

**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. 08-01789 (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, and Bernard L. Madoff,

Plaintiff,

v.

BANQUE LOMBARD ODIER & CIE SA,

Defendant.

Adv. Pro. No. 12-01693 (LGB)

**STIPULATION AND ORDER  
FOR INTERIM EXTENSION OF DISCOVERY DEADLINES**

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 defendant Banque Lombard Odier & Cie SA (“Lombard Odier” and together with the Trustee, the “Parties”), by and through their respective undersigned counsel, stipulate and agree as follows:

**WHEREAS**, on March 17, 2023, this Court entered a case management plan in this action (“Case Management Plan”) that provided a fact discovery deadline of February 28, 2025. [ECF No. 130];

**WHEREAS**, the Parties have met and conferred and are negotiating appropriate extensions of certain deadlines in the Case Management Plan;

**WHEREAS**, the Parties agree that all deadlines in the Case Management Plan should be extended for thirty (30) days while the Parties continue to negotiate an amended case management plan; and

**WHEREAS**, within thirty (30) days from entry of this stipulation and order, the Parties will submit either a proposed amended case management plan on consent or, if necessary, separate proposed amended case management plans on notice;

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

1. All deadlines in the Case Management Plan shall be extended thirty (30) days.
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.

Dated: February 27, 2025  
New York, New York

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*Attorneys for Defendant*

**SO ORDERED.**

**Dated: February 27, 2025**  
**NEW YORK, NEW YORK**

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