

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MASTER FILE NO. 09-CV-118 (VM)(THK)

COURTESY COPY

PASHA ANWAR, et al.,

Plaintiff,

v.

FAIRFIELD GREENWICH
LIMITED, et al.,,

Defendants.

NOTICE OF MOTION TO
QUASH SUBPOENA

This Document Relates to: *All
Standard Chartered Cases*

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DATE FILED 4/24/12

TO: Paul Dans, Esq.
Rivero Mestre, LLP
565 Fifth Avenue, 7th Floor
New York, NY 10017

Richard Brodsky, Esq.
The Brodsky Law Firm
66 West Flagler Street, 9th Floor
Miami, FL 33130

PLEASE TAKE NOTICE that, upon the accompanying
Memorandum of Law, the annexed Declaration of Louis Smith dated April
6, 2012, and the exhibits attached thereto, and all pleadings and proceedings
had herein, non-party American Express Company will move this Court,

before the Honorable Theodore H. Katz, in Courtroom 17D of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 45 quashing the deposition subpoena issued by Plaintiff Headway Investment Corp. on behalf of the Standard Chartered Plaintiffs Steering Committee.

Dated: April 6, 2012

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: s/Louis Smith
LOUIS SMITH

200 Park Avenue

P.O. Box 677

Florham Park, New Jersey 07932

(973) 360-7900 (Phone)

(973) 301-8410 (Facsimile)

Attorneys for non-party

American Express Company

No opposition having been filed to American Express Co.'s motion to quash subpoena, and the Court being in agreement that the subpoena is overbroad and unduly oppressive, the Standard Chartered Plaintiffs' motion to quash is hereby granted.

SO ORDERED

4/24/12

Theodore H. Katz

THEODORE H. KATZ
UNITED STATES MAGISTRATE JUDGE