

EXHIBIT B



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February 27, 2025

VIA E-MAIL (jeff.butler@cliffordchance.com)

Clifford Chance US LLP

Jeff E. Butler
Two Manhattan West
375 9th Avenue
New York, New York 10001

Re: Picard v. Banque Internationale à Luxembourg S.A., et al., Adv. Pro. No. 12-01698 (LGB)

Dear Jeff,

Thank you for meeting and conferring with us on February 11 and 12, 2025 about the outstanding discovery issues addressed in our recent letters to you. I write to set forth our understandings from those meetings regarding (i) the additional documents the BIL Defendants agreed to produce, beyond those addressed in our December 20, 2024 letter, and (ii) the documents you said you would get back to us about after conferring with your clients.

We understand the BIL Defendants agreed to produce the following (if located):

- Confirmations for the 4/17/07 \$39M transfer alleged in this action;
- Account statements you claim show that the 2/14/03 \$1.9M and 11/17/05 \$6.3M transfers alleged in this action went to an RBC-Dexia joint venture (the “JV”) entity;
- Formation documents for the JV;
- Organizational charts for the JV;
- Policies in place from as early as available through December 31, 2008 concerning the BIL Defendants’ due diligence;
- Documents concerning solicitation, promotion, or marketing of any Madoff feeder fund in addition to Fairfield;

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- Documents concerning discussions between BIL and its regulator regarding its lending exposure to any Madoff feeder fund;
- Unredacted copies of the deposition transcript and court decision on spoliation in the Chapter 15 proceeding brought by the Fairfield liquidators; and
- Any documents the BIL Defendants have agreed to produce that are located in the email and attachments of legal department personnel in addition to Herman Dewitte.

You indicated that the BIL Defendants would make rolling productions and would try to complete them by the end of March.

We also understand that you will let us know whether the BIL Defendants agree to produce the following:

- External communications concerning non-Fairfield Madoff feeder funds through June 30, 2009, including communications with customers and insurance providers;
- Internal communications concerning non-Fairfield Madoff feeder funds through June 30, 2009;
- Prospectuses and other fund documents for Dexia World Alternative and Dexia Multi Alternatif; and
- Documents concerning Luxembourg actions against BIL in connection with its promotion of Rafale Partners.

We look forward to hearing your clients' position on these communications and documents.

We note that this letter does not address all of the Trustee's Requests and other issues discussed in our prior correspondence and meetings, but is intended to help move the ball forward with respect to the above categories of documents. The Trustee reserves all rights as to matters not expressly raised above.

Sincerely,

/s/ Antonio J. Casas

Antonio J. Casas