

**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.

BNP PARIBAS ARBITRAGE SNC,

Defendant.

Adv. Pro. No. 25-01085 (LGB)

**STIPULATION AND ORDER TO WAIVE ORAL ARGUMENT
SCHEDULED FOR HEARING ON DECEMBER 18, 2025**

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–*lll*, and the chapter 7 estate of Bernard L. Madoff, and defendant BNP Paribas Arbitrage SNC (“Defendant,” and together with the Trustee, the “Parties”), by and through their respective undersigned counsel, stipulate and agree as follows:

WHEREAS, on August 13, 2025, Defendant filed a motion to dismiss the Trustee’s Complaint (the “Motion”) [ECF No. 9]; on October 27, 2025, the Trustee opposed the Motion

[ECF No. 13]; and on December 3, 2025, Defendant filed a reply in further support of the Motion [ECF No. 15] (collectively, the “Motion Papers”);

WHEREAS, pursuant to Defendant’s notice of hearing [ECF No. 10] and the Parties’ October 3, 2025 stipulation [ECF No. 12], a hearing to consider the Motion was scheduled for December 18, 2025 at 10:00 a.m.; and

WHEREAS, the Parties have conferred and agree to rest on the Motion Papers and waive oral argument on the Motion.

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

1. The Parties waive oral argument on all issues in the Motion and request the Court issue its ruling based on the Motion Papers.
2. The Parties otherwise reserve all rights, arguments, objections, and defenses they may have, and their entry into this Stipulation shall not impair or otherwise affect any such rights, arguments, objections, and defenses.

Dated: December 4, 2025
New York, New York

By: /s/ Marco Molina
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LLC and the Chapter 7 Estate of
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*Attorneys for Defendant BNP Paribas
Arbitrage SNC*

SO ORDERED.

Dated: December 8, 2025
NEW YORK, NEW YORK

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