

**BROWN RUDNICK LLP**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>In re:</b>	)	<b>Chapter 15 Case</b>
	)	
<b>Fairfield Sentry Limited, <u>et al.</u>,</b>	)	<b>Case No. 10-13164 (BRL)</b>
	)	
<b>Debtors in Foreign Proceedings.</b>	)	<b>Jointly Administered</b>
	)	

**NOTICE OF FOREIGN REPRESENTATIVE’S APPLICATION,  
PURSUANT TO 11 U.S.C. §§ 105(a), 363, 1507(a), 1520(a)(2) AND 1521(a),  
FOR CONSIDERATION OF SIPA CLAIM ASSIGNMENT TRANSACTION  
CONTEMPLATED BY TRADE CONFIRMATION**

Kenneth Krys (together with his predecessors, the “Foreign Representative”), in his capacity as the duly appointed liquidator and foreign representative of Fairfield Sentry Limited (“Sentry” or the “Debtor”), one of the debtors in the above-captioned jointly administered Chapter 15 cases,<sup>1</sup> through his United States attorneys Brown Rudnick LLP, respectfully submits this application (the “Application”), pursuant to Sections 105(a), 363(b), 1507(a), 1520(a)(2) and 1521(a) of title 11 of the United States Code (as amended, the “Bankruptcy Code”), for consideration of approval or disapproval of the contemplated claim assignment transaction (the

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<sup>1</sup> The other debtors in these Chapter 15 cases are Fairfield Sigma Limited (“Sigma”) and Fairfield Lambda Limited (“Lambda”), for which Mr. Krys also acts as liquidator and foreign representative.

“Transaction”), as between Sentry, as Seller, and Farnum Place, LLC, as Buyer, referred to by the document entitled “Trade Confirmation,” dated December 13, 2010 (the “Trade Confirmation”), and recommends that the Court disapprove the Trade Confirmation and Transaction contemplated thereby for the reasons set forth in the accompanying memorandum of law.

The Foreign Representative has made no prior request to this Court or any other U.S. court for the relief requested by this Application.

The Foreign Representative is providing notice of this Application to (a) the Office of the United States Trustee; (b) counsel to the trustee for the liquidation of Bernard L. Madoff Investment Securities LLC; (c) United States counsel to Farnum Place, LLC; (d) all known registered shareholders of Sentry; and (e) all parties that have filed a notice of appearance in these Chapter 15 cases. The Foreign Representative respectfully submits that no other or further notice need be given.

WHEREFORE, the Foreign Representative respectfully requests that the Court enter an order granting the relief requested herein, and such other and further relief as the Court deems just and appropriate.

Dated: New York, New York  
April 18, 2012

Respectfully submitted,

**BROWN RUDNICK LLP**

By: /s/David J. Molton

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