

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE TREMONT SECURITIES LAW,	Master File No.:
STATE LAW, and INSURANCE	: 08 Civ. 11117 (TPG)
LITIGATION	
:	
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This Document Relates to: Insurance Action	: ECF CASE
09 Civ. 557 (TPG)	: Electronically Filed
:	
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**DECLARATION IN SUPPORT OF MOTION TO WITHDRAW**

**JAMIE B.W. STECHER**, declares under penalties of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a member of Tannenbaum Helpern Syracuse & Hirschtritt LLP (the “Tannenbaum firm”), attorneys for defendant Rye Select Broad Market Insurance Portfolio, LDC (“Insurance Portfolio”) in this action. As such, I am fully familiar with the facts and circumstances I describe below. I submit this declaration in support of the Tannenbaum firm’s motion for an order allowing it to withdraw as counsel for defendant Insurance Portfolio.

2. The Tannenbaum firm has appeared on behalf of Insurance Portfolio and Rye Select Broad Market Fund, L.P. in the above-captioned action, but this application relates only to Insurance Portfolio.

3. On March 23, 2009, the Grand Court of the Cayman Islands entered an order placing Insurance Portfolio, a Cayman Islands entity, into liquidation. James Cleaver and Richard Fogerty, of Zolfo Cooper, were appointed as Official Liquidators (the “Liquidator”). A copy of the Court’s order is attached as Exhibit 1.

4. On May 20, 2009, this Court so-ordered a stipulation between all parties staying all further proceedings pending the plaintiffs' filing of an Amended Complaint.

5. On May 29, 2009, the Liquidator sent me a letter concerning this matter, and thereafter we engaged in conversations with respect to the Tannenbaum firm's continued representation of Insurance Portfolio.

6. Ultimately, the Liquidator requested that the Tannenbaum firm cease its representation of Insurance Portfolio and move to withdraw as counsel for Insurance Portfolio.

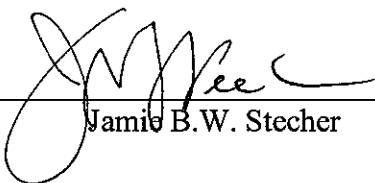
7. Therefore, at the request of the Liquidator, I am filing this motion to withdraw.

8. I sent a copy of these papers to Insurance Portfolio, through the Liquidator, before I filed this motion, and they have authorized me to file them.

9. As this action is currently stayed pending plaintiffs' filing of an Amended Complaint, the Tannenbaum firm's withdrawal as counsel for Insurance Portfolio will have no adverse impact on any party in this litigation.

10. For the foregoing reasons, movant respectfully requests leave to withdraw as counsel of record for Insurance Portfolio pursuant to Local Civil Rule 1.4. I attach a proposed order as Exhibit 2

Dated: New York, New York  
July 30, 2009

  
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Jamie B.W. Stecher