

**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. ROYAL BANK OF CANADA, individually and as successor in interest to Royal Bank of Canada (Asia) Limited; GUERNROY LIMITED; RBC TRUST COMPANY (JERSEY) LIMITED; RBC DOMINION SECURITIES INC.; and RBC ALTERNATIVE ASSETS, L.P., Defendants.

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

SIPA Liquidation
(Substantively Consolidated)

Adv. Pro. No. 12-01699 (LGB)

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL OF 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 Royal Bank of Canada, individually and as successor in interest to Royal Bank of

Canada (Asia) Limited, Guernroy Limited, RBC Trust Company (Jersey) Limited, RBC Dominion Securities Inc., and RBC Alternative Assets, L.P. (collectively, the “RBC 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 Defendants and others in the above-captioned adversary proceeding (ECF No. 1).

2. On December 22, 2021, the Court entered a Stipulation and Order Regarding Changes to Defendants that dismissed one defendant and substituted three others (ECF No. 142).

3. On May 3, 2022, the Trustee filed an Amended Complaint (ECF 145).

4. On June 2, 2023, the RBC Defendants and then-defendant Banque Syz S.A., as successor in interest to Royal Bank of Canada (Suisse) S.A., filed an Answer with Affirmative Defenses and Jury Demand (ECF No. 186).

5. On January 5, 2024, the Court entered a stipulation and order dismissing Banque Syz S.A. from the case, with prejudice, on account of a settlement between the Trustee and Banque Syz of all of his claims against Banque Syz, leaving the RBC Defendants as the only remaining defendants (ECF No. 195).

6. On February 9, 2026, the Parties entered into a settlement agreement that settled the Trustee’s claims against the RBC Defendants, which was approved by order of this Court on March 12, 2026 (ECF No. 209).

7. 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 Defendants in the above-captioned adversary proceeding with prejudice and without costs to any Party.

8. 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.

9. 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

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Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
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Attorney for the RBC Defendants

SO ORDERED this 13th day of April 2026:

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