

**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.

LION GLOBAL INVESTORS LIMITED,

Defendant.

Adv. Pro. No. 11-02540 (LGB)

**STIPULATION AMENDING THE SCHEDULING  
ORDER ON JURISDICTIONAL DISCOVERY**

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 Lion Global Investors Limited (“Defendant,” and with the Trustee, the “Parties”), by and through their respective undersigned counsel, state as follows:

**WHEREAS**, on July 17, 2025, the Court entered an Amended Scheduling Order for jurisdictional discovery (the “Scheduling Order”);

**WHEREAS**, the Scheduling Order set forth the following briefing schedule after the completion of jurisdictional discovery: (i) a deadline of August 18, 2025, for the Trustee to file either a supplemental memorandum in opposition to the motion to dismiss or a motion for leave to amend the complaint; (ii) a deadline of October 17, 2025, for the Defendant to file an opposition to the Trustee’s memorandum or opposition to the motion; and (iii) a deadline of November 17, 2025, in the event the Trustee files a motion for leave to amend the complaint, the Trustee shall file a reply in further support of his motion;

**WHEREAS**, a Status Conference and a hearing on Defendant’s Motion to Dismiss is scheduled for December 18, 2025;

**WHEREAS**, the Parties completed jurisdictional discovery and are currently engaged in discussions to determine whether they may be able to negotiate a resolution to this matter;

**WHEREAS**, the Parties therefore agree to extend all deadlines as well as the Status Conference and Hearing by 30 days so that they may diligently work together in an attempt to resolve this matter; and

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

1. The Trustee shall file either a supplemental memorandum in opposition to the motion to dismiss or a motion for leave to amend the complaint by **September 17, 2025**;
2. Defendant shall file an opposition to the Trustee’s memorandum or opposition to the motion by **November 17, 2025**;

3. In the event the Trustee files a motion for leave to amend the complaint, the Trustee shall file a reply in further support of his motion by **December 17, 2025**;
4. The Status Conference scheduled for **December 18, 2025**, has been adjourned to the Court's **January 2026 omnibus hearing date**.
5. The Hearing on Defendant's Motion to Dismiss scheduled for **December 18, 2025**, has been adjourned to the Court's **January 2026 omnibus hearing date**.

Date: August 14, 2025  
New York, New York

By: /s/ Robertson D. Beckerlegge  
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Liquidation of Bernard L. Madoff  
Investment Securities LLC and the  
Chapter 7 Estate of Bernard L. Madoff*

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*Attorneys for Defendant Lion Global Investors  
Limited*

**SO ORDERED.**

Dated: August 15, 2025  
New York, New York

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