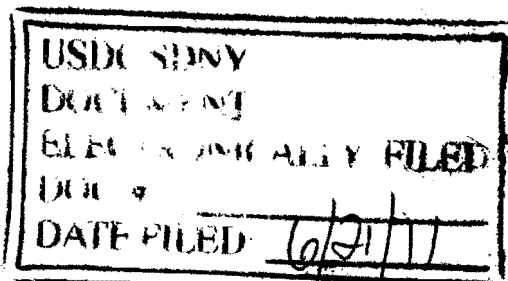


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



-----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)

**STIPULATION AND SECOND [PROPOSED] ORDER AMENDING THE AMENDED
CASE MANAGEMENT PLAN AND SCHEDULING ORDER**

WHEREAS, on March 11, 2009, this Court entered a Case Management Plan and
Scheduling Order;

WHEREAS, on November 2, 2010, this Court entered an Amended Case Management
Plan and Scheduling Order ("Amended CMO");

WHEREAS, on February 4, 2011, this Court entered an Order extending the time within
which Plaintiffs in the above-captioned action could serve a motion for class certification
("Motion") pursuant to Fed. R. Civ. P. 23 to March 1, 2011.

WHEREAS, the Amended CMO provides that fact discovery directed to class
certification shall be completed within 120 days of the service of the Motion.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and
between the undersigned counsel for parties in the above-captioned action that paragraph 8 of the
Amended CMO is amended as follows:

1. Fact and expert discovery directed to class certification shall be completed by
August 29, 2011.

2. Except as amended above, the provisions of the Amended CMO remain in effect.

Dated: New York, New York
June 20, 2011

SIMPSON THACHER & BARTLETT LLP

By: _____

Mark G. Cunha
Peter E. Kazanoff
425 Lexington Ave.
New York, NY 10017
(212) 455-2000

Attorneys for Fairfield Greenwich Limited, Fairfield Greenwich (Bermuda) Ltd., Fairfield Heathcliff Capital LLC, Fairfield Greenwich Advisors, LLC, Fairfield Risk Services Ltd., Lourdes Barreneche, Vianney d'Hendecourt, Yanko Della Schiava, Corina Noel Piedrahita, Harold Greisman, Jacqueline Harary, Richard Landsberger, Daniel Lipton, Julia Luongo, Mark McKeefry, Maria Teresa Pulido Mendoza, Charles Murphy, Santiago Reyes, Andrew Smith, and Philip Toub

BROWN AND HELLER, P.A.

CURTIS, MALLET-PREVOST, COLT
& MOSLE LLP

By: _____

Lewis N. Brown
1 Biscayne Tower, 15th Fl.
2 S. Biscayne Blvd.
Miami, FL 33131
(305) 358-3580

By: _____

Eliot Lauer
Michael Moscato
101 Park Avenue
New York, NY 10178
(212) 696-6000

Attorneys for Citco Fund Services (Europe) B.V., Citco (Canada) Inc., Citco Bank Nederland N.V. Dublin Branch, Citco Global Custody N.V., Citco Fund Services (Bermuda) Limited, and The Citco Group Limited

2. Except as amended above, the provisions of the Amended CMO remain in effect.

Dated: New York, New York
June 20, 2011

SIMPSON THACHER & BARTLETT LLP

By:

Mark G. Cunha
Peter E. Kazanoff
425 Lexington Ave.
New York, NY 10017
(212) 455-2000

Attorneys for Fairfield Greenwich Limited, Fairfield Greenwich (Bermuda) Ltd., Fairfield Heathcliff Capital LLC, Fairfield Greenwich Advisors, LLC, Fairfield Risk Services Ltd., Lourdes Barreneche, Vianney d'Hendecourt, Yanko Della Schiava, Corina Noel Piedrahita, Harold Greisman, Jacqueline Harary, Richard Landsberger, Daniel Lipton, Julia Luongo, Mark McKeefry, Maria Teresa Pulido Mendoza, Charles Murphy, Santiago Reyes, Andrew Smith, and Philip Toub

BROWN AND HELLER, P.A.

CURTIS, MALLET-PREVOST, COLT
& MOSLE LLP

By:

Lewis N. Brown / cc
Lewis N. Brown
1 Biscayne Tower, 15th Fl.
2 S. Biscayne Blvd.
Miami, FL 33131
(305) 358-3580

By:

Michael Moscato / cc
Eliot Lauer
Michael Moscato
101 Park Avenue
New York, NY 10178
(212) 696-6000

Attorneys for Citco Fund Services (Europe) B.V., Citco (Canada) Inc., Citco Bank Nederland N.V. Dublin Branch, Citco Global Custody N.V., Citco Fund Services (Bermuda) Limited, and The Citco Group Limited

HUGHES HUBBARD & REED LLP

By: Sarah L. Cave /cs
William R. Maguire
Sarah L. Cave
One Battery Park Plaza
New York, NY 10004
(212) 837-6000

*Attorneys for PricewaterhouseCoopers
Accountants N.V. (PwC Netherlands)*

KIRKLAND & ELLIS LLP

By: Timothy Duffy /cs
Timothy A. Duffy, P.C.
Amy E. Crawford
300 North LaSalle
Chicago, Illinois 60654
(312) 862-2445

