

Exhibit 6

FRESHFIELDS BRUCKHAUS DERINGER US LLP
601 Lexington Avenue, 31st Floor
New York, NY 10022

Attorneys for the Trust Defendants

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

-----X

SECURITIES INVESTOR PROTECTION CORPORATION,	:	Adv. Pro. No. 08-01789 (BRL)
	:	
Plaintiff-Applicant,	:	
	:	SIPA Liquidation
v.	:	
	:	
BERNARD L. MADOFF INVESTMENT SECURITIES LLC,	:	(Substantively Consolidated)
	:	
Defendant.	:	

-----X

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,	:	Adv. Pro. No. 09-1161 (BRL)
	:	
Plaintiff,	:	
	:	11 Civ. 07134 (JSR)
v.	:	11 Civ. 07256 (JSR)
	:	
FEDERICO CERETTI, et al.,	:	
	:	
Defendants.	:	

-----X

**REPLY MEMORANDUM IN FURTHER SUPPORT OF THE TRUST
DEFENDANTS' MOTION TO WITHDRAW THE REFERENCE TO
THE UNITED STATES BANKRUPTCY COURT**

TABLE OF AUTHORITIES

	Page(s)
CASES	
<i>In re AOL Time Warner, Inc. Sec. and “ERISA” Litig.</i> , No. 02 Civ. 8853 (SWK), 2005 WL 563166, at *5 (S.D.N.Y. March 10, 2005)	1, 2
<i>McCormick v. Chase</i> , No. 05 Civ. 10576 (TPG), 2007 WL 2456444, at *3 (S.D.N.Y. Aug. 29, 2007)	1
STATUTES	
28 U.S.C. § 157(d)	1
OTHER AUTHORITIES	
Federal Rule of Bankruptcy Procedure 5011	1
Local Bankruptcy Rule 5011-1	1

The Trust Defendants¹ submit this reply memorandum of law in further support of their motion pursuant to 28 U.S.C. § 157(d), Federal Rule of Bankruptcy Procedure 5011, and Local Bankruptcy Rule 5011-1 for the entry of an order directing the withdrawal of the reference of the Adversary Proceeding to the Bankruptcy Court.

The Trust Defendants join in the arguments submitted by Citi Hedge Fund Services Ltd. and the FIM Defendants. The Trust Defendants adopt every position taken therein and contend that this Court should withdraw the reference of this case to the Bankruptcy Court for each named defendant.² For reasons of judicial efficiency, the Trust Defendants do not address any differences between the Complaint's allegations concerning the Trust Defendants and other defendants named in this Adversary Proceeding, but reserve the right to do so if such distinctions become pertinent for purposes of this or other motions.

In addition, the SIPA Trustee has presented no rebuttal to the Trust Defendants' argument that this Court should hear all grounds upon which the Trust Defendants intend to move to dismiss this case in a single motion. By so doing, the Trustee has waived any opposition to the Trust Defendants bringing a motion to dismiss on additional grounds, including lack of personal jurisdiction, failure to state a claim, international comity and *forum non conveniens* in the event the Court grants the motions to remove the reference. *See McCormick v. Chase*, No. 05 Civ. 10576 (TPG), 2007 WL 2456444, at *3 (S.D.N.Y. Aug. 29, 2007) ("Plaintiff does not respond to this argument, and apparently concedes the point."); *In re AOL Time Warner, Inc. Sec. and*

¹ Capitalized terms used herein shall have the same meanings as ascribed to them in the Memorandum in Support of the Trust Defendants' Motion to Withdraw the Reference to the United States Bankruptcy Court dated October 17, 2011.

² The Trust Defendants reserve all rights and defenses they may have, including challenge to the jurisdiction of this Court and the Bankruptcy Court and do not waive their defense that this Court lacks personal jurisdiction over them by filing the Motion or this reply.

