

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Regina Griffin
Thomas L. Long
Catherine E. Woltering
Jonathan D. Blattmachr

Hearing Date: October 22, 2014
Hearing Time: 10:00 a.m. EST
Objection Deadline: October 10, 2014

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the estate
of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DEFENDANTS IN ADVERSARY
PROCEEDINGS LISTED ON EXHIBIT 1
ATTACHED HERETO,

Defendants.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. Nos. listed on Exhibit 1
Attached Hereto

**NOTICE OF MOTION FOR LEAVE TO REPLEAD PURSUANT TO
FED. R. CIV. P. 15(a) AND COURT ORDER AUTHORIZING LIMITED
DISCOVERY PURSUANT TO FED. R. CIV. P. 26(d)(1)**

Irving H. Picard, as trustee (the “Trustee”) for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff, by the Trustee’s undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on October 22, 2014, or as soon thereafter as counsel may be heard, seeking entry of an order (i) granting the Trustee leave to replead the operative complaints in certain adversary proceedings identified on Exhibit 2, attached hereto, pursuant to Fed. R. Civ. P. 15(a), made applicable to this proceeding pursuant to Fed. R. Bankr. P. 7015; and (ii) directing the defendants in adversary proceedings identified on Exhibit 3, attached hereto, to comply with the Proposed Limited Document Discovery Demand attached as Exhibit D to the declaration of Regina Griffin dated August 28, 2014 pursuant to Fed. R. Civ. P. 26(d), made applicable to this proceeding by Fed. R. Bankr. P. 7026.

PLEASE TAKE FURTHER NOTICE that written objections to the Motion must be filed with the Clerk of the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004 by no later than October 10, 2014 (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan and Regina Griffin.

Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

Dated: August 28, 2014
New York, New York

Respectfully submitted,

/s/ Regina Griffin

Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Regina Griffin
Thomas L. Long
Catherine E. Woltering
Jonathan D. Blattmachr

*Attorneys for Irving H. Picard,
Trustee for the Substantively Consolidated
SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the estate of
Bernard L. Madoff*

EXHIBIT 1

EXHIBIT 1
Pg 2 of 3

Adversary Proceeding Number	Case Name
09-01154	Picard v. Vizcaya Partners Limited
09-01239	Picard v. Fairfield Sentry Limited
09-01364	Picard v. HSBC Bank plc
09-01365	Picard v. Thybo Asset Management Limited
10-04284	Picard v. Plaza Investments International Limited
10-04285	Picard v. UBS AG
10-04287	Picard v. Cardinal Management
10-04330	Picard v. Square One Fund Ltd
10-04457	Picard v. Equity Trading Fund
10-04471	Picard v. Citrus Investment Holdings Ltd.
10-05120	Picard v. Oreades SICAV
10-05229	Picard v. Defender Limited
10-05286	Picard v. Legacy Capital Ltd.
10-05311	Picard v. UBS AG
10-05345	Picard v. Citibank, N.A.
10-05346	Picard v. Merrill Lynch International
10-05348	Picard v. Nomura Bank International plc
10-05351	Picard v. Banco Bilbao Vizcaya Argentaria, S.A.
10-05353	Picard v. Natixis
10-05354	Picard v. ABN AMRO Bank, N.A.
10-05355	Picard v. ABN AMRO Bank (Ireland) Ltd.
10-05415	Picard v. American Securities Management, L.P.
11-01724	Picard v. Pictet et Cie
11-01725	Picard v. Banque J. Safra (Suisse) SA f/k/a Banque Jacob Safra (Suisse) SA
11-01885	Picard v. Safra National Bank of New York
11-02149	Picard v. Banque Syz & Co., SA
11-02493	Picard v. Abu Dhabi Investment Authority
11-02537	Picard v. Orbita Capital Return Strategy
11-02538	Picard v. Quilvest Finance Ltd.
11-02539	Picard v. Meritz Fire & Insurance Co. Ltd.
11-02540	Picard v. Lion Global Investors Limited
11-02541	Picard v. First Gulf Bank
11-02542	Picard v. Parson Finance Panama S.A.
11-02551	Picard v. Delta National Bank and Trust Company
11-02553	Picard v. Unifortune Asset Management SGR SpA
11-02554	Picard v. National Bank of Kuwait S.A.K.
11-02568	Picard v. Cathay Life Insurance Co. Ltd.
11-02569	Picard v. Barclays Bank (Suisse) S.A.
11-02570	Picard v. Banca Carige S.P.A.
11-02571	Picard v. Banque Privee Espirito Santo S.A.
11-02572	Picard v. Korea Exchange Bank
11-02573	Picard v. Sumitomo Trust and Banking Co., Ltd.
11-02730	Picard v. Atlantic Security Bank
11-02733	Picard v. Naidot & Co.

