

M. Marrero

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DEPARTMENT
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PASHA S. ANWAR et al.)
)
) Plaintiffs,)
) v.)
) FAIRFIELD GREENWICH LIMITED, et al.)
))
) Defendants.)
)
) This Document Relates To: *Tradewaves Ltd., et al.*)
) *v. Standard Chartered Int'l (USA) Ltd. et al.*, No. 09)
) CV 9423)
)
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No. 09 CV 0118 (VM)(THK)

STIPULATION AND [PROPOSED] ORDER

WHEREAS, on November 12, 2009, Plaintiffs Tradewaves Ltd., Parasram Daryani, Neelam P. Daryani, Vikas P. Daryani, Nikesh P. Daryani, Ashokkumar Damodardas Raipancholia, Dilip Damodardas Raipancholia, Rajeshkumar Damodardas Raipancholia, Kishu Nathurmal Uttamchandani, Prerna Vinod Uttamchandani, Rajendrakumar Patel, Vandna Patel, Arjan Mohandas Bhatia, Kishin Mohandas Bhatia, Suresh M. Bhatia, Bharat Mohandas, and Aarvee Ltd. (the "Plaintiffs") filed a complaint (the "*Tradewaves Complaint*"), No. 09-CV-9423, against Standard Chartered International (USA) Ltd. and Standard Chartered PLC (the "Standard Chartered Defendants") in the United States District Court for the Southern District of New York, upon which the action was assigned to the Honorable Victor Marrero;

WHEREAS, on November 13, 2009, counsel for Plaintiffs transmitted a copy of the *Tradewaves Summons* and *Tradewaves Complaint* to counsel for the Standard Chartered Defendants by email;

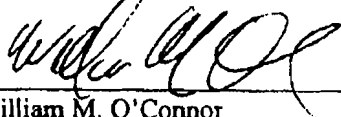
WHEREAS, on December 1, 2009, *Tradewaves* was marked as related to an action captioned *Bhatia, et al. v. Standard Chartered International (USA) et al.*, No. 09-CV-2410 (“*Bhatia*”), and, on December 10, 2009, *Tradewaves* was consolidated for pretrial purposes with *Anwar, et al. v. Fairfield Greenwich Limited, et al.*, No. 09-CV-118 (“*Anwar*”);

WHEREAS, on November 13 and December 1, 2009, counsel for Plaintiffs and counsel for the Standard Chartered Defendants signed stipulations and proposed orders in the *Bhatia* action, which were entered as Docket Nos. 298 and 306, wherein counsel for Plaintiffs and counsel for the Standard Chartered Defendants agreed that the time for the Standard Chartered Defendants to answer or otherwise respond to the *Bhatia* Amended Complaint would be temporarily adjourned pending further discussions among counsel to the parties concerning, *inter alia*, service of the *Tradewaves* Complaint; and

WHEREAS, on January 25, 2010, counsel for Plaintiffs and counsel for the Standard Chartered Defendants reached an agreement on a proposed scheduling order with respect to the *Bhatia* and *Tradewaves* actions (and other actions involving the Standard Chartered Defendants) and submitted the proposed scheduling order to Magistrate Judge Katz for consideration;

IT IS HEREBY STIPULATED AND AGREED by and among the undersigned parties through their respective counsel, that Standard Chartered International (USA) Ltd. and Standard Chartered PLC hereby accept service of the *Tradewaves* Complaint, without prejudice to any defenses that the Standard Chartered Defendants may have, including jurisdictional defenses.

Dated: New York, New York
January 28, 2010



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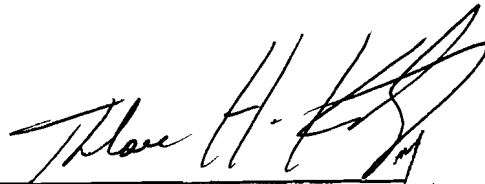
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Kishin Mohandas Bhatia, Suresh M. Bhatia,
Bharat Mohandas, and Aarvee Ltd.*

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

SO ORDERED.

2/2/10



UNITED STATES DISTRICT JUDGE

USMJ