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Hearing Date: December 16, 2020, 10:00 a.m.
Opposition Deadline: December 1, 2020
Reply Deadline: December 11, 2020

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

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

HSBC BANK PLC, *et al.*

Defendants.

Adv. Pro. No. 09-01364 (SMB)

NOTICE OF MOTION FOR AN ORDER ISSUING LETTER OF REQUEST

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. § 1781, this Court’s inherent authority, and in light of the comity between the United States and Luxembourg and upon the accompanying Motion for an Order Issuing a Letter of Request (the “Motion”), Irving H. Picard, as trustee (the “Trustee”) for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, substantively consolidated with the Chapter 7 estate of Bernard L. Madoff, through his undersigned counsel, will move before The Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, on **December 16, at 10:00 a.m.**, seeking entry of an order Issuing a Letter of Request for Service Abroad of Judicial or Extrajudicial Documents in Civil or Commercial Matters (the “Order”).

PLEASE TAKE FURTHER NOTICE that any objection to the Motion (“Objection”) shall: (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and General Orders; (iii) specify the name of the objecting party and state with specificity the basis of the Objection(s) and specific grounds therefor; (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with a proof of service, and a courtesy copy delivered to the Chambers of The Honorable Stuart M. Bernstein, One Bowling Green, New York, New York, 10004; (v) be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Oren J. Warshavsky, Esq.; and (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington, DC 20006-1620, Attn: Kevin H. Bell, Esq., so as to be received no later than **December 1, 2020**.

PLEASE TAKE FURTHER NOTICE that failure to timely file an Objection may result in the entry of an order granting the relief requested in the Motion without further notice to any party or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that the Trustee shall file a reply, if any, by no later than **December 11, 2020**.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

The Trustee made no prior request to this Court or to any other court for the relief requested by the Motion.

Dated: New York, New York
November 16, 2020

Respectfully submitted,

/s/ Oren J. Warshavsky

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the Chapter 7 Estate of Bernard L. Madoff*