

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Adv. Pro. No. 08-01789 (LGB)

Plaintiff-Applicant,

SIPA Liquidation

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant,

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.

Adv. Pro. No. 12-01693 (LGB)

BANQUE LOMBARD ODIER & CIE SA,

Defendant.

**STIPULATION AND ORDER FOR
VOLUNTARY DISMISSAL OF ADVERSARY PROCEEDING**

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, and defendant Banque Lombard Odier & Cie SA (“Lombard Odier”, and together with the Trustee, the “Parties”, and each, individually, as a “Party), by and through their respective undersigned counsel, hereby stipulate and agree to the following:

1. On May June 6, 2012, the Trustee filed a Complaint against Lombard Odier in the above-captioned adversary proceeding (ECF No. 1).

2. On January 27, 2022, the Bankruptcy Court entered a stipulation and order to amend the Complaint to dismiss claims to recover certain transfers alleged in the Complaint (ECF No. 87).

3. On December 21, 2022, Lombard Odier filed an Answer to the Complaint (ECF No. 116).

4. On July 28, 2025, the Parties entered into a settlement agreement that settled the Trustee's claims against Lombard Odier, which was approved by order of this Court on January 2, 2026 (ECF No. 153).

5. In accordance with Federal Rule of Bankruptcy Procedure 7041, and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal of the Trustee's claims against Lombard Odier in the above-captioned adversary proceeding with prejudice and without costs to any Party.

6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed an original. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties in interest.

[Signatures on following page]

Dated: January 20, 2026
New York, New York

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SIPA Liquidation of Bernard L. Madoff
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SO ORDERED.

**DATED: January 22, 2026
NEW YORK, NEW YORK**

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