EXHIBIT 1
Pg 3 of 3

Adversary Proceeding Number	Case Name
11-02759	Picard v. Nomura International plc
11-02760	Picard v. ABN Amro Bank N.V.
11-02761	Picard v. KBC Investments Limited
11-02762	Picard v. Lighthouse Investment Partners LLC
11-02763	Picard v. Inteligo Bank Ltd.
11-02784	Picard v. Somers Dublin Limited
11-02796	Picard v. BNP Paribas Arbitrage SNC
11-02910	Picard v. Merrill Lynch Bank (Suisse) SA
11-02922	Picard v. Bank Julius Baer & Co. Ltd.
11-02923	Picard v. Falcon Private Bank Ltd.
11-02929	Picard v. LGT Bank in Liechtenstein Ltd.
12-01002	Picard v. The Public Institution For Social Security
12-01004	Picard v. Fullerton Capital PTE Ltd.
12-01005	Picard v. SICO Limited
12-01019	Picard v. Banco Itau
12-01021	Picard v. Grosvenor Investment Management
12-01023	Picard v. Arden Asset Management
12-01046	Picard v. SNS Bank N.V.
12-01047	Picard v. Koch Industries Inc.
12-01048	Picard v. Banco General S.A.
12-01194	Picard v. Kookmin Bank
12-01195	Picard v. Six Sis AG
12-01202	Picard v. Vontobel AG
12-01205	Picard v. Multi Strategy Fund Ltd
12-01207	Picard v. Lloyds TSB Bank plc
12-01209	Picard v. BSI AG
12-01210	Picard v. Schroder & Co.
12-01211	Picard v. Union Securities
12-01216	Picard v. Bank Hapoalim
12-01512	Picard v. ZCM Asset Holding Co
12-01565	Picard v. Standard Chartered Financial Services
12-01566	Picard v. UKFP (Asia) Nominees Ltd.
12-01576	Picard v. BNP Paribas S.A.
12-01577	Picard v. Dresdner Bank
12-01690	Picard v. EFG Bank S.A.
12-01691	Picard v. Banque Degroof SA
12-01693	Picard v. Lombard Odier Darier Hentsch & Cie
12-01694	Picard v. Banque Cantonale Vaudoise
12-01695	Picard v. Bordier & Cie
12-01697	Picard v. ABN AMRO Fund Services (Isle of Man) Nominees Limited
12-01700	Picard v. Caprice International Group Inc.
12-01701	Picard v. RD Trust
12-01702	Picard v. Barreneche, Inc.

