IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AMERIS BANK, Plaintiff/Counterclaim Defendant, v. PATRICK E. BYRNE, THE PATRICK E. BYRNE REVOCABLE TRUST U/T/A DATED FEBRUARY 23, 2001, and THE PATRICK E. BYRNE IRREVOCABLE TRUST U/T/A DATED JULY 22, 2021, Defendants/Counterclaim Plaintiffs.	C.A. No. 1:26-cv-00190-JLH (Consolidated)

STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME

WHEREAS, Defendants filed a Motion for Leave to File Counterclaims/Second Amended Complaint and an Opening Brief in support thereof on September 30, 2026 ("Defendants' Motion") (D.I. 48 and 49);

WHEREAS, Plaintiff's current deadline to respond to Defendants' Motion is October 14, 2026;

WHEREAS, the parties have discussed and agreed to an extension of Plaintiff's deadline to respond to Defendants' Motion;

IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto, subject to the approval of the Court, that:

1. Plaintiff shall file its response to Defendants' Motion on or before November 16, 2026.
2. Defendants shall file their reply in support of Defendants' Motion on or before December 18, 2026.

[signatures on following page]

Dated: October 5, 2026

Reed Smith LLP

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Counsel for Plaintiff

It is so ordered this ____ day of _____, 2026.

_____
The Honorable Jennifer L. Hall
United States District Judge