

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

Brigade Leveraged Capital Structures Fund Ltd.,
Brigade Distressed Value Master Fund Ltd.,
Tasman Fund LP, Claren Road Credit Master
Fund, Ltd., Claren Road Credit Opportunities
Master Fund, Ltd., Fore Multi Strategy Master
Fund, Ltd., Sola Ltd, Ultra Master Ltd, Solus
Opportunities Fund 5 LP,

Plaintiffs,

- against -

The Government Development Bank for Puerto
Rico,

Defendant.

Civil No. 16-CV-1610

**[PROPOSED] STIPULATION AND ORDER EXTENDING PLAINTIFFS' TIME TO
RESPOND TO DEFENDANT'S MOTION TO DISMISS AND FOR PLAINTIFFS TO
FILE AN AMENDED COMPLAINT**

This stipulation is made as of April 29, 2016, by and among the Plaintiffs the in above-captioned proceeding (the "Plaintiffs") and the Government Development Bank for Puerto Rico (the "Defendant" and together with the Plaintiffs, the "Parties").

RECITALS

WHEREAS, on April 4, 2016 the Plaintiffs filed the Complaint [Dkt. 1] commencing this action;

WHEREAS, on April 12, 2016, the Defendants filed a Motion to Dismiss the Complaint [Dkt. 32] ("Motion to Dismiss").

WHEREAS, on April 14, 2016, the Honorable Francisco A. Besosa of the United States District Court for the District of Puerto Rico entered an Order scheduling the deadline for Plaintiffs to respond to Defendants' Motion to Dismiss as April 29, 2016 [Dkt. 36];

WHEREAS, the Parties have determined that it is in each of their own best interests to enter into this Stipulation to extend Plaintiffs' time to respond to the Motion to Dismiss and to file an Amended Complaint in light of the Parties' ongoing negotiations;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, that in the interests of judicial economy and the convenience of the parties, Plaintiffs shall have until May 31, 2016 to respond to Defendant's Motion to Dismiss or to file an Amended Complaint.

IT IS FURTHER STIPULATED AND AGREED that nothing in this Stipulation shall, other than as expressly set forth herein, waive any right of any party, all of which rights are expressly reserved.

Dated: April 29, 2016
San Juan, Puerto Rico

By: /s/ Harold D. Vicente
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Ltd.; Sola Ltd; Ultra Master Ltd; and Solus
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SO ORDERED:

Dated: _____, 2016
San Juan, Puerto Rico

THE HONORABLE FRANCISCO A. BESOSA
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I hereby certify that on April 29, 2016, I caused to be electronically filed the [Proposed] Stipulation and Order Extending Plaintiffs' Time to Respond to Defendant's Motion to Dismiss and For Plaintiffs to File an Amended Complaint with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: April 29, 2016
San Juan, Puerto Rico

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