

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: All Actions
MASTER FILE NO. 09-CV-0118 (VM)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the Memorandum of Law in Support of the Fee Defendants' Motion to Dismiss the Second Consolidated Amended Complaint, the annexed declaration of Michael Thorne, Esq., dated December 22, 2009, and the exhibits attached thereto; the annexed affidavit of Gerard Farara and the exhibits attached thereto; and the annexed affidavit of Rod Attride-Stirling and the exhibits attached thereto, Defendants Lourdes Barreneche, Robert Blum, Cornelis Boele, Yanko Della Schiava, Vianney d'Hendecourt, David Horn, Jacqueline Harary, Harold Greisman, Julia Luongo, Corina Piedrahita, Santiago Reyes, Philip Toub and Maria Teresa Pulido Mendoza (the "Fee Defendants") by their undersigned attorneys, hereby move this Court, before the Honorable Victor Marrero, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and at a time to be designated by the Court, for an Order: (1) dismissing with prejudice, pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) and the Securities Litigation Uniform Standards Act of 1998, 15 U.S.C. § 78bb(f), all of the claims against the Fee Defendants set forth

in the Second Consolidated Amended Complaint in the above-captioned action; and (2) granting such other and further relief as this Court may deem just and proper.

Dated: New York, New York
December 22, 2009

Respectfully submitted,

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