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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*

**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,

FAIRFIELD INVESTMENT FUND LIMITED, STABLE  
FUND, FAIRFIELD GREENWICH LIMITED,  
FAIRFIELD GREENWICH (BERMUDA), LTD.,  
FAIRFIELD GREENWICH ADVISORS LLC,  
FAIRFIELD INTERNATIONAL MANAGERS, INC.,  
THE ESTATE OF WALTER M. NOEL, JR., MONICA  
NOEL, in her capacity as Executor of the Estate of Walter  
M. Noel, Jr., JEFFREY TUCKER, ANDRES  
PIEDRAHITA, AMIT VIJAYVERGIYA, PHILIP

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

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 09-01239 (LGB)

**Ref. Docket No. 432**

TOUB, CORINA NOEL PIEDRAHITA, FAIRFIELD  
GREENWICH CAPITAL PARTNERS and SHARE  
MANAGEMENT LLC,

Defendants.

**SUPPLEMENTAL DECLARATION OF ERIKA K. THOMAS  
IN SUPPORT OF THE TRUSTEE'S OPPOSITION TO  
DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Erika Thomas, pursuant to 28 U.S.C. § 1746, declare as follows:

I am a partner with the law firm of Baker & Hostetler LLP, counsel to Irving H. Picard, as trustee ("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, and the chapter 7 estate of Bernard L. Madoff. I submit this Supplemental Declaration in Support of the Trustee's Opposition to Defendants' Motion for Partial Summary Judgment to correct and supplement previously submitted exhibits.

1. On January 26, 2026, the Trustee filed the *Declaration of Erika K. Thomas in Support of the Trustee's Opposition to Defendants' Motion for Partial Summary Judgment*. [Docket No. 432] (the "Thomas Declaration").

2. Attached to the Thomas Declaration as Exhibit 47 was a true and correct copy of the excerpted interview transcript of Daniel E. Lipton taken by the Massachusetts Office of the Secretary of the Commonwealth Securities Division on March 5, 2009.

3. Attached to the Thomas Declaration as Exhibit 117 was a true and correct copy of the excerpted deposition transcript of Patricia Perruzza taken in *Anwar et al. v. Fairfield Greenwich Limited, et al.*, Index No. 09-cv-00118 (S.D.N.Y.) on September 24, 2012.

4. Attached to the Thomas Declaration as Exhibit 160 was a true and correct copy of minutes of a meeting of the Board of Directors of Fairfield Lambda Limited dated May 16, 2006.

5. Attached to the Thomas Declaration as Exhibit 230 was a true and correct copy of the excerpted deposition transcript of Amit Vijayvergiya taken in this action on January 30, 2025.

6. Attached to the Thomas Declaration as Exhibit 238 was a true and correct copy of the Rule 2004 Examination transcript of Christopher Cutler taken on January 21, 2010.

7. Attached hereto is **Exhibit 47 (Corrected)**, which has been supplemented to include a true and correct copy of transcript pages which were previously cited but inadvertently omitted from the excerpted interview of Daniel E. Lipton taken by the Massachusetts Office of the Secretary of the Commonwealth Securities Division on March 5, 2009.

8. Attached hereto is **Exhibit 117 (Corrected)**, which has been supplemented to include a true and correct copy of transcript pages which were previously cited but inadvertently omitted from the excerpted deposition of Patricia Perruzza taken in *Anwar et al. v. Fairfield Greenwich Limited, et al.*, Index No. 09-cv-00118 (S.D.N.Y.) on September 24, 2012.

9. Attached hereto is **Exhibit 160 (Substitute)**, which is a true and correct copy of the minutes of a meeting of the Board of Directors of Fairfield Sentry Limited, dated May 16, 2006, which is submitted to replace the minutes of a meeting of the Board of Directors of Fairfield Lambda Limited, dated May 16, 2006.

10. Attached hereto is **Exhibit 230 (Corrected)**, which has been supplemented to include a true and correct copy of transcript pages which were previously cited but inadvertently omitted from the excerpted deposition of Amit Vijayvergiya taken in this action on January 30, 2025.

11. Attached hereto is **Exhibit 238 (Corrected)**, which has been supplemented to include a true and correct copy of transcript pages which were previously cited but inadvertently omitted

from the excerpted Rule 2004 Examination of Christopher Cutler taken January 21, 2010.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 24, 2026  
New York, New York

/s/ Erika K. Thomas

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