

Anwar et al v. Fairfield Greenwich Limited et al

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July 25, 2011

By fax to (212) 805-7932

Honorable Theodore H. Katz
 United States Magistrate Judge
 Daniel Patrick Moynihan U.S. 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);
 Standard Chartered Cases

Dear Judge Katz:

I write on behalf of the Standard Chartered Plaintiffs' Steering Committee.

On July 14, 2011, we served our Second Request for Production of Documents to the Standard Chartered Defendants, requesting documents concerning Standard Chartered's plans to sell or abandon Standard Chartered Bank International (Americas) Ltd., which was known until its acquisition by Standard Chartered in 2008 as American Express Bank International.¹ By letter to counsel dated July 14, 2011, we requested that the Standard Chartered Defendants agree to a shorter return time of fourteen days. It was not until July 22, 2011, eight days later, that Sullivan & Cromwell answered and rejected the shorter time frame.

We attach copies of the Request for Production, the letter to counsel and a letter to clients of Standard Chartered Bank International (Americas) by Standard Chartered management discussing the sale or abandonment.

Since we anticipate that the Standard Chartered Defendants will object to the request and assume that they know their position now, we respectfully submit that it would expedite matters and permit a more prompt judicial review of their expected objection if they were required to provide a response to the Standard Chartered Plaintiffs by Thursday, July 28, 2011, or as soon thereafter as Your Honor deems appropriate.

We respectfully submit that in light of the apparently imminence of a sale or abandonment, which could lead to the denuding of the entity that is the sole

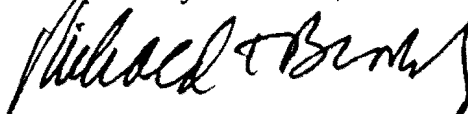
¹ This is an Edge Act Bank located in Miami, Florida, through which American

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defendant in one or more of the Standard Chartered Cases, and was the entity most directly connected to our clients' injuries, there is good cause to expedite the process by which the Request for Production be responded to and, if necessary, the objections to the Request be addressed by the Court. It is for this reason that we respectfully request not only Your Honor's prompt consideration of this letter and Your Honor's approval of the request.

Thank you for your attention to this matter.

Respectfully submitted,



Richard E. Brodsky
Counsel for the Maridom Plaintiffs
On behalf of the Plaintiffs' Steering
Committee

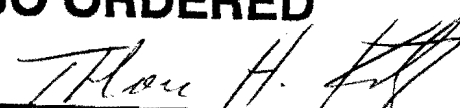
Enclosures

cc: Other Members of the Plaintiffs' Steering Committee
Sharon Nelles, Esq., counsel for Standard Chartered Defendants

The request for expedited discovery is denied, as it has not been adequately justified. As agreed to by the Standard Chartered Defendants' counsel, the Court expects them to keep Plaintiffs and the Court apprised of any changes in SBCI's corporate status or ownership or any other transactions that would have an impact on Plaintiffs' ability to recover a judgment from the Standard Chartered Defendants.

SO ORDERED

8/3/11


THEODORE H. KATZ
UNITED STATES MAGISTRATE JUDGE