EXHIBIT 2

EXHIBIT 3
Pg 2 of 3

Adversary Proceeding Number	Case Name
09-01154	Picard v. Vizcaya Partners Limited
09-01239	Picard v. Fairfield Sentry Limited
09-01364	Picard v. HSBC Bank plc
09-01365	Picard v. Thybo Asset Management Limited
10-04284	Picard v. Plaza Investments International Limited
10-04285	Picard v. UBS AG
10-04287	Picard v. Cardinal Management
10-04330	Picard v. Square One Fund Ltd
10-04457	Picard v. Equity Trading Fund
10-04471	Picard v. Citrus Investment Holdings Ltd.
10-05120	Picard v. Oreades SICAV
10-05229	Picard v. Defender Limited*
10-05286	Picard v. Legacy Capital Ltd.
10-05311	Picard v. UBS AG
10-05345	Picard v. Citibank, N.A.
10-05346	Picard v. Merrill Lynch International
10-05348	Picard v. Nomura Bank International plc
10-05351	Picard v. Banco Bilbao Vizcaya Argentaria, S.A.
10-05353	Picard v. Natixis
10-05354	Picard v. ABN AMRO Bank, N.A.
10-05355	Picard v. ABN AMRO Bank (Ireland) Ltd.
10-05415	Picard v. American Securities Management, L.P.
11-01724	Picard v. Pictet et Cie
11-01725	Picard v. Banque J. Safra (Suisse) SA f/k/a Banque Jacob Safra (Suisse) SA
11-01885	Picard v. Safra National Bank of New York
11-02149	Picard v. Banque Syz & Co., SA
11-02493	Picard v. Abu Dhabi Investment Authority
11-02537	Picard v. Orbita Capital Return Strategy
11-02538	Picard v. Quilvest Finance Ltd.
11-02539	Picard v. Meritz Fire & Insurance Co. Ltd.
11-02540	Picard v. Lion Global Investors Limited
11-02541	Picard v. First Gulf Bank
11-02542	Picard v. Parson Finance Panama S.A.
11-02551	Picard v. Delta National Bank and Trust Company
11-02553	Picard v. Unifortune Asset Management SGR SpA
11-02554	Picard v. National Bank of Kuwait S.A.K.
11-02568	Picard v. Cathay Life Insurance Co. Ltd.
11-02569	Picard v. Barclays Bank (Suisse) S.A.
11-02570	Picard v. Banca Carige S.P.A.
11-02571	Picard v. Banque Privee Espirito Santo S.A.
11-02572	Picard v. Korea Exchange Bank
11-02573	Picard v. Sumitomo Trust and Banking Co., Ltd.
11-02730	Picard v. Atlantic Security Bank
11-02733	Picard v. Naidot & Co.
11-02759	Picard v. Nomura International plc
11-02760	Picard v. ABN Amro Bank N.V.
11-02761	Picard v. KBC Investments Limited
11-02762	Picard v. Lighthouse Investment Partners LLC
11-02763	Picard v. Inteligo Bank Ltd.
11-02784	Picard v. Somers Dublin Limited
11-02796	Picard v. BNP Paribas Arbitrage SNC
11-02910	Picard v. Merrill Lynch Bank (Suisse) SA
11-02922	Picard v. Bank Julius Baer & Co. Ltd.
11-02923	Picard v. Falcon Private Bank Ltd.
11-02929	Picard v. LGT Bank in Liechtenstein Ltd.

EXHIBIT 3
Pg 5 of 3

Adversary Proceeding Number	Case Name
12-01002	Picard v. The Public Institution For Social Security
12-01004	Picard v. Fullerton Capital PTE Ltd.
12-01005	Picard v. SICO Limited
12-01019	Picard v. Banco Itau
12-01021	Picard v. Grosvenor Investment Management
12-01023	Picard v. Arden Asset Management
12-01046	Picard v. SNS Bank N.V.
12-01047	Picard v. Koch Industries Inc.
12-01048	Picard v. Banco General S.A.
12-01194	Picard v. Kookmin Bank
12-01195	Picard v. Six Sis AG
12-01202	Picard v. Vontobel AG
12-01205	Picard v. Multi Strategy Fund Ltd
12-01207	Picard v. Lloyds TSB Bank plc
12-01209	Picard v. BSI AG
12-01210	Picard v. Schroder & Co.
12-01211	Picard v. Union Securities
12-01216	Picard v. Bank Hapoalim
12-01512	Picard v. ZCM Asset Holding Co
12-01565	Picard v. Standard Chartered Financial Services
12-01566	Picard v. UKFP (Asia) Nominees Ltd.
12-01576	Picard v. BNP Paribas S.A.
12-01577	Picard v. Dresdner Bank
12-01690	Picard v. EFG Bank S.A.
12-01691	Picard v. Banque Degroof SA**
12-01693	Picard v. Lombard Odier Darier Hentsch & Cie
12-01694	Picard v. Banque Cantonale Vaudoise
12-01695	Picard v. Bordier & Cie
12-01697	Picard v. ABN AMRO Fund Services (Isle of Man) Nominees Limited
12-01700	Picard v. Caprice International Group Inc.
12-01701	Picard v. RD Trust
12-01702	Picard v. Barreneche, Inc.

