

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Master File No. 09-cv-00118-VM-THK

This Document Relates To: *Headway Investment Corp. v. American Express Bank Ltd.*, No. 09-CV-08500; *Bhatia v. Standard Chartered International (USA) Ltd., et al.*, No. 09-CV-2410; *Tradewaves Ltd. v. Standard Chartered International (USA) Ltd., et al.*, No. 09-CV-9423; *Ricardo Lopez v. Standard Chartered Bank International (Americas) Ltd.*, No. 10-CV-00919; *Maridom Ltd. v. Standard Chartered Bank International (Americas) Ltd.*, No. 10-CV-00920; and *Maria Akriby Valladolid v. American Express Bank Ltd.*, No. 10-CV-00918.

PASHA ANWAR, et al.,

Plaintiffs,

v.

FAIRFIELD GREENWICH  
LIMITED, et al.,

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO  
STANDARD CHARTERED DEFENDANTS' MOTION TO DISMISS**

Plaintiffs Maridom Limited, Caribetrans, S.A., and Abbot Capital, Inc., No. 10-cv-00920, hereby request that this Court grant a one-week extension of time for the Plaintiffs in the above-referenced cases to respond to the Motion to Dismiss filed by the Standard

Chartered Defendants.<sup>1</sup>

Plaintiffs represent to the Court that this Motion has the agreement, through counsel, of the other Standard Chartered Plaintiffs in the above-referenced cases, and that Standard Chartered's counsel has stated that it does not object to this Motion.

Pursuant to Paragraph 3 of this Court's Initial Scheduling Order Regarding Standard Chartered Cases, responses to any motion to dismiss are due 45 days from the filing and service of the Motion to Dismiss, *i.e.*, April 26, 2010 (additional two days because 45<sup>th</sup> day falls on a Saturday, pursuant to Fed.R.Civ.P. 6(a)(1)(C)). The requested extension is until May 3, 2010.

The reason for this request is that the undersigned attorney, who represents the Plaintiffs in *Maridom*, had previously committed to an overseas vacation ending on April 25, 2010. Without an extension, it would be impossible for the undersigned attorney to participate fully in the preparation of opposition memoranda to the Motion to Dismiss. A one-week extension would permit such participation.

The time for the Standard Chartered Defendants to file and serve a reply to Plaintiffs' response memoranda will remain no later than 21 days from the filing and service of opposition briefs, pursuant to Paragraph 4 of the Initial Scheduling Order, but, out of an abundance of caution, request is made that any order entered by the Court explicitly state that the deadline for reply briefs will be so determined.

The *Maridom* Plaintiffs and their counsel respectfully represent that this Motion is made not for the purposes of prejudicial or undue delay.

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<sup>1</sup> The terms "Standard Chartered Cases", "Standard Chartered Plaintiffs" and "Standard Chartered Defendants" are used herein as they are defined in the Initial Scheduling Order Regarding Standard Chartered Cases (DE 325).

WHEREFORE, the *Maridom* Plaintiffs request that the Court enter an order (a) permitting the filing of briefs in opposition to the Standard Chartered Defendants' Motions to Dismiss no later than May 3, 2010, and (b) permitting the filing of a reply brief by the Standard Chartered Defendants within 21 days of the filing and service of the opposition briefs.

*/s/ Richard E. Brodsky*

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Richard E. Brodsky  
The Brodsky Law Firm  
66 West Flagler Street  
9<sup>th</sup> Floor  
Miami, Florida 33130  
Tel: 786-220-3328  
Fax: 866-564-8231  
rbrodsky@thebrodskylawfirm.com  
Admitted pro hac vice