

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PASHA S. ANWAR, *et al.*,

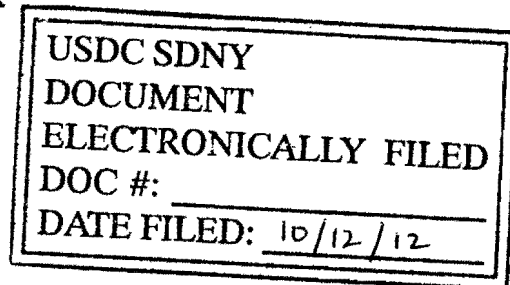
Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED,
et al.,

Defendants.

This Document Relates To:
*Barbachano v. Standard Chartered
Bank International (Americas) Ltd., et
al.*, No. 11-CV-3553



Master File No. 09-CV-118 (VM) (FM)

ORIGINAL

**STIPULATION AND [PROPOSED] ORDER REGARDING
STANDARD CHARTERED DEFENDANTS' TIME TO RESPOND TO
COMPLAINT AND EXPERT REPORTS IN ABOVE-CAPTIONED CASE**

WHEREAS, plaintiff Joaquina Teresa Barbachano Herrero ("Barbachano") in the above-captioned action filed a complaint on December 9, 2010 asserting various claims against defendants Standard Chartered Bank International (Americas) Ltd. and Standard Chartered PLC ("Standard Chartered");

WHEREAS, on July 31, 2012, pursuant to the Stipulation and Order Amending Second Amended Scheduling Order Regarding Standard Chartered Cases [Dkt. 891], Barbachano served two expert reports in support of her claims;

WHEREAS, on September 12, 2012, the Court dismissed certain of Barbachano's claims;

WHEREAS, on October 3, 2012, Barbachano filed a request for leave to amend her complaint;

WHEREAS, Standard Chartered anticipates filing an opposition to Barbachano's request for leave to amend her complaint;

WHEREAS, Standard Chartered's answer to Barbachano's original complaint is presently due on October 12, 2012;

WHEREAS, Standard Chartered's rebuttal expert reports are presently due on October 31, 2012;

WHEREAS, in an effort to conserve resources, the parties have agreed that it would be preferable to defer any obligation that Standard Chartered may have to answer the original complaint and to submit rebuttal expert reports prior to the Court ruling on Barbachano's request for leave to amend;

WHEREAS, extending the time for Standard Chartered to answer, move against or otherwise respond to Barbachano's complaint and to file rebuttal expert reports should not impact the uniform schedule guiding the Standard Chartered Cases;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for parties in the above-captioned action, subject to the approval of the Court, that:

1. Standard Chartered's deadlines to answer Barbachano's original complaint and to serve rebuttal expert reports are adjourned pending the Court's decision on Barbachano's request for leave to amend.

2. In the event that Barbachano's request for leave to amend is granted, Standard Chartered shall answer, move against or otherwise respond to the Amended Complaint on or before 21 days of entry of the order granting leave to amend. If Standard Chartered answers the Amended Complaint, then Standard Chartered shall serve its rebuttal expert reports on or before


45 days of the entry of the order granting leave to amend. If Standard Chartered moves against the Amended Complaint, then the parties shall confer and submit to the Court on or before 5 days of the Court's final order on Standard Chartered's motion to dismiss a proposed schedule(s) for expert reports.

3. Likewise, in the event that Barbachano's request for leave to amend is denied, Standard Chartered's answer to Barbachano's complaint shall be due no later than 14 days after entry of the order denying Barbachano's request, and Standard Chartered's rebuttal expert reports shall be due no later than 45 days after the entry of the order denying Barbachano's request.

DATE: October 11, 2012

KATZ BARRON SQUITERO FAUST

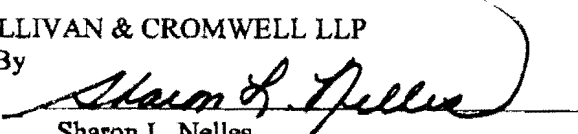
By


 H. Eugene Lindsey III
 Attorney for Plaintiff Joaquina Teresa
 Barbachano Herrero

DATE: October 11, 2012

SULLIVAN & CROMWELL LLP

By


 Sharon L. Nelles
 Attorney for Defendants Standard
 Chartered Bank International (Americas)
 Ltd. and Standard Chartered PLC

SO ORDERED this 12th day of October, 2012.


 HON. FRANK MAAS
 UNITED STATES MAGISTRATE JUDGE