EXHIBIT 3

EXHIBIT 3
Page 1 of 3

Adversary Proceeding Number	Case Name
09-01365	Picard v. Thybo Asset Management Limited
10-04284	Picard v. Plaza Investments International Limited
10-04287	Picard v. Cardinal Management
10-04330	Picard v. Square One Fund Ltd
10-04457	Picard v. Equity Trading Fund
10-04471	Picard v. Citrus Investment Holdings Ltd.
10-05120	Picard v. Oreades SICAV
10-05229	Picard v. Defender Limited*
10-05345	Picard v. Citibank, N.A.
10-05346	Picard v. Merrill Lynch International
10-05348	Picard v. Nomura Bank International plc
10-05351	Picard v. Banco Bilbao Vizcaya Argentaria, S.A.
10-05353	Picard v. Natixis
10-05354	Picard v. ABN AMRO Bank, N.A.
10-05355	Picard v. ABN AMRO Bank (Ireland) Ltd.
11-02149	Picard v. Banque Syz & Co., SA
11-02493	Picard v. Abu Dhabi Investment Authority
11-02537	Picard v. Orbita Capital Return Strategy
11-02538	Picard v. Quilvest Finance Ltd.
11-02539	Picard v. Meritz Fire & Insurance Co. Ltd.
11-02540	Picard v. Lion Global Investors Limited
11-02541	Picard v. First Gulf Bank
11-02542	Picard v. Parson Finance Panama S.A.
11-02551	Picard v. Delta National Bank and Trust Company
11-02553	Picard v. Unifortune Asset Management SGR SpA
11-02554	Picard v. National Bank of Kuwait S.A.K.
11-02568	Picard v. Cathay Life Insurance Co. Ltd.
11-02569	Picard v. Barclays Bank (Suisse) S.A.
11-02570	Picard v. Banca Carige S.P.A.
11-02571	Picard v. Banque Privee Espirito Santo S.A.
11-02572	Picard v. Korea Exchange Bank
11-02573	Picard v. Sumitomo Trust and Banking Co., Ltd.
11-02730	Picard v. Atlantic Security Bank
11-02733	Picard v. Naidot & Co.
11-02759	Picard v. Nomura International plc
11-02760	Picard v. ABN Amro Bank N.V.
11-02761	Picard v. KBC Investments Limited
11-02762	Picard v. Lighthouse Investment Partners LLC
11-02763	Picard v. Inteligo Bank Ltd.
11-02784	Picard v. Somers Dublin Limited
11-02796	Picard v. BNP Paribas Arbitrage SNC
11-02910	Picard v. Merrill Lynch Bank (Suisse) SA
11-02922	Picard v. Bank Julius Baer & Co. Ltd.
11-02923	Picard v. Falcon Private Bank Ltd.
11-02929	Picard v. LGT Bank in Liechtenstein Ltd.

EXHIBIT 3
Page 13 of 33

Adversary Proceeding Number	Case Name
12-01002	Picard v. The Public Institution For Social Security
12-01004	Picard v. Fullerton Capital PTE Ltd.
12-01005	Picard v. SICO Limited
12-01019	Picard v. Banco Itau
12-01021	Picard v. Grosvenor Investment Management
12-01023	Picard v. Arden Asset Management
12-01046	Picard v. SNS Bank N.V.
12-01047	Picard v. Koch Industries Inc.
12-01048	Picard v. Banco General S.A.
12-01194	Picard v. Kookmin Bank
12-01195	Picard v. Six Sis AG
12-01202	Picard v. Vontobel AG
12-01205	Picard v. Multi Strategy Fund Ltd
12-01207	Picard v. Lloyds TSB Bank plc
12-01209	Picard v. BSI AG
12-01210	Picard v. Schroder & Co.
12-01211	Picard v. Union Securities
12-01216	Picard v. Bank Hapoalim
12-01512	Picard v. ZCM Asset Holding Co
12-01565	Picard v. Standard Chartered Financial Services
12-01566	Picard v. UKFP (Asia) Nominees Ltd.
12-01576	Picard v. BNP Paribas S.A.
12-01577	Picard v. Dresdner Bank
12-01690	Picard v. EFG Bank S.A.
12-01691	Picard v. Banque Degroof SA**
12-01693	Picard v. Lombard Odier Darier Hentsch & Cie
12-01694	Picard v. Banque Cantonale Vaudoise
12-01695	Picard v. Bordier & Cie
12-01697	Picard v. ABN AMRO Fund Services (Isle of Man) Nominees Limited
12-01700	Picard v. Caprice International Group Inc.
12-01701	Picard v. RD Trust
12-01702	Picard v. Barreneche, Inc.
* - The Trustee seeks discovery from only the specific defendant named in this adversary proceeding, Reliance Management (BVI) Ltd., and from its principal, Tim Brockmann.	
** - The Trustee seeks discovery from only the following specific defendants named in this adversary proceeding: (i) Banque Degroof SA/NV (a/k/a Banque Degroof Bruxelles a/k/a Banque Degroof SA/NV); (ii) Banque Degroof Luxembourg SA; (iii) Banque Degroof France SA (a/k/a Banque Degroof et Phillipe SA); (iv) Degroof Gestion Institutionelle Luxembourg SA; (v) Aforge Finance Holding; (vi) Aforge Finance; (vii) Aforge Capital Management SA; and (viii) Aforge Gestion.	