

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

-----X	:	Chapter 11
<i>In re</i>	:	
Overseas Shipholding Group, Inc., <i>et al.</i> ,	:	Case No. 12-20000 (PJW)
Debtors. <sup>1</sup>	:	Jointly Administered
-----X	:	Re: D.I. 3260, 3211, 3145, 3142, 3141, 3288

**ORDER ESTABLISHING AMENDED DISCOVERY SCHEDULE AND  
OTHER PROCEDURES FOR CONFIRMATION OF FIRST AMENDED  
PLAN OF REORGANIZATION**

Overseas Shipholding Group, Inc. (“OSG”) and certain of its affiliates, as debtors and debtors in possession (collectively, the “Debtors”), filed the First Amended Joint Plan of

<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are: Overseas Shipholding Group, Inc. (7623); OSG International, Inc. (7117); OSG Bulk Ships, Inc. (2600); 1372 Tanker Corporation (4526); Africa Tanker Corporation (9119); Alcesmar Limited (5306); Alcmar Limited (5307); Alpha Suezmax Corporation (1684); Alpha Tanker Corporation (6063); Amalia Product Corporation (3808); Ambermar Product Carrier Corporation (8898); Ambermar Tanker Corporation (7100); Andromar Limited (5312); Antigmar Limited (5303); Aqua Tanker Corporation (7408); Aquarius Tanker Corporation (9161); Ariadmar Limited (5301); Aspro Tanker Corporation (4152); Atalmar Limited (5314); Athens Product Tanker Corporation (9565); Atlas Chartering Corporation (8720); Aurora Shipping Corporation (5649); Avila Tanker Corporation (4155); Batangas Tanker Corporation (8208); Beta Aframax Corporation (9893); Brooklyn Product Tanker Corporation (2097); Cabo Hellas Limited (5299); Cabo Sounion Limited (5296); Caribbean Tanker Corporation (6614); Carina Tanker Corporation (9568); Carl Product Corporation (3807); Concept Tanker Corporation (9150); Crown Tanker Corporation (6059); Delphina Tanker Corporation (3859); Delta Aframax Corporation (9892); DHT Ania Aframax Corp. (9134); DHT Ann VLCC Corp. (9120); DHT Cathy Aframax Corp. (9142); DHT Chris VLCC Corp. (9122); DHT Rebecca Aframax Corp. (9143); DHT Regal Unity VLCC Corp. (9127); DHT Sophie Aframax Corp. (9138); Dignity Chartering Corporation (6961); Edindun Shipping Corporation (6412); Eighth Aframax Tanker Corporation (8100); Epsilon Aframax Corporation (9895); First Chemical Carrier Corporation (2955); First LPG Tanker Corporation (9757); First Union Tanker Corporation (4555); Fourth Aframax Tanker Corporation (3887); Front President Inc. (1687); Goldmar Limited (0772); GPC Aframax Corporation (6064); Grace Chartering Corporation (2876); International Seaways, Inc. (5624); Jademar Limited (7939); Joyce Car Carrier Corporation (1737); Juneau Tanker Corporation (2863); Kimolos Tanker Corporation (3005); Kythnos Chartering Corporation (3263); Leo Tanker Corporation (9159); Leyte Product Tanker Corporation (9564); Limar Charter Corporation (9567); Luxmar Product Tanker Corporation (3136); Luxmar Tanker LLC (4675); Majestic Tankers Corporation (6635); Maple Tanker Corporation (5229); Maremar Product Tanker Corporation (3097); Maremar Tanker LLC (4702); Marilyn Vessel Corporation (9927); Maritrans General Partner Inc. (8169); Maritrans Operating Company L.P. (0496); Milos Product Tanker Corporation (9563); Mindanao Tanker Corporation (8192); Mykonos Tanker LLC (8649); Nedimar Charter Corporation (9566); Oak Tanker Corporation (5234); Ocean Bulk Ships, Inc. (6064); Oceania Tanker Corporation (9164); OSG 192 LLC (7638); OSG 209 LLC (7521); OSG 214 LLC (7645); OSG 215 Corporation (7807); OSG 242 LLC (8002); OSG



