

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

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant,

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.

ROYAL BANK OF CANADA, individually and as
successor in interest to Royal Bank of Canada (Asia)
Limited; GUERNROY LIMITED; RBC TRUST
COMPANY (JERSEY) LIMITED; BANQUE SYZ
S.A., as successor in interest to Royal Bank of
Canada (Suisse) S.A.; RBC DOMINION
SECURITIES INC.; and RBC ALTERNATIVE
ASSETS, L.P.,

Defendants.

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

SIPA Liquidation
(Substantively Consolidated)

Adv. Pro. No. 12-01699 (CGM)

**STIPULATION AND ORDER
TO EXTEND INITIAL DISCLOSURE DEADLINE**

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–III, and the estate of Bernard L. Madoff, under Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 701-784, and defendants Royal Bank of Canada, individually and as successor in interest to Royal Bank of Canada (Asia) Limited;

Guernroy Limited; RBC Trust Company (Jersey) Limited; Banque SYZ S.A., as successor in interest to Royal Bank of Canada (Suisse) S.A.; RBC Dominion Securities Inc.; and RBC Alternative Assets, L.P. (collectively, “Defendants,” and together with the Trustee, the “Parties”), by and through their respective undersigned counsel, stipulate and agree as follows:

WHEREAS, on July 14, 2023, this Court entered a Case Management Plan in this action, which required that the Parties serve initial disclosures on or before September 12, 2023 (the “Initial Disclosure Deadline”) (ECF No. 191); and

WHEREAS, Defendants requested, and the Trustee agreed to, an extension of the Initial Disclosure Deadline.

IT IS HEREBY STIPULATED AND AGREED, by the Parties, and **SO ORDERED**, by the Court:

1. The Initial Disclosure Deadline shall be extended to September 29, 2023.
2. The Parties otherwise reserve all rights, arguments, objections, and defenses they may have, and their entry into this stipulation shall not impair or otherwise affect any such rights, arguments, objections, and defenses.

[Signatures on following page]

Dated: September 11, 2023
New York, New York

/s/ Howard L. Simon
Windels Marx Lane & Mittendorf, LLP

Howard L. Simon
Kim M. Longo
Alan D. Lawn
156 West 56th Street
New York, New York 10019
Telephone: (212) 237-1000
hsimon@windelsmarx.com
klongo@windelsmarx.com
alawn@windelsmarx.com

*Special Counsel 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*

/s/ Mark T. Ciani
Katten Muchin Rosenman LLP

Anthony L. Paccione
Mark T. Ciani
50 Rockefeller Plaza
New York, New York 10020
Telephone: (212) 940-8800
anthony.paccione@katten.com
mark.ciani@katten.com

Attorney for Defendants

SO ORDERED.

**Dated: September 13, 2023
Poughkeepsie, New York**

{12219568:1}



5

/s/ Cecelia G. Morris

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