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Hearing Date: April 25, 2018
Hearing Time: 10:00 a.m. (EST)
Objections Due: April 11, 2018
Objection Time: 4:00 p.m. (EST)

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**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.

Adv. Pro. No. 08-01789 (SMB)
SIPA LIQUIDATION
(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO
TRUSTEE’S FOURTEENTH OMNIBUS MOTION TO DISALLOW CLAIMS AND
OVERRULE OBJECTIONS OF CLAIMANTS WHO HAVE NO NET EQUITY**

Irving H. Picard, trustee (“Trustee”) for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.*, and the chapter 7 estate of Bernard L. Madoff, by and through his undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule

9075-2, and respectfully represents:

1. On March 16, 2018, the Trustee filed the Trustee's Fourteenth Omnibus Motion to Disallow Claims and Overrule Objections of Claimants Who Have No Net Equity (the "Motion") (ECF No. 17366), together with the Declaration of Vineet Sehgal (ECF No. 17367) in support of the Motion.

2. The deadline for filing objections to the Motion expired on April 11, 2018 at 4:00 p.m.

3. Notice of the Motion was provided by U.S. Mail, postage prepaid or email to (i) claimants listed in Exhibit B annexed to the Motion (the "Claimants"); (ii) all parties included in the Master Service List as defined in the Order Establishing Notice Procedures (ECF No. 4560); (iii) all parties that have filed a notice of appearance in this case; (iv) the SEC; (v) the IRS; (vi) the United States Attorney for the Southern District of New York; and (vii) the Securities Investor Protection Corporation, pursuant to the Order Establishing Notice Procedures (ECF No. 4560).

4. Counsel for the Trustee reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Motion, appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Motion.

5. An electronic copy of a proposed order (the "Order"), that is substantially in the form of the proposed order that was annexed to the Motion, and Exhibit A thereto, will be submitted to the Court along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing, but notes that the Claimants subject to the Motion are both *pro se* and represented by counsel.

Dated: New York, New York
April 16, 2018

Respectfully submitted,

/s/ David J. Sheehan

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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

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

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**[PROPOSED] ORDER GRANTING TRUSTEE’S FOURTEENTH OMNIBUS MOTION
TO DISALLOW CLAIMS AND OVERRULE OBJECTIONS OF CLAIMANTS
WHO HAVE NO NET EQUITY**

Upon consideration of the motion (the “Motion”) (ECF No. 17366), by Irving H. Picard, trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) and the chapter 7 estate of Bernard L. Madoff (“Madoff”) (collectively, “Debtor”), in the above-captioned SIPA liquidation proceeding seeking to have the Court disallow any and all claims and overrule objections filed by or on behalf of customers that withdrew more money from BLMIS than they deposited and are thus, in the parlance of this case, net winners, or by customers that withdrew an equal amount to what was deposited or, in the parlance of this case, net zeros (collectively, the “Claimants”); and the Claims¹ to be disallowed and Objections to be overruled are identified in Exhibit A to the Declaration of

¹ All capitalized terms not defined herein shall have the meaning ascribed in the Motion.

Vineet Sehgal (the “Sehgal Declaration”), attached to the Motion as Exhibit A; and due and proper notice of the Motion having been given and it appearing that no other or further notice need be provided; and Trustee having filed a certificate of no objection representing that no objection has been received and that no party has indicated to the Trustee that it intends to oppose the relief requested in the Motion; and the Court having found and determined that the relief sought in the Motion as set forth herein is in the best interests of the Debtor, its estate, creditors, and all parties in interest; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Motion is granted to the extent provided herein; and it is further

ORDERED that the Claims listed on Exhibit A hereto under the heading “Claims and Objections”, are disallowed and the Trustee’s Claims determinations are affirmed; and it is further

ORDERED that the Objections listed on Exhibit A hereto under the heading “Claims and Objections”, are overruled; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2018
New York, New York

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

IN RE: BLMIS. CASE NO: 08-01789 (SMB)

