

**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. RSM US LLP, Defendant.	Adv. Proc. No. 23-50138 (KBO) Re: Adv. Docket No. 1

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING SECOND
STIPULATION FOR FURTHER EXTENSION OF TIME**

The above-captioned plaintiff (“Plaintiff”) and the above-captioned defendant (“Defendant” and, together with the Plaintiff, the “Parties”), by and through their undersigned counsel, pursuant to Rule 7012-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court of the District of Delaware (the “Local Rules”), hereby certifies as follows:

1. On March 6, 2023, the Plaintiff filed its *Complaint to Avoid and Recover Transfers Pursuant to 11 U.S.C. §§ 544, 547, 548 and 550* [Adv. Docket No. 1] (the “Complaint”) against the Defendant.

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. On June 28, 2023, the Parties filed a *Stipulation for Further Extension of Time* [Adv. Docket No. 4] to extend the time for Defendant to answer, move or otherwise respond to the Complaint, through and including and including July 24, 2023.

3. Pursuant to Rules 7007-1 and 7012-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, counsel for the Parties have agreed and entered into a stipulation (the "Stipulation") attached as **Exhibit 1** to the proposed order (the "Proposed Order") attached hereto as **Exhibit A**, extending the time for Defendant to answer, move or otherwise respond to the Complaint, through and including August 23, 2023.

WHEREFORE, the undersigned respectfully request that, unless the Court has questions or concerns, the Court enter the Proposed Order attached as **Exhibit A** at the Court's earliest convenience.

Dated: July 19, 2023
Wilmington, Delaware

Respectfully submitted,

/s/ Sameen Rizvi

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EXHIBIT A

**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. RSM US LLP, Defendant.	Adv. Proc. No. 23-50138 (KBO) Re: Adv. Docket No. __

**ORDER APPROVING SECOND STIPULATION FOR FURTHER
EXTENSION OF TIME**

This Court, having considered the *Second Stipulation for Further Extension of Time* (the “Stipulation”) between the above-captioned plaintiff (“Plaintiff”) and the above-captioned defendant (the “Defendant” and, together with the Plaintiff, the “Parties”), attached hereto as **Exhibit 1**; the Court having determined that good and adequate cause exists for approval of the Stipulation; and the Court having determined that no further notice of the Stipulation must be given;

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.

IT IS HEREBY ORDERED THAT:

1. The Stipulation is approved.
2. The time for Defendant to answer the *Complaint* [Adv. Docket No. 1] is extended through, to and including August 23, 2023.
3. The Court shall retain jurisdiction over any and all matters arising from the interpretation or implementation of this Order.

EXHIBIT 1

**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. RSM US LLP, Defendant.	Adv. Proc. No. 23-50138 (KBO)

SECOND STIPULATION FOR FURTHER EXTENSION OF TIME

The above-captioned plaintiff (“Plaintiff”) and the above-captioned defendant (the “Defendant” and, together with the Plaintiff, the “Parties”), by and through their undersigned counsel, enter into this *Second Stipulation for Further Extension of Time for Defendant to Answer, Move or Otherwise Respond to the Complaint* (the “Stipulation”) and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which the Defendant may answer the *Complaint* [Adv. Docket No. 1] in the above-captioned adversary proceeding is hereby extended to and including August 23, 2023.
2. Except as specifically set forth herein, all rights, claims and defenses of the Parties are fully preserved.

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.

Dated: July 19, 2023

/s/ Sameen Rizvi

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Dated: July 19, 2023

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