

**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.

SCHEDULING ORDER

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.

FIRST ABU DHABI BANK,

Defendant.

Adv. Pro. No. 11-02541 (LGB)

STIPULATION AND ORDER

It is stipulated and agreed by Plaintiff Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-III, and the chapter 7 estate of Bernard L. Madoff, and Defendant First Abu Dhabi Bank (“FAB” and together with the Trustee, the “Parties”), by and through their respective counsel, as follows:

WHEREAS, on November 13, 2024, the Discovery Arbitrator, Hon. Frank Maas, entered Discovery Order No. 6 that requested the parties submit a proposed agreed briefing schedule on the Trustee’s “application to recover his expenses incurred by reason of FGB’s¹ failure to comply with [the Discovery Arbitrator’s] prior discovery orders.” ECF No. 117.

IT IS HEREBY STIPULATED AND AGREED,

1. The Trustee will file his application for fees on Friday, January 17, 2025;
2. FAB shall respond to the application by Friday, February 14, 2025;
3. The Trustee will file his reply by Friday, February 28, 2025;
4. The Parties will seek a hearing on the application at the Discovery Arbitrator’s first available convenience.
5. The deadlines established by this Stipulation and Order are without prejudice to either Party seeking future extensions of time.

¹ On November 13, 2024 the Parties stipulated to the substitution of FAB for First Gulf Bank (“FGB”) as the Defendant in the proceeding. ECF No. 1168

Dated: November 21, 2024

BAKER & HOSTETLER LLP

By: /s/ David J. Sheehan
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Torello Calvani
Email: tcalvani@bakerlaw.com

811 Main Street, Suite 1100
Houston, Texas 77002-5018
Telephone: 713.751.1600
Facsimile: 713.751.1717
Dean D. Hunt
Email: dhunt@bakerlaw.com
Farrell A. Hochmuth
Email: fhochmuth@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
for the Chapter 7 Estate of Bernard L. Madoff*

**QUINN EMANUEL URQUHART &
SULLIVAN LLP**

By: /s/ Marc L. Greenwald
51 Madison Avenue, 22nd Floor
New York, New York 10010-1601
Telephone: (212) 849-7000
Fax: (212) 849-7100
Marc L. Greenwald
marcgreenwald@quinnemanuel.com
Eric M. Kay
erickay@quinnemanuel.com
Daniel M. Kelly
danielkelly@quinnemanuel.com


CHALOS & CO., P.C.

55 Hamilton Avenue
Oyster Bay, New York 11771
Telephone: 216.714.4300
Facsimile: 516.750.9051
Briton Sparkman
Email: bsparkman@chaloslaw.com

Attorneys for Defendant First Abu Dhabi Bank

SO ORDERED.

Dated: November 21, 2024



**HON. FRANK MAAS (RET.)
DISCOVERY ARBITRATOR**