FOURTEENTH OMNIBUS MOTION: EXHIBIT A – CLAIMS AND OBJECTIONS

Objection Party	Claim Number	Objection To Determination Docket Number	Counsel	Account Name	Account Number
Abel Kowalsky	009605	1925	Pro Se Filing	Millennium Trust Company, LLC FBO Abel Kowalsky (044469)	1ZR269
Alex Sirotkin	006103	2349	Pro Se Filing	Alexander Sirotkin	1S0102
Arlene Turbi Smilow	004239	2432	Pro Se Filing	Turbi Smilow	1S0329
Barbara A. Sirotkin, Esq.	001365	3096	Pro Se Filing	Barbara Sirotkin	1S0513
Bertha Berkowitz I/T/F Calvin Berkowitz	007953	914	Pro Se Filing	Bertha Berkowitz I/T/F Calvin Berkowitz	1ZA224
Beth P Feldman As Trustee of Trust Dated 11/15/82	003254	2112 3413	Becker & Poliakoff, LLP	Beth P Feldman As Trustee Dated 11/15/82	1F0129
Beth P Feldman As Trustee of Trust Dated 11/15/82	002837	2112 3413	Becker & Poliakoff, LLP	Beth P Feldman As Trustee Dated 11/15/82	1F0129
Beth P Feldman As Trustee of Trust Dated 11/15/82	002838	2112 3413	Becker & Poliakoff, LLP	Beth P Feldman As Trustee Dated 11/15/82	1F0129
Beth P Feldman As Trustee of Trust Dated 11/15/82	003253	2112 3413	Becker & Poliakoff, LLP	Beth P Feldman As Trustee Dated 11/15/82	1F0129
Calvin Berkowitz and Bertha Berkowitz ITF Peretz Berkowitz	002606	917	Pro Se Filing	Calvin Berkowitz and Bertha Berkowitz	1ZA222
Calvin Berkowitz I/T/F Bertha Berkowitz	002607	916	Pro Se Filing	Calvin Berkowitz I/T/F Bertha Berkowitz	1ZA225
Deborah Kaye	009124	2510	Lax & Neville, LLP	Deborah Kaye	1ZA364
Debra Brown	000294	2771	Becker & Poliakoff, LLP	Debra Brown	1B0195
Dr Leon I Fink MD Retirement Trust	001437	823	Pro Se Filing	Dr Leon I Fink MD Retirement Trust	1ZA357
JIR Enterprises LLC	011572	2471	Lax & Neville, LLP	JIR Enterprises LLC	1J0060
John F Rosenthal	015233	2080	Becker & Poliakoff, LLP	John F Rosenthal	1CM162
Karl Drobitsky	004124	2786	Lax & Neville, LLP	Karl Drobitsky	1D0050
Leon I & Mikki L Fink Family Trust	001438	823	Pro Se Filing	Leon I & Mikki L Fink Family Trust	1ZA355
NTC & CO. FBO Helen Schupak (093010)	006933	1785	Pro Se Filing	Millennium Trust Company, LLC FBO Helen Schupak (093010)	1ZR331
NTC & CO. FBO Leon Fink	001436	823	Pro Se Filing	Millennium Trust Company, LLC FBO Leon Fink (26908)	1ZR030
Roger Williams, Executor of the Estate of Barbara L. Laird	008623	2474	Lax & Neville, LLP	Barbara L Laird	1ZA365
The Feldman Rous Grodin Epstein MD PA Profit Sharing Plan, Mark S. Feldman	002836	2694	Becker & Poliakoff, LLP	Feldman Rous Grodin Epstein MD PA Prof Shar Plan 6/25/82	1F0005

Objection Party	Claim Number	Objection To Determination Docket Number	Counsel	Account Name	Account Number
The Feldman Rous Grodin Epstein MD PA Profit Sharing Plan, Mark S. Feldman	003256	2694	Becker & Poliakoff, LLP	Feldman Rous Grodin Epstein MD PA Prof Shar Plan 6/25/82	1F0005

