

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

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

SCHRODER & CO. BANK AG,

Defendant.

Adv. Pro. No. 12-01210 (CGM)

**STIPULATION AND ORDER  
EXTENDING TIME TO FILE RESPONSIVE BRIEFING**

WHEREAS, on February 2, 2022, the parties entered a stipulation and proposed order (the “Stipulation”) (Dkt. No. 89) establishing a schedule to govern the briefing of the motion to dismiss (the “Motion to Dismiss”) to be filed by Defendant Schroder & Co. Bank AG (“Defendant”) in this action;

WHEREAS, pursuant to the Stipulation, Defendant filed an opening brief in support of the Motion to Dismiss on March 11, 2022, and Plaintiff filed its brief opposing that motion on May 11, 2022; and

WHEREAS, pursuant to the Stipulation, Defendant was to file a reply brief in further support of the Motion to Dismiss on or before June 13, 2022.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto, that:

1. Defendant's time to file its reply brief in further support of the Motion to Dismiss is extended until June 22, 2022. This is the first such extension, and it is necessitated by Defendants' counsel experiencing unforeseen medical issues and family obligations.

2. No other term of the Stipulation shall be altered by this further stipulation.

3. Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses that they may have in this action, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including, without limitation, any objection to jurisdiction of this Court.

4. This stipulation may be signed by counsel in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument.

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Dated: June 10, 2022  
New York, New York

**BAKER & HOSTETLER LLP**

*/s/ Robertson D. Beckerlegge*

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**ROPES & GRAY LLP**

*/s/ Martin J. Crisp*

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**SO ORDERED.**

**Dated: June 13, 2022**  
**Poughkeepsie, New York**



*/s/ Cecelia G. Morris*

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