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**Hearing Date:** December 16, 2020

**Time:** 10:00 a.m.

**Objection Deadline:** November 16, 2020

**Reply Deadline:** December 9, 2020

**Time:** 4:00 p.m.

*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.

In re:

BERNARD L. MADOFF,

Debtor.

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

Plaintiff,

v.

STANDARD CHARTERED FINANCIAL  
SERVICES (LUXEMBOURG) S.A. (f/k/a  
AMERICAN EXPRESS FINANCIAL SERVICES  
(LUXEMBOURG) S.A. and f/k/a AMERICAN  
EXPRESS BANK (LUXEMBOURG) S.A.), as  
represented by its Liquidator HANSPETER  
KRÄMER, HANSPETER KRÄMER, in his

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01565 (SMB)

capacities as liquidator and representative of STANDARD CHARTERED FINANCIAL SERVICES (LUXEMBOURG) S.A., STANDARD CHARTERED BANK INTERNATIONAL (AMERICAS) LTD., f/k/a AMERICAN EXPRESS BANK INTERNATIONAL, and STANDARD CHARTERED INTERNATIONAL (USA) LTD., f/k/a AMERICAN EXPRESS BANK LTD.,

Defendants.

**NOTICE OF MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff, by and through the Trustee’s undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on **December 16, 2020 at 10:00 a.m.**, seeking entry of an order under Rule 15 of the Federal Rules of Civil Procedure, as incorporated in this proceeding by Rule 7015 of the Federal Rules of Bankruptcy Procedure, granting the Trustee’s motion for leave to file an amended complaint, in substantially the form attached as **Exhibit A** to the declaration of Jonathan A. Forman filed concurrently herewith, on the grounds and for the reasons set forth in the accompanying Memorandum of Law.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motion must be: (i) in writing, conform to applicable rules of this Court and filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 no later than **November 16, 2020** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York, 10111, Attn: David J. Sheehan; and (b) Securities Investor Protection

Corporation, 1667 K Street, N.W., Suite 10, Washington, DC 20006, Attn: Kevin Bell. Any objections must specifically state the interest that that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

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

**PLEASE TAKE FURTHER NOTICE** that the Trustee shall file a reply, if any, by no later than **December 9, 2020 at 4:00 p.m.**

Dated: October 14, 2020  
New York, New York

*/s/ David J. Sheehan*

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