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**Hearing Date: February 25, 2026**

**Hearing Time: 10:00 a.m. (EST)**

**Opp. Deadline: February 6, 2026**

**Reply Deadline: February 20, 2026**

*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*

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

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant,

In re:

BERNARD L. MADOFF,

Debtor.

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

SIPA Liquidation  
(Substantively Consolidated)

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.

BANQUE INTERNATIONALE À LUXEMBOURG S.A.  
(f/k/a Dexia Banque Internationale à Luxembourg S.A.);  
CACEIS BANK S.A. (d/b/a CACEIS Bank, Luxembourg  
Branch), as successor in interest to RBC Dexia Investor  
Services Bank S.A.; RBC INVESTOR SERVICES  
TRUST (f/k/a RBC Dexia Investor Services Trust);  
BANCO INVERISIS, S.A., as successor in interest to RBC  
Dexia Investor Services España S.A.; and BANQUE  
INTERNATIONALE À LUXEMBOURG (SUISSE) S.A.  
(f/k/a Dexia Private Bank (Switzerland) Ltd.),

Defendants.

Adv. Pro. No. 12-01698 (LGB)

**NOTICE OF THE TRUSTEE'S  
MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS  
AND COMPLETE ANSWERS TO  
INTERROGATORIES WITHIN 30  
DAYS**

**PLEASE TAKE NOTICE** that Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”), under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III (“SIPA”), and the chapter 7 estate of Bernard L. Madoff, by and through his undersigned counsel, will move before the Honorable Lisa G. Beckerman, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, on February 25, 2026 at 10:00 a.m. (EST), or as soon thereafter as counsel may be heard, seeking entry of an order, substantially in the form attached hereto as Exhibit A, (i) compelling defendants Banque Internationale à Luxembourg S.A. (*f/k/a* Dexia Banque Internationale à Luxembourg S.A.) and Banque Internationale à Luxembourg (Suisse) S.A. (*f/k/a* Dexia Private Bank (Switzerland) Ltd.) (together, the “BIL Defendants”) to, within 30 days of the Court’s order approving the Motion, (a) produce all responsive documents and provide complete interrogatory answers, (b) provide signed verifications of their interrogatory answers, and (c) provide a privilege log, and (ii) awarding the Trustee his reasonable expenses incurred in making the motion, including attorney’s fees.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Court’s directive, all hearings will be conducted remotely pending further Order of the Court. All parties who wish to participate in the Hearing must refer to the Procedures for All Hearings Before Beckerman Being Held by Zoom Video and are required to make arrangements to appear via ZoomGov. For further details on ZoomGov, please call the Courtroom Deputy at (845) 451-6367. Further instructions regarding remote appearances via ZoomGov can be found on the Court’s website at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>. Pro se parties may participate telephonically in hearings free of charge.

**PLEASE TAKE FURTHER NOTICE** that the BIL Defendants' opposition to the Trustee's motion is due February 6, 2026, and the Trustee's reply in further support of his motion is due February 20, 2026.

Date: New York, New York  
January 23, 2026

Respectfully submitted,

/s/ Kim M. Longo

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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*

# EXHIBIT A

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

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

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.

BANQUE INTERNATIONALE À LUXEMBOURG S.A.  
(*f/k/a* Dexia Banque Internationale à Luxembourg S.A.);  
CACEIS BANK S.A. (*d/b/a* CACEIS Bank, Luxembourg  
Branch), as successor in interest to RBC Dexia Investor  
Services Bank S.A.; RBC INVESTOR SERVICES  
TRUST (*f/k/a* RBC Dexia Investor Services Trust);  
BANCO INVERSIS, S.A., as successor in interest to RBC  
Dexia Investor Services España S.A.; and BANQUE  
INTERNATIONALE À LUXEMBOURG (SUISSE) S.A.  
(*f/k/a* Dexia Private Bank (Switzerland) Ltd.),

Defendants.

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

SIPA Liquidation  
(Substantively Consolidated)

Adv. Pro. No. 12-01698 (LGB)

**[PROPOSED] ORDER GRANTING THE TRUSTEE’S MOTION  
TO COMPEL PRODUCTION OF DOCUMENTS AND  
COMPLETE ANSWERS TO INTERROGATORIES WITHIN 30 DAYS**

This cause having come before the Court on February 25, 2026, on the motion (“Motion”) of Irving H. Picard (the “Trustee”), as 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, by and through his counsel, Windels Marx Lane & Mittendorf, LLP, for entry of an order (i) compelling defendants Banque Internationale à Luxembourg S.A. (f/k/a Dexia Banque Internationale à Luxembourg S.A.) and Banque Internationale à Luxembourg (Suisse) S.A. (f/k/a Dexia Private Bank (Switzerland) Ltd.) (together, the “BIL Defendants”) to, within 30 days of the Court’s entry of this Order, (a) produce all responsive documents and provide complete interrogatory answers, (b) provide signed verifications of their interrogatory answers, and (c) provide a privilege log, and (ii) awarding the Trustee his reasonable expenses incurred in making the Motion, including attorney’s fees; and

Due notice of the Motion having been given and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein, and after deliberation:

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:**

1. The Motion is granted in its entirety;
2. The BIL Defendants are hereby ordered to, (i) within 30 days of entry of this Order, (a) produce all documents responsive to the Trustee’s document requests and provide complete answers to the Trustee’s interrogatories, (b) provide signed verifications of their interrogatory answers, and (c) provide a privilege log, and (ii) pay the Trustee his reasonable expenses incurred in making the Motion, including attorney’s fees.
3. The Trustee shall file an affidavit of his reasonable expenses, including attorney’s fees, incurred in making the Motion, within 30 days of the date of this Order.

4. This Court shall retain jurisdiction to, among other things, interpret and enforce the terms and provisions of this Order.

**SO ORDERED.**

**Dated:** \_\_\_\_\_  
**New York, New York**

\_\_\_\_\_  
**Honorable Lisa G. Beckerman**  
**United States Bankruptcy Judge**