

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,  Plaintiff,  v.  BERNARD L. MADOFF INVESTMENT SECURITIES LLC,  Defendant.
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.  LEGACY CAPITAL LTD.,  Defendant.

Adv. Pro. No. 08-01789 (LGB)  
SIPA Liquidation  
(Substantively Consolidated)

Adv. Pro. No. 10-05286 (LGB)

**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 British Virgin Islands and upon the accompanying Motion for an Order Issuing a Letter of Request (the “Motion”), Irving H. Picard, as trustee (the “Trustee”) for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 Estate of Bernard L. Madoff, through his

undersigned counsel, will move before The Honorable Lisa G. Beckerman, United States Bankruptcy Judge, on May 22, 2024 at 10:00 a.m., or as soon as counsel may be heard, 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”) upon Hamilton Trust & Management Company Limited and H.T.M. Services Limited, in the British Virgin Islands..

**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 Beckerman’s guidelines for remote appearances and are required to make arrangements to appear via ZoomGov. 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 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; (v) be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Carrie Longstaff, 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 April 23, 2024.

**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 May 15, 2024.

**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: April 2, 2024  
New York, New York

/s/ Carrie Longstaff  
**Baker & Hostetler LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Oren J. Warshavsky  
Carrie Longstaff  
Peter B. Shapiro  
dsheehan@bakerlaw.com  
owarshavsky@bakerlaw.com  
clongstaff@bakerlaw.com  
pshapiro@bakerlaw.com

*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*