

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

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

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.

GROSVENOR INVESTMENT
MANAGEMENT LTD., GROSVENOR
PRIVATE RESERVE FUND LIMITED, and
GROSVENOR BALANCED GROWTH
FUND LIMITED,

Defendant.

Adv. Pro. No. 12-01021 (LGB)

**STIPULATION AND ORDER EXTENDING TIME FOR
THE TRUSTEE TO RESPOND TO DEFENDANTS' MOTION TO STAY**

Irving H. Picard, as trustee (the "Trustee") for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act 15 U.S.C. §§ 78aaa *et seq.*, and the substantively consolidated chapter 7 estate of Bernard L. Madoff, and Defendants

Grosvenor Investment Management Ltd., Grosvenor Private Reserve Fund Limited, and Grosvenor Balanced Growth Fund Limited (“Defendants” and, together with the Trustee, the “Parties”), by and through their respective undersigned counsel, stipulate and agree as follows.

WHEREAS, on October 11, 2024, Defendants filed their Motion to Stay (“Motion”), requesting a hearing on October 30, 2024, and stating that the Trustee shall respond to the Motion by October 23, 2024, and that the Defendants would file their reply by October 28, 2024 at 4:00 p.m.

WHEREAS, on October 22, 2024, the Trustee requested an extension of the time to respond to the Motion and counsel for Defendants consented to that request.

WHEREAS, on August 26, 2024, the Defendants were ordered to respond to the Trustee’s First Set of Requests for Production by October 29, 2024, and produce any responsive non-privileged documents together with a categorical privilege log thereafter.

WHEREAS, on October 22, 2024, the Parties agreed to extend the deadline for Defendants to respond to the Trustee’s First Set of Requests for Production to November 11, 2024, with production on a rolling basis and categorical privilege log to follow.

IT IS HEREBY STIPULATED AND AGREED, by the Parties, and **SO ORDERED**, by the Court:

1. The Trustee’s deadline to respond to the Motion is November 6, 2024.
2. Defendant’s deadline to file a reply is November 15, 2024.
3. The hearing on the Motion is November 20, 2024 at 10 am eastern via Zoom for Government.

4. Defendants' deadline to respond to the Trustee's First Set of Requests for Production is extended to November 11, 2024.
5. The Parties otherwise reserve all rights they may have, and their entry into this stipulation shall not impair or otherwise affect any such rights or defenses. Neither this stipulation, nor the accompanying letter filed on the docket contemporaneously, shall prejudice either party in any proceeding, whether in the United States or otherwise. The entry into this stipulation by the Grosvenor Defendants shall not be deemed to waive or in any other manner affect the Grosvenor Defendants' defenses or their objections to the jurisdiction of this Court.

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Date: October 22, 2024

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Substantively Consolidated SIPA Liquidation of
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and the Chapter 7 Estate of Bernard L. Madoff*

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*Attorneys for Defendants Grosvenor Investment
Management, Ltd., Grosvenor Private Reserve
Fund Limited, Grosvenor Balanced Growth
Fund Limited, and Grosvenor Aggressive
Grown Fund Limited.*

SO ORDERED.

**Dated: October 23, 2024
NEW YORK, NEW YORK**

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