

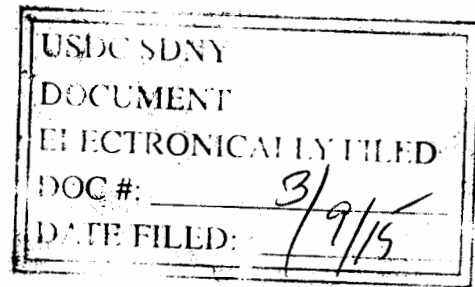
THE BRODSKY LAW FIRM, PL

RICHARD E. BRODSKY, ATTORNEY AT LAW

March 4, 2015

By Facsimile Transmission

Honorable Victor Marrero
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007-1312



**Re: *Anwar, et al. v. Fairfield Greenwich Limited, et al.,*
09-cv-118 (VM) (THK)
SC Cases**

Dear Judge Marrero:

I am the Liaison Counsel for, and on behalf of, the Standard Chartered Plaintiffs, in the Standard Chartered Cases.

This is a request for a conference during which we would seek to raise with the Court its filing with the Judicial Panel on Multi District Litigation a Suggestion of Remand of the Standard Chartered Cases under JPML Rules 10.1 and 10.3.

The status of the Standard Chartered Cases is as follows:

1. The first Standard Chartered Case was transferred to this Court for pretrial procedures in October 2009. (DE 281, Oct. 14, 2009).
2. All fact discovery was concluded in August 2012.
3. All expert reports have been delivered and all expert discovery has been concluded.
4. By letter dated August 29, 2014, the Standard Chartered requested a conference regarding their desire to file a motion for summary judgment. (DE 1314, Sept. 3, 2014).
5. By letter dated September 12, 2014, the Standard Chartered Plaintiffs opposed the request for leave to file for summary

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Hon. Victor Marrero
March 4, 2015
Page 2

judgment on the ground that such a motion would be futile and a waste of party and judicial resources. (Sealed).

6. This Court held a hearing on September 29, 2014 on the request and ordered additional letter briefs. (Unnumbered paperless order, Sept. 29, 2014).
7. The Standard Chartered Defendants submitted a letter brief dated October 31, 2014. (DE 1333, 11/05/14).
8. The Standard Chartered Plaintiffs submitted a letter brief dated November 17, 2014. (DE 1349, 1/7/15).

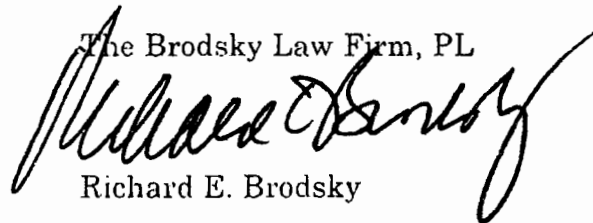
No order or other direction from the Court has been given. We note, however, that at the hearing on September 29, 2014, the Court stated its preliminary view that the Standard Chartered Defendants' showing an entitlement to summary judgment on the Standard Chartered Plaintiffs' claims would be an "uphill battle." Transcr., 9/29/14 hrg., 47. As we have demonstrated, the Standard Chartered Defendants should be declared the losers of that battle.

With respect, further delay occasioned by the Standard Chartered Defendants' request for leave to file a futile motion for summary judgment will cause our clients undue prejudice. We respectfully submit that a conference would enable the Court and the parties to discuss the Court's sending the JPML a suggestion of remand and therefore expedite this matter in accordance with Fed.R.Civ.P. 1.

Thank you for your careful consideration of this letter.

Sincerely yours,

The Brodsky Law Firm, PL



Richard E. Brodsky

cc: SC Plaintiffs' Counsel
SC Defendants' Counsel

The Clerk of Court is directed to enter into the public record of this action the letter above submitted to the Court by

Standard Chartered Plaintiffs

SO ORDERED.

3-6-15
DATE


VICTOR MARRERO, U.S.D.J.