

Exhibit E

Declaration of Steven Glover

INTERNATIONAL CENTRE FOR DISPUTE RESOLUTION

In the Matter of Arbitration Between

MIGUEL CALVO, et al.,

Claimants

- and -

STANDARD CHARTERED BANK, et al.,

Respondents

DECLARATION OF STEVEN GLOVER

I, STEVEN GLOVER, declare and state as follows:

1. My name is STEVEN GLOVER. I am the Director of Project Management at Respondent StanChart Securities International, Inc. ("SCSI") and at Standard Chartered Bank International (Americas) Limited ("SCBI"). I have served as the Director of Project Management at SCSI and SCBI since February of 2008. I work at SCSI's and SCBI's offices located at 1111 Brickell Avenue, 16th Floor, Miami, Florida 33131.

2. As the Director of Project Management, I was responsible for coordinating approved mailings with respect to the creation of SCSI and the migration of investment accounts held at SCBI to SCSI.

3. In connection with the above-mentioned mailings, I forwarded approved SCSI client mailings to the General Services Department of SCSI, or to the Operations Manager of SCSI, with instructions to send out the mailings to clients using designated client mailing lists. The General Services Department then sends, via mail, the approved SCSI client mailings to the addresses associated with the clients included on the mailing lists, which are created based on internal client records. (Some customers ask us not to send mail to them, but instead to hold it for them in a so-called "hold-mail" file. Under the agreements with such customers, communications to the customer are deemed received when placed in the hold-mail file.)

4. On or about October 1, 2008, I received an approved mailing for all clients with investment accounts at Standard Chartered Bank International (Americas) Limited ("SCBI"). The approved mailing consisted of a letter dated October 1, 2008 (a copy of which is attached hereto as Exhibit 1).

5. On or about October 1, 2008, I forwarded a copy of the October 1, 2008 letter, along with a mailing list of all SCBI clients with investment accounts, to the General Services Department with instructions to send the letter via mail to the clients included on the SCBI client mailing list. I have reviewed a copy of the SCBI client mailing list that I sent to the General Services Department, and that list includes entries for each of the accounts held by Claimants in this arbitration.

6. On or about March 1, 2009, I received an approved mailing for all SCSI clients that included a copy of the StanChart Securities International, Inc. Brokerage Client Agreement ("SCSI Brokerage Agreement") (a copy of which is attached hereto as Exhibit 2), and a letter dated March 1, 2009 (a copy of which is attached hereto as Exhibit 3).

7. On or about March 1, 2009, I forwarded copies of the SCSI Brokerage Agreement and the letter dated March 1, 2009 to the Operations Manager of SCSI with instructions to have the General Services Department send those documents via mail to all existing SCSI clients. I have reviewed an archived copy of the mailing list of all SCSI clients in effect in early March 2009, and that list includes entries for each of the accounts held by Claimants in this arbitration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on this 23rd day of February, 2010.



STEVEN GLOVER