

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

-----X
Anwar *et al.*,

Plaintiffs,

vs.

Fairfield Greenwich Limited, *et al.*,

Defendants.

This Document Relates To: All Actions
-----X

MASTER FILE
Civil Action No.: 09-CV-0118 (VM)(THK)

**MOTION TO ADMIT COUNSEL PRO
HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Bruce A. Baird, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Matthew F. Dunn, Esq.
Covington & Burling LLP
1201 Pennsylvania Avenue, NW
Washington, DC 20004
Telephone: (202) 662-5314
Facsimile: (202) 778-5314

Matthew F. Dunn is a member in good standing of the Maryland State Bar and the District of Columbia Bar, and there are no pending disciplinary proceedings against Mr. Dunn in any State or Federal court.

Dated: New York, New York
December 3, 2010

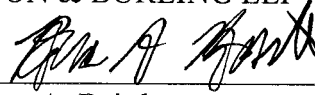
12/06/10
11:05 AM
11/10/10

01/19/11
12/6/10
078266-558
DB

Respectfully submitted,

COVINGTON & BURLING LLP

By:



Bruce A. Baird

SDNY Bar No: A-032599

1201 Pennsylvania Avenue, NW

Washington, DC 20004

Phone: (202) 662-5122

Facsimile: (202) 778-5122

Email: bbaird@cov.com

Attorneys for Defendant Gregory Bowes

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
Anwar *et al.*,

Plaintiffs,

vs.

Fairfield Greenwich Limited, *et al.*,

Defendants.

This Document Relates To: All Actions

MASTER FILE

Civil Action No.: 09-CV-0118 (VM)(THK)

-----X
CERTIFICATE OF SERVICE

I hereby certify that I caused true and correct copies of the foregoing **Notice of Motion to Admit Counsel *Pro Hac Vice*** on behalf of Defendant Gregory Bowes, dated December 3, 2010, to be served upon the following counsel of record in the within action (09-CV-0118 (VM)) by overnight Federal Express in accordance with Rule 5 of the Federal Rules of Civil Procedure on this 6th day of December, 2010:

David A. Barrett, Esq.
Email: dbarrett@bsflp.com
Boies, Schiller & Flexner, LLP (NYC)
575 Lexington Avenue
New York, NY 10022

Stuart Harold Singer, Esq.
Email: ssinger@bsflp.com
Sashi Back Boruchow, Esq.
Email: sboruchchow@bsflp.com
Susan E. Klock, Esq.
Email: sklock@bsflp.com
Boies, Schiller & Flexner LLP
401 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, FL 33301

Christopher Lovell, Esq.
Email: clovell@lshllp.com
Victor E. Stewart, Esq.
Email: victornj@ix.netcom.com
Jody Krisiloff, Esq.
Email: jrisiloff@lshllp.com
Lovell Stewart Halebian Jacobson LLP
61 Broadway, Suite 501
New York, NY 10006

Robert Craig Finkel, Esq.
Email: rfinkel@wolfpopper.com
James Abram Harrod, III, Esq.
Email: jharrod@wolfpopper.com
Carl Lester Stine, Esq.
Email: cstine@wolfpopper.com
Chet Barry Waldman, Esq.
Email: cwaldman@wolfpopper.com
Wolf Popper LLP
845 Third Avenue
New York, NY 10022

Interim Co-Lead Counsel for Plaintiffs

Robert Alan Wallner, Esq.
Email: rwallner@milberg.com
Jean Lee, Esq.
Email: jlee@milberg.com
Kent Andrew Bronson, Esq.
Email: kbronson@milberg.com
Kristi Stahnke McGregor, Esq.
Email: kmcgregor@milberg.com
Milberg LLP (NYC)
One Pennsylvania Plaza
New York, NY 10119

Counsel for Morning Mist Holdings Limited, Miguel Laneli, David Ferber, Frank Pierce, Frank Pierce Ira

Matthew W. Cheney, Esq.
Email: mcheney@crowell.com
William M. O'Connor, Esq.
Email: woconnor@crowell.com
Crowell & Moring LLP (DC)
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004

Counsel for Jitendra Bhatia, Gopal Bhatia, Jayshree Bhatia, Kishanchand Bhatia, Mandakini Gajaria