*Attorneys for PricewaterhouseCoopers LLP
(PwC Canada)*

KOBRE & KIM LLP

By: Brad Samuels /cs
Jonathan D. Cogan
Michael S. Kim
Brad H. Samuels
800 Third Avenue
New York, NY 10022
(212) 488-1200

Attorneys for GlobeOp Financial Services LLC

COVINGTON & BURLING LLP

By: Bruce Baird /cs
Bruce A. Baird
Matthew F. Dunn
1201 Pennsylvania Avenue, NW
Washington, DC 20004
(202) 662-6000

Attorneys for Gregory Bowes

DECHERT LLP

By: David Hoffner /cs
Andrew Levander
David Hoffner
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3500

Attorneys for Andres Piedrahita

WHITE & CASE LLP

By: Andrew Hammond /cs
Glenn Kurtz
Andrew Hammond
1155 Avenue of the Americas
New York, NY 10036
(212) 819-8200

Attorneys for Walter M. Noel, Jr.

DEBEVOISE & PLIMPTON LLP

By: Mark Goodman /csz
Mark Goodman
Helen Cantwell
919 Third Avenue
New York, NY 10022
(212) 909-6000

Attorneys for Amit Vijayvergiya

KASOWITZ BENSON TORRES &
FRIEDMAN LLP

By: Daniel Fetterman /csz
Marc Kasowitz
Daniel J. Fetterman
1633 Broadway
New York, NY 10019
(212) 506-1700

Attorneys for Jeffrey Tucker

O'SHEA PARTNERS LLP

By: Sean O'Shea /csz
Sean F. O'Shea
Michael E. Petrella
521 Fifth Avenue, 25th Floor
New York, NY 10175
(212) 682-4426

Attorneys for Cornelis Boele

MORVILLO, ABRAMOWITZ, GRAND,
IASON, ANELLO & BOHRER, P.C.

By: Edward Spiro /csz
Robert J. Anello
Edward M. Spiro
565 Fifth Avenue
New York, NY 10017
(212) 856-9600

Attorneys for David B. Horn and Robert A. Blum

BOIES, SCHILLER & FLEXNER LLP
WOLF POPPER LLP
LOVELL STEWART & HALEBIAN LLP

By: _____
David Boies
BOIES, SCHILLER & FLEXNER LLP
333 Main Street
Armonk, NY 10504
(914) 749-8200

David A. Barrett
Howard L. Vickery
BOIES, SCHILLER & FLEXNER LLP
575 Lexington Avenue
New York, NY 10022
(212) 446-2300

DEBEVOISE & PLIMPTON LLP

By:

Mark Goodman
Helen Cantwell
919 Third Avenue
New York, NY 10022
(212) 909-6000

Attorneys for Amit Vijayvergiya

KASOWITZ BENSON TORRES &
FRIEDMAN LLP

By:

Marc Kasowitz
Daniel J. Fetterman
1633 Broadway
New York, NY 10019
(212) 506-1700

Attorneys for Jeffrey Tucker

O'SHEA PARTNERS LLP

By:

Sean F. O'Shea
Michael E. Petrella
521 Fifth Avenue, 25th Floor
New York, NY 10175
(212) 682-4426

Attorneys for Cornelis Boele

MORVILLO, ABRAMOWITZ, GRAND,
IASON, ANELLO & BOHRER, P.C.


By:

Robert J. Anello
Edward M. Spiro
565 Fifth Avenue
New York, NY 10017
(212) 856-9600

Attorneys for David B. Horn and Robert A. Blum

BOIES, SCHILLER & FLEXNER LLP
WOLF POPPER LLP
LOVELL STEWART & HALEBIAN LLP

By:



David Boies
BOIES, SCHILLER & FLEXNER LLP
333 Main Street
Armonk, NY 10504
(914) 749-8200

David A. Barrett
Howard L. Vickery
BOIES, SCHILLER & FLEXNER LLP
575 Lexington Avenue
New York, NY 10022
(212) 446-2300

Stuart H. Singer
Carlos M. Sires
Sashi Bach Boruchow
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Boulevard, #1200
Ft. Lauderdale, Florida 33301
(954) 356-0011

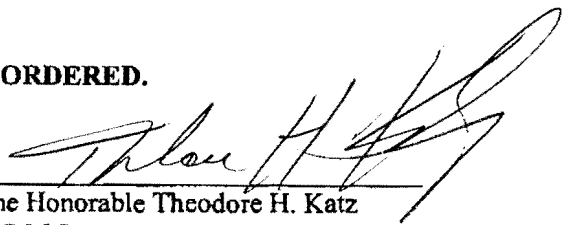
Robert C. Finkel
James A. Harrod
WOLF POPPER LLP
845 Third Avenue
New York, NY 10022
(212) 759-4600

Christopher Lovell
Victor E. Stewart
LOVELL STEWART HALEBIAN LLP
61 Broadway, Suite 501
New York, NY 10006
(212) 608-1900

Lead Counsel for Plaintiffs and Counsel for PSLRA Plaintiffs

Dated: New York, New York
June 27, 2011

SO ORDERED.



The Honorable Theodore H. Katz
U.S.M.J.

du