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**Hearing Date: September 20, 2023**  
**Response Date: September 13, 2023**  
**Reply Date: September 17, 2023**

*Attorney for Defendant NatWest Markets N.V.*

**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.

**ORAL ARGUMENT  
REQUESTED**

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

Plaintiff,

v.

ABN AMRO BANK, N.V. (presently known as  
NATWEST MARKETS N.V.),

Defendant.

Adv. Pro. No. 10-05354 (CGM)

Adv. Pro. No. 11-02760 (CGM)

**NOTICE OF MOTION ON  
DEFENDANT NATWEST MARKETS N.V.'S  
MOTION TO AMEND AFFIRMATIVE DEFENSES**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of NatWest Markets N.V.'s Motion to Amend Affirmative Defenses, dated August 24, 2023, and upon all prior pleadings and proceedings herein, NatWest Markets N.V. ("NatWest" or "Defendant"), will move this Court, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, made applicable here by Rule 7015(a)(2) of the Federal Rules of Bankruptcy Procedure, on **September 20, 2023**, at 10am Eastern Time, before the Honorable Cecelia G. Morris, Judge, for an order granting NatWest leave to amend its Affirmative Defenses in its Answer and Counterclaims to the Consolidated Second Amended Complaint filed in this action by Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (ECF No. 220).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Rule 9006-1, all papers responsive to the Defendant's Motion to Amend Affirmative Defenses shall be served and filed no later than **September 13, 2023** and filed no later than **September 14, 2023**, and all reply papers in further support of the Defendant's Motion to Amend Affirmative Defenses shall be served no later than **September 17, 2023** and filed no later than **September 18, 2023**.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, the Defendant does not consent to the entry of final orders or judgment by this Court.

**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.

Dated: New York, New York  
August 24, 2023

Respectfully submitted,

By: Michael S. Feldberg

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