

**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 Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 Estate of Bernard L. Madoff, Plaintiff, v. BANK HAPOALIM B.M. AND BANK HAPOALIM (SWITZERLAND) LTD., Defendants.	Adv. Pro. No. 12-01216 (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 Bank Hapoalim B.M. and Hapoalim (Switzerland) Ltd. in Liquidation (sued as Bank Hapoalim (Switzerland) Ltd.) (collectively, the “Hapoalim 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 March 29, 2012, the Trustee filed a Complaint against the Hapoalim Defendants and others in the above-captioned adversary proceeding (ECF No. 1).

2. On February 7, 2022, the Court entered an Order dismissing the Kingate Global Subsequent Transfers (ECF No. 113).

3. On November 21, 2022, the Hapoalim Defendants filed an Answer to the Complaint (ECF No. 132).

4. On March 24, 2026, the Parties entered into a settlement agreement that settled the Trustee’s claims against the Hapoalim Defendants, which was approved by order of this Court on April 21, 2026 (ECF No.156).

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

6. 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.

7. 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.

Date: May 29, 2026
New York, New York

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Liquidation of Bernard L. Madoff
Investment Securities LLC and
the Chapter 7 Estate of Bernard L. Madoff*

*Attorneys for Defendants Bank Hapoalim B.M. and
Hapoalim (Switzerland) Ltd. in Liquidation
(sued as Bank Hapoalim (Switzerland) Ltd.)*

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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 the Chapter 7 Estate of Bernard L. Madoff*

SO ORDERED.

**Dated: June 1, 2026
NEW YORK, NEW YORK**

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