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David Bernfeld, Esq.
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Attorneys for the Defendants
set forth in Exhibt A hereto

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

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

SIPA LIQUIDATION

(Substantively Consolidated)

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In re:

BERNARD L. MADOFF,

Debtor.

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

Plaintiff,

v.

FRANITZA FAMILY LIMITED PARTNERSHIP, MANFRED FRANITZA REVOCABLE TRUST, NTC & CO., LLP, as former custodian of an Individual Retirement Accounts for the benefit of

Adv. Proc. No. 10-04476

Manfred Franitza and Margrit Franitza, MANFRED FRANITZA, individually and in his capacities as General Partner of the Franitza Family Limited Partnership and as Trustee and/or Beneficiary of the Manfred Franitza Revocable Trust, MARGRIT FRANITZA, individually and in her capacities as General Partner of the Franitza Family Limited Partnership and as Trustee and/or Beneficiary of the Manfred Franitza Revocable Trust, URTE FRANITZA-GOLDSTEIN, individually and as General Partner of the Franitza Family Limited Partnership, and KAREN FENNER, individually and as General Partner of the Franitza Family Limited Partnership,

Defendants.

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NOTICE OF MOTION
SEEKING WITHDRAWAL OF THE REFERENCE
FROM THE BANKRUPTCY COURT
TO THE DISTRICT COURT

PLEASE TAKE NOTICE that the Defendants represented by the undersigned counsel in the adversary proceedings fully set forth in Exhibit A to the June 30, 2011 Declaration of David B. Bernfeld (the "Defendants"), respectfully move for entry of an order, pursuant to 28 U.S.C. § 157(d), Federal Rule of Bankruptcy Procedure 5011, and Rule 5011-1 of the Local Rules of the Bankruptcy Court, withdrawing the reference to the Bankruptcy Court on behalf of the Defendants in their respective adversary proceedings for the reasons set forth in the accompanying Memorandum of Law, the Bernfeld Declaration and the exhibits annexed thereto.

Dated: New York, New York
June 30, 2011

Bernfeld, DeMatteo & Bewrnfeld, LLP

By:_____/s/_____

David B. Bernfeld (DBB-0177)
Jeffrey L. Bernfeld (JLB-1615)
Attorneys for the Defendants listed in Exhibit A to the Bernfeld Declaration
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