

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

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

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.

LEGACY CAPITAL LTD.,

Defendant.

Adv. Pro. No. 10-05286 (LGB)

**SUPPLEMENTAL STIPULATION AND ORDER**

Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. § 78aaa-III (“SIPA”), and the chapter 7 estate of Bernard L. Madoff, and Defendant Legacy Capital Ltd. (“Legacy”) (together with the Trustee, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows:

**WHEREAS**, on April 2, 2024, the Trustee filed two motions for orders issuing letters of request seeking foreign discovery (ECF Doc Nos. 308 & 309) (the “Motions”);

**WHEREAS**, the hearing date for the Motions is currently scheduled for May 22, 2024 at 10:00 a.m. (EDT), with the Trustee having set a deadline to file any objection to the Motion (“Objection”) by April 23, 2024 and the Trustee having set a deadline to reply to those Objections, if any (“Reply”), by May 15, 2024; and

**WHEREAS**, the Parties previously agreed to extend the briefing schedule as to the Objection and Reply deadlines; and

**WHEREAS**, in order to provide additional time for the Parties to meet and confer regarding the Motions, the Parties have agreed to further extend the briefing schedule as to the Objection and Reply deadlines and adjourn the hearing as set forth below.

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

1. The deadline to file an Objection is adjourned from May 2, 2024 to June 3, 2024;
2. The deadline for the Trustee to file his Reply is adjourned from May 17, 2024 to June 21, 2024; and
3. The hearing is adjourned from May 22, 2024, at 10:00 a.m. (EDT) to June 26, 2024, at 10:00 a.m. (EDT).

Dated: April 26, 2024  
New York, New York

Dated: April 26, 2024  
New York, New York

/s/ Carrie Longstaff

**BAKER & HOSTETLER LLP**

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*Attorneys 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: April 29, 2024  
NEW YORK, NEW YORK**

/s/ Eric B. Fisher

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*Attorneys for Legacy Capital Ltd.*

/s/ Lisa G. Beckerman

**HONORABLE LISA G. BECKERMAN  
UNITED STATES BANKRUPTCY JUDGE**