Reorganization of Overseas Shipholding Group, Inc., et al., Under Chapter 11 of the Bankruptcy Code (the “Plan”) (D.I. 3107), on May 2, 2014. A hearing (the “Confirmation Hearing”) on the possible confirmation of the Plan, as may be further amended, is scheduled to commence on July 18, 2014, before the Honorable Peter J. Walsh, United States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware (the “Court”), 824 Market Street, 6th Floor, Wilmington, DE 19801. Pursuant to Bankruptcy Code sections 105(a) and (d) and Federal Rules of Bankruptcy Procedure 9006 and 9014, the following schedule is established for purposes of

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243 LLC (7647); OSG 244 LLC (3601); OSG 252 LLC (7501); OSG 254 LLC (7495); OSG 300 LLC (3602); OSG 400 LLC (7499); OSG America LLC (2935); OSG America L.P. (2936); OSG America Operating Company LLC (5493); OSG Car Carriers, Inc. (1608); OSG Clean Products International, Inc. (6056); OSG Columbia LLC (7528); OSG Constitution LLC (8003); OSG Courageous LLC (2871); OSG Delaware Bay Lightering LLC (4998); OSG Discovery LLC (8902); OSG Endeavor LLC (5138); OSG Endurance LLC (2876); OSG Enterprise LLC (3604); OSG Financial Corp. (8639); OSG Freedom LLC (3599); OSG Honour LLC (7641); OSG Independence LLC (7296); OSG Intrepid LLC (7294); OSG Liberty LLC (7530); OSG Lightering Acquisition Corporation (N/A); OSG Lightering LLC (0553); OSG Lightering Solutions LLC (5698); OSG Mariner LLC (0509); OSG Maritrans Parent LLC (3903); OSG Navigator LLC (7524); OSG New York, Inc. (4493); OSG Product Tankers AVTC, LLC (0001); OSG Product Tankers I, LLC (8236); OSG Product Tankers II, LLC (8114); OSG Product Tankers, LLC (8347); OSG Product Tankers Member LLC (4705); OSG Quest LLC (1964); OSG Seafarer LLC (7498); OSG Ship Management, Inc. (9004); OSG Valour Inc. (7765); Overseas Allegiance Corporation (7820); Overseas Anacortes LLC (5515); Overseas Boston LLC (3665); Overseas Diligence LLC (6681); Overseas Galena Bay LLC (6676); Overseas Houston LLC (3662); Overseas Integrity LLC (6682); Overseas Long Beach LLC (0724); Overseas Los Angeles LLC (5448); Overseas Martinez LLC (0729); Overseas New Orleans LLC (6680); Overseas New York LLC (0728); Overseas Nikiski LLC (5519); Overseas Perseverance Corporation (7817); Overseas Philadelphia LLC (7993); Overseas Puget Sound LLC (7998); Overseas Sea Swift Corporation (2868); Overseas Shipping (GR) Ltd. (5454); Overseas ST Holding LLC (0011); Overseas Tampa LLC (3656); Overseas Texas City LLC (5520); Pearlmar Limited (7140); Petromar Limited (7138); Pisces Tanker Corporation (6060); Polaris Tanker Corporation (6062); Queens Product Tanker Corporation (2093); Reyman Limited (7131); Rich Tanker Corporation (9147); Rimar Chartering Corporation (9346); Rosalyn Tanker Corporation (4557); Rosemar Limited (7974); Rubymar Limited (0767); Sakura Transport Corp. (5625); Samar Product Tanker Corporation (9570); Santorini Tanker LLC (0791); Serifos Tanker Corporation (3004); Seventh Aframax Tanker Corporation (4558); Shirley Tanker SRL (3551); Sifnos Tanker Corporation (3006); Silvermar Limited (0766); Sixth Aframax Tanker Corporation (4523); Skopelos Product Tanker Corporation (9762); Star Chartering Corporation (2877); Suezmax International Agencies, Inc. (4053); Talara Chartering Corporation (3744); Third United Shipping Corporation (5622); Tokyo Transport Corp. (5626); Transbulk Carriers, Inc. (6070); Troy Chartering Corporation (3742); Troy Product Corporation (6969); Urban Tanker Corporation (9153); Vega Tanker Corporation (3860); View Tanker Corporation (9156); Vivian Tankships Corporation (7542); Vulpecula Chartering Corporation (8718); Wind Aframax Tanker Corporation (9562). The mailing address of the Debtors is: 1301 Avenue of the Americas, 42nd Floor, New York, NY 10019.

discovery in respect of the Confirmation Hearing (“Confirmation Discovery”).<sup>2</sup>

