

## Exhibit 17

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*Attorneys for the Trust Defendants*

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

IRVING H. PICARD,

Plaintiff,

v.

FEDERICO CERETTI, et al.,

Defendants.

**11-CV-7134-UA**

**NOTICE OF THE TRUST DEFENDANTS' MOTION TO WITHDRAW THE  
REFERENCE TO THE UNITED STATES BANKRUPTCY COURT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum in Support of the Trust Defendants' Motion to Withdraw the Reference to the United States Bankruptcy Court, dated October 12, 2011, and all papers filed and proceedings had herein, named defendants The Ashby Trust, The El Prela Trust, Alpine Trustees Limited, Port of Hercules Trustees Limited, First Peninsula Trustees Limited, El Prela Group Holding Services Limited, Ashby Holding Services Limited, Ashby Investment Services Limited, and El Prela Trading Investments Limited (collectively, the "Trust Defendants") move, 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 above-captioned action to the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court").

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Dated: October 17, 2011  
New York, NY

Respectfully submitted,

FRESHFIELDS BRUCKHAUS DERINGER US LLP

By:                         /s/ Timothy P. Harkness                        

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\* Application to the U.S. District Court for the Southern District of New York pending.