Brian Dale Graifman, Esq.
Email: bgraifman@gkblaw.com
David Alan Gehn, Esq.
Email: dgehn@gkblaw.com
Gusrae, Kaplan, Bruno & Nusbaum, PLLC
120 Wall Street
New York, NY 10005

Counsel for Pacific West Health Medical Center Inc. Employees Retirement Trust, on behalf of Itself

Catherine A. Torell, Esq.
Email: ctorell@cohenmilstein.com
Daniel S. Sommers, Esq.
Email: dsommers@cohenmilstein.com
Joshua Seth Devore, Esq.
Email: jdevore@cohenmilstein.com
Steven Jeffrey Toll, Esq.
Email: stoll@cohenmilstein.com
Cohen Milstein Sellers & Toll P.L.L.C.
88 Pine Street, 14th, Floor
New York, NY 10005

Counsel for Shimon Laor and Fairfield Investor Group

Daniel W. Krasner, Esq.
Email: krasner@whafh.com
Demet Basar, Esq.
Email: basar@whafh.com
Gregory Mark Nespole, Esq.
Email: nespole@whafh.com
Wolf Haldenstein Adler Freeman & Herz LLP
270 Madison Avenue
New York, NY 10016

Counsel for The Knight Services Holdings Limited and Americas/SwissCo. Trusts

David Robert Kromm, Esq.
Email: dkromm@zsz.com
Hillary Sobel, Esq.
Email: hsobel@zsz.com
Jeffrey Charles Zwerling, Esq.
Email: jzwerling@zsz.com
Robert S. Schachter, Esq.
Email: rschachter@zsz.com
Stephanie Elizabeth Kirwan, Esq.
Email: skirwan@zsz.com
Stephen Leland Brodsky, Esq.
Email: sbrodsky@zsz.com
Richard A. Speirs, Esq.
Email: rspeirs@cohenmilstein.com
Zwerling, Schachter & Zwerling
41 Madison Avenue
New York, NY 10010

Counsel for Nadav Zohar and, Ronit Zohar, Rosa Julietaa A De Pujals

David J. Molton, Esq.
Email: dmolton@brownrudnick.com
Martin S. Siegel, Esq.
Email: msiegel@brownrudnick.com
Brown Rudnick LLP (NYC)
Seven Times Square
New York, NY 10036

Jack Yoskowitz, Esq.
Email: yoskowitz@sewkis.com
Seward & Kissel LLP
One Battery Park Plaza
New York, NY 10004

Counsel for Fairfield Sentry Ltd.

Paul Edouard Dans, Esq.
Email: pdans@riveromestre.com
Rivero Mestre & Castro
2525 Ponce de Leon Boulevard
Suite 1000
Coral Gables, FL 33134

Counsel for Headway Investment Corp.

David Alan Rothstein, Esq.
Jeffrey Brett Kaplan, Esq.
Lorenz Michael Pruss, Esq.
Rebert E. Linkin, Esq.
Dimond Kaplan & Rothstein
2665 South Bayshore Drive
PH-2B
Coconut Grove, FL 33133
Fax: 305-374-1961

Jeffrey D. Bogert, Esq.
Bogert & Rembold, PL
2121 Ponce DeLeon
Suite 600
Coral Gables, FL 33134

Counsel for Jose Antonio Pujals and Rosa Julieta A De Pujals, Individually and in Their Representative Capacities for all Similarly Situated Plaintiffs

Richard E. Brodsky, Esq.
Email: rbrodsky@thebrodskylawfirm.com
The Brodsky Law Firm
66 West Flagler Street, Ninth Floor
Miami, FL 33130

Counsel for Maridom Limited

Laurence Edward Curran, III, Esq.
Email: lecurran@lecurran.com
Curran & Associates
4000 Ponce De Leon Blvd , Suite 470
Coral Gables, FL 33146

Counsel for Ricardo Lopez

Joseph Emanuel Neuhaus, Esq.
Email: neuhausj@sullcrom.com
Sullivan & Cromwell, LLP
125 Broad Street
New York, NY 10004

*Counsel for Standard Chartered Bank International (Americas) Limited and
Stanchart Securities International, Inc.*