IT IS HEREBY ORDERED that:

1. Except as otherwise ordered by the Court, this Order shall control any and all discovery by the Debtors, the Official Committee of Unsecured Creditors (the “Committee”), the Official Committee of Equity Security Holders (the “Equity Committee”; the Equity Committee together with the Committee, the “Committees”), each of the Commitment Parties (as that term is defined in the Equity Commitment Agreement (D.I. 3105)) (each of the Commitment Parties together with the Committees and the Debtors, the “Plan Parties”), along with any other party-in-interest in connection with the confirmation of or objections to the Plan (collectively, including the Plan Parties, the “Discovery Parties”). This Order shall not affect the rights of any party to seek discovery in connection with any other contested matters or adversary proceedings (even if related to, or to be heard contemporaneously with, Plan confirmation). For the avoidance of doubt, this Order governs only certain procedures with respect to Confirmation Discovery, and the Discovery Parties reserve all rights to object to any discovery served or sought in accordance with the Order.

2. All Confirmation Discovery sought must be sought in connection with Plan confirmation only, and no discovery, or any information contained therein, may be used in connection with any other matter or proceeding, except to the extent mutually agreed upon between each Requesting Party and Producing Party (each as defined in paragraph 5 below) or otherwise ordered by the Court.

3. Any Discovery Party that intends to file an objection to the Plan, or request Confirmation Discovery, must identify itself by providing a general description of the topic(s) its

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<sup>2</sup> Except as otherwise set forth herein, capitalized terms used but not defined herein shall have the meaning ascribed to them in the Plan.

anticipated Plan objections will address, if any, by Thursday, May 29, 2014, at 4:00 p.m. (prevailing Eastern time) and serving notice upon each of the Plan Parties of any such anticipated Plan objections. Such description shall serve only to provide a good faith articulation of the anticipated topics and is without prejudice to any objections that may be asserted in accordance with paragraph 24 below. For the avoidance of doubt, any notices of anticipated plan objections served pursuant to the Order Establishing Discovery Schedule and Other Procedures for Plan Confirmation (D.I. 2968) are deemed withdrawn or satisfied absent service of an amended notice pursuant to this Order.

4. This Order applies only to the Plan presently proffered by the Debtors (D.I. 3107), as such Plan may be amended from time to time. To the extent that any new plan of reorganization supersedes the present Plan, the Plan Parties will negotiate a new discovery schedule.

#### **FACT DISCOVERY**

5. All requests for document production and interrogatories shall be served by each Discovery Party requesting production (a "Requesting Party") upon the entity from whom production is sought (a "Producing Party" and together with a Requesting Party, the "Parties") by 4:00 p.m. (prevailing Eastern time) on Monday, June 2, 2014; provided, however, in the event the Plan Parties propose any amendments to the Plan (a "Plan Amendment"), renewed discovery limited only to the subject-matter of the Plan Amendment may be served upon the Plan Parties within seven (7) days of the filing of such amendments.

6. Counsel of record for each Producing Party agrees to accept service via email of any requests for production of documents, document subpoenas, deposition notices, deposition subpoenas, interrogatories, or requests for admission on behalf of such Producing Party and its employees, officers, or directors, and any of their respective current legal, financial, or other

advisors; provided that, however, in the case of the Committees, service on counsel to the Committees shall constitute service only on the Committees in their respective capacities as such (including its professional advisors) and not on individual members of the Committees.

7. Written objections and responses to any document requests or interrogatories shall be served within five business days of service.

8. Interrogatories shall be restricted solely to those seeking to discover the (i) names of witnesses with knowledge of information relevant to the subject matter of the hearing and (ii) existence, custodian, location and general description of relevant documents, other physical evidence, or information of a similar nature. No requests for admissions shall be propounded or served.

9. Producing Parties shall endeavor to state any categorical privilege objections they may have in conjunction with their written responses and objections. Subject to the following, and paragraph 10 herein, all Producing Parties that are served with any document requests by a Requesting Party and withhold any documents from production on a basis of privilege shall produce a category privilege log, identifying the specific privilege or protection asserted and the entities and general topics of the relevant documents or communications, within five (5) business days of otherwise producing non-privileged documents responsive to the relevant production. Following the production of a category privilege log, if a Party determines that the category privilege log for the production is insufficient, the Parties shall meet and confer with respect thereto within two (2) business days from the time of any request for additional information with respect to the production made by the Requesting Party. If the Parties are unable to satisfactorily resolve their privilege dispute, the Requesting Party may apply to the Court for such relief pursuant to the provisions of Paragraph 15 hereto. To the extent that a Producing Party needs

more time to complete its privilege log, it may apply to the Court for such relief or so stipulate with the Requesting Party that served the request.

