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Hearing Date: July 30, 2025
Hearing Time: 10:00 a.m. (EDT)

*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 (LGB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

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,

Plaintiff,

v.

SQUARE ONE FUND LTD.,

Defendant.

Adv. Pro. No. 10-04330 (LGB)

NOTICE OF UNOPPOSED MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Statement of Material Facts in Support of the Trustee’s Motion for Summary Judgment, the Declarations of Marco Molina, Dr. Steve Pomerantz, Lisa M. Collura, Bruce G. Dubinsky, and Matthew B. Greenblatt, with all exhibits annexed thereto, and upon all the prior pleadings and proceedings had herein, Irving H. Picard, as trustee (“Trustee”) for the Liquidation of Bernard L. Madoff Investment Securities LLC, by and through his counsel, will move this Court, before the Honorable Lisa G. Beckerman, United States Bankruptcy Judge for the Southern District of New York, at the United States Bankruptcy Courthouse, One Bowling Green, New York, New York 10004, on **July 30, 2025, at 10:00 a.m.**, or as soon thereafter as counsel may be heard, for an order granting the Trustee’s motion for summary judgment (“Motion”) pursuant to Rule 56 of the Federal Rules of Civil Procedure (made applicable by Rule 7056 of the Federal Rules of Bankruptcy Procedure and Southern District of New York Local Bankruptcy Rule 7056-1), together with such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that The Trustee files this motion unopposed following the filing of Defendant Square One Fund Ltd.’s Statement of Determination to Cease Actively Defending Adversary Proceeding (ECF No. 318). In the statement, Square One stated that it “does not intend, among other things, . . . to file any opposition to any motions that Plaintiff might make” (ECF No. 318). Nevertheless, if Defendant chooses to oppose the Trustee’s motion, Defendant’s opposition shall be served and filed on or before July 9, 2025, and the

Trustee's reply papers (if necessary) shall be served and filed on or before July 23, 2025.

Date: June 24, 2025
New York, New York

BAKER & HOSTETLER LLP

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