Sharon Nelles, Esq.
Sullivan & Cromwell, LLP (NYC)
125 Broad Street
New York, NY 10004

*Counsel for Standard Chartered International (USA) Ltd., Standard Chartered
PLC, Standard Chartered Bank International (Americas) Limited, Standard
Chartered Private Bank, and Standard Chartered Bank*

Michael Jules Aguirre, Esq.
Email: maguirre@amslawyers.com
Aguirre, Morris & Severson LLP
444 West C Street, Suite 210
San Diego, CA 92101

Counsel for Maria Valladolid

Mark Geoffrey Cunha, Esq.
Email: mcunha@stblaw.com
Peter Kazanoff, Esq.
Email: pkazanoff@stblaw.com
Sara Ricciardi, Esq.
Email: sricciardi@stblaw.com
Philip Mirrer-Singer, Esq.
Email: pmirrer-singer@stblaw.com
Simpson Thacher & Bartlett LLP
425 Lexington Avenue
New York, NY 10017

Counsel for Fairfield Greenwich Limited, Fairfield Greenwich (Bermuda) Ltd, Fairfield Greenwich Advisors L.L.C. Fairfield Heathcliff Capital LLC, Fairfield Risk Services Ltd., Fairfield Greenwich (UK) Limited, Yanko Dellaw Schiava, Philip Toub, Lourdes Barreneche, Cornelis Boele Vianney D'hendecourt, Harold Greisman, Jacqueline Harary, Julia Luongo Mark McKeefry, Maria Teresa Pulido Mendoza, Charles Murphy, Santiago Reyes, Andrew Smith, Fairfield Greenwich Advisors, L.L.C., Daniel Lipton, Corina Noel Piedrahita, Richard Landsberger

Glenn Kurtz, Esq.
Email: gkurtz@whltecase.com
White & Case LLP
1155 Ave. of the Americas
New York, NY 10036

Counsel for Walter M. Noel, Jr.

Andrew J. Levander, Esq.
Email: Andrew.levander@dechert.com
David Hoffner, Esq.
Email: david.hoffner@dechert.com
Jennie Boehm Krasner, Esq.
Email: jennie.krasner@dechert.com
Dechert, LLP
1095 Avenue of the Americas
New York, NY 10036-6797

Counsel for Andres Piedrahita

Sean F. O'Shea, Esq.
O'Shea Partners LLP
521 Fifth Avenue, 25th Floor
New York, NY 10175

Counsel for Cornelis Boele

Email: mkasowitz@kasowitz.com
Adam K. Grant, Esq.
Email: dfetterman@kasowitz.com
Marc E. Kasowitz, Esq.
Email: agrant@k.asowitz.com
Daniel R. Benson, Esq.
Email: dbenson@kasowitz.com
Daniel Fetterman, Esq.
Kasowitz, Benson, Torres & Friedman, LLP
1501 Broadway 12th, Floor
New York, NY 10036

Counsel for Jeffrey Tucker

Mark P. Goodman, Esq.
Email: mpgoodman@debevoise.com
Helen Virginia Cantwell, Esq.
Email: hvcantwell@devoise.com
Debevoise & Plimpton, LLP
919 Third Avenue, 31 st Floor
New York, NY 10022

Counsel for Amit Vigayvergia

Eliot Lauer, Esq.
Email: elauer@cm-p.com
Michael Moscato, Esq.
Email: mmoscato@cm-p.com
Curtis, Mallet-Prevost, Colt & Mosle, LLP
101 Park Avenue
New York, NY 10178

Counsel for Citco Fund Services (Europe) B. V.

Edward M. Spiro, Esq.
Email: espiro@maglaw.com
Claudio Ochoa, Esq.
Email: cochoa@maglaw.com
Robert James Anello, Esq.
Email: ranello@maglaw.com
Morvillo, Abramowitz, Grand, Jason, Anello & Bohrer, P.C.
New York, NY 10017

Counsel for David Horn

Jonathan David Cogan, Esq.
Email: jonathan.cogan@kobrekim.com
Michael Sangyun Kim, Esq.
Email: michael.kim@kobrekim.com
800 Third Avenue, 6th Floor
New York, NY 10022

Counsel for GlobeOp Financial Services LLC.

