

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANWAR, et al.,

Plaintiffs,

- against -

FAIRFIELD GREENWICH LIMITED, et al.,

Defendants.

This Document Relates To: All Actions

MASTER FILE NO.
09-CV-0118 (VM)

**SOME EXHIBITS FILED
UNDER SEAL PURSUANT
TO CONFIDENTIALITY
ORDER**

**DECLARATION OF PATRICK J. SOMERS IN SUPPORT OF DEFENDANTS
THE CITCO GROUP LTD., CITCO FUND SERVICES (EUROPE) B.V.,
CITCO (CANADA) INC., CITCO GLOBAL CUSTODY N.V., CITCO BANK
NEDERLAND N.V. DUBLIN BRANCH, AND CITCO FUND SERVICES
(BERMUDA) LTD.'S RULE 72(a) OBJECTIONS TO THE JULY 8, 2013
DISCOVERY ORDER OF MAGISTRATE JUDGE FRANK MAAS**

I, PATRICK J. SOMERS, declare under penalty of perjury, pursuant to 28 U.S.C.

§1746, as follows:

1. I am an attorney associated with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, counsel for Defendants The Citco Group Ltd., Citco Fund Services (Europe) B.V., Citco (Canada) Inc., Citco Global Custody N.V., Citco Bank Nederland N.V. Dublin Branch, and Citco Fund Services (Bermuda) Ltd. (collectively, "Citco"). I submit this Declaration in support of Citco's Rule 72(a) Objections to the July 8, 2013 Discovery Order of Magistrate Judge Frank Maas. I am fully familiar with the facts and circumstances stated herein, based on personal knowledge, the attached documents, or review of the files maintained by my firm.

2. Attached as Exhibit 1 is a copy of the Discovery Order of Magistrate Judge Frank Maas, dated July 8, 2013.

3. Attached as Exhibit 2 is a copy of a letter, with accompanying attachments, sent by Plaintiffs to Citco, dated May 10, 2013.

4. Attached as Exhibit 3 is a copy of a letter, with accompanying attachment, sent by Citco to Plaintiffs, dated May 20, 2013.

5. Attached as Exhibit 4 is a copy of a letter, with accompanying exhibits, sent by Plaintiffs to Magistrate Judge Maas, dated May 28, 2013, which will be filed under seal pursuant to the Confidentiality Order.

6. Attached as Exhibit 5 is a copy of a letter, with accompanying exhibits, sent by Citco to Magistrate Judge Maas, dated May 31, 2013, which will be filed under seal pursuant to the Confidentiality Order.

7. Attached as Exhibit 6 is a copy of a letter, with accompanying exhibit, sent by Plaintiffs to Magistrate Judge Maas, dated June 4, 2013.

8. Attached as Exhibit 7 is a copy of excerpts of a transcript of the deposition of Nicholas Braham, dated May 24, 2013, which will be filed under seal pursuant to the Confidentiality Order.

9. Attached as Exhibit 8 is a copy of excerpts of a transcript of the deposition of William DeRosa, dated February 7, 2013, which will be filed under seal pursuant to the Confidentiality Order.

10. Attached as Exhibit 9 is a copy of excerpts of a transcript of the deposition of Ronald Irausquin, dated January 24, 2013, which will be filed under seal pursuant to the Confidentiality Order.

11. Attached as Exhibit 10 is a copy of excerpts of a transcript of the deposition of Paul Kavanagh, dated October 25, 2012, which will be filed under seal pursuant to the Confidentiality Order.

12. Attached as Exhibit 11 is a copy of excerpts of a transcript of the deposition of William Keunen, dated December 21, 2012, which will be filed under seal pursuant to the Confidentiality Order.

13. Attached as Exhibit 12 is a copy of excerpts of a transcript of the deposition of Anthony Murray, dated June 26, 2013, which will be filed under seal pursuant to the Confidentiality Order.

14. Attached as Exhibit 13 is a copy of excerpts of a transcript of the deposition of Charles Rund, dated January 31, 2013, which will be filed under seal pursuant to the Confidentiality Order.

15. Attached as Exhibit 14 is a copy of excerpts of a transcript of the deposition of Ian Smith, dated October 19, 2012, which will be filed under seal pursuant to the Confidentiality Order.

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

Dated: New York, New York
July 22, 2013



PATRICK J. SOMERS