
Mutual release	10	Release of claims "contained in Petition from the beginning of the world through the date of this Stipulation"	Vacatur Strategy; SCC Cause 2
Supersession / merger	13	All prior negotiations merged; no modification without signed writing	General contract interpretation

PART C -- How Counsel Should Use This Page

If you need to read the stipulation text: Start with the PDF link above, then review [WT-106B](#) for the paragraph-by-paragraph factual summary.

If you need scope of work details: Go to [WT-108A](#) (standalone scope extract with task matrix and Glass margin notes) or [WT-106 Section B.2](#) (verbatim transcription).

If you need compliance analysis: Go to [WT-118](#) (paragraph-by-paragraph compliance timeline covering the full 2021-2023 performance window).

If you need the release / vacatur strategy: Go to the [Stipulation Release & Vacatur Strategy](#) page (Layer 2 -- Immediate Attention).

If you need the full docket history: Go to [WT-117](#) (34-document NYSCEF docket analysis including the Smith decision).

PART D -- Related Documents

Document	Tab / Page	Function
WT-106B	Vol 07 Tab 106B	Paragraph-by-paragraph factual summary of all 17 stipulation terms
WT-106	Vol 07 Tab 106	Scope comparison: court-ordered vs. executed work
WT-106A	Vol 07 Tab 106A	SERVPRO field incident video documentation
WT-108A	Vol 07 Tab 108A	Exhibit 1 scope of work extract (Dec 8, 2020)
WT-108	Vol 07 Tab 108	ALC Post-Remediation Verification (Jul 28, 2021)
WT-109	Vol 07 Tab 109	Olmsted response: non-completed scope items (Aug 18, 2022)
WT-110	Vol 07 Tab 110	Olmsted follow-up scope additions (Nov 7, 2022)
WT-117	Vol 07 Tab 117	HP 6086/2020 NYSCEF docket analysis (34 documents)
WT-118	Vol 07 Tab 118	Stipulation compliance timeline analysis
Vacatur Strategy	Orientation Layer 2	Release defeat mechanisms and vacatur motion posture
SCC Cause 2	Supreme Court Complaint	Breach of Contract -- The Stipulation
Purple T2	Vol 08	Stipulation performance / court integrity strategy track
Orange B001	Vol 12	Sandercock malpractice framework

PART E -- Source Document

Document	File
Stipulation of Settlement (Original PDF)	WT-106_Stipulation_of_Settlement_Original.pdf

END -- Stipulation of Settlement (HP 6086/2020) -- Orientation v1.0