

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

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

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.

UBS AG, et al.,

Defendants.

Adv. Pro. No. 10-04285 (LGB)

STIPULATION AND ORDER FOR DISMISSAL

WHEREAS, 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 estate of Bernard L. Madoff, and Katten Muchin Rosenman LLP (“**Katten**”), counsel for defendants: Access International Advisors, LLC (“**Access LLC**”), Access International Advisors, Ltd. (“**Access Ltd.**”), Access Management (Luxembourg), S.A. (f/k/a Access International Advisors (Luxembourg) S.A.) (“**AML**”), Access Partners, S.A (“**AP (Lux)**”), Patrick Littaye (“**Littaye**,” and together with Access LLC, Access Ltd., and AML, AP (Lux) collectively the “**Access Defendants**”); (Trustee, and the Access Defendants collectively the “**Parties**”), set forth these recitals (the “**Recitals**”);

WHEREAS, the Trustee commenced this adversary proceeding on or about November 23, 2010 (the “**Adversary Proceeding**”) and filed a Second Amended Complaint against the Access Defendants, among others, on or about February 28, 2022 (ECF 274)¹ asserting various causes of action against the Access Defendants;

WHEREAS, the Trustee has sought to prosecute the Claims against the Access Defendants, and a Scheduling Order was entered on or about August 1, 2024 (ECF 441);

WHEREAS, on or about December 9, 2024, Katten Muchin Rosenman LLP (“**Katten**”) filed a motion seeking the entry of an Order authorizing Katten’s withdrawal as counsel of record for the Access Defendants in the Adversary Proceeding (ECF 443) (the “**Motion to Withdraw**”);

WHEREAS, on or about January 10, 2025, the Trustee filed his opposition to Katten’s Motion to Withdraw (ECF 446);

WHEREAS, on June 20, 2025, a Stipulation and Order of Mediation and to adjourn Hearing Dates was entered by the Court (the “**Mediation Order**”) (ECF 461) and thereafter, pursuant to the Mediation Order, Katten and the Trustee continued to engage in confidential negotiations;

NOW THEREFORE, the Parties, by their undersigned counsel hereby stipulate and agree as follows and, upon review, it is hereby **ORDERED** by the Court that:

1. In accordance with Federal Rule of Bankruptcy Procedure 7041 and Federal Rule of Civil Procedure 41(a)(1), the Trustee’s Claims against the Access Defendants are hereby dismissed with prejudice.
2. The dismissal of Access Defendants does not affect any of the Trustee’s claims against any of the other defendants in this or any other Adversary Proceeding.

¹ Docket references are to Adv. Pro. No. 10-04285.

3. Nothing in this Stipulation should be deemed an admission of any liability for the Claims all of which are expressly denied.
4. 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.

Dated: June 3, 2026
New York, New York

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

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Financier Ltd., Claudine Magon de la Villehuchet
(a/k/a Claudine de la Villehuchet) in her capacity
as Executrix under the Will of Thierry Magon de
la Villehuchet (a/k/a Rene Thierry de la
Villehuchet) and Claudine Magon de la
Villehuchet (a/k/a Claudine de la Villehuchet)*

SO ORDERED.

DATED: June 3, 2026
NEW YORK, NEW YORK

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