10. Other than in response to reasonably limited, targeted search requests mutually agreed to by the relevant Parties or ordered by the Court, Discovery Parties shall not be required to search or produce documents from the following categories of documents, regardless of when the documents were created:

- a. Hard copy files of outside counsel and in-house counsel (solely to the extent in-house counsel is acting in its legal capacity), except for non-privileged documents or communications shared or exchanged with third parties; provided, however, that any such third-party documents or communications over which a claim of privilege is asserted will be identified by category in accordance with paragraph 9;
- b. Documents and communications solely between in-house counsel and outside counsel;
- c. Internal documents and communications solely within an outside counsel's law firm;
- d. Documents and communications solely between or among outside counsel law firms jointly representing a single client;
- e. Documents and communications solely between or among client and inside counsel (solely to the extent in-house counsel is acting in its legal capacity) or outside counsel; and
- f. Internal documents and communications prepared by and maintained solely within an advisor, and not shared, exchanged or transmitted to any other party;

provided, however, that such advisor shall advise the Requesting Party, within five (5) business days of receipt of such document request, of any categories of documents as to which it will not search or produce pursuant to this paragraph 10 f.;

Provided, however, in the event that a representative of any advisor is disclosed to be an anticipated witness at the Confirmation Hearing, or such advisor's work product, papers, or opinions are relied upon in any way by a witness identified as the Party's expert, such individual's documents shall be subject to discovery (and subject to applicable privileges and protections), and the advisory firm shall also be subject to reasonably limited, targeted document requests relating to the subjects of the proposed witness's expected testimony, subject to whatever privilege or other protection may apply. Nothing in this paragraph shall modify or expand a Discovery Party's rights or obligations under Federal Rule of Civil Procedure 26(b)(4)(B).

11. Producing Parties shall make their good faith, best efforts to produce documents on a rolling basis whenever practicable. The Parties shall meet and confer in good faith in an effort to resolve any disputes that may arise concerning any Producing Party's responses and objections before seeking relief from the Court pursuant to Paragraph 15. To the extent that a Producing Party needs more time to complete its production of documents it may apply to the Court for such relief pursuant to the provisions of Paragraph 15 hereto or so stipulate with the Requesting Party that served the request.

12. All Producing Parties shall complete production of all responsive documents and interrogatory answers, which were timely served by a Requesting Party and not objected to by the Producing Party, in accordance with the timeline set forth in Paragraph 5 of this Order, on or

before Tuesday, June 17, 2014, at 4:00 p.m. (prevailing Eastern time), unless another date is mutually agreed to between the relevant Producing and Requesting Party or ordered by the Court.

13. By 4:00 p.m. (prevailing Eastern time) on Friday, May 30, 2014, the Debtors shall provide preliminary lists of all witnesses (except witnesses from whom expert reports will be submitted pursuant to Federal Rule of Civil Procedure 26(a)(2)(B)), if any, that the Debtors anticipate calling to provide testimony at the Confirmation Hearing (a “Witness List”), along with a brief listing of the anticipated general topics about which the party calling such witness then anticipates such witness testifying (a “Witness List Description”). By 4:00 p.m. (prevailing Eastern time) on Monday, June 2, 2014, all other Discovery Parties shall provide preliminary Witness Lists (that shall not include witnesses from whom expert reports will be submitted pursuant to Federal Rule of Civil Procedure 26(a)(2)(B)), along with accompanying Witness List Descriptions. Each Witness List Description shall serve only to provide a good faith articulation of the anticipated general topics that each witness may address and is without prejudice to any testimony that may later be provided by each witness. Thereafter, a Discovery Party shall promptly notify all other Discovery Parties regarding any additional witnesses identified during the discovery process and/or the removal of any witness from a Discovery Party’s Witness List, providing a Witness List Description for any additional witness later identified.

