

**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 (CGM)

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.

BNP PARIBAS ARBITRAGE SNC,

Defendant.

Adv. Pro. No. 11-02796 (CGM)

**JOINT STIPULATION AND ORDER  
EXTENDING DEADLINE TO FILE AMENDED ANSWER**

**WHEREAS**, on November 3, 2011, Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC and the chapter 7 estate of Bernard L. Madoff, filed a complaint (Dkt. No. 1) in the above-captioned matter;

**WHEREAS**, on May 26, 2023, the Trustee filed an amended complaint (Dkt. No. 100) (the “Amended Complaint”) in the above-captioned matter;

**WHEREAS**, on March 11, 2024, BNP Paribas Arbitrage SNC (“BNP Paribas Arbitrage”) filed an answer (Dkt. No. 119) (the “Answer”) to the Amended Complaint; and

**WHEREAS**, the Trustee and BNP Paribas Arbitrage have conferred regarding the Answer and BNP Paribas Arbitrage has agreed to amend the Answer (the “Amended Answer”).

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and among the undersigned counsel for the signatory parties (the “Parties”), subject to the Court’s approval, that:

1. BNP Paribas Arbitrage shall file the Amended Answer by May 1, 2024.
2. The Trustee shall file any motion to strike related to the Amended Answer no later than 21 days after the service of the Amended Answer.
3. Nothing in this stipulation prevents any party from seeking further extensions on the consent of the Parties or from the Court.
4. Nothing in this stipulation is intended to curtail the rights under the Federal Rules of Civil Procedure or Federal Rules of Bankruptcy Procedure that might otherwise exist absent this agreement.

*[Signatures on following page]*

DATED: March 28, 2024  
New York, New York

**BAKER & HOSTETLER LLP**

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LLC and the Chapter 7 Estate of Bernard L.  
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*Attorneys for Defendant BNP Paribas  
Arbitrage SNC*

**SO ORDERED.**

**Dated: April 1, 2024  
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris  
U.S. Bankruptcy Judge**