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VIA ECF & EMAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Room 723
New York, New York 10004-1408
Email: bernstein.chambers@nysb.uscourts.gov

Re: Irving H. Picard v. Stanley Shapiro, et al., Adv. Pro. No. 10-05383 (SMB): Defendants' Motion to Quash the Trustee's Subpoena to JPMorgan Chase Bank, N.A.

Dear Judge Bernstein:

In accordance with Rule 9074-1(a) of the Local Bankruptcy Rules for the Southern District of New York, plaintiff Irving H. Picard, as trustee for the substantively consolidated SIPA liquidation of Bernard L. Madoff Investment Securities LLC and the chapter 7 estate of Bernard L. Madoff, and defendants Stanley Shapiro and the estate of Renee Shapiro respectfully request a one-week extension of the deadline to submit an order on defendants' motion to quash the Trustee's subpoena issued to JPMorgan Chase Bank, N.A.

Following the December 19, 2018 hearing on the motion to quash, counsel for the parties have conferred for the purpose of submitting a consensual order consistent with the Court's decision granting in part and denying in part the motion. The Parties are hopeful that they will reach an agreement on a consensual order and not need to settle an order on notice. However, given delays from traveling over the holidays, the parties respectfully request an additional seven (7) days—until January 9, 2019—to submit an order under Local Rule 9074-1(a).

Respectfully submitted,

/s/ *Torello H. Calvani*

Torello H. Calvani

cc: Barry R. Lax, Esq.
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