14. On or before Monday, June 2, 2014, at 4:00 p.m. (prevailing Eastern time), all non-Debtor Discovery Parties shall notice any fact depositions, and may serve additional notices of fact depositions through Wednesday June 18, 2014, at 4:00 p.m. (prevailing Eastern time), with respect to witnesses whose relevance first becomes apparent in (i) documents produced after June 2, 2014, (ii) notices and lists produced pursuant to this Order, or (iii) any other



information previously unavailable to the relevant non-Debtor Discovery Party that is discovered only after June 2, 2014. The Debtors shall serve notice of any fact depositions on or before Thursday, June 5, 2014, at 4:00 p.m. (prevailing Eastern time). Fact depositions shall be scheduled by the Discovery Parties at mutually agreed-upon dates and times, to be conducted beginning Wednesday June 18, 2014 and concluding Thursday June 26, 2014. All depositions shall be conducted in accordance with Rule 30 of the Federal Rules of Civil Procedure and Bankruptcy Rule 7030. Depositions will be coordinated so that witnesses who are to be questioned by multiple Discovery Parties shall be simultaneously deposed by such Discovery Parties and by any other Discovery Party wishing to question the witness. The Parties wishing to question the witness shall work cooperatively as to the order of questioning and the allocation of time between all such Discovery Parties.

15. With respect to any discovery dispute that may arise, the Parties to the dispute(s) shall meet and confer no later than two (2) business days after any Party requests such a meet and confer conference. If the Parties are unable to resolve their dispute(s), such Parties may seek Court intervention utilizing the following procedure in lieu of the procedures contained in Rule 7026-1 of the Local Rules for the United States Bankruptcy Court, District of Delaware:

- a. The Requesting Parties to such discovery dispute shall deliver to the Court a single letter, no more than four (4) pages in length identifying the issue(s) and relief requested and summarizing the basis thereof (the "Initial Letter"), addressed to the relevant Producing Parties and served via email upon the Discovery Parties;
- b. no later than two (2) business days after receipt of such Initial Letter, the Producing Parties to whom the Initial Letter is directed shall deliver to the Court a single letter that shall be no longer than four (4) pages in length, responding to the Initial Letter and served via email upon the Requesting Parties and the Discovery Parties; and
- c. the Court will thereafter instruct the Parties to the dispute whether a telephonic conference or hearing shall be scheduled with the Court to address the issues

raised and/or if the Court requires further briefing in advance of any such conference or hearing.

16. Other than any discovery that is the subject of an active discovery dispute pursuant to Paragraph 15 and any Party's obligation to supplement discovery pursuant to the applicable rules, all fact discovery shall be completed no later than Thursday, June 26, 2014.

#### **EXPERT DISCOVERY**

17. All expert discovery shall be completed no later than July 9, 2014.

18. Each Discovery Party shall have the right to identify and utilize expert witnesses in connection with the Confirmation Hearing, subject to applicable rules of evidence and procedure. The Discovery Parties will meet and confer in good faith regarding a reasonable number of expert witnesses for the Confirmation Hearing. Nothing herein shall preclude any Discovery Party from seeking appropriate relief from the Court with respect to the number of expert witnesses and the scope of any expert testimony.

19. On or prior to Monday, June 23, 2014, at 4:00 p.m. (prevailing Eastern time) all Discovery Parties shall disclose the identity of any expert witness they may use to present evidence in their case-in-chief under Federal Rules of Evidence 702, 703 or 705, and shall also provide a written summary of the topics that each such witness is expected to address at the Confirmation Hearing (a "Summary"); provided, however, that such Summary shall not prejudice an identified witness's ability to reasonably amend or supplement the topics set forth in such Summary in its expert witness report filed thereafter in accordance with paragraph 20 below.

20. The Discovery Parties shall serve their expert reports, if any, and otherwise comply with the requirements of Bankruptcy Rule 7026 and Federal Rule of Civil Procedure

26(a)(2)(B) with respect to experts on or prior to Thursday June 26, 2014 at 12:00 p.m. (prevailing Eastern time).

21. All Discovery Parties shall serve their rebuttal expert reports, whether from existing or newly-identified experts, and otherwise comply with the requirements of Bankruptcy Rule 7026 and Federal Rule of Civil Procedure 26(a)(2)(B) with respect to experts on or prior to Thursday, July 3, 2014 at 12:00 p.m. (prevailing Eastern time).

22. Expert depositions of any experts whose testimony a Discovery Party intends to rely upon at the Confirmation Hearing shall be taken between July 7, 2014 and July 9, 2014.

