Docket #0004 Date Filed: 12/5/2012

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SEALINK FUNDING LIMITED, *Plaintiff*, v. DEUTSCHE BANK AG; DEUTSCHE BANK SECURITIES INC.; DB STRUCTURED PRODUCTS, INC.; ACE SECURITIES CORP.; and DEUTSCHE ALT-A SECURITIES INC., *Defendants*.	Adv. Proc. No. 12-2051 (MG) **STIPULATION AND PROPOSED ORDER ESTABLISHING A BRIEFING SCHEDULE**

Plaintiff Sealink Funding Limited ("Plaintiff") and Defendants Deutsche Bank AG, Deutsche Bank Securities Inc., DB Structured Products, Inc., ACE Securities Corp., and Deutsche Alt-A Securities Inc. ("Defendants"), by and through their attorneys, hereby stipulate and agree as follows:

1. Defendants shall respond to, answer, or move to dismiss Plaintiff's amended complaint on or before Wednesday, January 16, 2013.

2. Plaintiff shall file any papers in opposition to a motion to dismiss on or before Thursday, March 7, 2013.

3. Defendants shall file any papers in reply to Plaintiff's papers in opposition to a motion to dismiss on or before Friday, April 5, 2013.

4. Plaintiff shall file any motion(s) seeking remand or withdrawal of the reference (together, "Forum Motions") on or before 30 days from removal and referral of the action, Wednesday, December 19, 2012.

5. Defendants shall file any papers in opposition to any Forum Motion on or before Wednesday, January 23, 2013.

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6. Plaintiff shall file any papers in reply to Defendants' papers in opposition to any Forum Motion on or before Wednesday, February 6, 2013.

7. All defenses are expressly reserved and not waived.

8. This stipulation may be executed in counterparts, each of which shall be deemed an original but all of which constitute one and the same agreement. Facsimile signatures shall have the same force and effect as original signatures.

Dated: New York, New York
December 5, 2012.

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Attorneys for Defendants Deutsche Bank AG, Deutsche Bank Securities Inc., DB Structured Products, Inc., ACE Securities Corp., and Deutsche Alt-A Securities Inc.

SO ORDERED:

_____
United States Bankruptcy Judge