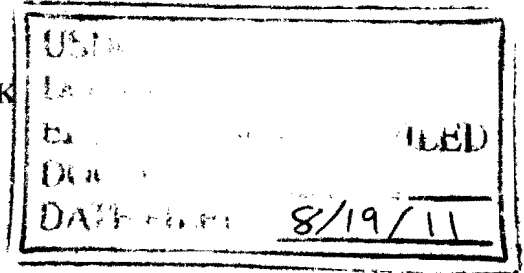


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



PASHA S. ANWAR, *et al.*,

Plaintiffs.

v.

FAIRFIELD GREENWICH LIMITED, *et al.*,

Defendants.

This Document Relates To: All Cases

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

**STIPULATION AND [~~PROPOSED~~] ORDER
CONCERNING CERTAIN DISCOVERY MATERIAL**

IT IS HEREBY STIPULATED AND AGREED, by and among the parties named below, through their undersigned counsel, and subject to the Court's order, that:

1. This stipulation and order applies to all actions filed in, or transferred to, this Court for pretrial proceedings that are consolidated and/or coordinated with *Anwar v. Fairfield Greenwich Limited* ("*Anwar*"), including cases involving the Standard Chartered Defendants¹ (the "Standard Chartered Actions") and cases that have not yet been filed in or transferred to this Court.

¹ The Standard Chartered Defendants include: Standard Chartered Bank International (Americas) Ltd., Standard Chartered Bank, Standard Chartered PLC, Standard Chartered International (USA) Ltd., Carlos Gadala Maria, Raul N. Mas, Robert Friedman, Rodolfo Pages, John G. Dutkowski, and Luisa Serena. As used herein, "Standard Chartered Defendants" also includes any other entity or individual currently or to-be named as a defendant in the Standard Chartered Actions that is affiliated with Standard Chartered Bank or a current or former employee of Standard Chartered Bank or any of its affiliates.

2. On December 2, 2010, the Court entered a Second Amended Stipulation and Order Governing Confidentiality of Discovery Material (Docket No. 591), with respect to discovery in *Anwar* (the “*Anwar* Protective Order”) (attached hereto as Exhibit A).

3. On February 4, 2011, the Court entered a separate Stipulation and Order Governing Confidentiality of Discovery Material (Docket No. 603), with respect to discovery in the Standard Chartered Actions (the “SCB Cases Protective Order”) (attached hereto as Exhibit B).

4. Although the *Anwar* Protective Order and the SCB Cases Protective Order are similar in many respects, they are not identical.

5. The Standard Chartered Defendants have requested access to discovery materials that have been or will be produced by Fairfield Greenwich Limited and certain affiliated entities and individuals (the “FG Defendants”)² under the *Anwar* Protective Order, and the Standard Chartered Defendants have agreed to provide the Standard Chartered Plaintiffs with copies of all documents obtained from the FG Defendants.

6. In an effort to preserve the confidentiality of all such discovery materials consistent with the protective order pursuant to which they have been or will be produced, all parties to the SCB Cases Protective Order agree that any discovery materials shared with them by the FG Defendants are provided subject to the *Anwar* Protective Order as if the parties to the

² The FG Defendants include: 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. As used herein, the term “FG Defendants” also includes any other entity or individual currently or to-be named as a defendant in a Fairfield case that is affiliated with Fairfield Greenwich Limited or a current or former employee of Fairfield Greenwich or any of its affiliates.

Standard Chartered Protective Order were also signatories to the *Anwar* Protective Order and considered "Parties" as used therein.

7. Nothing contained in this stipulation and order shall alter in any way (i) the parties' discovery obligations under the federal rules, local rules, or otherwise; (ii) the FG Defendants' rights to object or otherwise oppose any request for discovery; (iii) the terms of SCB Cases Protective Order as between the parties to the SCB Cases Protective Order; or (iv) the terms of the *Anwar* Protective Order as between the parties to the *Anwar* Protective Order.

Dated: August 18, 2011

Respectfully submitted,

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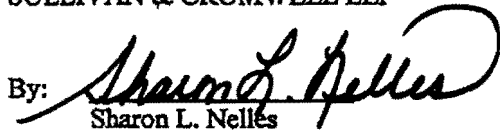
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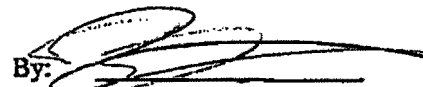
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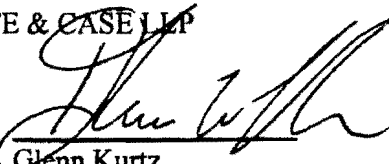
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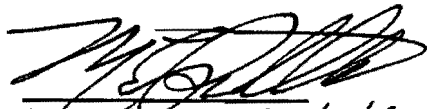
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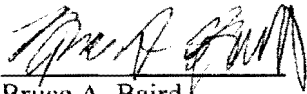
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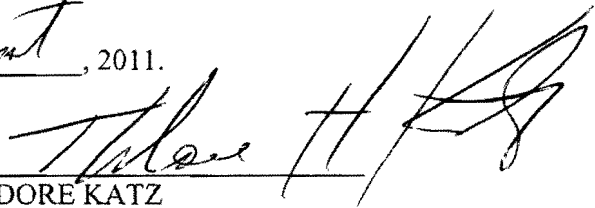
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SO ORDERED.

New York, New York, this 19th day of August, 2011.


THEODORE KATZ
UNITED STATES MAGISTRATE JUDGE