

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANWAR et al.

Plaintiffs,

- against -

FAIRFIELD GREENWICH LIMITED et al.

Defendants.

Consolidated Case

Docket No. 09 CV 00118 (VM)

**(PROPOSED) ORDER FOR APPOINTMENT OF LEAD PLAINTIFFS
AND CONCOMITANT SELECTION OF LEAD COUNSEL**

1. Class members The Knight Services Holdings Limited and the Americas/SwissCo. Trusts are appointed Lead Plaintiffs over the claims alleging violations of federal securities laws, pursuant to 15 U.S.C. § 78u-4 (a)(3)(B).

2. The law firm of Wolf Haldenstein Adler Freeman & Herz LLP is hereby appointed Lead Counsel over the federal securities claims.

3. With the approval of the Court, and in conjunction with this Court's Orders of January 30, 2009 and March 11, 2009, Lead Counsel, in coordination with Interim Co-Lead Counsel prosecuting the state law claims, shall assume and exercise the following powers and responsibilities regarding all claims alleging violations of federal securities laws:

- briefing and argument of motions;
- the conduct of written discovery proceedings;
- the examination of witnesses in depositions;
- the selection of counsel to act as spokesperson at pre-trial conferences;

- to call meetings of the plaintiffs' counsel as they deem necessary and appropriate from time to time;
- to conduct all settlement negotiations with counsel for the Defendants;
- the preparation for trial, and the trial of this matter and to delegate work responsibilities to selected counsel as may be required;
- to receive orders, notices, correspondence and telephones calls from the Court on behalf of all plaintiffs, and to transmit copies of such telephone calls to plaintiffs' counsel; and
- to supervise any other matters concerning the prosecution or resolution of the actions.

4. With respect to scheduling and/or procedural matters, Defendants' counsel may rely upon all agreements with Lead Counsel.

5. No pleadings or other papers shall be filed or discovery conducted by any plaintiff except as directed or undertaken by Lead Counsel.

6. Counsel in any related action that is consolidated with this action shall be bound by this organizational structure of plaintiffs' counsel.

SERVICE OF PLEADINGS AND OTHER PARTIES

7. Service by the Defendants on plaintiffs of any papers shall be deemed to be complete for all purposes when a copy is served on Lead Counsel.

IT IS SO ORDERED.

DATED: _____

U.S.D.J.