

Sonn & Erez, PLC

ATTORNEYS & COUNSELORS
Southeast Financial Center
200 South Biscayne Blvd., Suite 4330
Miami, FL 33131
Telephone: (954) 763 - 4700
Telephone: (305) 428 - 8530
Facsimile: (954) 763 - 1866

JEFFREY R. SONN, ESQ.
JEFFREY EREZ, ESQ.
STEFAN APOTHEKER, ESQ.
JENNIFER POOLE FARRAR, ESQ.
BRIAN PASTOR, ESQ., OF COUNSEL*
** admitted in Florida and Georgia*

ADAM NATIV, ESQ.
MICHAEL G. RAPAPORT, ESQ.
DEBORAH L. SCHWARTZ, ESQ.

November 13, 2014

Honorable Victor Marrero, United States District Judge
Daniel Patrick Moynihan United States Courthouse,
500 Pearl Street,
New York, New York 10007

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

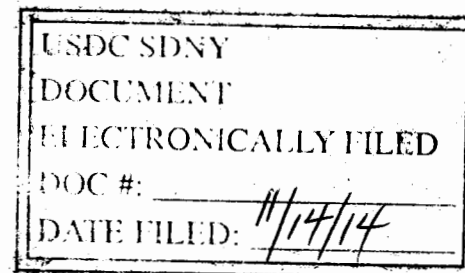
Dear Judge Marrero:

We write as counsel for the individual parties known as the Standard Chartered Plaintiffs. This letter is sent to supplement the letter of even date from Richard E. Brodsky, Liaison Counsel for the Standard Chartered Plaintiffs. We write this letter with the full intent of preserving intact the confidentiality of communications protected by the attorney-client privilege and of attorney work-product.

Counsel for Standard Chartered, in her October 31, 2014 letter to the Court, made the following statements:

Finally, plaintiffs' claims here are based on alleged wrongdoing originally pled as federal securities fraud claims. Knowing that their allegations fail to meet the requirements of the PSLRA, plaintiffs have tried to avoid dismissal by filing complaints asserting only state law claims. This is precisely what SLUSA says you cannot do—it is SLUSA's purpose 'to negate the artful pleading by which certain plaintiffs evaded the dictates of the PSLRA.' (Letter, 8-9)

Indeed, SLUSA's remedial purpose would be undermined completely if plaintiffs could evade it simply by engaging separate counsel and claiming lack of intent to 'join.' (Letter, 11-12)

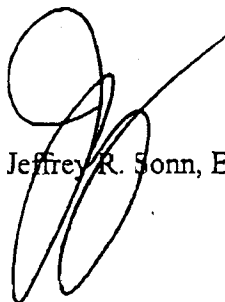


Honorable Victor Marrero
November 13, 2014
Page 2

We wish to reaffirm to this Court the following. As Mr. Brodsky's letter states, the undersigned counsel did not coordinate with the lawyer for any other SC Plaintiff in bringing the cases brought by the undersigned. In the case of those counsel who have filed more than one lawsuit (Jones & Adams, P.A., Marko & Magolnick, P.A., and Curran & Associates, P.A.), there was no coordination among that counsel's individual clients (except those joined in a single lawsuit). Individual decisions were made to bring separate lawsuits predominantly alleging breach of fiduciary duty and negligence. All counsel who brought lawsuits before 50 plaintiffs' claims had been made—i.e., all counsel besides Mr. Curran—did so with no knowledge, or the ability to know or believe, that, eventually, there would be more than 50 individual SC Plaintiffs.


Thank you for consideration of this letter.

Very truly yours,



Jeffrey R. Sonn, Esq.

JRS/mjd

The Clerk of Court is directed to enter into the public record of this action the letter above submitted to the Court by	
<i>Standard Chartered Plaintiffs</i>	
SO ORDERED.	
<i>11-14-14</i>	
DATE	VICTOR MARRERO, U.S.D.J.