

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

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

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
Liquidation of Bernard L. Madoff Investment
Securities LLC,

Plaintiff,

v.

NAIDOT & CO. and BESSEMER TRUST
COMPANY,

Defendants.

Adv. Pro. No. 11-02733 (LGB)

STIPULATION AND ORDER TO ADJOURN DEADLINES SINE DIE

Plaintiff Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of the business 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

individually, and defendants Naidot & Co. and Bessemer Trust Company (“Defendants” and, together with the Trustee, the “Parties,” and each individually, a “Party”), by and through their respective undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on February 10, 2026, the Bankruptcy Court entered a Second Amended Case Management Plan to which the Parties had stipulated (ECF No. 143); and

WHEREAS, on March 23, 2026, the Bankruptcy Court entered a Stipulation and Order Concerning Mediation wherein the Parties agreed to submit to mediation in an attempt to resolve this action (ECF No. 144).

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, and upon review by the Court it is **ORDERED**, as follows:

1. All pending deadlines are adjourned *sine die*.

[Signatures on following page]

Dated: May 28, 2026
New York, New York

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MITTENDORF, LLP**

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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 Defendants Naidot & Co. and
Bessemer Trust Company*

SO ORDERED.

**Dated: May 29, 2026
New York, New York**

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