

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 & 40

**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 October 24, 2025 (the “Response Deadline”).

4. The Parties have agreed to extend the Response Deadline to November 24, 2025. The Parties further agree that (i) to the extent that Plaintiff submits one or more declaration(s) in response to the Motion, Plaintiff will provide copies of any such declarations to Defendant’s counsel by November 7, 2025, (ii) Defendant is permitted to depose the persons providing any such declarations concerning matters raised in the declarations on mutually agreeable dates in advance of Plaintiff’s deadline to file its response to the Motion, and (iii) the Defendant’s time to file reply in further support of the Motion is extended through and including December 10, 2025. A stipulation (the “Stipulation”) reflecting the agreement of the Parties is attached to the proposed order (the “Proposed Order”) as Exhibit 1.

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

Dated: October 24, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Sameen Rizvi

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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, 40

**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 May 19, 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. 31], which set 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”) as 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 subsequently agreed to extend Plaintiff's time to file a response to the Motion through and including October 24, 2025.

3. The Parties now agree and stipulate to further extend Plaintiff's time to file a response to the Motion through and including November 24, 2025.

4. The Parties further agree and stipulate as follows: to the extent that Plaintiff submits one or more declaration(s) in response to the Motion, Plaintiff will provide copies of any such declarations to Defendant's counsel by November 7, 2025, and Defendant is permitted to depose the persons providing any such declarations concerning matters raised in the declarations on mutually agreeable dates in advance of Plaintiff's deadline to file its response to the Motion.

5. The Parties further agree and stipulate that Defendant's time to file reply in further support of the Motion is extended through and including December 10, 2025.

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

Dated: October 24, 2025

/s/ Sameen Rizvi

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