

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

DEUTSCHE OEL & GAS S.A.,

Plaintiff,

-against-

ENERGY CAPITAL PARTNERS
MEZZANINE OPPORTUNITIES FUND A,
LP, et al.,

Defendants.

Index No. 656717/2019

Hon. Robert R. Reed

I.A.S. Part 43

**STIPULATION AND [REDACTED] ORDER EXTENDING DEADLINE TO
COMPLETE FACT DISCOVERY**

WHEREAS, on February 19, 2026, the Court entered a Preliminary Conference Order (NYSCEF No. 54) (the "Preliminary Conference Order"), establishing deadlines for discovery and the filing of the note of issue in the above-captioned action;

WHEREAS, the parties have exchanged written discovery requests and responses, but document productions have not yet commenced;

WHEREAS, the parties are continuing to meet and confer regarding custodians, search terms, and other issues concerning the collection, review and production of electronically stored information;

WHEREAS, the parties agree that substantial completion of document production should precede party depositions so that the depositions may proceed efficiently and on a complete record;

WHEREAS, to comply with the existing Preliminary Conference Order, the parties are serving deposition notices on July 10, 2026, but agree that the dates identified in those notices may be adjourned by agreement consistent with the revised schedule set forth below;

WHEREAS, the requested extension will permit the parties to complete document discovery and conduct meaningful depositions without prejudice to any party;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that the deadlines in the Preliminary Conference Order are modified as follows:

1. The parties shall meet and confer and use good-faith efforts to finalize the custodians, search terms, and other ESI parameters on or before **July 31, 2026**;
2. The parties shall substantially complete their document productions on or before **September 18, 2026**;
3. Depositions of Plaintiff's witnesses shall be completed on or before **October 16, 2026**;
4. Depositions of Defendants' witnesses shall be completed on or before **November 13, 2026**;
5. Non-party depositions and all remaining fact depositions shall be completed on or before **December 18, 2026**;
6. The end date for all disclosure shall be extended from October 16, 2026 to **January 15, 2027**;
7. The deadline for Plaintiff to file the Note of Issue and Certificate of Readiness shall be extended from October 23, 2026 to **January 29, 2027**;
8. The deposition notices served pursuant to the existing Preliminary Conference Order shall preserve the parties' rights to take the noticed depositions. The dates stated in those notices may be adjourned by agreement of counsel without the need to serve amended notices, provided that the depositions are completed within the deadlines set forth above.

9. Nothing in this Stipulation shall constitute a waiver of any party's objections to any discovery request, deposition notice, subpoena, proposed custodian, search term, or other discovery issue.
10. Except as expressly modified herein, all other provisions of the Preliminary Conference Order shall remain in full force and effect.
11. This Stipulation may be executed in counterparts, each of which shall be deemed an original, and all of which together shall constitute one and the same instrument. Facsimile and electronic signatures shall be deemed original signatures for all purposes.
12. The parties will appear for a status conference in this action on September 15, 2026 at 11:30am.

Dated: New York, New York
July 13, 2026

/s/ Marc Antonecchia
Marc Antonecchia

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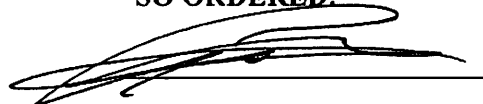
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Attorneys for Defendants

Dated: 7/14/26

SO ORDERED:



Hon. Robert R. Reed, J.S.C.