

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE	:	
COMMISSION,	:	
	:	
Plaintiff,	:	Case No. 08 Civ. 10791 (LLS)
	:	
vs.	:	
	:	
BERNARD L. MADOFF and	:	
BERNARD L. MADOFF INVESTMENT	:	
SECURITIES LLC,	:	
	:	
Defendants.	:	
	:	
_____		X

NOTICE OF MOTION FOR PARTIAL RELIEF FROM INJUNCTION

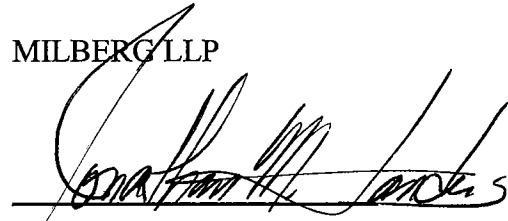
PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law in Support of Motion for Partial Relief From Injunction, and all prior papers and proceedings herein, Movants The Blumenthal & Associates Florida General Partnership, Marc Cherno, Judith Rock Goldman, the Horowitz Family Trust, Steven Morganstern, M.D., The Martin Rappaport Charitable Remainder Unitrust, and Martin Rappaport (“Movants”) hereby move this Court for an order modifying the Partial Judgment on Consent Imposing Permanent Injunction and Continuing Other Relief (“Permanent Injunction”) [Dkt. No. 18], issued by the Court on February 9, 2009, to allow the Movants to file an involuntary bankruptcy petition against Bernard L. Madoff in the United States Bankruptcy Court for the Southern District of New York.

The Permanent Injunction incorporates by reference certain provisions of the Order on Consent Imposing Preliminary Injunction, Freezing Assets and Granting Other Relief Against Defendants [Dkt. No. 8], issued by the Court on December 18, 2008, which provides that the instant Motion shall be made on three day’s notice to the Plaintiff.

Dated: April 1, 2009

Respectfully submitted,

MILBERG LLP

A handwritten signature in black ink, appearing to read "Jonathan M. Landers", is written over a horizontal line.

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CERTIFICATE OF SERVICE

I, Jonathan M. Landers, certify that on the 1st day of April 2009, I caused a true and correct copy of the foregoing NOTICE OF MOTION FOR PARTIAL RELIEF FROM INJUNCTION to be served on all parties to this action via electronic filing and on the following parties via Federal Express overnight delivery:

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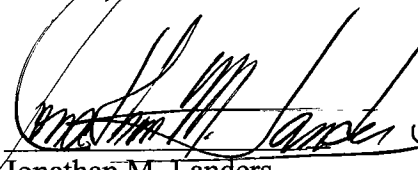
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