

**D'AMATO & LYNCH, LLP**

Mary Jo Barry  
Maryann Taylor  
Two World Financial Center  
225 Liberty Street  
New York, New York 10281  
(212) 269-0927

*Attorneys for Defendants Iron-Starr Excess  
Agency Ltd., Ironshore Insurance Ltd.,  
and Starr Insurance & Reinsurance Limited*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MF GLOBAL HOLDINGS LTD, et al.,  
  
Debtors.

MF GLOBAL HOLDINGS LTD., as Plan  
Administrator; and MF GLOBAL ASSIGNED  
ASSETS LLC,

Plaintiffs,

v.

ALLIED WORLD ASSURANCE COMPANY  
LTD., et al.,  
  
Defendants.

Case No. 11-15059 (MG)

Chapter 11

Jointly Administered

Adv. Case No. 16-01251 (MG)

S.D.N.Y. Civ. Action No  
1 :17-cv-00933-RWS

Related: S.D.N.Y. Civ. Action Nos  
1:17-cv-00106-RWS  
1:17-cv-00113-RWS  
1 :17-cv-00742-RWS  
1 :17-cv-00780-RWS  
1 :17-cv-00953-RWS

**NOTICE OF JOINDER IN BRIEF OF ALLIED WORLD  
ASSURANCE COMPANY, LTD ON APPEALABILITY OF BARTON ORDER**

PLEASE TAKE NOTICE that Defendants Iron-Starr Excess Agency Ltd., (“Iron-Starr”), Ironshore Insurance Ltd., (“Ironshore Ltd.”) and Starr Insurance & Reinsurance Limited (“SIRL”) (collectively, “Iron-Starr Defendants”) hereby join in the position taken by Allied World Assurance Company, Ltd. (“Allied World”, together with the Iron-Starr Defendants, the “Bermuda Insurers”) in its Memorandum In Support Of Defendant Allied World Assurance Company, Ltd.’s Appeal As Of Right, And In The Alternative, Motion For Leave To Appeal The Bankruptcy Court’s Barton Order, dated March 21, 2017 in Case No. 1:17-cv-00953-RSW, Dkt. No. 9. The Iron-Starr Defendants appeal from the same Order of the Bankruptcy Court as Allied World. See Case No. 1:17-cv-00933-RSW, Dkt. No. 1 and Case No. 1:17-cv-00953-RSW, Dkt. No. 1. The Iron-Starr Defendants filed a Notice of Appeal on February 6, 2017 pursuant to 28 U.S.C. § 158(a)(1) and on February 21, 2017 filed their Statement of Issues (Dkt. No. 4) and Designation of the Record (Dkt. No. 5). Pursuant to the Stipulation and Order dated March 9, 2017, the parties agreed to abide by the so ordered schedule in briefing the issue of appealability, specifically, whether the Bermuda Insurers' appeals are as of right or, alternatively, whether the District Court should grant them leave to appeal. See Case No. 1:17-cv-00933-RSW, Dkt. No. 8 and Case No. 1:17-cv-00953-RSW, Dkt. No. 8.

The Iron-Starr Defendants incorporate by reference the arguments and legal authorities set forth in Allied World’s brief on the appealability of the Barton Order. See Case No. 1:17-cv-00953-RSW, Dkt. No. 9. The Iron-Starr Defendants further join in Allied World’s request for relief and respectfully request that this Court maintain their appeal of the Barton Order as of right under 28 U.S.C. § 158(a)(1) or, in the alternative, grant leave to appeal the Barton Order under § 158(a)(3).

Dated: New York, New York  
March 21, 2017

Respectfully submitted,

**D'AMATO & LYNCH, LLP**

By: /s/ Maryann Taylor

Mary Jo Barry  
Maryann Taylor  
Two World Financial Center  
225 Liberty Street  
New York, New York 10281  
(212) 269-0927

*Attorneys for Defendants Iron-Starr Excess  
Agency Ltd., Ironshore Insurance Ltd.,  
and Starr Insurance & Reinsurance Limited*

**CERTIFICATE OF SERVICE**

I, Maryann Taylor, certify that on March 21, 2017, I caused the foregoing Notice of Joinder in Brief of Allied World Assurance Company, Ltd. on Appealability of Barton Order to be filed with the Clerk of the Court and served upon all counsel of record via the Court's CM/ECF system.

/s/ Maryann Taylor

Maryann Taylor