

**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., as successor in interest to RBC
Dexia Investor Services Bank France S.A.,
and *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
INVERDIS, 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)

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL OF RBC-DEXIA
DEFENDANTS FROM ADVERSARY PROCEEDING WITH PREJUDICE**

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 RBC Investor Services Trust (*f/k/a* RBC Dexia Investor Services Trust) and Banco Inversis, S.A. (as successor in interest to RBC Dexia Investor Services España S.A.) (collectively, the “RBC-Dexia Defendants,” 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 June 6, 2012, the Trustee filed a Complaint against the RBC-Dexia Defendants and others in the above-captioned adversary proceeding (ECF No. 1).

2. On April 4, 2022, the Court entered a Stipulation and Order Regarding Changes to Defendants that dismissed one defendant, changed the names of two defendants, and substituted one defendant (ECF No. 128).

3. On June 30, 2022, the Trustee filed an Amended Complaint (ECF 134).

4. On May 15, 2023, the RBC-Dexia Defendants and one other defendant filed an Answer with Affirmative Defenses and Jury Demand (ECF No. 186).

5. On February 9, 2026, the Parties entered into a settlement agreement that settled the Trustee’s claims against the RBC-Dexia Defendants, which was approved by order of this Court on March 12, 2026 (ECF No. 232).

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 RBC-Dexia Defendants in the above-captioned 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.

[Signatures on following page]

Dated: April 9, 2026
New York, New York

/s/ Howard L. Simon
Windels Marx Lane & Mittendorf, LLP

Howard L. Simon
hsimon@windelsmarx.com
156 West 56th Street
New York, New York 10019
Telephone: (212) 237-1000
Facsimile: (212) 262-1215

*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*

/s/ Mark T. Ciani
Katten Muchin Rosenman LLP

Mark T. Ciani
mark.ciani@katten.com
50 Rockefeller Plaza
New York, New York 10020
Telephone: (212) 940-8800

Attorney for the RBC-Dexia Defendants

SO ORDERED this 13th day of April 2026:

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