

**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 Bernard L. Madoff,

Plaintiff,

v.

OFI MGA ALPHA PALMARES (f/k/a Oval
Alpha Palmares); OVAL PALMARES
EUROPLUS; and UMR SELECT
ALTERNATIF;

Defendants.

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

SIPA Liquidation
(Substantively Consolidated)

Adv. Pro. No. 12-01677 (LGB)

**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 defendants OFI MGA Alpha Palmares (f/k/a Oval Alpha Palmares), Oval Palmares Europlus, and UMR Select Alternatif (collectively, the “OFI Defendants” and, together with the Trustee, the

“Parties,” and each individually, a “Party”), by and through their respective undersigned counsel, hereby stipulate and agree to the following:

1. On May 30, 2012, the Trustee filed a Complaint against the OFI Defendants and others in the above-captioned adversary proceeding (ECF No. 1).

2. On April 18, 2022, the Court entered a Stipulation and Order to, *inter alia*, amend the Complaint to dismiss certain defendants and dismiss claims to recover certain transfers alleged in the Complaint (ECF No. 133) (the “Stipulation and Order”).

3. On November 1, 2022, the OFI Defendants filed an Answer to the Complaint, as amended by the Stipulation and Order (ECF No. 205).

4. On June 20, 2025, certain additional defendants and claims were dismissed from the adversary proceeding pursuant to a stipulation and order entered on June 20, 2025 (ECF No. 230), in connection with a settlement agreement.

5. On December 31, 2025, the Parties entered into a settlement agreement that settled the Trustee’s claims against the OFI Defendants, which was approved by order of this Court on March 11, 2026 (ECF No. 236).

6. 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 the OFI Defendants in the above-captioned adversary proceeding and dismissal of the adversary proceeding with prejudice and without costs to any Party.

7. 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.

8. 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.

Dated: April 1, 2026

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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 for the Chapter 7 Estate
of Bernard L. Madoff*

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Attorneys for the OFI Defendants

SO ORDERED.

**Dated: April 2, 2026
New York, New York**

/s/ Lisa G Beckerman
**Honorable Lisa G. Beckerman
United States Bankruptcy Judge**