

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANWAR, et al.,

MASTER FILE NO.

Plaintiffs,

09-CV-0118 (VM)

-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 DEFENDANT
THE CITCO GROUP LIMITED'S MOTION TO DISMISS THE SECOND
CONSOLIDATED AMENDED COMPLAINT**

GILBRIDE, HELLER & BROWN, P.A.

Lewis N. Brown
Amanda M. McGovern
One Biscayne Tower, 15th Floor
2 South Biscayne Blvd.
Miami, FL 33131
T: 305.358.3580
F: 305.374.1756
lbrown@ghblaw.com
amcgovern@ghblaw.com

**CURTIS, MALLET-PREVOST, COLT &
MOSLE, LLP**

Eliot Lauer (EL 5590)
Michael Moscato (MM 6321)
101 Park Avenue
New York, NY 10178
T: 212.696.6000
F: 212.697.1559
elauer@curtis.com
mmoscato@curtis.com

Attorneys for The Citco Group Limited

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 Defendant, The Citco Group Limited, in this action. I submit this Declaration in support of The Citco Group Limited's Memorandum of Law in Support of Its Motion to Dismiss the Second Consolidated Amended Complaint.

1. Attached hereto as Exhibit A is a true and correct copy of the Declaration of Melanie Crinis, dated December 22, 2009.

2. Attached hereto as Exhibit B is a chart summarizing certain of Plaintiffs' section 10(b), Rule 10b-5, and section 20(a) claims that are time-barred by the 28 U.S.C. § 1658 Five-Year Statute of Repose. For ease of reference, Plaintiffs are identified in the chart in the order in which they appear in the Second Consolidated Amended Complaint.

3. Attached hereto as Exhibit C is a chart summarizing certain of Plaintiffs' negligence-based tort claims that are time-barred by the CPLR § 214(4) Three-Year Statute of Limitations. For ease of reference, Plaintiffs are identified in the chart in the order in which they appear in the Second Consolidated Amended Complaint.

Dated: December 22, 2009.

/s/ Amanda M. McGovern
Amanda M. McGovern