

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.</p>	<p>Adv. Pro. No. 08-01789 (CGM) SIPA Liquidation (Substantively Consolidated)</p>
<p>In re: BERNARD L. MADOFF, Debtor.</p>	
<p>IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. HSBC BANK PLC, <i>et al.</i>, Defendants.</p>	<p>Adv. Pro. No. 09-01364 (CGM)</p>

STIPULATION AND ORDER

Irving H. Picard, as trustee (“Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. § 78aaa-III (“SIPA”), substantively consolidated with the chapter 7 estate of Bernard L. Madoff, and defendant HSBC Securities Services (Luxembourg) S.A. (“HSSL”) (together, the “Parties”), by and through their respective undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on November 16, 2020, the Trustee filed a motion seeking the issuance of a Letter of Request requesting documents from HSSL, a Luxembourg entity (ECF No. 648) (the “Motion”);

WHEREAS, the Parties have agreed to adjourn the briefing schedule and hearing date to allow the parties to continue to meet and confer on the Trustee’s request and attempt to resolve any objections;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel that:

1. The deadline to file an objection to the Motion is adjourned from March 24, 2021 to April 22, 2021;
2. The deadline to file a reply is adjourned from April 16, 2021 to May 13, 2021;
3. The hearing date for the Motion is scheduled for May 19, 2021; and
4. This stipulation is without prejudice to the arguments of either HSSL or the Trustee, including but not limited to that the Court lacks personal jurisdiction over HSSL.

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Dated: March 22, 2021
New York, New York

/s/ Oren J. Warshavsky

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Oren J. Warshavsky
Email: owarshavsky@bakerlaw.com
Michelle R. Usitalo
Email: musitalo@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

/s/ Nowell D. Bamberger

**CLEARY GOTTlieb STEEN &
HAMILTON LLP**

Nowell D. Bamberger
(admitted *pro hac vice*)
2112 Pennsylvania Avenue, N.W.
Washington, D.C. 20037
Telephone: (202) 974-1500
Facsimile: (202) 974-1999
Email: nbamberger@cgsh.com

One Liberty Plaza
New York, New York 10006
Telephone: (212) 225-2000
Facsimile: (212) 225-3999
Thomas J. Moloney
Email: tmoloney@cgsh.com
Joseph M. Kay
Email: jkay@cgsh.com

*Attorneys for HSBC Securities Service
(Luxembourg) S.A.*

Dated: March 23, 2021
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge