Exhibit 7

**ALLEN & OVERY LLP** 

1221 Avenue of the Americas

New York, New York 10020

Telephone: (212) 610-6300 Facsimile: (212) 610-6399

Attorneys for ABN AMRO Bank N.V. (presently known as The Royal Bank of Scotland, N.V.)

## 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, and Bernard L. Madoff,

Plaintiff.

v.

ABN AMRO BANK N.V. (presently known as THE ROYAL BANK OF SCOTLAND, N.V.); and ABN AMRO BANK (SWITZERLAND) AG (f/k/a ABN AMRO BANK (SCHWEIZ)),

Defendants.

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

**SIPA** Liquidation

(Substantively Consolidated)

Adv. Pro. No. 11-02760 (BRL)

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION OF ABN AMRO BANK N.V. (PRESENTLY KNOWN AS THE ROYAL BANK OF SCOTLAND, N.V.) IN SUPPORT OF ITS MOTION TO WITHDRAW THE BANKRUPTCY COURT REFERENCE

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law of ABN AMRO Bank N.V. (Presently Known as The Royal Bank of Scotland, N.V.) ("RBS/ABN") dated March 14, 2012, the Declaration of Michael S. Feldberg dated March 14, 2012 and the exhibits thereto, and all the papers filed and proceedings had herein, defendant RBS/ABN hereby respectfully moves for 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.

RBS/ABN has made no previous request for the relief requested by this motion.

RBS/ABN respectfully requests oral argument on this motion.

Dated: New York, New York March 14, 2012 ALLEN & OVERY LLP

By: /s/ Michael S. Feldberg
Michael S. Feldberg
michael.feldberg@allenovery.com
Bethany Kriss
bethany.kriss@allenovery.com

1221 Avenue of the Americas New York, NY 10020

Telephone: (212) 610-6300 Facsimile: (212) 610-6399

Attorneys for Defendant ABN AMRO Bank N.V. (presently known as The Royal Bank of Scotland, N.V.)