

**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.

Adv. Pro. No. 12-01211 (LGB)

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.

UNION SECURITIES INVESTMENT  
TRUST CO., LTD., UNION USD GLOBAL  
ARBITRAGE FUND, UNION USD GLOBAL  
ARBITRAGE A FUND, AND UNION  
ARBITRAGE STRATEGY FUND,

Defendants.

**ORDER GRANTING TRUSTEE'S REQUEST TO  
COMPEL DISCOVERY RESPONSES AND FEDERAL RULE 30(b)(6) TESTIMONY**

**WHEREAS**, on October 13, 2025, Irving H. Picard, Trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and the chapter 7 case of Bernard L. Madoff (the "Trustee"), filed a letter (ECF No. 125) pursuant to the Court's

Chambers Rules and S.D.N.Y. Local Bankruptcy Rule 7037-1(b) requesting a conference (the “Conference”) regarding a discovery dispute with defendants Union Securities Investment Trust Co., Ltd., Union USD Global Arbitrage Fund, Union USD Global Arbitrage A Fund, and Union Arbitrage Strategy Fund (the “Defendants”);

**WHEREAS**, on October 16, 2025, the Defendants submitted a letter in response to the Trustee’s October 13, 2025 letter (ECF No. 129);

**WHEREAS**, on October 21, 2025, the Conference was held before the Court.

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

1. The Defendants shall respond to Requests 1-8 of the Trustee’s Second Set of Requests for Production of Documents, dated July 31, 2025 (ECF No. 125, at Ex. 3), within thirty (30) days of entry of this Order; provided that, the “Applicable Period” for Requests 1-8 of the Trustee’s Second Set of Requests for Production of Documents shall be limited to January 1, 2006 – January 31, 2016; and

2. The Defendants shall designate a witness or witnesses to testify regarding all agreed upon topics contained in the Trustee’s Rule 30(b)(6) Deposition Notices to Defendants, dated August 20, 2025 (ECF No. 125, at Ex. 5), including Topics 1–8; provided that the “Applicable Period” for Topics 1–8 of the Trustee’s Rule 30(b)(6) Deposition Notices to Defendants shall be limited to January 1, 2006 – January 31, 2016, except as otherwise agreed to by the Trustee and the Defendants prior to such Rule 30(b)(6) Depositions.

**DATED: October 31, 2025**  
**NEW YORK, NEW YORK**

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