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**Hearing Date: March 25, 2026**  
**Hearing Time: 10:00 am (EDT)**  
**Opposition Deadline: March 11, 2026**  
**Reply Deadline: March 18, 2026**

*Attorneys 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.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated Liquidation of Bernard  
L. Madoff Investment Securities LLC and the  
Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

MALCOLM SAGE and LYNNE FLORIO,

Defendants.

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

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 23-01099 (LGB)

**NOTICE OF THE TRUSTEE'S MOTION FOR LEAVE TO AMEND COMPLAINT**

**PLEASE TAKE NOTICE** that Irving H. Picard, as Trustee for the liquidation of Bernard L. Madoff Investment Securities LLC, under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the substantively consolidated 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 **March 25, 2026 at 10:00 a.m. (EDT)**, or as soon thereafter as counsel may be heard, seeking entry of an order granting the Trustee’s motion for leave to amend his Complaint, as more particularly set forth in the accompanying Memorandum of Law and Declaration of James H. Rollinson.

**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. 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, should Defendants request an in-person hearing, such request should be made in writing to the Court and the Trustee. Upon receipt of such request, the Court will schedule the hearing for the next available in-person date.

**PLEASE TAKE FURTHER NOTICE** that Defendants’ opposition to the Trustee’s motion is due **March 11, 2026**, and the Trustee’s reply in further support of his motion is due **March 18, 2026**.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted  
herewith.

Date: February 25, 2026  
Cleveland, Ohio

By: /s/ James H. Rollinson  
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*Attorneys 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*

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**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 Liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 Estate of Bernard L. Madoff,  Plaintiff,  v.  MALCOLM SAGE and LYNNE FLORIO,  Defendant.

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

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 23-01099 (LGB)

**[PROPOSED] ORDER GRANTING THE TRUSTEE'S MOTION  
FOR LEAVE TO AMEND COMPLAINT**

This case having come before the Court on March 25, 2026, on the motion (“Motion”) of Irving H. Picard, 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, including with the Trustee’s supporting Memorandum of Law and Declaration of James H. Rollinson (with exhibits), by and through his counsel, Baker & Hostetler LLP, for entry of an order granting the Trustee’s motion for leave to amend his Complaint; 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 Trustee’s Motion for Leave to Amend the Complaint is granted in its entirety;
2. The Trustee shall file his Amended Complaint within 14 days of entry of this Order; and
3. This Court shall retain jurisdiction to, among other things, interpret and enforce the terms and provisions of this Order.

**Dated:** \_\_\_\_\_

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