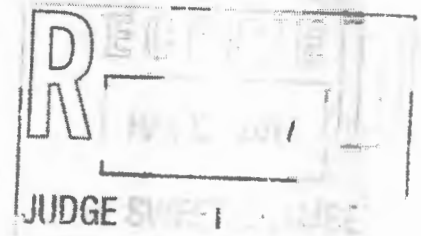


Sweet, R.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



In re:

MF GLOBAL HOLDINGS LTD, et al.,  
Debtors.<sup>1</sup>

Chapter 11  
Case No. 11-15059 (MG)  
(Jointly Administered)

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

Case No. 1:17-cv-00933-RWS  
Case No. 1:17-cv-00953-RWS

Plaintiffs/Appellees,

Adv. Proc. No. 16-01251 (MG)

v.

ALLIED WORLD ASSURANCE COMPANY  
LTD., et al.,

Defendants/Appellants.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3/9/17

**STIPULATION AND [PROPOSED] ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned  
counsel for plaintiffs/appellees MF Global Holdings Ltd., as Plan Administrator, and MF Global  
Assigned Assets LLC ("MF GLOBAL") and defendants/appellants Allied World Assurance  
Company Ltd, Iron-Starr Excess Agency Ltd., Ironshore Insurance Ltd. and Starr Insurance &  
Reinsurance Limited (collectively, the "BERMUDA INSURERS"), that:

1. MF GLOBAL and the BERMUDA INSURERS shall abide by the following deadlines in  
briefing the issue of appealability, specifically, whether the BERMUDA INSURERS'

<sup>1</sup> The debtors in the chapter 11 cases are MF Global Holdings Ltd.; MF Global Finance USA Inc.; MF Global Capital LLC; MF Global Market Services LLC; MF Global FX Clear LLC; and MF Global Holdings USA Inc. The Bankruptcy Court entered an order of final decree closing the chapter 11 cases of MF Global Capital LLC, MF Global FX Clear LLC, and MF Global Market Services LLC on February 11, 2016.

appeals are as of right or, alternatively, whether the District Court should grant them leave to appeal:

- a. The BERMUDA INSURERS' opening briefs on appealability shall be due **March 21, 2017**.
  - b. MF GLOBAL's opposition briefs on appealability shall be due **April 4, 2017**.
  - c. The BERMUDA INSURERS' reply briefs on appealability shall be due **April 11, 2017**.
2. The hearing currently scheduled for **March 23, 2017** shall be removed from the docket, and a new hearing scheduled at the Court's convenience for any date after briefing is completed on April 11, 2017.
3. MF GLOBAL shall file its counter-designations of the record within one (1) business day from the entry of any order by the Court determining that the appeal should proceed to the merits stage.

Dated: March 7, 2017

JONES DAY

By: 

Edward M. Joyce  
Jane Rue Wittstein  
250 Vesey Street  
New York, New York 10281  
Telephone: (212) 510-7008

*Counsel for MF Global Holdings Ltd., as  
Plan Administrator, and MF Global  
Assigned Assets LLC*

CRAVATH, SWAINE & MOORE LLP

By: 

Daniel Slifkin  
Omid H. Nasab  
Worldwide Plaza  
825 Eighth Avenue  
New York, New York 10019  
Telephone: (212) 474-1000

WHITE AND WILLIAMS LLP

Erica Kerstein  
7 Times Square  
New York, New York 10036  
Telephone: (212) 868-4837

*Counsel for Allied World Assurance  
Company, Ltd*

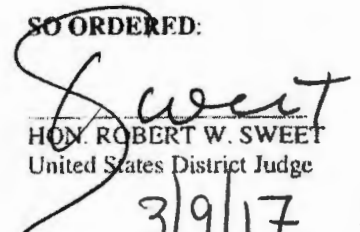
D'AMATO & LYNCH, LLP

By: 

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

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

SO ORDERED:

  
HON. ROBERT W. SWEET  
United States District Judge

3/9/17 JS