

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

SECURITIES INVESTOR PROTECTION CORPORATION,  Plaintiff-Applicant,  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 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 (the “Trustee”), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-III (“SIPA”), and the substantively consolidated 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**, on March 18, 2025, this Court entered a Supplemental Stipulation and Order (the “Supplemental Stipulation”) extending the deadline to complete all expert discovery, including all expert depositions, to May 27, 2025. ECF No. 330; and

**WHEREAS**, the parties have reached a settlement agreement in principle to fully resolve this adversary proceeding, as well as the related adversary proceeding, *Picard v. Mayer*, Adv. Pro. No. 20-01316 (LGB). The parties are in the midst of documenting the settlement and, once finalized, intend to file a motion pursuant to Rule 9019 of the Bankruptcy Rules seeking the Court’s approval of the settlement.

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

1. The deadline in the Amended CMO, Adjusted CMO, and as extended in the Supplemental Stipulation, to complete all expert discovery, including all expert depositions, shall be extended from May 27, 2025, to and including June 26, 2025;
2. All other deadlines shall be extended by 30 days;
3. The Parties may seek additional extensions or scheduling adjustments based on their agreement or upon a showing of good cause; and
4. To the extent not modified herein, the provisions of the CMO, Amended CMO, and Adjusted CMO remain in full force and effect.

Dated: June 2, 2025  
New York, New York

By: /s/ Tatiana Markel  
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*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*

Dated: June 2, 2025  
New York, New York

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*Attorneys for Legacy Capital Ltd.*

**SO ORDERED.**

Dated: June 3, 2025  
NEW YORK, NEW YORK

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