

Defendants and otherwise reserve any and all defenses to the action, including those defenses provided under Rule 12(b) of the Federal Rules of Civil Procedure;

WHEREAS, on May 6, 2009, the Court consolidated *Bhatia, et al. v. Standard Chartered International (USA) et al.*, No. 09-CV-2410 with *Anwar, et al. v. Fairfield Greenwich Limited, et al.*, No. 09-CV-0118 for all pretrial purposes;

WHEREAS, on September 18, 2009, the *Bhatia* Plaintiffs filed an amended complaint (the "*Bhatia* Amended Complaint");

WHEREAS, by Order dated October 30, 2009, Magistrate Judge Theodore Katz so ordered a stipulation by the parties extending the Standard Chartered Defendants' time to answer or otherwise respond to the *Bhatia* Amended Complaint to up to and including November 16, 2009;

WHEREAS, on November 12, 2009, counsel to the *Bhatia* Plaintiffs filed a complaint in the United States District Court for the Southern District of New York, captioned *Tradewaves Ltd. v. Standard Chartered International (USA) Ltd.*, No. 09-CV-9423 (the "*Tradewaves* Complaint"), which contains factual allegations and claims against the Standard Chartered Defendants that are similar in nature to those alleged in the *Bhatia* Amended Complaint; and

WHEREAS, on November 13, 2009, counsel to the *Bhatia* Plaintiffs informed counsel to the Standard Chartered Defendants of the filing of the *Tradewaves* Complaint, which has not yet been served;

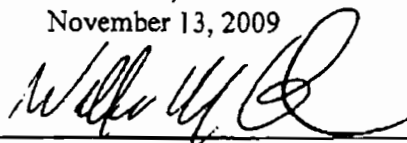
IT IS HEREBY STIPULATED AND AGREED by and among the undersigned parties through their respective counsel:

1. Without prejudice to any defense the Standard Chartered Defendants may raise, including those provided under Rule 12(b) of the Federal Rules of Civil Procedure, the time for

the Standard Chartered Defendants to answer or otherwise respond to the *Bhatia* Amended Complaint is temporarily adjourned pending further discussions among counsel to the parties concerning (i) service of the *Tradewaves* Complaint, (ii) the nature and timing of responses by the Standard Chartered Defendants to the *Bhatia* Amended Complaint and the *Tradewaves* Complaint, and (iii) potential coordination issues affecting both cases.

2. On or before December 1, 2009, the parties will submit for the Court's consideration a stipulation and proposed order addressing the subjects set forth in paragraph 1, or if no agreement can be reached, will seek the assistance of Magistrate Judge Katz to resolve any open issues.

Dated: New York, New York
November 13, 2009



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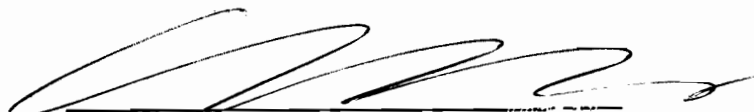
Attorney for Plaintiffs in the Bhatia Amended Complaint, and Attorney for Plaintiffs in the Tradewaves Complaint



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Attorney for Defendants Standard Chartered International (USA) Ltd. and Standard Chartered PLC

SO ORDERED. 13 November 2009



HON. VICTOR MARRERO, U.S.D.J.