

EXHIBIT C

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VIA EMAIL

Andrew Gordon, Esq.
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Re: *Anwar, et al. v. Fairfield Greenwich Limited, et al.*
Master File No. 09-CV-00118 (VM) (FM)

Dear Andrew:

We are writing in response to the Citco Administrators' Second Set of Contention Interrogatories and First Set of Requests for Admission. Judge Marrero's May 13, 2014 Order (the "Order," which allowed amendment of the SCCAC to reassert Plaintiffs' negligence-based initial investment claims), specifically addressed Citco's argument that amendment should be denied because it "would not only require additional fact discovery, but also would require significant additional expert discovery as well." Citco's April 23, 2014 letter at 3. With respect to fact discovery, Judge Marrero found that the amendment "would not unduly prejudice the Citco Defendants because *the proposed amendments are based on operative facts that have already been the subject of fact discovery.*" *Id.* at 3 (emphasis added). In contrast, the Court then went on to address expert discovery:

Inssofar as the Citco Defendants can make a sufficient showing that amendment of the SCCAC at this time would give rise to additional expert discovery, Court will consider a request for an extension of the deadline for expert discovery demonstrating the nature and scope of such supplemental expert discovery necessary by reason of Plaintiffs' amendment of the SCCAC at this time.

*Id.*¹

¹ The Court's carefully-crafted limitations on further discovery are particularly significant in light of Plaintiffs' statement in their April 24, 2014 letter (at 2) that they "would not oppose reasonable, specific requests by Citco for additional discovery or supplemental expert reports. ..." The Order suggests that the Court disagreed with this position as well as with the Citco Defendants' views on additional discovery.

Andrew Gordon, Esq.

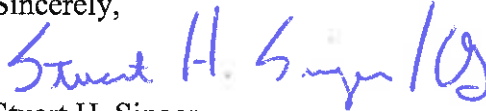
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As you know, Citco, along with the other Defendants, engaged in extensive fact discovery concerning Plaintiffs' initial investment claims by means of document requests, interrogatories and depositions of the class representatives and named plaintiffs selected by Defendants. Most of this discovery was conducted prior to the Court's August 6, 2012 Order which dismissed negligence-based claims based on initial investments. Even assuming that Citco contemporaneously construed the August 2012 Order as dismissing negligence-based claims against it rather than only against PwC – which we strongly doubt for the reasons stated in our letters to the Court on April 17 and April 24, 2014 – Plaintiffs' non-negligence causes of action, including Federal securities fraud claims against the Citco Administrators based on initial investments, continued to be part of the case for all purposes including discovery.

Because, among other reasons, (i) Citco had both ample reason and ample opportunity to conduct fact discovery on initial investments; and (ii) Judge Marrero limited additional discovery in such clear and specific detail in the Order – allowing only further expert discovery based on a specific showing of need – Citco's discovery requests are untimely.

Sincerely,



Stuart H. Singer