

EXHIBIT 2

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

In Re:)	Hearing Date: October 24, 2012
)	Hearing Time: 9:15 a.m.
)	Hearing Location: Albany
O'HARA, JOSEPH)	
(SSN: xxx-xx-7189))	Case No.08-12108 rel
Debtor)	Chapter 7

NOTICE OF MOTION UNDER DEFAULT PROCEDURE

The Trustee's Motion Pursuant to F.R.B.P. 9019 For An Order Approving Stipulation was filed on September 28, 2012, by Douglas J. Wolinsky, Chapter 7 Trustee (the "Motion"). The Motion seeks the Court's approval to authorize Special Litigation Counsel Cory E. Friedman, Esq. to execute a Stipulation of Dismissal, on behalf of the Trustee, in the matter of: *Joseph J. O'Hara v. Keith A. Raniere a/k/a Vanguard, et al*, U.S. District Court, Civil Action No. 1:12-CV-0252 pending in the United States District Court for the Northern District of New York.

If you oppose the Motion, you must file a written objection with the Clerk of Court on or before 4:00 p.m. on October 17, 2012. **If you file a written opposition, a copy must also be served upon** the Moving party, the debtor, the debtor's counsel, the United States Trustee, the case trustee, if any, and in a Chapter 11 Case, the creditors' committee and its counsel, or if no committee is appointed, then upon the twenty largest unsecured creditors. Addresses for those parties are set forth below.

If an opposition is filed timely, the Court will hold a hearing on the Motion and any objection at 9:15 a.m. on October 24, 2012, at the following location: United States Bankruptcy Court, James T. Foley Courthouse, 445 Broadway, Suite 306, Albany, New York 12207.

If no opposition is timely filed, the Court may deem the matter unopposed and grant the Notice without further hearing.

PURSUANT TO BANKRUPTCY RULE 9014 AND LOCAL BANKRUPTCY RULE 9013-1, IF YOU INTEND TO OPPOSE THE MOTION, YOU MUST SERVE ON THE MOVANT'S COUNSEL AND FILE WITH THE CLERK OF THE BANKRUPTCY COURT, WRITTEN OPPOSITION TO THE MOTION NOT LATER THAN SEVEN (7) BUSINESS DAYS PRIOR TO THE RETURN DATE OF THIS MOTION. IN THE EVENT NO WRITTEN OPPOSITION IS SERVED AND FILED, NO HEARING ON THE MOTION WILL BE HELD BEFORE THE COURT ON THE RETURN DATE, AND THE COURT WILL CONSIDER THE MOTION AS UNOPPOSED.

Dated: September 28, 2012

DOUGLAS J. WOLINSKY
CHAPTER 7 TRUSTEE

By: /s/ Douglas J. Wolinsky
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Moving Party and Chapter 7 Trustee

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