

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

PASHA S. ANWAR, *et al.*,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED, *et al.*,

Defendants.

This Document Relates To: *Jose Antonio Pujals v. Standard Chartered Bank International (Americas) Ltd.*, No. 10-CV-2878

Master File No. 09-CV-118 (VM) (THK)

DECLARATION OF PATRICK B. BERARDUCCI

I, PATRICK B. BERARDUCCI, make this declaration pursuant to

28 U.S.C. § 1746. I hereby state as follows:

1. I am an attorney associated with the law firm of Sullivan & Cromwell LLP, counsel for Standard Chartered Bank International (Americas) Ltd. and Standard Chartered Bank (collectively, “Standard Chartered”) in the above-captioned action, and am admitted to practice before this Court. I am fully familiar with the matters stated herein based on personal knowledge or review of files in the possession of my firm.

2. I make this declaration in support of Standard Chartered’s Memorandum of Law in Support of their Motion to Dismiss Plaintiffs’ Amended Complaint.

3. Attached as Exhibit A is a true and correct copy of plaintiffs' Account Application and Agreement for Individuals with American Express Bank International, dated October 26, 1998.
4. Attached as Exhibit B is a true and correct copy of plaintiffs' Fairfield Sentry Limited purchase letter.
5. Attached as Exhibit C is a true and correct copy of plaintiffs' Subscription Agreement for Fairfield Sentry Limited Class B Shares.
6. Attached as Exhibit D is a true and correct copy of the Fairfield Sentry Limited Confidential Private Placement Memorandum, dated July 1, 2003.
7. Attached as Exhibit E is a true and correct copy of plaintiffs' Statement of Accounts, dated January 31, 2004.
8. Attached as Exhibit F is a true and correct copy of plaintiffs' Statement of Accounts, dated July 31, 2005.
9. Attached as Exhibit G is a true and correct copy of plaintiffs' Statement of Accounts, dated October 31, 2006.
10. Attached as Exhibit H is a true and correct copy of plaintiffs' Statement of Accounts, dated July 31, 2007.
11. Attached as Exhibit I is a true and correct copy of plaintiffs' Statement of Accounts, dated January 31, 2008.
12. Attached as Exhibit J is a true and correct copy of the American Express Bank International Rules and Regulations Governing Accounts, dated as of September 2003.
13. Attached as Exhibit K is a true and correct copy of the American Express Bank International Rules and Regulations Governing Accounts, dated as of December 2006.

14. Attached as Exhibit L is a true and correct copy of the Standard Chartered Bank International (Americas) Limited Rules and Regulations Governing Accounts, dated as of August 1, 2008.

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

/s/ Patrick B. Berarducci
Patrick B. Berarducci

March 7, 2011
New York, New York