

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
NOVEL COMMODITIES S.A.,	:	
	:	
Plaintiff,	:	No. 11-cv-6339 (PGG)
	:	ECF CASE
v.	:	
	:	
QBE INSURANCE CORPORATION,	:	
	:	
Defendant.	:	
-----X	:	

**NOTICE OF DEFENDANT QBE INSURANCE CORPORATION'S
MOTION TO STAY EXECUTION OF JUDGMENT**

PLEASE TAKE NOTICE that, upon the Memorandum of Law submitted herewith, and the Declaration of Stephen M. Kennedy dated June 21, 2013 (and the Exhibits annexed thereto), Defendant QBE Insurance Corporation (“QBE”), by and through its attorneys, Clyde & Co US LLP, shall move this Court at the United States Courthouse, Courtroom 705, 40 Foley Square, New York, New York 10007, before the Honorable Paul G. Gardephe, for an order pursuant to Rule 62(b) of the Federal Rules of Civil Procedure staying execution of judgment pending the disposition of QBE's motion for judgment as a matter of law under Rule 50 of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that, in accordance with Local Civil Rule 6.1(b) of the United States District Court for the Southern District of New York, any opposing affidavits and answering memoranda shall be served within fourteen days, and any reply affidavits and memoranda of law shall be served within seven days after service of the answering papers.

Dated: New York, New York
June 21, 2013

CLYDE & CO US LLP

By: Stephen M. Kennedy

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