

Exhibit 20

PAUL HASTINGS LLP

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*Attorneys for Defendants Federico Ceretti, Carlo
Grosso, FIM Limited and FIM Advisers LLP*

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

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

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

Plaintiff,

v.

FEDERICO CERETTI, CARLO GROSSO,
KINGATE GLOBAL FUND, LTD., KINGATE
EURO FUND, LTD., KINGATE
MANAGEMENT, LIMITED, FIM ADVISERS
LLP, FIM LIMITED, CITI HEDGE FUND
SERVICES LIMITED, FIRST PENINSULA
INDIVIDUALLY AND AS TRUSTEES OF THE
ASHBY TRUST, THE ASHBY TRUST, ASHBY
INVESTMENT SERVICES LIMITED
INDIVIDUALLY AND AS TRUSTEES OF THE

Adv. Pro. No. 09-1161 (BRL)

ASHBY TRUST, ALPINE TRUSTEES LIMITED INDIVIDUALLY AND AS TRUSTEES OF THE EL PRELA TRUST, PORT OF HERCULES LTD. INDIVIDUALLY AND AS TRUSTEE OF THE EL PRELA TRUST, EL PRELA TRUST, EL PRELA GROUP HOLDING SERVICES, ASHBY HOLDING SERVICES LIMITED, AND EL PRELA TRADING INVESTMENTS LIMITED AND HSBC BANK BERMUDA LIMITED,

Defendants.

THE FIM DEFENDANTS' MOTION TO WITHDRAW THE REFERENCE TO THE BANKRUPTCY COURT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the FIM Defendants' Motion to Withdraw the Reference, dated October 7, 2011; the Declaration of Jodi Kleinick dated October 7, 2011 and exhibits thereto; and all the papers filed and proceedings had herein, the Defendants Federico Ceretti, Carlo Grosso, FIM Limited and FIM Advisers LLP (together, the "FIM Defendants"), by and through their attorneys, Paul Hastings LLP, will move the United States District Court for the Southern District of New York for entry of an order pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure and Rule 5011-1 of the Local Rules of the Bankruptcy Court, withdrawing the reference to the United States Bankruptcy Court for the Southern District of New York of the above-captioned adversary proceeding.

The FIM Defendants have made no prior request to this Court or to any other court for the relief requested by this Motion¹

¹ The FIM Defendants make this Motion to Withdraw the Reference without prejudice to, and without waiver of, any rights, arguments, or defenses they might otherwise have at law or in equity, including, without limitation, their rights to contest personal jurisdiction, to challenge the appropriateness of the forum, and to assert any applicable statute of limitations.

Dated: New York, New York
October 7, 2011

PAUL HASTINGS LLP
Barry Sher
Jodi Kleinick
Mor Wetzler

By: /s/ Jodi Kleinick

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