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Hearing Date: June 27, 2018  
Hearing Time: 10:00 a.m. (EST)  
Objections Due: June 13, 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 EIGHTEENTH 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 May 16, 2018, the Trustee filed the Trustee's Eighteenth Omnibus Motion to Disallow Claims and Overrule Objections of Claimants Who Have No Net Equity (the "Motion") (ECF No. 17583), together with the Declaration of Vineet Sehgal (ECF No. 17585) in support of the Motion.

2. The deadline for filing objections to the Motion expired on June 13, 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  
June 19, 2018

Respectfully submitted,

/s/ David J. Sheehan

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*Attorneys for Irving H. Picard, Trustee for the  
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**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 EIGHTEENTH OMNIBUS MOTION  
TO DISALLOW CLAIMS AND OVERRULE OBJECTIONS OF CLAIMANTS  
WHO HAVE NO NET EQUITY**

Upon consideration of the motion (the “Motion”) (ECF No. 17583), 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 Claims<sup>1</sup> to be disallowed and Objections to be overruled are identified in Exhibit A to the Declaration of

<sup>1</sup> 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

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE

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

**EIGHTEENTH OMNIBUS MOTION: EXHIBIT A – CLAIMS AND OBJECTIONS**

<b>Objection Party</b>	<b>Claim Number</b>	<b>Objection To Determination Docket Number</b>	<b>Counsel</b>	<b>Account Name</b>	<b>Account Number</b>
Debbie Lynn Lindenbaum	003283	2879	Certilman, Balin, Adler & Hyman LLP	Debbie Lynn Lindenbaum	1C1011
Elisabeth Fishbein	013314	3822	Pryor Cashman LLP	Elisabeth Fishbein	1ZA302
George Nierenberg & Rhona Silverbush J/T WROS	013966	3818	Pryor Cashman LLP	George Nierenberg & Rhona Silverbush J/T WROS	1N0032
Jan Bernstein and Ken Bernstein JT/WROS	013294	3824	Pryor Cashman LLP	Jan Bernstein and Kenneth Bernstein J/T WROS	1ZA804
Ken Macher Settlor; Macher Family Trust	003211	1793	Pro Se Filing	Ken Macher Settlor Macher Family Trust	1ZA460
Linda Morse, Trustee for the Linda Morse Revocable Trust, dated 6/18/93	009369	2110	Lax & Neville, LLP	Linda Morse Revocable Trust Dated 6/18/93	1M0167
Linda Morse, Trustee for the Linda Morse Revocable Trust, dated 6/18/93	009715	2110	Lax & Neville, LLP	Linda Morse Revocable Trust Dated 6/18/93	1M0167
Murray Gold, Trustee U/A/D 08/08/90	001011	2865	Bernfeld, Dematteo & Bernfeld, LLP	Murray Gold as Trustee U/A/D 08/08/90	1G0036
NTC & CO FBO Ken Macher	001831	1046	Pro Se Filing	Millennium Trust Company, LLC FBO Ken Macher (95448)	1ZR049
Oxford Envelope Corporation	013402	3827	Pryor Cashman LLP	Oxford Envelope Corporation C/O Hertz Herson & Co LLP	1ZA865
Ruth Mechaneck	000838	2792	Lax & Neville, LLP	Ruth Mechaneck	1ZB506
Ruth Mechaneck	070176	2792	Lax & Neville, LLP	Ruth Mechaneck	1ZB506
Sheila Kolodny	003349	2440	Lax & Neville, LLP	Sheila Kolodny	1K0132
Sondov Capital Inc	003249	1130	Pro Se Filing	Sondov Capital Inc	1S0362
Steven J. Andelman and Susan R. Andelman	013044	2453	Pro Se Filing	Steven J Andelman & Susan R Andelman J/T WROS	1A0030
The Estate of Richard A. Luria, David Richman and Jay Rose, Executors	002859	3036	Jaspan Schlesinger LLP	Estate of Richard A Luria David Richman and Jay Rosen	1L0108
The Estate of Richard A. Luria, David Richman and Jay Rose, Executors	002859	3035	Jaspan Schlesinger LLP	Estate of Richard A Luria David Richman and Jay Rosen	1L0108
The Fishbein Family Interstitial Cystitis Rsch Fnd, c/o Robert Fishbein	013296	3823	Pryor Cashman LLP	The Fishbein Family Interstitial Cystitis Rsch Fdn	1ZB334
Verna T Smith Trustee U/A DTD 5/25/95	002439	826	Pro Se Filing	Verna T Smith Trustee U/A DTD 5/25/95	1S0261