

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

Plaintiff,

v.

ABU DHABI INVESTMENT AUTHORITY,

Defendant.

Adv. Pro. No. 11-02493 (LGB)

**STIPULATION AND ORDER**

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 Abu Dhabi Investment Authority (“Defendant”, and with the Trustee, the “Parties”), by and through their respective undersigned counsel, state as follows:

**WHEREAS**, on April 25, 2025, the Trustee filed Motion for Leave to Amend Complaint and to Strike Affirmative Defense (the “Motion”); *see* ECF Nos. 158-160;

**WHEREAS**, Defendant filed its Opposition to the Motion on May 14, 2025; *see* ECF Nos. 162-163;

**WHEREAS**, the Trustee’s reply in further support of the Motion is currently due May 23, 2025;

**WHEREAS**, the Parties have agreed to adjourn the Hearing on the Motion and to extend the reply deadline.

**NOW, THEREFORE, IT IS HEREBY ORDERED THAT:**

1. Trustee’s reply in further support of the Motion shall be filed and served no later than **June 4, 2025**; and
2. The Hearing on the Motion scheduled for May 28, 2025 shall be adjourned to **June 25, 2025 at 10:00 a.m.**

*[Remainder of page intentionally left blank]*

Dated: May 19, 2025  
New York, New York

By: /s/ David J. Sheehan  
**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Keith R. Murphy  
Email: kmurphy@bakerlaw.com

*Attorneys for 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*

**WINDELS MARX LANE &  
MITTENDORF, LLP**  
156 West 56th Street  
New York, New York 10019  
Telephone: (212) 237-1000  
Facsimile: (212) 262-1215  
Kim M. Longo  
klongo@windelsmarx.com

*Special Counsel for 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*

By: /s/ Marc L. Greenwald  
**QUINN EMANUEL URQUHART &  
SULLIVAN**  
295 Fifth Avenue  
New York, NY 10016  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100  
Marc L. Greenwald  
marcgreenwald@quinnemanuel.com  
Eric M. Kay  
erickay@quinnemanuel.com  
Daniel M. Kelly  
danielkelly@quinnemanuel.com

*Attorneys for Abu Dhabi Investment Authority*

Dated: May 20, 2024  
New York, New York

/s/ Lisa G. Beckerman  
**Hon. Lisa G. Beckerman**  
**United States Bankruptcy Judge**