

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ANWAR, et al.,
Plaintiffs,
v.
FAIRFIELD GREENWICH LIMITED, et al.,
Defendants.
This Document Relates To:
09-CV-2588 (VM) (Pierce Action)
MASTER FILE NO. 09-CV-0118 (VM)

FURTHER SUPPLEMENTAL DECLARATION OF PAUL J. SIRKIS

I, Paul J. Sirkis, make this declaration pursuant to 28 USC § 1746. I hereby state as follows:

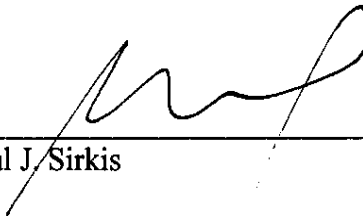
- 1. I am an attorney associated with the law firm of Simpson Thacher & Bartlett LLP, counsel for certain Defendants in the above-captioned action. I submit this Further Supplemental Declaration and exhibits hereto in support of FGA’s Sur-Reply in Further Opposition to Derivative Plaintiffs’ Motions to Remand. I am fully familiar with the matters stated herein based on personal knowledge or review of files in the possession of my firm.
2. Pursuant to an order issued by Magistrate Judge Theodore H. Katz on May 13, 2009 (the “Order”), subpoenas were served on 9 non-party limited partners in GSP (the “Subpoenas”), including on Triumph Multi-Series Fund LP, c/o Calhoun Asset Management, 8770 West Bryn Mawr Avenue, Suite 1300, Chicago, IL 60631 (“Triumph”); and on Accucom Consulting Inc., c/o John Narducci, Trustee, 250 Post Road East, Westport, CT 06880 (“Accucom”).
3. Attached hereto as Exhibit 1 is a true and correct copy of a subsequent Subpoena response received from Calhoun Asset Management, the General Partner of Triumph, on

August 30, 2009, indicating that all of the investors in Triumph listed in their Subpoena response dated June 25, 2009, were investors in Triumph as of December 31, 2008.

4. Attached hereto as Exhibit 2 is a true and correct copy of a subsequent Subpoena response received from Accucom on September 8, 2009, listing 10 current employees of Accucom who participate in the Accucom Profit Sharing Plan.
5. In my previous Declarations dated July 27, 2009 and July 31, 2009, I calculated that there were 111 current beneficial equity holders in Greenwich Sentry Partners ("GSP"). This calculation was based in part on my assumption that the 12 beneficial equity holders in Accucom Profit Sharing Plan reported by Accucom all were current holders. As set forth in paragraph 4 above, Accucom Profit Sharing Plan has now advised that only 10 of the 12 are current holders. Accordingly, the number of current GSP beneficial equity holders is revised to 109.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 8, 2009



Paul J. Sirkis