

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

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In re:	:	Chapter 11
AIG FINANCIAL PRODUCTS CORP.,	:	Case No. 22-11309 (MFW)
Debtor. ¹	:	
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	:	
AIG FINANCIAL PRODUCTS CORP.,	:	
Plaintiff,	:	
	:	
v.	:	
LEE ARTHURS; DAVID ACKERT; MITCHELL	:	Adv. Pro. No. 23-50110 (MFW)
BELL; ERIK BENGTON; PAUL BRADSHAW;	:	
THOMAS BUTTKE; JOHN CAPPETTA;	:	
DAVID CHANG; ROBERT CHANG; JASON	:	
DESANTIS; RICHARD FABBRO; KENNETH	:	
FARRAR; JONATHAN FRAADE; CARL	:	
GIESLER JR.; JAMES HAAS; CHARLES	:	
HSIEH; THOMAS KALB; THOMAS	:	
KUSHNER; ROBERT LEARY; JONATHAN	:	
LIEBERGALL; NATHANIEL LITWAK;	:	
BRENDAN LYNCH; ALFRED MEDIOLI;	:	
MATTHEW MIHALY; JOANN PALAZZO;	:	
EUGENE PARK; ANDREW PARTNER; CARL	:	
PETERSON; STEVEN PIKE; THOMAS	:	
PLAGEMANN; ROBERT POWELL; DANIEL	:	
RAAB; ANN REED; PAUL SCHREINER;	:	
DMITRY SATANOVSKY; MARY HEATHER	:	
SINGER; KEITH STEIN; FRANK STROHM;	:	
EMILY SULLIVAN; CHRISTIAN TOFT; JOE	:	
TOM; RYAN VETTER; STEVEN WAGAR;	:	
THOMAS WARD; MARTIN WAYNE; JAMES	:	
WOLF.	:	
Defendants.	:	
	X	

¹ The Debtor in this case, along with the last four digits of the Debtor's federal tax identification number, is: AIG Financial Products Corp. (9410). The Debtor's address is 50 Danbury Road, Wilton, Connecticut 06897.

**STIPULATED SCHEDULING ORDER FOR
EXPERT DISCOVERY FOR INITIAL CLAIMS**

Plaintiff AIG Financial Products Corp. (“the “*Debtor*”), co-Plaintiff and parent entity, American International Group, Inc. (“*AIG*”), and the Defendants (the “*Employee Plaintiffs*”)² (together, the “*Parties*”) have stipulated to the following schedule for expert discovery of the following initial causes of action in the above-captioned adversary proceeding (the “*Adversary Proceeding*”). Pursuant to the Court’s ruling at the hearing on August 28, 2024 granting bifurcation of the claims, the following claims (“*Initial Claims*”) will be adjudicated first, and the expert deadlines for these Initial Claims will be subject to this scheduling order:

- Debtor’s Count I: The Debtor’s claim for declaratory judgment that the funds provided from its parent entity, American International Group, Inc. (“AIG”) to the Debtor under the revolving credit agreement (the “Revolver”) is debt;
- Employee Plaintiffs’ Counterclaim I against the Debtor and AIG: The Employee Plaintiffs’ claim for declaratory judgment that the Revolver is equity;
- Debtor’s Count II: The Debtor’s claim for declaratory judgment that the Employee Plaintiffs’ claims are subordinated in the bankruptcy;
- Employee Plaintiffs’ Count I against AIG: The Employee Plaintiffs’ equitable subordination claim against AIG;
- Employee Plaintiffs’ Count II against AIG: The Employee Plaintiffs’ prima facie tort claim against AIG;
- Employee Plaintiffs’ Count III against AIG: The Employee Plaintiffs’ tortious interference with contractual relations claim against AIG; and
- Employee Plaintiffs’ Count IV against AIG: The Employee Plaintiffs’ claim for declaratory judgment that the Debtor transferred all or substantially all of its assets

² The Employee Plaintiffs are Lee Arthurs; David Ackert; Mitchell Bell; Erik Bengtson; Paul Bradshaw; Thomas Buttke; John Cappetta; David Chang; Robert Chang; Jason DeSantis; Richard Fabbro; Kenneth Farrar; Jonathan Fraade; Carl Giesler Jr.; James Haas; Charles Hsieh; Thomas Kalb; Thomas Kushner; Robert Leary; Jonathan Liebergall; Nathaniel Litwak; Brendan Lynch; Alfred Medioli; Matthew Mihaly; Joann Palazzo; Eugene Park; Andrew Partner; Carl Peterson; Steven Pike; Thomas Plagemann; Robert Powell; Daniel Raab; Ann Reed; Paul Schreiner; Dmitry Satanovsky; Mary Heather Singer; Keith Stein; Frank Strohm; Emily Sullivan; Chris Toft; Joe Tom; Ryan Vetter; Steven Wagar; Thomas Ward; Martin Wayne; and James Wolf.

to or otherwise combined with AIG, and that AIG assumed the Debtor's obligations under the compensation plans.

This scheduling order will govern expert discovery on the Initial Claims, and expert discovery—including expert reports, opinions, and depositions—will be limited to issues relevant to the Initial Claims. A proposed pre-trial scheduling order with additional pre-trial deadlines and a proposed trial date for the Initial Claims will be submitted separately to the Court.

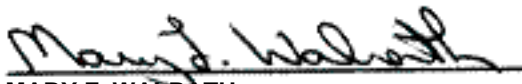
NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. The Parties shall adhere to the following schedule in connection with litigating the Initial Claims:

<u>Event</u>	<u>Date</u>
Date of Court's ruling on bifurcation	August 28, 2024
Deadline to exchange opening expert reports	October 25, 2024
Deadline to exchange rebuttal reports	December 13, 2024
Deadline to complete all expert depositions	January 31, 2025

2. Any deadline set forth in this Order may be modified or extended by agreement of the Parties without further order of the Court, *provided, however*, that if the deadline would affect any submission to the Court, the Parties shall notify the Court by written notice of any such modification or extension within three (3) business day after such mutual agreement.

Dated: September 11th, 2024
Wilmington, Delaware


MARY F. WALRATH
UNITED STATES BANKRUPTCY JUDGE