

SECURITIES AND EXCHANGE COMMISSION
New York Regional Office
3 World Financial Center, Suite 400
New York, New York 10281
Ph: (212) 336-1100

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

GALLEON MANAGEMENT, LP,
RAJ RAJARATNAM,
RAJIV GOEL,
ANIL KUMAR,
DANIELLE CHIESI,
MARK KURLAND,
ROBERT MOFFAT,
NEW CASTLE FUNDS LLC,
ROOMY KHAN,
DEEP SHAH,
ALI HARIRI,
ZVI GOFFER,
DAVID PLATE,
GAUTHAM SHANKAR,
SCHOTTENFELD GROUP LLC,
STEVEN FORTUNA,
and
S2 CAPITAL MANAGEMENT, LP,

Defendants.

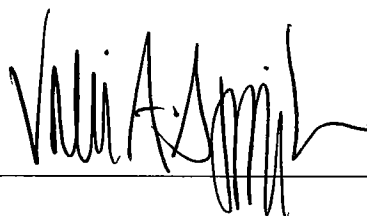
**:
:
: 09 Civ. 8811
: (JSR)**

**:
: ECF CASE**

PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
REQUEST FOR CLERK'S CERTIFICATE
NOTING DEFAULT OF DEFENDANT DEEP SHAH

Plaintiff Securities and Exchange Commission hereby respectfully requests that the Clerk of the Court issue a Clerk's Certificate noting the default of defendant Deep Shah pursuant to Federal Rule of Civil Procedure 55(a) and Local Civil Rule 55.1. In support of its Request, the Commission submits, as required by this Court's Electronic Case Filing Rule 16.1, an unsigned Clerk's Certificate (Attachment A). In further support of its Request, the Commission also submits the attached Declaration of Timothy Casey in Support of Clerk's Certificate Noting Default of Defendant Deep Shah (Attachment B).

Dated: March 4, 2011
New York, New York



VALERIE A. SZCZEPANIK
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Attachment A

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

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

**GALLEON MANAGEMENT, LP,
RAJ RAJARATNAM,
RAJIV GOEL,
ANIL KUMAR,
DANIELLE CHIESI,
MARK KURLAND,
ROBERT MOFFAT,
NEW CASTLE FUNDS LLC,
ROOMY KHAN,
DEEP SHAH,
ALI HARIRI,
ZVI GOFFER,
DAVID PLATE,
GAUTHAM SHANKAR,
SCHOTTENFELD GROUP LLC,
STEVEN FORTUNA,
and
S2 CAPITAL MANAGEMENT, LP,**

Defendants.

09 Civ. 8811 (JSR)

ECF CASE

CLERK'S CERTIFICATE

I, RUBY J. KRAJICK, Clerk of the United States District Court for the Southern District of New York, do hereby certify that:

1. This action commenced on October 16, 2009, with the filing of a summons and complaint by the Securities and Exchange Commission ("Commission").

2. On November 5, 2009, the Commission filed an Amended Complaint.

3. On January 29, 2010, the Commission filed a Second Amended Complaint.

4. Service of a Second Amended Summons to defendant Deep Shah (“Shah”) and the Second Amended Complaint was affected upon Shah on March 22, 2010, by the Department of Legal Affairs of the Ministry of Law and Justice of India pursuant to Federal Rule of Civil Procedure 4 and the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents. Proof of such service was filed with the Court on March 4, 2011.

5. I further certify that the docket entries indicate that defendant Shah has not filed an answer or otherwise moved with respect to the complaint herein. The default of defendant Shah is hereby noted.

Dated:
New York, New York

RUBY J. KRAJICK
Clerk of Court

By: _____
Deputy Clerk

Attachment B

SECURITIES AND EXCHANGE COMMISSION
New York Regional Office
3 World Financial Center, Suite 400
New York, New York 10281-1022
(212) 336-1100

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,	:	
	:	
	:	09 Civ. 8811
Plaintiff,	:	(JSR)
	:	
-against-	:	ECF CASE
	:	
GALLEON MANAGEMENT, LP,	:	
RAJ RAJARATNAM,	:	
RAJIV GOEL,	:	
ANIL KUMAR,	:	
DANIELLE CHIESI,	:	
MARK KURLAND,	:	
ROBERT MOFFAT,	:	
NEW CASTLE FUNDS LLC,	:	
ROOMY KHAN,	:	
DEEP SHAH,	:	
ALI HARIRI,	:	
ZVI GOFFER,	:	
DAVID PLATE,	:	
GAUTHAM SHANKAR,	:	
SCHOTTENFELD GROUP LLC,	:	
STEVEN FORTUNA,	:	
and	:	
S2 CAPITAL MANAGEMENT, LP,	:	
	:	
Defendants.	:	

**DECLARATION OF TIMOTHY CASEY IN SUPPORT OF CLERK'S CERTIFICATE
NOTING DEFAULT OF DEFENDANT DEEP SHAH**

I, TIMOTHY CASEY, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am employed as an attorney in the New York Regional Office of Plaintiff Securities and Exchange Commission (the "Commission"). I submit this Declaration in support of the Commission's application, pursuant to Fed. R. Civ. P. 55(a) and Local Rule 55.1, for a Clerk's Certificate Noting Default of Defendant Deep Shah ("Shah").

2. I am familiar with the facts and proceedings in this action and the allegations in the Commission's Second Amended Complaint. I make this declaration upon information and belief, the sources of which are documents obtained by the Commission and conversations with other members of the Commission's staff. The documents that I reviewed include the docket maintained by the Court in this matter and documents obtained by the Commission staff during the course of this litigation.

3. Upon information and belief, Shah is a person who is not an infant, in the military or an incompetent person.

4. The Commission filed its Complaint in this matter on October 16, 2009.

5. On November 5, 2009, the Commission filed an Amended Complaint.

6. On January 29, 2010, the Commission filed a Second Amended Complaint.

7. On March 22, 2010, copies of the Second Amended Summons issued to Shah and the Second Amended Complaint were served on Shah by the Department of Legal Affairs of the Ministry of Law and Justice of India. Proof of such service was filed with the Court on March 4, 2011.

8. As indicated in the docket, Shah's Answer was due no later than May 21, 2010.

9. Shah has failed to appear personally or through counsel in connection with this litigation.

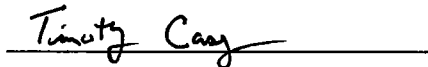
10. Shah has failed to plead or otherwise defend this action as provided for by the Federal Rules of Civil Procedure and the Local Civil Rules.

11. Shah is in default.

Accordingly, a Certificate of Default should be issued by the Clerk of this Court and a judgment by default should be entered against Shah.

I state under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
March 4, 2011

A handwritten signature in cursive script that reads "Timothy Casey". The signature is written in black ink and is positioned above a solid horizontal line.

Timothy Casey
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