

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

PASHA S. ANWAR, *et al.*,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED, *et al.*,

Defendants.

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

This Document Relates To: *Lou-Martinez v. Standard Chartered Bank International (Americas) Ltd., et al.*, No. 10-CV-8272; *Almiron v. Standard Chartered Bank International (Americas) Ltd., et al.*, No. 10-CV-6186; and *Carrillo v. Standard Chartered Bank International (Americas) Ltd., et al.*, No. 10-CV-6187.

**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., Standard Chartered PLC, and StanChart Securities International, Inc. (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 to place before the Court the documents described below, which are relevant to Standard Chartered's unified motion to dismiss the operative complaints in the above-captioned actions, which is being filed concurrently with this declaration.

3. Attached as Exhibit A is a true and correct copy of an Account Application and Agreement for Individuals with American Express Bank International, executed by Ricardo Almiron on June 27, 2006.

4. Attached as Exhibit B is a true and correct copy of an Account Application and Agreement for Individuals with American Express Bank International, executed by Carlos Carrillo on November 28, 2006.

5. Attached as Exhibit C is a true and correct copy of a Nondiscretionary Investment Services Agreement with American Express Bank International, executed by Ricardo Almiron on June 27, 2006.

6. Attached as Exhibit D is a true and correct copy of a Nondiscretionary Investment Services Agreement with American Express Bank International, executed by Carlos Carrillo on November 26, 2006.

7. Attached as Exhibit E is a true and correct copy of Ricardo Almiron's Statement of Accounts, dated September 30, 2008.

8. Attached as Exhibit F is a true and correct copy of an Account Application and Agreement for Individuals with American Express Bank International, executed by Moises Lou-Martinez and Wong Yuk Hing de Lou (collectively, the "Lou-Martinezes") on January 21, 1998.

9. Attached as Exhibit G is a true and correct copy of the Lou-Martinezes' Statement of Accounts, dated October 31, 2005.

10. Attached as Exhibit H is a true and correct copy of the Lou-Martinezes' Statement of Accounts, dated January 31, 2006.

11. Attached as Exhibit I is a true and correct copy of the Lou-Martinezes' Statement of Accounts, dated January 31, 2007.

12. Attached as Exhibit J is a true and correct copy of the Lou-Martinezes' Statement of Accounts, dated January 31, 2008.

13. Attached as Exhibit K is a true and correct copy of the Lou-Martinezes' Statement of Accounts, dated November 30, 2008.

14. Attached as Exhibit L is a true and correct copy of Ricardo Almiron's Subscription Agreement for Fairfield Sentry Limited Class B Shares.

15. Attached as Exhibit M is a true and correct copy of Carlos Carrillo's Subscription Agreement for Fairfield Sentry Limited Class B Shares.

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

/s/ Patrick B. Berarducci  
Patrick B. Berarducci

March 21, 2011  
New York, New York