

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

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

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.

SQUARE ONE FUND LTD.,

Defendant.

Adv. Pro. No. 10-04330 (CGM)

**STIPULATION AND ORDER
FOR THIRD AMENDED CASE MANAGEMENT PLAN**

WHEREAS pursuant to Federal Rules of Civil Procedure 16 and 26, as incorporated by Bankruptcy Rules 7016 and 7026, Plaintiff Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the estate of Bernard L. Madoff under chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 701, *et seq.*, and Defendant Square One Fund Ltd. (“Square One,” and with the Trustee, the

“Parties”), stipulated to the Case Management Plan, which was entered by this Court on July 16, 2019 (ECF No. 178);

WHEREAS, on August 26, 2021, this Court entered the Order Amending Case Management Plan (ECF No. 230);

WHEREAS, the Amended Case Management Plan ordered that all fact discovery shall be completed on or before July 29, 2022;

WHEREAS, on May 16, 2022, this Court signed the Stipulation and Order for Second Amended Case Management Plan (ECF No. 245) (the “Second Amended Case Management Plan”);

WHEREAS, the Second Amended Case Management Plan ordered that all fact discovery shall be completed on or before December 30, 2022;

WHEREAS, the Second Amended Case Management Plan ordered that the Parties may serve document requests under Section 2(d) of the Case Management Plan no later than November 15, 2022;

WHEREAS, the Second Amended Case Management Plan ordered that the Parties may serve interrogatories under Section 2(e) of the Case Management Plan no later than November 15, 2022;

WHEREAS, the Second Amended Case Management Plan ordered that the Parties may serve requests for admission under Section 2(f) of the Case Management Plan no later than November 15, 2022;

WHEREAS, the Parties seek additional time to serve document requests, interrogatories, and requests for admission;

WHEREAS, the Parties seek additional time to respond to document requests, interrogatories, and requests for admission;

NOW THEREFORE, it is ORDERED that the deadline for the Parties to:

(i) Serve document requests under Section 2(d) of the Case Management Plan shall be extended to November 25, 2022;

(ii) Serve interrogatories under Section 2(e) of the Case Management shall be extended to November 25, 2022;

(iii) Serve requests for admission under Section 2(f) of the Case Management Plan shall be extended to November 25, 2022;

(iv) Respond to document requests, interrogatories, and requests for admission shall be extended to December 30, 2022.

The Parties reserve all rights, arguments, objections, and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect the Parties' right to request from the Court a further extension of time.

[Signatures on following page]

Dated: November 9, 2022
New York, New York

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Dated: November 10, 2022
Poughkeepsie, New York



/s/ Cecelia G. Morris

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