Ricardo Alejandro Gonzalez, Esq.
Greenberg Traurig, P.A.
333 Avenue of The Americas
Miami, FL 33131

*Counsel for Carlos Gadala-Maria, Raul Mas, Robert Friedman, Rodolfo Pages,
John G. Dutkowski*

Stephen Lee Weinstein, Esq.
Email: sweinstein@ellklaw.com
Eiseman, Levine, Lehrhaupt &
Kakoyiannis, P.C.
805 Third Avenue, 10th Floor
New York, NY 10022

Counsel for Miguel Calvo

Kenneth A. Zitter, Esq.
Email: kzitter@aol.com
Law Offices of Kenneth A. Zitter
260 Madison Avenue
New York, NY 10016

Dated: New York, New York
December 6, 2010


Michael C. Nicholson

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

-----X
Anwar *et al.*,

Plaintiffs,

vs.

Fairfield Greenwich Limited, *et al.*,

Defendants.

This Document Relates To: All Actions

-----X

MASTER FILE
Civil Action No.: 09-CV-0118 (VM)(THK)

**DECLARATION OF BRUCE A. BAIRD
IN SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

Bruce A. Baird, under penalty of perjury, hereby declares:

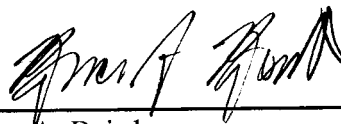
1. I am a Partner at Covington & Burling, LLP, counsel for Defendant Gregory Bowes in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant Gregory Bowes' motion to admit Matthew F. Dunn as counsel *pro hac vice* to represent Mr. Bowes in this matter.
2. I am a member in good standing of the bar of the State of New York. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Mr. Dunn since 2009.
4. Mr. Dunn is an associate at Covington and Burling, LLP in Washington, DC and is a member in good standing of the bars of the State of Maryland, the District of Columbia, and the United States District Court for the District of Columbia. Attached hereto as Exhibit "A" is a certificate of good standing for Mr. Dunn issued by the Maryland State

Bar. Attached hereto as Exhibit "B" is a certificate of good standing for Mr. Dunn issued by the District of Columbia Bar.

5. I have found Mr. Dunn to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Matthew F. Dunn, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Matthew F. Dunn, *pro hac vice*, which is attached hereto as Exhibit "C".

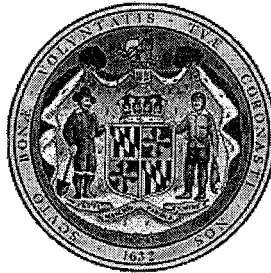
WHEREFORE it is respectfully requested that the motion to admit Matthew Dunn, *pro hac vice*, to represent Defendant Gregory Bowes in the above captioned matter, be granted.

Dated: New York, New York
December 3, 2010



Bruce A. Baird
SDNY Bar No: A-032599

**Court of Appeals
of Maryland
Annapolis, MD**



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the sixteenth day of December, 2008,*

Matthew Fitzgerald Dunn

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
fifteenth day of November, 2010.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland



District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

MATTHEW F. DUNN

was on the 7TH day of DECEMBER, 2009

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on November 12, 2010.

JULIO A. CASTILLO
Clerk of the Court

By: 

Deputy Clerk

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

-----X
Anwar *et al.*,

Plaintiffs,

vs.

Fairfield Greenwich Limited, *et al.*,

Defendants.

This Document Relates To: All Actions
-----X

MASTER FILE
Civil Action No.: 09-CV-0118 (VM)(THK)

**[PROPOSED] ORDER FOR
ADMISSION PRO HAC VICE ON
WRITTEN MOTION**

Upon the motion of Bruce A. Baird, attorney for Defendant Gregory Bowes, and said sponsor attorney's Declaration in support;

IT IS HEREBY ORDERED that

Matthew F. Dunn, Esq.
Covington & Burling LLP
1201 Pennsylvania Avenue, NW
Washington, DC 20004
Telephone: (202) 662-5314
Facsimile: (202) 778-5314
Email Address: mdunn@cov.com

is admitted to practice *pro hac vice* as counsel for Defendant Gregory Bowes in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: New York, New York
December _____, 2010

United States District/Magistrate Judge