

EXHIBIT F

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August 19, 2025

Re: Picard v. Banque Internationale à Luxembourg S.A., Adv. Pro. No. 12-1698 (LGB)

Dear Tony,

As directed by Judge Beckerman during the conference on July 22, we are writing to confirm the categories of documents our clients, Banque Internationale à Luxembourg S.A. (“BIL”) and Banque Internationale à Luxembourg Suisse S.A. (“BILS”), have agreed to produce, as well as those categories our clients have *not* agreed to produce. By agreeing to produce a category of documents, we do not necessarily mean to imply that such documents exist (or exist in any quantity). Rather, we have made or will make a reasonable search for such documents and produce any responsive documents found through that search.

As discussed, throughout our productions, we are redacting customer-identifying information, including customer names and identification numbers.

During the course of our previous discussions and correspondence, we have agreed to produce the following categories of documents:

1. Back-office files for Fairfield subscriptions and redemptions. These are hard copy files created at the time of each transaction, and include emails and other communications concerning the transaction.
2. Account-related agreements for each customer involved in Fairfield subscriptions and redemptions.
3. Customer account statements reflecting Fairfield subscription and redemption payments including, for the avoidance of doubt, account statements reflecting redemption payments to RBC Dexia Investor Services.

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4. Documents concerning the alleged \$39.8 million payment in or about April 2007.
5. Communications with the Fairfield Funds through the end of 2008.
6. Documents produced in the Fairfield Citco action.
7. Unredacted copies of the Rule 30(b)(6) deposition transcript and sanctions motion court filings in the Fairfield Citco action.
8. Marketing materials (i.e., prospectuses, private placement memoranda, etc.) relating to Fairfield or any other Madoff feeder fund.
9. Due diligence of Madoff or any feeder fund, including Rafale, Blue Star, Mianda and Mount Capital. We use the term due diligence broadly to mean “any investigation, vetting, review, examination, assessment, critique, verification, analysis, monitoring or auditing” of Madoff or any Feeder Fund, consistent with the definition of due diligence in the Trustee’s document requests. This category includes credit committee presentations and minutes concerning lending to Rafale, Blue Star, Mianda and Mount Capital.
10. Policies concerning due diligence for investments (without date limitation).
11. Documents sufficient to show lending to Rafale, Blue Star, Mianda and Mount Capital from 2003 through 2008.
12. From 2003 to the present, BIL annual reports.
13. RBC Dexia JV Agreement.
14. RBC Dexia organizational charts.
15. For the time period December 2008 through June 2009 (the “Post-Fraud Period”), emails and other communications with customers concerning Madoff or any feeder fund.
16. For the Post-Fraud Period, minutes and other materials (agendas, presentations, etc.) for the BIL Board of Directors, the BIL Executive Committee and the BIL task force created upon the collapse of BLMIS to the extent they discuss Madoff or any feeder fund.
17. Principal pleadings, including the equivalents of the complaint and summary judgment submissions, from customer lawsuits in Luxembourg.

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For the avoidance of doubt, we have agreed to search the email and attachments of legal department personnel, including Herman Dewitte, for any of the categories of documents we have agreed to produce subject, of course, to possible withholding on privilege grounds.

The following categories of documents have been discussed during previous meetings, and our clients have not agreed to produce them:

1. Communications with insurers concerning Madoff-related losses.
2. Communications between BIL and its Luxembourg regulator concerning lending exposure to Rafale, Blue Star, Mianda and Mount Capital.
3. Settlement agreements relating to customer lawsuits in Luxembourg.

Please let us know at your earliest convenience if you think we have omitted any relevant category of documents from these lists.

Sincerely,



Jeff E. Butler