

**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. 08-1789 (CGM)**

**SIPA Liquidation  
(Substantively Consolidated)**

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

UBS AG, UBS EUROPE SE (f/k/a UBS  
(LUXEMBOURG) SA), UBS FUND  
SERVICES (LUXEMBOURG) SA, UBS  
THIRD PARTY MANAGEMENT  
COMPANY SA, ACCESS  
INTERNATIONAL ADVISORS LLC,  
ACCESS INTERNATIONAL ADVISORS  
LTD., ACCESS MANAGEMENT  
LUXEMBOURG SA (f/k/a ACCESS  
INTERNATIONAL ADVISORS  
(LUXEMBOURG) SA) as represented by  
its Liquidator MAÎTRE FERNAND  
ENTRINGER, ACCESS PARTNERS SA  
as represented by its Liquidator MAÎTRE  
FERNAND ENTRINGER, PATRICK  
LITTAYE, CLAUDINE MAGON DE LA

**Adv. Pro. No. 10-04285 (CGM)**

VILLEHUCHET (a/k/a CLAUDINE DE LA VILLEHUCHET) in her capacity as Executrix under the Will of THIERRY MAGON DE LA VILLEHUCHET (a/k/a RENE THIERRY DE LA VILLEHUCHET), CLAUDINE MAGON DE LA VILLEHUCHET (a/k/a CLAUDINE DE LA VILLEHUCHET) individually as the sole beneficiary under the Will of THIERRY MAGON DE LA VILLEHUCHET (a/k/a RENE THIERRY DE LA VILLEHUCHET), PIERRE DELANDMETER, THEODORE DUMBAULD, LUXALPHA SICAV as represented by its Liquidators MAÎTRE ALAIN RUKAVINA and PAUL LAPLUME, MAÎTRE ALAIN RUKAVINA AND PAUL LAPLUME, in their capacities as liquidators and representatives of LUXALPHA, GROUPEMENT FINANCIER LTD.,

Defendants.

**STIPULATION AND ORDER EXTENDING TIME TO ANSWER SECOND AMENDED COMPLAINT**

**WHEREAS**, on December 6, 2022, the Court entered an order (ECF No. 340) denying Defendant Theodore Dumbauld’s (“Dumbauld”) Motion to Dismiss the Second Amended Complaint (the “Order”);

**WHEREAS**, the Order set a deadline of January 31, 2023 by which Dumbauld was to answer the Second Amended Complaint;

**WHEREAS**, Dumbauld’s counsel and the Trustee’s counsel previously agreed, at Dumbauld’s request, to extend the time to file an Answer to the Second Amended Complaint to February 28, 2023 and a proposed stipulation was submitted to the Court; and

**WHEREAS**, Dumbauld has requested, and the Trustee’s counsel have agreed to, an extension of the deadline to file an answer to the Second Amended Complaint from February 28, 2023 until March 3, 2023;

**IT IS HEREBY STIPULATED AND AGREED** by and between the parties that:

1. Dumbauld will submit an answer to the Second Amended Complaint on or before  
March 3, 2023.

2. Nothing in this stipulation shall change any discovery deadlines in this  
proceeding.

Dated: February 28, 2023  
New York, New York

BAKER & HOSTETLER, LLP

By: /s/ Robertson D. Beckerlegge  
Robertson D. Beckerlegge  
Oren J. Warshavsky  
Geoffrey A. North  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
rbeckerlegge@bakerlaw.com  
owarshavsky@bakerlaw.com  
gnorth@bakerlaw.com

SHER TREMONTE LLP

By: /s/ Robert Knuts  
Robert Knuts  
Cathy Liu  
90 Broad Street, 23rd Floor  
New York, New York 10004  
Tel: 212.202.2638  
rknuts@shertremonte.com

*Attorneys for Defendant Theodore Dumbauld*

*Attorneys for 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*

**SO ORDERED:**

**Dated: March 2, 2023**  
**Poughkeepsie, New York**



***/s/ Cecelia G. Morris***

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