## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

	X
PASHA ANWAR, et al.,	
Plaintiffs,	) )
v.	) Master File No. 09-CV-118 ( <u>Calvo</u> )
FAIRFIELD GREENWICH LIMITED, et al.,	) )
Defendants.	) )
This Document Relates To: Standard Chartered Bank International (Americas) Limited et al. v. Miguel Calvo, et al., No 10-CV-4684	) ) ) x

## NOTICE OF APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND MOTION FOR PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of their Application for a Temporary Restraining Order and Motion for a Preliminary Injunction, dated July 14, 2010, the Declaration of Patrick Berarducci dated July 14, 2010, the Supplemental Declaration of Steven Glover dated July 13, 2010, and all other papers filed herein, Standard Chartered Bank International (Americas) Limited and StanChart Securities International, Inc. (collectively, "Standard Chartered") will move this Court, before the Honorable Victor Marrero, at a time and place to be determined by the Court, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order pursuant to Rules 65(a) and 65(b) of the Federal Rules of Civil Procedure temporarily or preliminarily enjoining the defendants in the above-captioned action from (1) proceeding against StanChart Securities International, Inc. in the arbitration pending before the American Arbitration Association styled *Miguel Calvo, et al.* v. *Standard Chartered Bank, et al.*, ICDR No. 50 148 T 00508 09 (the

"Calvo arbitration"); (2) proceeding against Standard Chartered Bank International (Americas)

Limited in the *Calvo* arbitration, except for defendants Miguel Calvo and Maria Luisa Calvo;

and (3) obtaining discovery in the *Calvo* arbitration in contravention of the stay of discovery this

Court entered in Anwar v. Fairfield Greenwich Group, No. 09-CV-118 pursuant to the Private

Securities Litigation Reform Act.

In accordance with the agreement of the parties set forth in Standard Chartered's

letter to this Court dated July 13, 2010, which the Court endorsed on July 13, 2010, defendants

shall file and serve any papers in opposition to Standard Chartered's application and motion so

that they are received on or before July 21, 2010.

Dated: New York, New York

July 14, 2010

Respectfully submitted,

/s/ Joseph E. Neuhaus

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Attorneys for Plaintiffs Standard Chartered Bank International (Americas) Ltd. and StanChart

Securities International, Inc.

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