

undersigned counsel, filed the motion (the “Motion”) for entry of an order resolving clerical errors and omissions related to previously resolved objections. The Motion will be heard before the Honorable Cecelia G. Morris, Chief United States Bankruptcy Judge for the United States Bankruptcy Court, Southern District of New York, on **July 19, 2023, at 10:00 a.m.** (the “Hearing”), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court’s directive, all hearings will be conducted remotely pending further Order of the Court. All parties who wish to participate in the Hearing must refer to Judge Morris’ guidelines for remote appearances and are required to make arrangements to appear via ZoomGov. For further details on ZoomGov, please call the Courtroom Deputy at (845) 451-6367. Further instructions regarding remote appearances via ZoomGov can be found on the Court’s website at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>. Pro se parties may participate telephonically in hearings free of charge.

PLEASE TAKE FURTHER NOTICE that if you object to the relief requested in the Motion you are required to serve a written objection (“Objection”) so that it is received by **4:00pm on July 10, 2023** (the “Objection Deadline”). An Objection must be served on the Trustee and the Securities Investor Protection Corporation by mailing the Objection to the following addresses: (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq. and (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington, DC 20006, Attn: Kevin H. Bell, Esq. and Nathanael Kelley, Esq. Any Objection must specifically state the interest that the objecting party has in these proceedings and the basis of the objection to the Motion. Upon

receipt of an Objection, the Trustee shall file the Objection with the Clerk of the United States Bankruptcy Court and deliver a courtesy copy to Chambers.

PLEASE TAKE FURTHER NOTICE that if no Objections are timely served with respect to the Motion, the Trustee may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed hereto, which order may be entered without further notice or an opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that you need not appear at the Hearing if you do not object to the relief requested in the Motion.

NOTICE

Notice of this Motion has been provided by U.S. mail, postage prepaid, or email to the following: (i) all Claimants listed on Exhibit A to the Sehgal Declaration (and their counsel) whose Objections are subject to this Motion; (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) SIPC, pursuant to the Order Establishing Notice Procedures (ECF No. 4560). The Trustee submits that no other or further notice is required. In addition, the Motion and related pleadings will be posted to the Trustee's website www.madofftrustee.com and are accessible, without charge, from that site.

No previous request for the relief sought herein has been made by the Trustee to this or any other Court.

Dated: New York, New York
June 16, 2023

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. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**[PROPOSED] ORDER GRANTING TRUSTEE’S FIFTY-THIRD
OMNIBUS MOTION FOR AN ORDER RESOLVING CLERICAL ERRORS
AND OMISSIONS RELATED TO PREVIOUSLY RESOLVED OBJECTIONS**

Upon consideration of the motion (the “Motion”) [Docket No. ___], by Irving H. Picard, trustee (“Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) and the substantively consolidated chapter 7 estate of Bernard L. Madoff (“Madoff”) (collectively, “Debtor”), in the above-captioned SIPA¹ liquidation proceeding seeking entry of an order resolving clerical errors and omissions related to previously resolved objections as identified in Exhibits A through D to the Declaration of Vineet Sehgal in Support of the Motion (the “Sehgal Declaration”), [Docket No. ___]; and due and proper notice of the Motion having been given and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Motion as set forth herein is in the best

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

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 are disallowed; and it is further

ORDERED that the Trustee's Claims determinations regarding the Claims listed on Exhibit A are affirmed; and it is further

ORDERED that the Objections listed on Exhibit A 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.

Exhibit A

EXHIBIT A – OBJECTIONS AND CLAIMS

List Of Objections and Claims Containing Clerical Errors and/or Omissions

Objection Party	Objection Docket	Claim Number	Resolution Document	Resolution Document Docket No.	Account Number
Article Fourth Trust U/W Martin J. Joel, Jr., Deceased	2335	000386, 008922	Notice of Withdrawal	16613	1J0057
Bradermak Equities, Ltd.	2856	013292	Notice of Withdrawal	22162	1B0150
Carol Nelson	648	000495, 001870	Notice of Withdrawal	19209	1ZA283
Carol Nelson and Stanley Nelson J/T WROS	647	000480, 001868	Notice of Withdrawal	19208	1ZA284
Cindy Giamarrusco, Trustee of Trust FBO Heather Tsumpes	2145	010278	Motion Order	18131	1EM463
David T. Washburn	2281	013526, 013766, 015291, 015346	Notice of Withdrawal via Executed Settlement agreement on 8/28/15	39 ¹	1W0087
Donald A Benjamin	399, 400	000141, 100119, 100134	Notice of Withdrawal	19850	1CM006
Frank H. Wolf & Roberta Wolf	2758	001475, 001635	Notice of Withdrawal	5123	1W0132
Gettinger Management LLC Profit Sharing Plan	2900	005403	Notice of Withdrawal	16754	1G0386
Jeffrey Schaffer	3189	010700, 011601, 011602	Notice of Withdrawal	20062	1ZA339
Jeffrey Schaffer and Donna Schaffer	1027, 2138, 3188	011600, 011773	Notice of Withdrawal	20063	1ZA401
Jeffrey Shankman	650	010631, 100158, 100411	Notice of Withdrawal	20761	1S0060
Martin R Harnick & Steven P Norton Partners	649, 3123	001925, 100132	Notice of Withdrawal	20132	1H0123
Martin R. Harnick and Steven P. Norton Partners	2290	001924	Notice of Withdrawal	20132	1H0062
NTC & CO. FBO Carol Nelson (47003)	646	000531, 001098, 001869	Notice of Withdrawal	19207	1ZR265
NTC & CO. FBO Donald A Benjamin	291, 295	000980, 100120, 100135	Notice of Withdrawal	19850	1CM402
NTC & CO. FBO Gunther K Unflat (40366)	704	000732, 000733	Notice of Withdrawal	20889	1U0018
Realty Negotiators Inc	692	009614, 100139, 100154	Notice of Withdrawal	12819	1R0096
The Guritzky Family Partnership LP	2800	001050	Notice of Withdrawal	12384	1G0228
Trust F/B/O Melissa Perlen U/A DTD 9/12/79	828	009385, 011761	Notice of Withdrawal	12386	1P0043

¹ See *Picard v. Washburn*, Adv. No. 10-04294(CGM), ECF No. 39 (Sept. 4, 2015)