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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: MF Global Holdings Ltd., et al.	:	**Chapter 11 Case No.**
	:	**11-15059 (MG)**
Debtors.	:	
	:	**Jointly Administered**

APPLICATION ON CONSENT TO EXTEND
DEADLINES FOR COMPLETION OF FACT DISCOVERY

JPMorgan Chase Bank, N.A. ("JPMorgan"), through its undersigned attorneys, respectfully submits this application for an extension of the deadlines set for fact discovery in the *Case Management and Scheduling Order for Objection of Plan Administrator to Proofs of Claim Numbers 1216 and 1217, Filed by JPMorgan Chase Bank, N.A.* [Doc. 2046] (the "Case Management and Scheduling Order").

1. Pursuant to the Case Management and Scheduling Order, document discovery and depositions are to be completed by February 13, 2015 and March 20, 2015, respectively. JPMorgan respectfully requests an extension until March 13, 2015 to complete document discovery and until May 22, 2015 to complete depositions. This is the first request for an extension of discovery deadlines. The Plan Administrator consents to the request.

2. The proofs of claims in this matter are based on JPMorgan's early termination of foreign exchange transactions with Debtor MF Global FX Clear LLC pursuant to an ISDA Master Agreement. At a hearing on November 19, 2014, Your Honor instructed the parties to engage in targeted discovery. Since that time, the parties have cooperated in good faith to agree on the scope of discovery and have worked to conduct discovery in an expeditious and efficient manner.

3. For its part, beginning immediately after the November 19 hearing, JPMorgan began to identify the relevant custodians and sources of documents from the various bank departments and lines of business that were involved in the closeout of the transactions at issue. JPMorgan then located and collected documents from dozens of custodians and data sources that were likely to contain relevant materials. While this document collection process was ongoing, the parties met and conferred to agree on a reasonable set of search terms to be applied to the data. As the data was collected and processed, JPMorgan applied the agreed-upon set of search terms, resulting in more than 35,000 documents to review. JPMorgan has made substantial progress in the review of these documents and began making rolling productions to the Plan Administrator on January 20, 2015. However, more time is needed to complete the document review, make any necessary redactions based for example on attorney-client privilege, and to process the documents for production.

4. Accordingly, JPMorgan respectfully requests that the deadline to complete document discovery be extended to March 13, 2015. JPMorgan would continue to make rolling productions through that date.

5. JPMorgan further submits that a corresponding extension of the deadline for completing depositions would be appropriate to ensure that the Plan Administrator has sufficient

time to review the documents produced and to prepare for depositions. Counsel for the Plan Administrator has informed us that they have a several-week arbitration trial in another matter scheduled commencing on April 8, 2014. Therefore, the parties request that the deadline to complete depositions be extended to May 22, 2015.

6. Finally, JPMorgan requests that the next conference in this matter be adjourned from April 7, 2015, to a date that is convenient to the Court on or after June 1, 2015.

7. The Plan Administrator consents to the extensions requested above. Annexed hereto as Exhibit A is a proposed form of an Order Amending the Case Management and Scheduling Order.

Dated: February 6, 2015
New York, New York

SATTERLEE STEPHENS BURKE & BURKE LLP

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: MF Global Holdings Ltd., et al.	:	**Chapter 11 Case No.**
	:	**11-15059 (MG)**
Debtors.	:	
	:	**Jointly Administered**

ORDER AMENDING CASE MANAGEMENT AND SCHEDULING ORDER FOR OBJECTION OF PLAN ADMINISTRATOR TO PROOFS OF CLAIM NUMBERS 1216 AND 1217, FILED BY JPMORGAN CHASE BANK, N.A

The discovery deadlines set forth in the *Case Management and Scheduling Order for Objection of Plan Administrator to Proofs of Claim Numbers 1216 and 1217, Filed by JPMorgan Chase Bank, N.A.* [Doc. 2046], are hereby amended as follows:

1. All document discovery shall be completed no later than March 13, 2015, with documents produced on a rolling basis.

2. All depositions shall be completed on or before May 22, 2015.

3. The next Case Management Conference is scheduled for _____, 2015, at _____ .

SO ORDERED.

Dated: New York, New York
February ____, 2015

_____
UNITED STATES BANKRUPTCY JUDGE