

**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.

UBS EUROPE SE, formerly known as UBS
Deutschland AG, as successor in interest to
Dresdner Bank Lateinamerika AG, and LGT
BANK (SWITZERLAND) LTD. as successor in
interest to Dresdner Bank (Schweiz) AG,

Defendants.

Adv. Pro. No. 12-01577 (LGB)

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL OF
DEFENDANT LGT BANK (SWITZERLAND) LTD. WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as 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, *et seq.*, and the chapter 7 estate of Bernard L. Madoff, by and through

his undersigned counsel, Baker & Hostetler LLP, and Defendant LGT Bank (Switzerland) Ltd. as successor in interest to Dresdner Bank (Schweiz) AG (the “Defendant,” and collectively with the Trustee, the “Parties”), by and through its undersigned counsel, Wuersch & Gering LLP, hereby stipulate and agree to the following:

1. On May 4, 2012, the Trustee filed his Complaint against Defendant [Adv. Pro. ECF No. 1].

2. On July 14, 2022, the Trustee filed his Amended Complaint against Defendant [Adv. Pro. ECF 105].

3. On April 28, 2023, Defendant timely filed and served its Answer to the Amended Complaint. [Adv. Pro. ECF No. 152].

4. Pursuant to the Settlement Procedures Order, entered by this Court in the Substantively Consolidated SIPA Liquidation on November 12, 2010 [ECF No. 3181], the Parties entered into a Settlement Agreement and Release on May 22, 2025.

5. In accordance with Federal Rule of Bankruptcy Procedure 7041, and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to dismissal of the Trustee’s claims against Defendant in the above-captioned adversary proceeding with prejudice, and without costs to the Trustee or to Defendant.

6. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

7. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the

same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Stipulation.

9. The caption for the Complaint is amended to remove Defendant LGT Bank (Switzerland) Ltd. from the caption, consistent with the attached Exhibit A.

[Signatures on following page]

Dated: June 24, 2025
New York, New York

BAKER & HOSTETLER LLP

By: /s/ David Sheehan
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Torello H. Calvani
Email: tcalvani@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for
the Liquidation of Bernard L. Madoff
Investment Securities LLC and the chapter
7 Estate of Bernard L. Madoff*

Of Counsel:

BAKER & HOSTETLER LLP
811 Main Street, Suite 1100 Houston,
Texas 77002-6111
Telephone: (713) 751-1600
Facsimile: (713) 751-1717
Dean D. Hunt
Email: dhunt@bakerlaw.com
Marie L. Carlisle
Email: mcarlisle@bakerlaw.com

WUERSCH & GERING LLP

By: /s/ Jascha Preuss
100 Wall Street, 10th Fl.
New York, New York 10005
Telephone: 212.509.5050
Jascha D. Preuss
Email: jascha.preuss@wg-law.com
Gregory F. Hauser
Email: gregory.hauser@wg-law.com

*Attorneys for Defendant LGT Bank
(Switzerland) Ltd. as successor in interest to
Dresdner Bank (Schweiz) AG*

SO ORDERED.

Dated: June 24, 2025
New York, New York

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

EXHIBIT A – AMENDED CAPTION

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