

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

In re:

PENSON WORLDWIDE, *et al.*,¹
Debtors.

Chapter 11

Case No. 13-10061 (LSS)

(Jointly Administered)

PENSON TECHNOLOGIES LLC, (successor in
interest to SAI HOLDINGS, INC. and PENSON
FINANCIAL SERVICES, INC.),

Plaintiff,

Adv. Proc. No 16-51522 (LSS)

–against–

SCHONFELD GROUP HOLDINGS LLC,

Defendant.

Ref. Adv. D.I. 49

**CERTIFICATION OF COUNSEL REGARDING STIPULATION TO EXTEND
TIME FOR BRIEFING SCHONFELD’S MOTION FOR SUMMARY JUDGMENT**

The undersigned counsel to plaintiff Penson Technologies, LLC (“Plaintiff”), hereby certifies as follows:

1. On July 31, 2018, defendant Schonfeld Group Holdings LLC (“Defendant,” and together with Plaintiff, the “Parties”) filed *Defendant Schonfeld Group Holdings LLC’s Motion for Summary Judgment* [Adv. Docket No. 49] (the “Motion”).

2. The Parties have entered into a stipulation (the “Stipulation”) pursuant to which they have agreed, subject to approval of the Court, that (i) the time for Plaintiff to file and serve its response to the Motion shall be extended until and including October 15, 2018, and (ii)

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Penson Worldwide, Inc. (6356); SAI Holdings, Inc. (3657); and Penson Financial Services, Inc. (3990). The Debtors’ mailing address is 5960 W. Parker Rd. #278-198, Plano, Texas 75093.



Defendant's reply in support of the Motion, if any, shall be filed and served no later than November 14, 2018.

3. A copy of the Stipulation is attached as Exhibit A to the proposed order annexed hereto as Exhibit 1 (the "Proposed Order").

WHEREFORE, Plaintiff respectfully requests that the Court enter the Proposed Order approving the Stipulation at the Court's earliest convenience.

Dated: August 7, 2018
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Michael S. Neiburg

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Counsel to Plaintiff

Exhibit 1

Proposed Order

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

In re:

PENSON WORLDWIDE, *et al.*,¹

Debtors.

Chapter 11

Case No. 13-10061 (LSS)

(Jointly Administered)

PENSON TECHNOLOGIES LLC, (successor in
interest to SAI HOLDINGS, INC. and PENSON
FINANCIAL SERVICES, INC.),

Plaintiff,

Adv. Proc. No 16-51522 (LSS)

–against–

SCHONFELD GROUP HOLDINGS LLC,

Defendant.

**ORDER APPROVING STIPULATION TO EXTEND TIME FOR
BRIEFING SCHONFELD’S MOTION FOR SUMMARY JUDGMENT**

Upon the Certification of Counsel filed by Plaintiff; and upon review of such certification and the Parties’ *Stipulation to Extend Time for Briefing Schonfeld’s Motion for Summary Judgment* attached hereto as Exhibit A (the “Stipulation”);² and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED that:

1. The Stipulation is approved.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Penson Worldwide, Inc. (6356); SAI Holdings, Inc. (3657); and Penson Financial Services, Inc. (3990). The Debtors’ mailing address is 5960 W. Parker Rd. #278-198, Plano, Texas 75093.

² Capitalized terms used but not otherwise defined in this Order shall have the meaning ascribed to such terms in the Stipulation.

2. The time for Plaintiff to file and serve its response to the Motion shall be extended until and including October 15, 2018.

3. Defendant's reply in support of the Motion, if any, shall be filed and served no later than November 14, 2018.

Exhibit A

Stipulation

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

In re:

PENSON WORLDWIDE, *et al.*,¹

Debtors.

Chapter 11

Case No. 13-10061 (LSS)

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PENSON TECHNOLOGIES LLC, (successor in
interest to SAI HOLDINGS, INC. and PENSON
FINANCIAL SERVICES, INC.),

Plaintiff,

–against–

SCHONFELD GROUP HOLDINGS LLC,

Defendant.

Adv. Proc. No 16-51522 (LSS)

**STIPULATION TO EXTEND TIME FOR BRIEFING
SCHONFELD’S MOTION FOR SUMMARY JUDGMENT**

Plaintiff Penson Technologies, LLC (“Plaintiff”), as successor in interest to Debtors SAI Holdings, Inc. and Penson Financial Services, Inc., and Defendant Schonfeld Group Holdings LLC (“Defendant” and, together with Plaintiff, the “Parties”), through their respective counsel, enter into this Stipulation to Extend Time for Briefing Schonfeld’s Motion for Summary Judgment (“Motion for Summary Judgment”), and hereby stipulate and agree as follows:

1. The Parties stipulate and agree that the time within which Plaintiff may respond to the Motion for Summary Judgment [Adv. Proc. Docket No. 49] hereby is extended to October 15, 2018.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Penson Worldwide, Inc. (6356); SAI Holdings, Inc. (3657); and Penson Financial Services, Inc. (3990). The Debtors’ mailing address is 5960 W. Parker Rd. #278-198, Plano, Texas 75093.

2. The Parties stipulate and agree that Defendant will have until November 14, 2018 to submit any reply.

Dated: August 7, 2018

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

/s/ Michael S. Neiburg

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