

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ANWAR, et al.,

MASTER FILE NO.  
09-CV-0118 (VM)

Plaintiffs,

-against-

FAIRFIELD GREENWICH LIMITED, et al.,

Defendants.

This Document Relates To: All Actions

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**DECLARATION OF AMANDA M. MCGOVERN IN SUPPORT OF DEFENDANTS  
CITCO BANK NEDERLAND N.V. DUBLIN BRANCH AND CITCO GLOBAL  
CUSTODY N.V.'S MOTION TO DISMISS THE SECOND  
CONSOLIDATED AMENDED COMPLAINT**

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*Attorneys for Citco Bank Nederland N.V.  
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N.V.*

Pursuant to 28 U.S.C. § 1746, AMANDA M. MCGOVERN deposes and states:

I am a member of the bar of the State of Florida and have been admitted to practice *pro hac vice* before the United States District Court for the Southern District of New York in this matter. I am a partner of the firm of Gilbride, Heller & Brown, P.A., counsel for Defendants Citco Bank Nederland N.V. Dublin Branch and Citco Global Custody N.V. in this action. I submit this Declaration in support of Citco Bank Nederland N.V. Dublin Branch and Citco Global Custody N.V.'s Memorandum of Law in Support of Their Motion to Dismiss the Second Consolidated Amended Complaint.

1. Attached hereto as Exhibit A is a true and correct copy of Fairfield Sentry Limited's Custodian Agreement, dated July 3, 2006.

2. Attached hereto as Exhibit B is a true and correct copy of Fairfield Sigma Limited's Brokerage and Custody Agreement, dated August 12, 2003.

3. Attached hereto as Exhibit C is a true and correct copy of the Declaration of Michel Deckers, dated December 20, 2009.

Dated: December 22, 2009.

/s/ Amanda M. McGovern  
Amanda M. McGovern