

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Medley LLC, <sup>1</sup>	Case No. 21-10526 (KBO)
Debtor.	
MEDLEY LLC LIQUIDATING TRUST,	
Plaintiff,	Adv. Proc. No. 23-50121 (KBO)
v.	Re: Adv. Docket No. 26, 27, 31, 38, 40, 42, 44
EVERSHEDS SUTHERLAND (US) LLP,	
Defendant.	

**CERTIFICATION OF COUNSEL REGARDING STIPULATION EXTENDING TIME  
FOR DEFENDANT TO FILE A REPLY IN FURTHER SUPPORT OF 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. 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 (the "Plaintiff", and together with the Defendant, the "Parties") response to the Motion as September 19, 2025.
3. The Parties subsequently agreed to extend Plaintiff's time to file a response to the

<sup>1</sup> 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.



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Motion through and including October 24, 2025.

4. The Parties subsequently agreed to extend Plaintiff's time to file a response to the Motion through and including November 24, 2025.

5. The Parties subsequently agreed to extend Plaintiff's time to file a response to the Motion through and including January 9, 2026 with Defendant's reply in further support of the Motion due January 23, 2026.

6. The Parties now agree and stipulate to extend Defendant's time to file a reply in further support of the Motion through and including January 30, 2026.

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

Dated: January 21, 2026  
Wilmington, Delaware

**CHIPMAN BROWN CICERO & COLE, LLP**

*/s/ William E. Chipman, Jr.* \_\_\_\_\_  
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—and—

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*Counsel for Eversheds Sutherland (US) LLP*

**EXHIBIT A**

**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 DEFENDANT TO  
FILE A REPLY IN FURTHER SUPPORT OF DEFENDANT'S  
MOTION FOR SUMMARY JUDGMENT**

This Court, having considered the Stipulation Extending Time for Defendant to File a Reply in Further Support of 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**

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

In re:	Chapter 11
Medley LLC, <sup>1</sup>	Case No. 21-10526 (KBO)
Debtor.	
 MEDLEY LLC LIQUIDATING TRUST,	
Plaintiff,	Adv. Proc. No. 23-50121 (KBO)
v.	<b>Re: Adv. Docket No. 26, 27, 31, 38, 40, 42, 44</b>
EVERSHEDS SUTHERLAND (US) LLP,	
Defendant.	

**STIPULATION EXTENDING TIME FOR DEFENDANT TO FILE A REPLY IN  
FURTHER SUPPORT OF 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.

<sup>1</sup> 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 subsequently agreed to extend Plaintiff's time to file a response to the Motion through and including November 24, 2025.

4. The Parties subsequently agreed to extend Plaintiff's time to file a response to the Motion through and including January 9, 2026 with Defendant's reply in further support of the Motion due January 23, 2026.

5. The Parties now agree and stipulate to extend Defendant's time to file a reply in further support of the Motion through and including January 30, 2026.

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

Dated: January 21, 2026

/s/ Sameen Rizvi

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