

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

PASHA S. ANWAR, *et al.*,
Plaintiffs,

-against-

FAIRFIELD GREENWICH LIMITED, *et al.*,
Defendants.

This Documents Relates to: All Actions

Master File No. 09-cv-0118(VM)

**CORRECTED DECLARATION OF
SASHI BACH BORUCHOW IN
SUPPORT OF MOTION FOR
CLASS CERTIFICATION**

Sashi Bach Boruchow, under penalty of perjury, hereby declares:

1. I am a Partner at Boies, Schiller & Flexner, LLP, Interim Co-Lead Counsel for the Plaintiffs and Co-Lead Counsel for the PSLRA Lead Plaintiffs in the above captioned action. I submit this Corrected Declaration in support of Plaintiffs' Motion for Class Certification.

2. Attached hereto as Exhibit 1 is a true and correct copy of January 6, 2011 and January 7, 2011 emails from Frank McGing, a Manager at KRyS Global (formerly KryS & Associates (BVI) Ltd.), to myself, in which information concerning shareholder investments in Fairfield Sentry Limited ("Fairfield Sentry") and Fairfield Sigma Limited ("Fairfield Sigma") (together, the "Funds") was provided to Plaintiffs' counsel by the Funds' joint liquidators, who were appointed by the Eastern Caribbean Supreme Court in the High Court of Justice, British Virgin Islands ("Joint Liquidators"). According to the email, this information is based on data that the Joint Liquidators obtained from Citco's Transfer Agency system, which we understand was maintained in the regular course of business, for the purpose of recording investments and redemptions by shareholders in the Funds.

3. Attached hereto as Exhibit 2 is a spreadsheet prepared by Plaintiffs' counsel based on the information concerning Fairfield Sentry that was provided by the Joint Liquidators in Exhibit 1. The number at the bottom of the spreadsheet on pages 1-2 – approximately \$4.6 billion – reflects the total net losses incurred by investors who suffered net losses of principal (“Net Loss Shareholders”) in Fairfield Sentry. In addition, the spreadsheet indicates the countries of Fairfield Sentry's Net Loss Shareholders, which we understand is based on Fairfield Sentry's books and records; the number of Net Loss Shareholders from each country; the total net loss of the Net Loss Shareholders from each country; and the percentage of Fairfield Sentry's Net Loss Shareholders and percentage of net loss amount from each country. Page 3 groups the countries of the Fairfield Sentry Net Loss Shareholders according to the groupings used in the expert opinions submitted by Plaintiffs herewith, and further indicates the percentage of the Net Loss Shareholders and the percentage of the total losses from the countries covered by each of the expert opinions.

4. Attached hereto as Exhibit 3 is a spreadsheet prepared by Plaintiffs' counsel based on the information for Fairfield Sigma that was provided by the Joint Liquidators in Exhibit 1. The number at the bottom of the spreadsheet on page 1 – approximately \$694 million – reflects the total net losses incurred by Fairfield Sigma's Net Loss Shareholders. In addition, the spreadsheet indicates the countries of Fairfield Sigma's Net Loss Shareholders, which we understand is based on Fairfield Sigma's books and records; the number of Net Loss Shareholders from each country; the total net loss of the Net Loss Shareholders from each country; and the percentage of Fairfield Sigma's Net Loss Shareholders and percentage of net loss amount from each country. Page 2 groups the countries of the Fairfield Sigma Net Loss Shareholders according to the groupings used in the expert opinions submitted by Plaintiffs

herewith, and further indicates the percentage of the Net Loss Shareholders and the percentage of the total losses from the countries covered by each of the expert opinions.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Limited Partner Registry for Greenwich Sentry, L.P., ANWAR-CCI-00000001, and the Limited Partner Registry for Greenwich Sentry Partners, L.P., ANWAR-CCI-00000002, both of which have been modified solely to redact information identifying the limited partners. These documents were produced to Plaintiffs' counsel in discovery by Citco (Canada) Inc.

6. Attached hereto as Exhibit 5 is a true and correct copy of the Private Placement Memorandum ("PPM") for Fairfield Sentry Limited dated July 1, 2003.

7. Attached hereto as Exhibit 6 is a true and correct copy of the PPM for Fairfield Sigma Limited, dated December 1, 2008.

8. Attached hereto as Exhibit 7 is a true and correct copy of the Confidential Offering Memorandum ("COM") for Greenwich Sentry, L.P., dated May 2006.

9. Attached hereto as Exhibit 8 is a true and correct copy of the COM for Greenwich Sentry Partners, L.P., dated August 2006.

10. Attached hereto as Exhibit 9 is a true and correct copy of audited Financial Statements for the Year Ended December 31, 2005 for Fairfield Sigma Limited, dated July 14, 2006.

11. Attached hereto as Exhibit 10 is a true and correct copy of the Audited Financial Statements of Greenwich Sentry, L.P. for the Years Ended December 31, 2007 and 2006, dated April 18, 2008.

12. Attached hereto as Exhibit 11 are true and correct copies of monthly statements prepared by Citco Fund Services (Europe) B.V. including (i) a statement prepared for Plaintiff

Martin & Shirley Bach Family Trust, for the calendar month of October 2008, (ii) a statement prepared for Plaintiff Natalia Hatgis, for the calendar month of February 2007, and (iii) a statement prepared for Plaintiff St. Stephen's School, dated December 15, 2006.

13. Attached hereto as Exhibit 12 is a true and correct copy of a Subscription Agreement for Fairfield Sentry Limited executed by Plaintiff Securities & Investment Company BSC on March 25, 2004.

14. Attached hereto as Exhibit 13 is a true and correct copy of a Subscription Agreement for Fairfield Sigma Limited executed by Plaintiff Banca Sella Holding S.P.A. on November 23, 2006.

15. Attached hereto as Exhibit 14 is a true and correct copy of a Subscription Agreement to become a Limited Partner in Greenwich Sentry, L.P. executed by Plaintiff Dawson Bypass Trust on February 27, 2008.

16. Attached hereto as Exhibit 15 is a true and correct copy of PwC Netherlands' Engagement Letter relating to the Funds, dated February 7, 2006.

17. Attached hereto as Exhibit 16 is a true and correct copy of a cover letter, dated November 7, 2002, from Andrew J. Brook, PricewaterhouseCoopers (Bermuda), to Chris Wetherhill, Kingate Management Limited, enclosing an engagement letter, client service plan and planned investment advisor procedures.

18. Attached hereto as Exhibit 17 is a true and correct copy of a letter, dated November 7, 2002, from Andrew J. Brook, PricewaterhouseCoopers (Bermuda), to Chris Wetherhill, Kingate Management Limited, regarding "Control environment review at the Funds advisor and broker/dealer."

19. Attached hereto as Exhibit 18 are true and correct copies of (i) a Notice of

Trustee's Determination of Claim of Claim to Dawson Bypass Trust, dated December 8, 2009,
and (ii) a Notice of Trustee's Determination of Claim of Claim to AXA Private Management,
dated December 8, 2009.

I declare under penalty of perjury under the laws of the United States of America, that the
foregoing is true and correct.

Executed on March 2, 2011

/s/ Sashi Bach Boruchow
Sashi Bach Boruchow

CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2011, I caused the foregoing attached document to be electronically served to all counsel of record.

/s/ Eli J. Glasser _____
Eli J. Glasser