IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

AGREED MOTION FOR ENTRY OF A [PROPOSED] AGREED ORDER SETTING A BRIEFING SCHEDULE AND HEARING ON LIQUIDATORS' PETITION FOR RECOGNITION

Nigel Hamilton-Smith and Peter Wastell (collectively, "<u>Liquidators</u>"), Receiver Ralph Janvey, the SEC, and the Examiner, through their counsel, respectfully submit the following Proposed Agreed Order Setting a Briefing Schedule and Hearing on Liquidators' Petition for Recognition ("<u>Motion</u>"). As reflected in the attached Proposed Order ("<u>Order</u>"), the parties have agreed to the following schedule:

1. The parties exchanged the names of any witnesses they intend to call at a hearing on Liquidators' Petition for Recognition on **November 6, 2009**.

2. For purposes of the Liquidators' Petition For Recognition pending before the Court, the parties have agreed that they may supplement the evidence already on file in this Court, including using any materials used in foreign courts in regard to any petition for recognition or the issue of the center of main interests of Stanford International Bank Ltd ("<u>SIB</u>"). Any party who wishes to disclose such additional evidence, that is, evidence not on file in this action and not on file in any foreign courts in regard to any petition for recognition or the issue of the center of SIB, to be considered by the Court at the hearing without leave of Court must do so no later than **December 3, 2009**. Leave of Court shall be sought for any disclosure of evidence after December 3, 2009. This December 3, 2009 deadline and the leave of Court requirement do not apply to any deposition testimony that may be taken prior to the hearing.

3. Liquidators may file an additional brief, if any, no later than **December 3**, 2009.

4. Any party, including the SEC and the Examiner, who wishes to file a written response to Liquidators' brief may do so no later than **December 17, 2009**.

5. Any party, including the SEC and the Examiner, who wishes to file a reply brief may do so no later than **January 7, 2010**.

6. The Court will conduct a hearing on Liquidators' Petition for Recognition on Thursday, January 21 and Friday, January 22, 2010. **The hearing will begin at 9 a.m. on Thursday, January 21, 2010**.

The parties respectfully move the Court to enter the accompanying Order.

Dated: November 17, 2009.

Respectfully submitted,

/s/ Weston C. Loegering

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THE EXAMINER

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2009, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Evan P. Singer

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