

**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, the Parties met and conferred on several occasions and exchanged revised topics to which the Parties came to an agreement;

WHEREAS, on December 2, 2024, the Trustee’s 30(b)(6) deposition of Defendant occurred;

WHEREAS, on January 9, 2025, the Trustee served its Third Request for Production of Documents;

WHEREAS, Defendant’s deadline to respond to the Trustee’s Third Request for Production of Documents has been extended to February 24, 2025 upon Defendant’s request;

WHEREAS, the jurisdictional discovery cut-off is currently February 24, 2025, and the Parties agree additional time will be needed to complete discovery;

WHEREAS, the Court previously entered five Orders amending the schedule for jurisdictional discovery on May 12, 2023, July 5, 2023, November 30, 2023, March 15, 2024, and September 13, 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

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. The Status Conference scheduled for **January 29, 2025** has been adjourned to **February 26, 2025**;
2. 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 **April 25, 2025**;
3. All personal jurisdiction discovery is to be completed by **May 27, 2025** ("Jurisdictional Discovery Cut-Off Date");
4. Parties may serve additional requests for production of documents and interrogatories questions as needed, provided they are served at least 45 days before the Jurisdictional Discovery Cut-Off Date;
5. 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 **July 18, 2025**;
6. Defendant shall file an opposition to the Trustee's memorandum or opposition to the motion by **September 16, 2025**; and
7. 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 **October 16, 2025**.

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Date: February 3, 2025
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: New York, New York
February 3, 2025

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