

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

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff, 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. LION GLOBAL INVESTORS LIMITED, Defendant.

Adv. Pro. No. 08-01789 (LGB)
SIPA LIQUIDATION
(Substantively Consolidated)

Adv. Pro. No. 11-02540 (LGB)

**STIPULATION AND ORDER AMENDING THE SCHEDULING
ORDER ON JURISDICTIONAL DISCOVERY**

Plaintiff Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the chapter 7 estate of Bernard L. Madoff,

and defendant Lion Global Investors Limited (“Defendant,” and with the Trustee, the “Parties”), by and through their respective undersigned counsel, state as follows:

WHEREAS, on December 9, 2022, the Court entered a Scheduling Order for jurisdictional discovery (the “Scheduling Order”);

WHEREAS, the Trustee served a 30(b)(6) Deposition Notice on Defendant on May 30, 2023, noticing a deposition for June 29, 2023, on various subject matters and offered to meet and confer;

WHEREAS, Defendant advised that the noticed date of the Rule 30(b)(6) deposition was inconvenient and would provide a written response to the Trustee’s Deposition Notice;

WHEREAS, Defendant served written objections to the Rule 30(b)(6) Deposition Notice on September 20, 2023, and the Parties thereafter met and conferred on October 18, 2023 to negotiate the 30(b)(6) deposition topics;

WHEREAS, the Parties have exchanged revised 30(b)(6) deposition topics on October 26, 2023, November 14, 2023, January 12, 2024, and February 20, 2024, and the Parties came to an agreement on the deposition topics on March 7, 2024;

WHEREAS, on July 18, 2024, Defendant designated James Tan Thian Peng as its witness for the 30(b)(6) deposition;

WHEREAS, on August 9, 2024, Defendant informed the Trustee that Mr. Tan’s availability for the 30(b)(6) deposition is in late November;

WHEREAS, the jurisdictional discovery cut-off is currently November 25, 2024, and the Parties agree additional time will be needed to conduct the 30(b)(6) deposition and any additional discovery that may follow;

WHEREAS, the Court previously entered four Orders amending the schedule for jurisdictional discovery on May 12, 2023, July 5, 2023, November 30, 2023, and March 15, 2024;

WHEREAS, the Parties continue to work diligently to complete jurisdictional discovery, but agree that additional time is needed;

WHEREAS, the Parties therefore agree to extend the discovery deadlines and the corresponding briefing schedule so that they may effectively complete jurisdictional discovery; and

WHEREAS, the Parties agree to adjourn the September 25, 2024 Status Conference to December 18, 2024.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. In the event the Parties are unable to resolve their discovery disputes, the Parties shall comply with Judge Beckerman's chamber rules regarding discovery disputes and request a conference with the Court by **December 18, 2024**;
2. The Status Conference scheduled for **September 25, 2024** shall be adjourned to **December 18, 2024**;
3. All personal jurisdiction discovery is to be completed by **February 24, 2025**;
4. The Trustee shall file either a supplemental memorandum in opposition to the motion to dismiss or a motion for leave to amend the complaint by **April 25, 2025**;
5. Defendant shall file an opposition to the Trustee's memorandum or opposition to the motion by **June 24, 2025**; and
6. In the event the Trustee files a motion for leave to amend the complaint, the Trustee shall file a reply in further support of his motion by **July 24, 2025**.

Date: September 12, 2024
New York, New York

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Liquidation of Bernard L. Madoff
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*Attorneys for Defendant Lion Global Investors
Limited*

SO ORDERED.

Dated: September 13, 2024
NEW YORK, NEW YORK

/s/ Lisa G. Beckerman
HONORABLE LISA G. BECKERMAN
UNITED STATES BANKRUPTCY JUDGE