

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

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

No. 08-01789 (LGB)

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, et al.,

Defendants.

Adv. Pro. No. 10-04285 (LGB)

STIPULATION AND ORDER

Irving H. Picard, as trustee (the “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–*lll*, and the estate of Bernard L. Madoff, and Katten Muchin Rosenman LLP (“Katten”), counsel for defendants: (i) Access International Advisors, LLC (“Access LLC”), Access International Advisors, Ltd. (“Access Ltd.”), Access Management (Luxembourg), S.A. (f/k/a Access International Advisors (Luxembourg) S.A.) (“AML”), Access Partners, S.A (“AP (Lux)”), Patrick Littaye (“Littaye,”) and Groupement Financier Ltd. (“Groupement,” and together with Access LLC, Access Ltd., AML, AP (Lux), and Littaye,

collectively the “Access Defendants”); and (ii) Claudine Magon de la 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) and 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 (“CDLV”), hereby stipulate and agree as follows:

WHEREAS, on December 9, 2024, Katten filed a motion seeking the entry of an Order authorizing Katten’s withdrawal as counsel of record for the Access Defendants in the above captioned adversary proceeding (Adv. Pro. No. 10-04285 (LGB)) [ECF No. 443] (the “Motion to Withdraw”);

WHEREAS, on January 10, 2025, the Trustee filed his opposition to Katten’s Motion to Withdraw [ECF No. 446];

WHEREAS, Katten’s reply in further support of its Motion to Withdraw was due to be filed on February 21, 2025 (the “Reply Date”);

WHEREAS, Katten’s Motion to Withdraw is currently scheduled to be heard before the Honorable Lisa G. Beckerman, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 623, New York, NY 10004, on February 26, 2025 at 10:00 a.m. (ET) (the “Hearing Date”);

WHEREAS, Katten and the Trustee are engaging in negotiations in an effort to resolve the issues presented by the Motion to Withdraw, and seek additional time for such negotiations;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel that:

1. The Hearing Date is adjourned to March 26, 2025, or as soon thereafter as counsel may be

heard.

2. Katten's Reply Date is adjourned to March 21, 2025.

Dated: February 21, 2025
New York, New York

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Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

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Groupement Financier Ltd., and Claudine
Magon de la Villehuchet*

SO ORDERED:

Dated: February 24, 2025
New York, New York

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