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Presentment Date and Time: September 25, 2015 at 12:00 noon E.T. Objection Deadline: September 25, 2015 at 11:30 a.m. E.T.

JONES DAY 222 East 41st Street New York, New York 10017 Telephone: (212) 326-3939 Facsimile: (212) 755-7306 Veerle Roovers Stephen Pearson Amy Edgy Ferber

Attorneys for the Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

NOTICE OF PRESENTMENT OF SEVENTH STIPULATION AND AGREED ORDER BY AND BETWEEN THE FILB PLAN ADMINISTRATOR AND THE SOUNDVIEW TRUSTEE EXTENDING THE GENERAL BAR DATE

PLEASE TAKE NOTICE OF THE FOLLOWING

- 1. Corinne Ball, not individually but solely in her capacity as chapter 11 trustee in the above-captioned chapter 11 cases (the "**Trustee**") will present the Seventh Stipulation and Agreed Order by and between the FILB Plan Administrator and the Soundview Trustee Extending the General Bar Date (the "**Stipulation and Agreed Order**") annexed hereto as <u>Exhibit A</u> to the Honorable Robert E. Gerber, United States Bankruptcy Judge, for signature on **September 25, 2015 at 12:00 noon (Eastern Time)**.
- Objections, if any, to the proposed Stipulation and Agreed Order must be in writing, comply with the Case Management Order #1 (Docket No. 19) (the "Case
 Management Order") and be received in Judge Gerber's Chambers, United States Bankruptcy

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Court for the Southern District of New York, One Bowling Green, New York New York 10004, no later than 11:30 a.m. (Eastern Time) on September 25, 2015 (the "Objection Deadline"). Unless objections are received by the Objection Deadline, the Stipulation and Agreed Order may be signed.

- 3. Furthermore, any objection to the proposed Stipulation and Agreed Order must be filed in accordance with the Court's General Order M-399 and served so that it is received on or before the Objection Deadline by: (a) the Trustee, 222 East 41st Street, New York, New York 10017 (Attn: Corinne Ball, Esq.); (b) Jones Day, counsel to the Trustee, 222 East 41st Street, New York, New York 10017 (Attn: Veerle Roovers, Esq.); (c) the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Richard C. Morrissey, Esq.); (d) Luskin, Stern & Eisler LLP, counsel to the FILB Plan Administrator, Eleven Times Square, New York, New York, 10010 (Attn: Michael Luskin, Esq. and Stephan Hornung, Esq.); and (e) all parties requesting notice in these chapter 11 cases pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure.
- 4. If an objection to the entry of the proposed Stipulation and Agreed Order is properly filed and served before the Objection Deadline, a hearing will be scheduled to consider the proposed Stipulation and Agreed Order and the objection(s) at a time and date to be set by the Court.
- 5. A copy of the Case Management Order may be obtained from the Court's website at https://ecf.nysb.uscourts.gov.

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Dated: September 22, 2015 New York, New York /s/ Veerle Roovers
Veerle Roovers
Stephen Pearson
Amy Edgy Ferber
JONES DAY
222 East 41st Street
New York, New York 10017

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Attorneys for the Chapter 11 Trustee

EXHIBIT A

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Presentment Date and Time: September 25, 2015 at 12:00 noon (ET)

Objection Deadline: September 25, 2015 at 11:30 a.m. (ET)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re		:	Chapter 11
		:	Case No. 13-13098 (REG)
		•	
SOUNDVIEW ELITE LTD. et al.,		•	
		•	
	Debtor.	•	
		•	
		X	

SEVENTH STIPULATION AND AGREED ORDER BY AND BETWEEN THE FILB PLAN ADMINISTRATOR AND THE SOUNDVIEW TRUSTEE EXTENDING THE GENERAL BAR DATE

This Stipulation and Agreed Order (the "Stipulation and Agreed Order") is made by and between Richard J. Davis, not personally but solely in his capacity as Plan Administrator and former Chapter 11 Trustee of Fletcher International, Ltd. ("FILB"), and Corinne Ball, not personally but solely in her capacity as chapter 11 trustee (the "Soundview Trustee") of the each of the above-captioned debtors (the "Soundview Debtors"), with respect to the following:

RECITALS

- A. On November 17, 2014, this Court entered an order (the "Bar Date Order") [Docket No. 414] establishing December 31, 2014 at 5:00 p.m. Eastern time as the General Bar Date (as defined in the Bar Date Order) in the Soundview Debtors' chapter 11 cases.
- B. Pursuant to the Bar Date Order, the Soundview Trustee may extend the General Bar Date without further order of this Court. See Soundview Bar Date Order, ¶ 23.
- C. The FILB Plan Administrator and the Soundview Trustee have reached an agreement in principle as part of a global settlement by and among, among other parties, FILB, the FILB Plan Administrator, the Soundview Trustee, the Soundview Debtors and certain other

feeder funds and investors that would resolve, among other things, all claims asserted by FILB, the FILB Plan Administrator and certain other parties against the Soundview Debtors.

D. By the Sixth Stipulation and Agreed Order by and between the FILB Plan Administrator and the Soundview Trustee Extending the General Bar Date [Docket No. 752], the General Bar Date was extended until September 23, 2015 at 5:00 p.m. Eastern time for the FILB Parties (as defined below).

STIPULATION

NOW, THEREFORE, it is hereby stipulated and agreed by and between the parties to this Stipulation and Agreed Order (the "**Parties**"), through their undersigned counsel:

- 1. The General Bar Date is extended until October 23, 2015 at 5:00 p.m. Eastern time for the following parties only (the "FILB Parties"):
 - Fletcher International, Ltd. and the FILB Plan Administrator;
 - Fletcher Income Arbitrage Fund, Ltd. and its joint official liquidators;
 - FIA Leveraged Fund and its joint official liquidators;
 - Fletcher Fixed Income Alpha Fund, Ltd. and its joint voluntary liquidators;
 - The Massachusetts Bay Transportation Authority Retirement Fund;
 - The Firefighters Retirement System;
 - The New Orleans Firefighters Pension & Relief Fund; and
 - The Municipal Employees Retirement System of Louisiana.
- 2. Nothing in this Stipulation and Agreed Order shall be construed as an allowance of any claim or interest filed or asserted in these chapter 11 cases, and the Soundview

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Trustee reserves the right to dispute, object to or otherwise challenge the existence, amount, priority and classification of any claim or interest asserted by any party.

- 3. This Stipulation and Agreed Order may be signed in counterpart originals.
- 4. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation, interpretation and/or enforcement of this Stipulation and Agreed Order. The Parties agree that this Court shall have exclusive jurisdiction to apply and enforce the terms of this Stipulation and Agreed Order.

Dated: New York, New York September 22, 2015

JONES DAY LUSKIN, STERN & EISLER LLP

By: <u>/s/ Veerle Roovers</u>

By: <u>/s/ Michael Luskin</u>

Veerle Roovers

Michael Luskin

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Attorneys for the Soundview Trustee Attorneys for the FILB Plan Administrator and Former Chapter 11 Trustee

Dated: New York, New York
September ___, 2015
HONORABLE ROBERT F. GERBER
UNITED STATES BANKRUPTCY JUDGE

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