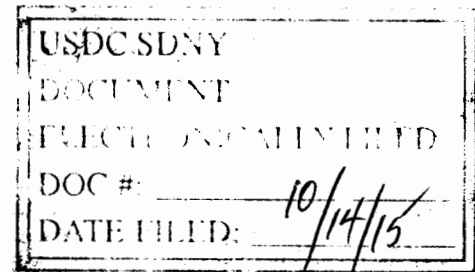


THE BRODSKY LAW FIRM, PL

RICHARD E. BRODSKY, ATTORNEY AT LAW

October 13, 2015



**By Facsimile Transmission
to (212) 805-6382**

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)
*Standard Chartered Cases***

Dear Judge Marrero:

By endorsement order dated October 9, 2015 (DE 1428), Your Honor has directed the "Plaintiffs" to respond to the Standard Chartered Defendants' letter to the Court dated October 8, 2015. (We have asked the Court for an extension to respond but have now determined that we do not need the requested extension.)

The Standard Chartered Plaintiffs have varying interests in the matters raised in the Defendants' letter. Some have no involvement in these matters. Thus, I am not writing this letter on behalf of the Standard Chartered Plaintiffs' Steering Committee, which, because the Plaintiffs have different interests, has had no role, as such, in responding. Nevertheless, I have been authorized to provide you this letter, which presents the common positions of the various Plaintiffs.

The Plaintiffs believe that, in whatever manner the three issues raised by the Standard Chartered Defendants are ultimately decided, none needs to be decided by this Court as "transferee court," and there is no reason that resolution of any of these issues should delay remand.

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The first issue raised by the Defendants is a negligence count. The Court has allowed certain plaintiffs to re-plead, in a common negligence claim, individual negligence claims that the Court previously dismissed, but agreement on the wording of the common claim has not been reached. Those Plaintiffs permitted to re-plead, who agree on a common negligence count, will reach out immediately to defense counsel to try to reach agreement, as suggested by the Defendants.

The Defendants imply that this issue should be decided before this Court remands ("Otherwise, this is not an impediment to remand."). To the contrary, the Plaintiffs, including those not permitted (or required) to re-plead this claim, believe that this process should not hold up the Court's consideration of remand. Doing so would cause unnecessary and prejudicial further delay for those not permitted (or required) to re-plead this claim. The issue can easily be handled by the transferor courts, or by this Court should the parties and the Court agree to the cases' staying with this Court for trial.

The second issue deals with seven Plaintiffs who unsuccessfully sought to dismiss their claims. They should now be permitted to do so. The Plaintiffs commit that none of the other Plaintiffs will argue that the dismissal of those complaints affects the Court's July 29, 2015 SLUSA decision.

The Defendants state that while "any issue regarding these seven plaintiffs remaining in their respective cases should be resolved prior to remand of those cases, there is no reason the dismissal of these seven plaintiffs cannot now be expediently addressed." The other unaffected Plaintiffs sincerely hope that this will be the case, but, again, request that this Court not delay addressing our request for a conference to discuss remand.

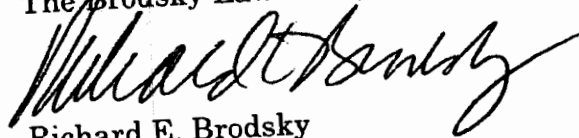
The third issue is delayed discovery of some Plaintiffs. This delay was separately agreed to by some *but not all* of the Plaintiffs. Again, those Plaintiffs who were not a party to the delay of discovery, and who have already submitted to the Defendants' discovery, should not be prejudiced by delay caused by the completion of the discovery as to the other Plaintiffs. There is no logical reason to prevent the remand of the unaffected cases from going forward. In the alternative, all the cases can be remanded and the limited discovery can be completed before trial.

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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.
10-14-15 [Signature]
DATE VICTOR MARRERO, U.S.D.J.