FOURTEENTH OMNIBUS MOTION: EXHIBIT B – CLAIMS AND OBJECTIONS

Claim Number	Objection To Determination Docket Number	Objection Party	Account Name	Account Number	Counsel	Date of Objection
000294	2771	Debra Brown	Debra Brown	1B0195	Becker & Poliakoff, LLP	7/19/2010
015233	2080	John F Rosenthal	John F Rosenthal	1CM162	Becker & Poliakoff, LLP	3/24/2010
004124	2786	Karl Drobitsky	Karl Drobitsky	1D0050	Lax & Neville, LLP	7/20/2010
002836	2694	The Feldman Rous Grodin Epstein MD PA Profit Sharing Plan, Mark S. Feldman	Feldman Rous Grodin Epstein MD PA Prof Shar Plan 6/25/82	1F0005	Becker & Poliakoff, LLP	7/14/2010
003256	2694	The Feldman Rous Grodin Epstein MD PA Profit Sharing Plan, Mark S. Feldman	Feldman Rous Grodin Epstein MD PA Prof Shar Plan 6/25/82	1F0005	Becker & Poliakoff, LLP	7/14/2010
003254	2112 3413	Beth P Feldman As Trustee of Trust Dated 11/15/82	Beth P Feldman As Trustee Dated 11/15/82	1F0129	Becker & Poliakoff, LLP	3/30/2010 12/13/2010
002837	2112 3413	Beth P Feldman As Trustee of Trust Dated 11/15/82	Beth P Feldman As Trustee Dated 11/15/82	1F0129	Becker & Poliakoff, LLP	3/30/2010 12/13/2010
002838	2112 3413	Beth P Feldman As Trustee of Trust Dated 11/15/82	Beth P Feldman As Trustee Dated 11/15/82	1F0129	Becker & Poliakoff, LLP	3/30/2010 12/13/2010
003253	2112 3413	Beth P Feldman As Trustee of Trust Dated 11/15/82	Beth P Feldman As Trustee Dated 11/15/82	1F0129	Becker & Poliakoff, LLP	3/30/2010 12/13/2010
011572	2471	JIR Enterprises LLC	JIR Enterprises LLC	1J0060	Lax & Neville, LLP	6/24/2010
006103	2349	Alex Sirotkin	Alexander Sirotkin	1S0102	Pro Se Filing	5/28/2010
004239	2432	Arlene Turbi Smilow	Turbi Smilow	1S0329	Pro Se Filing	6/14/2010
001365	3096	Barbara A. Sirotkin, Esq.	Barbara Sirotkin	1S0513	Pro Se Filing	11/1/2010
002606	917	Calvin Berkowitz and Bertha Berkowitz ITF Peretz Berkowitz	Calvin Berkowitz and Bertha Berkowitz	1ZA222	Pro Se Filing	11/17/2009

Claim Number	Objection To Determination Docket Number	Objection Party	Account Name	Account Number	Counsel	Date of Objection
007953	914	Bertha Berkowitz I/T/F Calvin Berkowitz	Bertha Berkowitz I/T/F Calvin Berkowitz	1ZA224	Pro Se Filing	11/17/2009
002607	916	Calvin Berkowitz I/T/F Bertha Berkowitz	Calvin Berkowitz I/T/F Bertha Berkowitz	1ZA225	Pro Se Filing	11/17/2009
001438	823	Leon I & Mikki L Fink Family Trust	Leon I & Mikki L Fink Family Trust	1ZA355	Pro Se Filing	11/13/2009
001437	823	Dr Leon I Fink MD Retirement Trust	Dr Leon I Fink MD Retirement Trust	1ZA357	Pro Se Filing	11/13/2009
009124	2510	Deborah Kaye	Deborah Kaye	1ZA364	Lax & Neville, LLP	7/6/2010
008623	2474	Roger Williams, Executor of the Estate of Barbara L. Laird	Barbara L Laird	1ZA365	Lax & Neville, LLP	6/25/2010
001436	823	NTC & CO. FBO Leon Fink	Millennium Trust Company, LLC FBO Leon Fink (26908)	1ZR030	Pro Se Filing	11/13/2009
009605	1925	Abel Kowalsky	Millennium Trust Company, LLC FBO Abel Kowalsky (044469)	1ZR269	Pro Se Filing	2/8/2010
006933	1785	NTC & CO. FBO Helen Schupak (093010)	Millennium Trust Company, LLC FBO Helen Schupak (093010)	1ZR331	Pro Se Filing	1/20/2010