

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

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

SIPA LIQUIDATION

(Substantively Consolidated)

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.

KOREA EXCHANGE BANK, individually and as
Trustee for Korea Global All Asset Trust I-1, and
as Trustee for Tams Rainbow Truste III,

Defendant.

Adv. Pro. No. 11-02572 (LGB)

STIPULATION AND ORDER

Plaintiff Irving H. Picard (the “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, and defendant Korea Exchange Bank, individually and as Trustee for Korea Global All Asset Trust I-1, and as

Trustee for Tams Rainbow Truste III (“the “KEB” and, together with the Trustee, the “Parties,” and each individually, a “Party”), by and through their respective undersigned counsel states as follows:

WHEREAS, on September 1, 2011, the Trustee initiated the above-captioned adversary proceeding in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) by filing a complaint against KEB. [ECF No. 1].

WHEREAS, on February 8, 2023, the Bankruptcy Court entered a Case Management Plan to which the parties had stipulated. [ECF No. 158].

WHEREAS, on December 20, 2024, the Bankruptcy Court entered a First Amended Case Management Plan to which the parties had stipulated. [ECF No. 161].

WHEREAS, on August 27, 2025, the Bankruptcy Court entered a Second Amended Case Management Plan to which the parties had stipulated. [ECF No. 162].

WHEREAS, on April 23, 2026, the Trustee issued an amended notice of deposition pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 14, 15, 18, 19, and 20, 2026 (the “Rule 30(b)(6) Deposition”).

WHEREAS, on April 27, 2026, the Trustee filed a letter requesting a discovery conference to resolve issues relating to KEB’s disclosure of the identities of its employees in connection with the Trustee’s discovery requests. [ECF No. 163].

WHEREAS, on May 5, 2026, the Court held a discovery conference and set a schedule and hearing on the Trustee’s forthcoming motion to compel (the “Motion to Compel”) [ECF No. 169].

IT IS HEREBY STIPULATED AND AGREED by and between the Parties by the endorsement of their counsel below that:

1. The Rule 30(b)6 Deposition is adjourned and the Parties agree to meet and confer in

good faith to reschedule for mutually agreeable dates in August or September 2026.

2. The Parties agree to hold all deadlines in the Second Amended Case Management Plan in abeyance while the Motion to Compel is pending. The Parties agree to meet and confer in good faith to amend discovery deadlines in the case management order after agreeing to new dates for the Rule 30(b)(6) Deposition.

3. The Bankruptcy Court shall retain jurisdiction over this Stipulation and Order.

Dated: May 8, 2026
New York, New York

By: /s/ Brian W. Song

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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*

SO ORDERED.

**DATED: May 8, 2026
NEW YORK, NEW YORK**

By: /s/ Richard A. Cirillo

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/s/ Lisa G. Beckerman
**HONORABLE LISA G. BECKERMAN
UNITED STATES BANKRUPTCY JUDGE**