23. No Discovery Party shall be required to produce in expert discovery any draft reports (including drafts of any materials, charts, illustrative documents, or exhibits prepared by the expert, any person working under the expert's supervision, or the Discovery Party and its counsel) or communications between such expert and counsel related to the subject matter of the reports, except to the extent such communications relate to the discoverable communications listed in Rule 26(b)(4)(C) of the Federal Rules of Civil Procedure and Bankruptcy Rule 7026(b)(4)(C).

#### **CONFIRMATION BRIEFS**

24. Any Discovery Party may file an objection to the Plan (an "Objection"), which shall be filed with the Court no later than Friday, July 11, 2014, at 4:00 p.m. (prevailing Eastern time).

25. Each Discovery Party (other than those who file an Objection) shall have the right to file a brief, statement or response, in further support of confirmation of the Plan and in response to Objections, if any, (the "Replies"), no later than Wednesday July 16, 2014, at 12:00 p.m. (prevailing Eastern time). Notwithstanding any provisions of the Local Rules for the

United States Bankruptcy Court for the District of Delaware, the Debtors' Reply may be the same number of pages in length as all of the Objections combined.

**PRE-TRIAL SUBMISSIONS**

26. No later than Tuesday, July 8, 2014, by 4:00 p.m. (prevailing Eastern time), all Discovery Parties shall serve the designation, by page and line number(s), of any deposition testimony from fact witnesses they reasonably anticipate offering into evidence at the Confirmation Hearing. On Thursday, July 10, 2014, by 4:00 p.m. (prevailing Eastern time), all Discovery Parties shall serve on one another any counter designations or objections to the designations, by page and line number(s), of any deposition testimony from fact witnesses they reasonably anticipate offering into evidence at the Confirmation Hearing. Nothing in this paragraph is intended to abrogate any of the provisions of Federal Rule of Civil Procedure 32, made applicable to this proceeding by Bankruptcy Rules 7032 and 9014.

27. On Wednesday, July 9, 2014, by 4:00 p.m. (prevailing Eastern time), the Debtors shall serve the list of exhibits they reasonably anticipate offering into evidence at the Confirmation Hearing ("Trial Exhibits"). On Friday, July 11, 2014, by 4:00 p.m. (prevailing Eastern time), all other Discovery Parties shall serve their list of additional Trial Exhibits. The Discovery Parties may supplement the list of Trial Exhibits in response to the Replies, no later than 4:00 p.m. (prevailing Eastern time) on Thursday July 17, 2014.

28. On Thursday, July 17, 2014, the Discovery Parties shall serve on one another any objections to the Trial Exhibits, with any objections to the Trial Exhibits to be resolved at the start of the Confirmation Hearing.

29. All pre-trial motions in limine, if any, shall be filed and served no later than Friday July 11, 2014, by 4:00 p.m. (prevailing Eastern time) to the extent the issues are ripe;

responses shall be served on Tuesday July 15, 2014 by 4:00 p.m. (prevailing Eastern Time). If additional issues arise after July 11, 2014, the parties may seek leave of the Court at the Confirmation Hearing to file motions in limine regarding those issues.

30. A pretrial hearing to resolve all disputed issues, if any, will be held on Thursday, July 17, 2014, at a time to be set by the Court.

**MISCELLANEOUS**

31. Pursuant to Federal Rule of Bankruptcy Procedure 9006(c)(1), and subject to all other deadlines and provisions in this Order governing the use of depositions and subpoenas, depositions may be noticed, and subpoenas returnable, on five business days' notice.

32. If the Confirmation Hearing is adjourned or continued, the Discovery Parties shall have an obligation to meet and confer in good faith within two (2) business days of such adjournment or continuance, for the purpose of amending the terms of this Order to reflect the length of the adjournment or continuance, as applicable.


33. Upon good cause shown, and on notice to all Discovery Parties, any entity may seek to have this Order modified by the Court.

34. This Order may also be modified by agreement of the affected Discovery Parties.

35. Telephonic status conferences to resolve disputes, if any, among the Discovery Parties and the Court shall be held on Friday, June 13, 2014 and Monday, July 14, 2014, or at other such mutually agreed upon dates and times.

36. The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation or enforcement of this Order.

Dated: July 28, 2014  
Wilmington, Delaware

  
THE HONORABLE PETER J. WALSH  
UNITED STATES BANKRUPTCY JUDGE