UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

		X
ANWAR, et al.,		:: ::
	Plaintiffs,	 ::
v.		:: :: MASTER FILE NO. 09-CV-0118 (VM)
FAIRFIELD GREENWIG	CH LIMITED, et al.,	 ::
	Defendants.	 ::
		 ::
		 x

DECLARATION OF JEFFREY L. ROETHER

I, Jeffrey L. Roether, Esq., make this declaration pursuant to 28 U.S.C. § 1746. I hereby state as follows:

- 1. I am an attorney duly admitted in the State of New York, a member of the bar of this Court, and an associate with the law firm of Simpson Thacher & Bartlett LLP, counsel for defendants in the above-captioned action Fairfield Greenwich Limited and Fairfield Greenwich (Bermuda) Limited (the "Settling Defendants"). I respectfully submit this declaration in support of the Settling Defendants' Statement Regarding Plaintiffs' Motion for Final Approval of the Proposed Partial Settlement.
- 2. Attached as Exhibits A and B are true and correct copies of the letters (without enclosures) providing notice of the proposed partial settlement of the above-captioned action sent to the appropriate State and Federal officials on November 16, 2012 on behalf of the Settling Defendants pursuant to 28 U.S.C. § 1715.
- 3. Pursuant to the Stipulation of Settlement (the "Stipulation"), on December7, 2012, Fairfield Greenwich Limited transferred \$500,000 to the Account (as defined in the

Stipulation), which is under the control of the Escrow Agent (as defined in the Stipulation). In

addition, as noted in the Settling Parties' joint-letter so-ordered by the Court on January 24, 2013

(ECF No. 1022), the Settling Defendants have facilitated Plaintiffs' Lead Counsel's receipt of a

bank guarantee for \$25,000,000.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 31, 2013

New York, New York

/s/ Jeffrey L. Roether

Jeffrey L. Roether, Esq.

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