

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

Medley LLC,¹

Debtor.

Chapter 11

Case No. 21-10526 (KBO)

MEDLEY LLC LIQUIDATING TRUST,

Plaintiff,

v.

EVERSHEDS SUTHERLAND (US) LLP,

Defendant.

Adv. Proc. No. 23-50121 (KBO)

Re: Adv. Docket Nos. 26, 27 31, & 38

**CERTIFICATION OF COUNSEL REGARDING STIPULATION
EXTENDING TIME FOR PLAINTIFF TO FILE RESPONSE TO
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

The undersigned hereby certifies as follows:

1. On May 2, 2025, the defendant in the above-captioned case (the “Defendant”) filed the *Motion of Defendant Eversheds Sutherland (US) LLP for Summary Judgment Dismissing the Complaint* [Adv. Docket No. 26, 27] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. The Defendant and the plaintiff in the above-captioned case (the “Plaintiff,” together with the Plaintiff, the “Parties”) have conferred and agreed to extend the date by which Plaintiff will file a response to the Motion as set forth herein.

¹ The Debtor’s current mailing address is c/o Medley LLC Liquidating Trust, c/o Saccullo Business Consulting, LLC, 27 Crimson King Drive, Bear, DE 19701.



3. The current deadline for Plaintiff to respond to the Motion is September 19, 2025 (the “Response Deadline”).

4. The Parties have agreed to extend the Response Deadline to October 24, 2025. A stipulation (the “Stipulation”) reflecting the agreement of the Parties is attached to the proposed order (the “Proposed Order”) as Exhibit 1.

WHEREFORE, the Plaintiff respectfully requests that the Court enter the Proposed Order attached hereto as **Exhibit A**, approving the Stipulation.

Dated: September 18, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Sameen Rizvi

Christopher M. Samis (No. 4909)

Sameen Rizvi (No. 6902)

POTTER ANDERSON & CORROON LLP

1313 N. Market Street, 6th Floor

Wilmington, Delaware 19801

Telephone: (302) 984-6000

Facsimile: (302) 658-1192

Email: csamis@potteranderson.com

srizvi@potteranderson.com

-and-

James S. Carr, Esq. (admitted *pro hac vice*)

Richard D. Gage, Esq. (admitted *pro hac vice*)

KELLEY DRYE & WARREN LLP

3 World Trade Center

175 Greenwich Street

New York, New York 10007

Telephone: (212) 808-7800

Facsimile: (212) 808-7897

Email: jcarr@kelleydrye.com

rgage@kelleydrye.com

Counsel for the Plaintiff

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Medley LLC, Debtor.	Chapter 11 Case No. 21-10526 (KBO)
MEDLEY LLC LIQUIDATING TRUST, Plaintiff, v. EVERSHEDS SUTHERLAND (US) LLP, Defendant.	Adv. Proc. No. 23-50121 (KBO) Re: Adv. Docket No. ____

**ORDER APPROVING STIPULATION EXTENDING
TIME FOR PLAINTIFF TO FILE RESPONSE TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

This Court, having considered the *Stipulation Extending Time for Plaintiff to File Response To Defendant's Motion For Summary Judgment* (the "Stipulation"), attached hereto as **Exhibit 1**, between the above-captioned Plaintiff, Medley LLC Liquidating Trust, and the Defendant, Eversheds Sutherland (US) LLP, and the Court having determined that good and adequate cause exists for approval of the Stipulation; and the Court having determined that no further or additional notice of the Stipulation must be given; it is hereby:

ORDERED that the Stipulation is APPROVED.

EXHIBIT 1

Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Medley LLC, ¹ Debtor.	Chapter 11 Case No. 21-10526 (KBO)
MEDLEY LLC LIQUIDATING TRUST, Plaintiff, v. EVERSHEDS SUTHERLAND (US) LLP, Defendant.	Adv. Proc. No. 23-50121 (KBO) Re: Adv. Docket No. 26, 27, 31, 38

**STIPULATION EXTENDING TIME FOR PLAINTIFF TO FILE RESPONSE TO
DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

This stipulation (the “Stipulation”) is entered into by and between the Medley LLC Liquidating Trust (“Plaintiff”) and Eversheds Sutherland (US) LLP (“Defendant,” and together with Plaintiff, the “Parties”). The Parties, by and through their undersigned counsel, hereby stipulate and agree as follows:

1. On July 16, 2025, the Court entered its *Order Approving Stipulation Extending Time for Plaintiff to File Response to Defendant’s Motion For Summary Judgment* [Adv. Docket No. 38], which further extended the deadline for Plaintiff’s response to the *Motion of Defendant Eversheds Sutherland (US) LLP for Summary Judgment Dismissing the Complaint* [Adv. Docket No. 26, 27] (the “Motion”) to September 19, 2025.

¹ The Debtor’s current mailing address is c/o Medley LLC Liquidating Trust, c/o Saccullo Business Consulting, LLC, 27 Crimson King Drive, Bear, DE 19701.

2. The Parties now agree and stipulate that the time within which Plaintiff may file a response to the Motion is hereby extended through and including October 24, 2025.

3. Except as specifically set forth herein, all rights, claims and defenses of the Parties are fully preserved.

[Remainder of Page Intentionally Left Blank]

Dated: September 18, 2025

/s/ Sameen Rizvi

Christopher M. Samis (No. 4909)
Sameen Rizvi (No. 6902)
POTTER ANDERSON & CORROON LLP
1313 N. Market Street, 6th Floor
Wilmington, Delaware 19801
Telephone: (302) 984-6000
Facsimile: (302) 658-1192
Email: csamis@potteranderson.com
srizvi@potteranderson.com

-and-

James S. Carr (admitted *pro hac vice*)
Richard D. Gage (admitted *pro hac vice*)
KELLEY DRYE & WARREN LLP
3 World Trade Center
175 Greenwich Street
New York, New York 10007
Telephone: (212) 808-7800
Facsimile: (212) 808-7897
Email: jcarr@kelleydrye.com
rgage@kelleydrye.com

Counsel to the Plaintiff

/s/ William E. Chipman, Jr.

Willian E. Chipman, Jr. (No. 3818)
CHIPMAN BROWN CICERO & COLE, LLP
1313 N. Market Street, Suite 5400
Wilmington, Delaware 19801
Telephone: (302) 295-0191
Facsimile: (302) 295-0199
Email: chipman@chipmanbrown.com

-and-

Adam D. Cole, Esq.
CHIPMAN BROWN CICERO & COLE, LLP
501 Fifth Avenue, 15th Floor
New York, New York 10017
Telephone: (646) 685-8364
Email: cole@chipmanbrown.com

Counsel to the Defendant