

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

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

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 Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff,

Plaintiff,

v.

LEGACY CAPITAL LTD.,

Defendant.

Adv. Pro. No. 10-05286 (LGB)

SUPPLEMENTAL STIPULATION AND ORDER

Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. § 78aaa-III (“SIPA”), and the chapter 7 estate of Bernard L. Madoff, and Defendant Legacy Capital Ltd. (“Legacy”) (together with the Trustee, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on June 13, 2023, this Court entered a Second Amended Case Management Order (the “CMO”). ECF No. 270;

WHEREAS, on December 5, 2023, this Court entered an Order Further Amending Second Amended Stipulated Case Management Order (“Amended CMO”). ECF No. 289;

WHEREAS, on July 1, 2024, this Court entered an Order to Adjust Deadlines in Second Amended Stipulated Case Management Order adjusting interim dates within the expert schedule (“Adjusted CMO”). ECF No. 327;

WHEREAS, the Amended CMO and Adjusted CMO state that the date by which to complete all expert discovery, including all expert depositions, is March 31, 2025;

WHEREAS, the Parties exchanged initial and rebuttal expert reports in accordance with the deadlines set forth in the Adjusted CMO;

WHEREAS, the Trustee and Legacy have agreed to participate in a private mediation before Hon. Henry Pitman (Ret.) on April 1, 2025;

WHEREAS, in order to provide additional time for the Parties to focus on mediation efforts, the Parties have agreed that all expert depositions shall be suspended until after mediation is concluded; and

WHEREAS, the Parties have further agreed that should the case not be resolved, all expert depositions shall conclude within eight (8) weeks of the April 1, 2025 mediation unless otherwise agreed by the Parties.

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

1. The deadline in the Amended CMO and Adjusted CMO to complete all expert discovery, including all expert depositions, shall be extended from March 31, 2025, to and including May 27, 2025;
2. The Parties may seek additional extensions or scheduling adjustments based on their agreement or upon a showing of good cause; and
3. To the extent not modified herein, the provisions of the CMO, Amended CMO, and Adjusted CMO remain in full force and effect.

Dated: March 17, 2025
New York, New York

Dated: March 17, 2025
New York, New York

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Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*

Attorneys for Legacy Capital Ltd.

SO ORDERED.

**Dated: March 18, 2025
NEW YORK, NEW YORK**

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