

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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

SUPPLEMENTAL DECLARATION OF STEVEN GLOVER

I, STEVEN GLOVER, make this declaration pursuant to
28 U.S.C. § 1746. I hereby state as follows:

1. I am the Director of Project Management at Standard Chartered Bank International (Americas) Limited (“SCBI”) and StanChart Securities International, Inc. (“StanChart”). I have served as the Director of Project Management at SCBI and StanChart since February of 2008. In that position, I was responsible for coordinating all approved mailings concerning the creation of StanChart and the migration of investment accounts from SCBI to StanChart. I previously submitted a declaration in connection with the arbitration between the parties to this action, styled *Miguel Calvo, et al., v. Standard Chartered Bank, et al.*, ICDR No. 50 148 T 00508 09 (“*Calvo*”).

2. In my previous declaration, I addressed two mailings sent to clients of SCBI and StanChart. The first mailing was sent on or about October 1, 2008, and the

second on or about March 1, 2009. I described the normal mailing procedures at StanChart (and SCBI), which include the use of client mailing lists. (Declaration of Steven Glover, Feb. 23, 2010, at ¶ 3.) I also noted that some clients of SCBI and StanChart ask us not to send them mail, in which case their mail is held in a “hold-mail” file at the offices of SCBI and StanChart in Miami. (*Id.* at ¶ 3.) I confirmed that normal mailing procedures were followed to send both the October 1, 2008, and March 1, 2009 mailings. (*Id.* at ¶¶ 4-7.) Further, based on my review of the mailing lists in effect at the times those mailings were sent, I verified that entries for each of the *Calvo* claimants’ accounts were included on those lists.

3. I offer this supplemental declaration to provide more detail regarding the addresses that the claimants in *Calvo* had provided for mailings as of the time that the October 1, 2008 or March 1, 2009 mailings were sent.

4. During the relevant time period, SCBI and StanChart utilized an electronic database, called GLOBUS, to maintain client account information. The GLOBUS system stores, among other things, mailing addresses for each client account. If and when a mailing address for an account changed, the GLOBUS system recorded the date on which the change occurred, the new address and the previous address. When an approved mailing was sent to SCBI clients, or certain mailings such as the March 1, 2009 mailing were sent to StanChart clients, the mailing addresses for each account designated to receive the mailing was taken from the GLOBUS system.

5. If a client chose to have mail held in the so-called “hold-mail” file, the GLOBUS system recorded the mailing address for that client’s account as the Miami offices of SCBI and StanChart at 1111 Brickell Avenue, 16th Floor, Miami, Florida

33131. The appearance of this address in the GLOBUS system therefore indicates that the client has instructed us to place his or her mail in the “hold-mail” file.

6. Attached hereto as Exhibit A is a spreadsheet reflecting the mailing addresses recorded on GLOBUS for each of the *Calvo* claimants’ 24 accounts during the period in which the October 1, 2008 and March 1, 2009 mailings were sent. Any address change during that period is noted, along with the effective date of the change. As Exhibit A reflects, the address of the Miami offices of SCBI and StanChart does not appear as the mailing address for any of the claimants’ accounts. Accordingly, none of the claimants in *Calvo* had their mail sent to the “hold-mail” file during the relevant time period.

7. Clients sometimes requested that mailings concerning their accounts be sent to the local office with which they had a relationship so that the client could collect the mail when the client came into the office. When a client did this, GLOBUS recorded the mailing address as that of the relevant office. Thus, in the case of Chile, if a client requested that mail be directed to the Chile Representative Office, the GLOBUS system recorded the mailing address for that client’s account as the Chile Representative Office at Av. Isidora Goyenechea 3621, 10 Floor, Of. 1001, Las Condes Santiago, Chile.

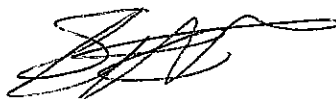
8. Exhibit A reflects that claimants Simon Echenique and Pedro Echenique, Fernando Selman-Nazal and GLDN Corporation Ltd. designated the Chile Representative Office as their mailing address during the relevant time period.

9. Some clients chose to hold their accounts at SCBI and StanChart in the name of investment companies. Some of those companies designated the offices of

Standard Chartered Bank Trust (Cayman) Ltd., formerly Amex International Trust (Cayman) Ltd., as their registered office and mailing address. If an investment company client did so, the GLOBUS system recorded the mailing address for that client's account as the offices of Standard Chartered Bank Trust (Cayman) Ltd. at P.O. Box 674, George Town, Grand Cayman, Cayman Islands.

10. Exhibit A reflects that claimants Boxer Limited, Tossa Del Mar Ltd., Shiva Enterprises Ltd. and Fujian Ltd. designated the offices of Standard Chartered Bank Trust (Cayman) Ltd. as their mailing address during the relevant time period.

I declare under penalty of perjury that the foregoing is true and correct.



Steven Glover

July 13, 2010
Miami, Florida