UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		
	X	
	:	
NOVEL COMMODITIES S.A.,	:	
	:	No. 11-cv-6339 (PGG)
Plaintiff,	:	
- V -	:	ECF CASE
	:	
QBE INSURANCE CORPORATION,	:	NOTICE OF MOTION FOR RECONSIDERATION
Defendant.	:	
	:	
	X	

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, and all prior pleadings and proceedings had herein, plaintiff Novel Commodities S.A. ("Novel"), pursuant to Local Civil Rule 6.3, will move this Court, Hon. Paul G. Gardephe, in Courtroom 6B of the United States Courthouse located at 500 Pearl Street, New York, New York 10007, for reconsideration of that portion of the Court's March 30, 2013 Order (dkt. no. 39) that denied Novel's motion for summary judgment, and for entry of an order granting Novel summary judgment against defendant QBE Insurance Corporation pursuant to Rule 56 of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE, that pursuant to Local Civil Rules 6.1(b) and 6.3, any opposing memorandum of law shall be served within fourteen days after service of this motion, and any reply memorandum shall be served within seven days after service of the opposition. Dated: New York, New York April 11, 2013

SULLIVAN & WORCESTER LLP

By: <u>/s/ Michael T. Sullivan</u>

Michael T. Sullivan Andrew T. Solomon Karen E. Abravanel 1633 Broadway New York, New York 10019 Telephone: (212) 660-3000 Facsimile: (212) 660-3001 msullivan@sandw.com asolomon@sandw.com kabravanel@sandw.com

Attorneys for Plaintiff Novel Commodities S.A.

To: Michael A. Knoerzer, Esq. Victoria L. Melcher, Esq. CLYDE & CO US LLP The Chrysler Building 405 Lexington Avenue New York, New York 10174 Telephone: (212) 710-3900

> Attorneys for Defendant QBE Insurance Corporation