

**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. ROYAL BANK OF CANADA, individually and as successor in interest to Royal Bank of Canada (Asia) Limited; GUERNROY LIMITED; RBC TRUST COMPANY (JERSEY) LIMITED; RBC DOMINION SECURITIES INC.; and RBC ALTERNATIVE ASSETS, L.P., Defendants.	Adv. Pro. No. 12-01699 (LGB)

STIPULATION AND ORDER TO ADJOURN DEADLINES *SINE DIE*

Plaintiff Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation 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 individually, and defendants Royal Bank of Canada, individually and as successor in interest to Royal Bank of

Canada (Asia) Limited; Guernroy Limited; RBC Trust Company (Jersey) Limited; RBC Dominion Securities Inc.; and RBC Alternative Assets, L.P. (collectively, “Defendants,” and together with the Trustee, the “Parties”), by and through their respective undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on July 14, 2023, the Parties entered into a Case Management Plan setting forth various discovery deadlines, including a fact discovery cut-off date of December 1, 2025 (ECF No. 191);

WHEREAS, the Parties, together with certain defendants in *Picard v. Banque International à Luxembourg S.A., et al.* (Adv. Pro. No. 12-01698), have engaged in mediation in order to reach a settlement in principle of the Trustee’s claims against them; and

WHEREAS, the Parties have agreed to request that all pending deadlines be adjourned *sine die* to allow the Parties to complete the settlement negotiations.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, and upon review by the Court it is **ORDERED**, as follows:

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

[Signatures on following page]

Dated: November 25, 2025
New York, New York

/s/ Howard L. Simon
Windels Marx Lane & Mittendorf, LLP

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*Special Counsel 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*

SO ORDERED.

Dated: November 25, 2025
New York, New York

/s/ Mark T. Ciani
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Attorney for Defendants

/s/ Lisa G. Beckerman
**Honorable Lisa G. Beckerman
United States Bankruptcy Judge**