

THE BRODSKY LAW FIRM, PL

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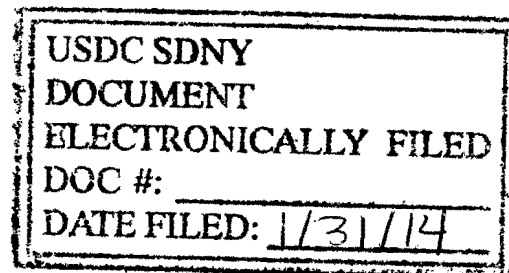
January 31, 2014

VIA EMAIL/PDF FORMAT

MEMO ENDORSED

The Hon. Frank Maas
 United States Magistrate Judge
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street
 New York, New York 10007-1312

Re: Anwar v. Fairfield Greenwich
 No. 09-cv-118 (S.D.N.Y.)
Standard Chartered Cases



Dear Judge Maas:

I am writing as counsel for the *Maridom* Plaintiffs and as Liaison Counsel for the Standard Chartered Plaintiffs ("SC Plaintiffs"). This letter is response to Sullivan & Cromwell's letter of even date concerning their request for additional delay in concluding the taking of depositions of the parties' experts.

It is true that we opposed this delay, but lest Your Honor think that we were unreasonable in opposing the Defendants' request, we want to inform the Court of the basis of the explanation provided us for the delay: that the new expert would be travelling March 2-14, 2014, with most of the time of the travel falling after the requested March 3 deadline for delivering the report. Sullivan & Cromwell made no mention about any travel plans for February 2014. Given that counsel had previously written this Court on December 10, 2013 that "Standard Chartered [had] proposed [to the Plaintiffs] a schedule pursuant to which its new expert would be deposed by February 28, 2014," and "*Standard Chartered remains prepared to proceed on such a schedule,*" (emphasis added), we saw no reason to accede to an abandonment of the previously agreed to schedule.

Now we have read today's letter to the Court, which provides a radically different reason for delay -- that the putative expert would be unavailable for extensive periods of time in *February*, and thus presumably would be unable to work on his or her report during those "away" days. Assuming, as of course we do, that the expert's schedule

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is as now presented to Your Honor, as much as we are opposed to further delay, we see no alternative than to accede to the requested postponement.

Therefore, we have agreed with Sullivan & Cromwell to the following schedule:

- The expert's report will be made available to Plaintiffs' counsel no later than March 3, 2014;
- The expert will be made available for a deposition in New York, New York on March 27 or March 28, 2014 (the date to be agreed to between counsel).

*So ordered
(and thank you!).
RFB
1/31/14*

Thank you very much for your consideration of this letter.

Sincerely yours,

The Brodsky Law Firm, PL



Richard E. Brodsky

cc: Counsel for Standard Chartered Defendants
Members of Standard Chartered Plaintiffs' Steering Committee