

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

<p>SECURITIES INVESTOR PROTECTION CORPORATION,</p> <p style="text-align: center;">Plaintiff-Applicant,</p> <p style="text-align: center;">v.</p> <p>BERNARD L. MADOFF INVESTMENT SECURITIES LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Adv. Pro. No. 08-01789 (CGM)</p> <p>SIPA Liquidation</p> <p>(Substantively Consolidated)</p>
<p>In re:</p> <p>BERNARD L. MADOFF,</p> <p style="text-align: center;">Debtor.</p>	
<p>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,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>BNP PARIBAS – DUBLIN BRANCH,</p> <p style="text-align: center;">Defendant.</p>	<p>Adv. Pro. No. 22-01087 (CGM)</p>

STIPULATION AND ORDER EXTENDING TIME TO RESPOND TO COMPLAINT

WHEREAS, on April 27, 2022 the plaintiff, Irving H. Picard (the “Trustee”), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”), under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-*lll* (“SIPA”), substantively consolidated with the chapter 7 estate of Bernard L. Madoff (“Madoff”), filed a complaint (the “Complaint”) against BNP Paribas - Dublin Branch (the “Defendant”) in this adversary proceeding; and

WHEREAS, on June 8, 2022, Defendant BNP Paribas - Dublin Branch was served with process of the summons and Complaint in this adversary proceeding prior to entering into this Stipulation and Consent Order; and

WHEREAS, the parties have conferred and agreed upon an extension of time for Defendant to answer, move, or otherwise respond to the Complaint;

THEREFORE, based on the foregoing, the parties, by their undersigned counsel, hereby stipulate and agree as follows:

1. Undersigned counsel for the Defendant represents that service of process of the summons and Complaint on Defendant has been completed, and hereby waives any defenses based on insufficiency of process or insufficiency of service of process on behalf of the Defendant.
2. The time by which Defendant may move, answer, or otherwise respond to the Complaint is extended up to and including October 31, 2022.
3. The Trustee and Defendant reserve all rights and defenses they may have, including but not limited to defenses based on personal jurisdiction, venue and forum non conveniens, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, except for any defenses based upon sufficiency of service of the Complaint.
4. This stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (ECF No. 21193) in the above-captioned case (No. 08-01789 (CGM)).

Dated: July 1, 2022
New York, New York

/s/ David J. Sheehan

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Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 estate of
Bernard L. Madoff*

/s/ Lisa M. Schweitzer

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*Attorneys for Defendant BNP Paribas - Dublin
Branch*

SO ORDERED.

**Dated: July 7, 2022
Poughkeepsie, New York**



/s/ Cecelia G. Morris

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