BakerHostetler

Baker&Hostetler LLP

45 Rockefeller Plaza New York, NY 10111

T 212.589.4200 F 212.589.4201 www.bakerlaw.com

Deborah H. Renner direct dial: 212.589.4654 drenner@bakerlaw.com

December 16, 2014

VIA ECF

Honorable John G. Koeltl United State District Judge, S.D.N.Y. Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Re: Picard v. Goldman, No. 14-CV-09524 (S.D.N.Y.) (Koeltl, J.)

Dear Judge Koeltl:

Pursuant to Your Honor's Individual Rule 2(E), Plaintiff Irving H. Picard (the "Trustee"), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* and the estate of Bernard L. Madoff, respectfully submits this letter to request oral argument on the Motion to Withdraw the Reference ("Motion") filed by Defendants.

The Trustee believes that oral argument will aid the Court in determining the Motion.

Respectfully submitted,

St. Kenn

Deborah H. Renner

CC: Counsel of record (via email)

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC