

**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 AND ORDER TO ADJOURN DEADLINES *SINE DIE*

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 September 16, 2025, the Court entered an Amended Scheduling Order [ECF No. 203] for jurisdictional discovery setting forth the following briefing schedule after the completion of jurisdictional discovery: (i) a deadline of November 17, 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 January 16, 2026, for the Defendant to file an opposition to the Trustee’s memorandum or opposition to the motion; and (iii) a deadline of February 16, 2026, 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 March 25, 2026; and

WHEREAS, on October 29, 2025, the Parties reached a settlement in principle and agreed to request that all pending deadlines be adjourned *sine die* to allow the Parties to complete the settlement.

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, and SO ORDERED, by the Court, that:

1. All pending deadlines are adjourned *sine die*.

[Signatures on following page]

Date: November 12, 2025
New York, New York

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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: November 12, 2025
NEW YORK, NEW YORK

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