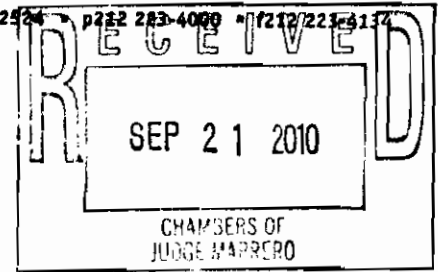




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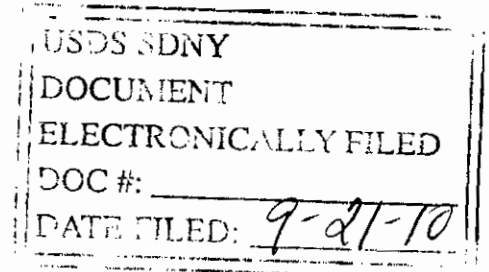
William M. O'Connor
(212) 895-4259
woconnor@crowell.com

September 20, 2010



BY FACSIMILE to (212) 805-6382

Hon. Victor Marrero
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312



Re: *Anwar, et al. v. Fairfield Greenwich Limited, et al.*,
09-CV-118 (VM) (THK)

Dear Judge Marrero:

This firm represents the plaintiffs in the actions styled *Bhatia, et al. v. Standard Chartered International (USA) Ltd., et al. (09-CV-2410)* and *Tradewaves, Ltd., et al. v. Standard Chartered International (USA) Ltd., et al. (09-CV-9423)*, which were administratively consolidated with the above-referenced *Anwar* action.

Today, the Court "So Ordered" the Statement of defendants Standard Chartered International (USA) Ltd. and Standard Chartered PLC (collectively, "Standard Chartered") that was e-filed on Friday, September 17, 2010 (the "Statement"). The Statement provides that Standard Chartered "expressly state their consent to the conditions set out in the Court's Decision and Order dated September 14, 2010."

We write to respectfully request that the Court amend its endorsed Order to direct Standard Chartered to submit an Amended Statement that expressly conforms with the conditions set forth in the Court's Decision and Order dated September 14, 2010, rather than simply referencing the Decision and Order. The September 14, 2010 Decision and Order is conditioned upon the requirement that Standard Chartered submit to the Court:

"...a statement expressing its consent that in the event the plaintiffs in this action commence litigation in Singapore arising out of the circumstances and general claims asserted in this case, Standard Chartered would accept service of process and the relevant tribunal's exercise of personal jurisdiction over them, not assert any defenses based on statutes of limitations that would not be available to Standard Chartered were the litigation of the action to proceed in this Court, and satisfy any final judgment rendered by a Singapore court of competent jurisdiction in

Hon. Victor Marrero
September 20, 2010
Page 2

connection with such litigation of claims arising out of the events described in the complaint in this action."

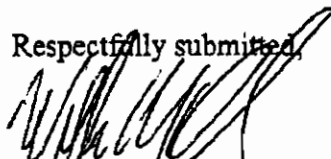
In the event the *Bhatia* and *Tradewaves* plaintiffs proceed with their claims in Singapore and it becomes necessary for our clients to bring these conditions to the attention of the Singapore court, we wish to avoid any ambiguity or need for further interpretation.

Therefore, we believe it would be appropriate and would serve the interests of judicial economy, comity and lucidity, if Standard Chartered submitted an Amended Statement expressly consenting to each condition set forth in the Decision and Order.

Shortly after Ms. Nelles filed the Statement on Friday evening, I sent an email to Ms. Nelles requesting that Standard Chartered prepare such an Amended Statement on the grounds discussed herein. Rather than raising this issue immediately with the Court, we wanted to provide Ms. Nelles an opportunity to discuss our request with her client and hoped Standard Chartered would be amenable to our request. Given the Jewish holiday, we were waiting until close of business today before contacting the court in order to provide Ms. Nelles with sufficient time to respond. We did not receive a response prior to the Court's endorsement of the Statement.


Given these circumstances and in light of the Court's action today, we write to respectfully request that the Court amend its endorsed Order and direct Standard Chartered to submit an Amended Statement that expressly sets forth its consent to each condition provided in the September 14 Decision and Order.

Respectfully submitted,



William M. O'Connor

cc: Counsel for all parties (by email)

Request GRANTED: The Standard Chartered Defendants are directed to submit for the Court's endorsement an amended statement setting forth their acceptance of the text of the conditions stated in the Court's
SO ORDERED: Order dated 9-14-10.
9-21-10
DATE  VICTOR MARRERO, U.S.D.J.