

Hearing Date: July 13, 2022 at 10:00 a.m. (ET)

Response Deadline: April 26, 2022

Reply Deadline: May 26, 2022

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*Attorneys for Defendant The Public Institution for Social Security*

**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.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff,	Adv. Pro. No. 12-01002 (CGM)

**ORAL ARGUMENT REQUESTED**

Plaintiff,  v.  THE PUBLIC INSTITUTION FOR SOCIAL SECURITY,  Defendant.
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**NOTICE OF DEFENDANT THE PUBLIC INSTITUTION  
FOR SOCIAL SECURITY’S MOTION TO DISMISS COMPLAINT**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law and Declaration of Leo Muchnik and the exhibits thereto, Defendant The Public Institution for Social Security (“PIFSS”) shall move this Court, before the Honorable Cecelia G. Morris, United States Bankruptcy Judge, at the United States Bankruptcy Court, Southern District of New York, Alexander Hamilton Customs House, Courtroom 621, One Bowling Green, New York, New York, 10004-1408, on July 13, 2022 at 10:00 a.m., for an Order pursuant to Rules 12(b)(1), (b)(2), and (b)(6) of the Federal Rules of Civil Procedure, made applicable hereto and incorporated into the above-captioned adversary proceeding by Federal Rule of Bankruptcy Procedure 7012, dismissing with prejudice the Complaint and for such other and further relief as this Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Scheduling Order, dated February 7, 2022 [Dkt. 113], the Trustee’s response, if any, is due on or before April 26, 2022, and PIFSS’ reply, if any, is due on or before May 26, 2022.

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

Dated: February 25, 2022  
New York, New York

**GREENBERG TRAURIG, LLP**

By: /s/ Leo Muchnik  
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