

EXHIBIT A

**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 (SMB)

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, UBS (LUXEMBOURG) S.A., UBS FUND
SERVICES (LUXEMBOURG) S.A., UBS THIRD PARTY
MANAGEMENT COMPANY S.A., M&B CAPITAL
ADVISERS SOCIEDAD DE VALORES, S.A., RELIANCE
INTERNATIONAL RESEARCH LLC, RELIANCE
MANAGEMENT (GIBRALTAR) LIMITED,
LUXEMBOURG INVESTMENT FUND AND
LUXEMBOURG INVESTMENT FUND U.S. EQUITY
PLUS, as represented by their Liquidators MAÎTRE ALAIN
RUKAVINA and PAUL LAPLUME, MAÎTRE ALAIN
RUKAVINA and PAUL LAPLUME, in their capacities of
liquidators and representatives of LUXEMBOURG
INVESTMENT FUND AND LUXEMBOURG
INVESTMENT FUND U.S. EQUITY PLUS, and
LANDMARK INVESTMENT FUND IRELAND,

Defendants.

Adv. Pro. No. 10-05311 (SMB)

**STIPULATION AND ORDER AUTHORIZING
INTERNATIONAL DISCOVERY**

WHEREAS, on April 4, 2016, the Trustee and the defendants in this action (the “LIF Action”) and *Picard v. UBS AG, et al.*, Adv. Pro. No. 10-4285 (SMB) (the “Luxalpha Action” and with the LIF Action, the “Actions”), which the Parties have agreed should be coordinated for scheduling purposes, participated in a conference under Rule 26(f) of the Federal Rules of Civil Procedure in the Actions to discuss, among other things, a schedule for discovery therein;

WHEREAS, at the Rule 26(f) conference and in additional efforts to meet and confer, the Parties disputed the appropriate timing of the commencement of discovery under the Federal Rules or otherwise;

WHEREAS, the Trustee asserted that the Federal Rules permit the immediate commencement of discovery in the Actions and that the further delay of discovery would result in the loss of evidence relevant to the events underlying the Trustee’s claims in the Actions and would unduly prejudice his ability to prosecute those claims and, in connection with the Rule 26(f) conference, served requests for the production of documents under Rule 34 (the “Rule 34 Requests”);

WHEREAS, the Defendants objected to the commencement of discovery under the Federal Rules or otherwise, asserting that certain pending motions, including the Extraterritoriality Motion, the Trustee’s motion for leave to amend his complaints, and the defendants’ motions to dismiss for lack of personal jurisdiction and *forum non conveniens*, and anticipated motions to dismiss on other grounds (the “Anticipated Motions”) will affect the identity of the parties and the scope of discovery in the Actions, making the commencement of discovery premature at this time and proposed that, in an effort to make progress while the

parties awaited the Court’s decision on the Extraterritoriality Motion, (a) the parties move forward with briefing on the Anticipated Motions, or (b) in the alternative, the parties be permitted to pursue document discovery overseas by letters of request pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters (the “Hague Convention”);

WHEREAS, unable to resolve their dispute concerning the appropriate time for the commencement of discovery, counsel for the Trustee and certain Parties appeared before the Honorable Stuart M. Bernstein, U.S.B.J. on April 27, 2016 for a status conference; and

WHEREAS, having considered the Parties’ positions at the April 27 status conference, Judge Bernstein permitted the Parties to commence document discovery through the Hague Convention.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel that:

1. As of the date of the entry of this Order, the Parties are authorized to conduct document discovery in connection with the Actions under the Hague Convention or through any other internationally recognized means of obtaining cross-border discovery, including but not limited to, letters rogatory (collectively, “International Discovery”).

2. All discovery other than International Discovery shall be stayed until further order of this Court authorizes such other discovery or the Parties agree, by further stipulation, that such other discovery shall be permitted to proceed.

3. Any Party that avails itself under this Order of International Discovery procedures will not be deemed to have waived, prejudiced, or otherwise altered its right to conduct discovery under the Federal Rules.

4. No Party served with Rule 34 Requests will be required to respond to those requests until the Court authorizes the commencement of discovery under the Federal Rules or until the Trustee and the Party served with Rule 34 Requests otherwise agree.

5. Nothing in this Stipulation shall constitute a waiver of (a) any objections that any Party may have to any particular discovery that may be propounded, or (b) any jurisdictional or other defense that any Party may have.

6. This Stipulation may be signed by respective counsel for 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.

Dated: May 17, 2016

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SO ORDERED:

Dated: May 18th, 2016
New York, New York

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE