

281st District Court, Harris County Texas; *Martin, et al. v. Proskauer Rose, LLP., et al*, Civ. 2011-77800, in the 11th District Court, Harris County Texas; *Pam Reed, et al. v. Proskauer Rose, LLP*, et al., Civ. 2011-CI-20426, in the 225th District Court, Bexar County, Texas; *Michael Gale, et al. v. Proskauer Rose, LLP., et al.*, Civ. 2011-CI-20427, in the 285th District Court, Bexar County Texas; and *Green et al., v. Proskauer Rose, LLP., et al.*, Civ. 2011-77805, In the 189th , Harris County Texas.

A copy of one the Petitions is attached hereto, and the undersigned invites the Court to read pages 35 through 76, which recount in great detail the Lawyer Defendants' involvement in the Stanford fraud conspiracy.

The undersigned counsel has forwarded said lawsuits to counsel for the Lawyer Defendants and has asked them to accept service of said suits.

The undersigned was compelled to file these cases because, unlike the Willis Defendants, the Lawyer Defendants and their counsel would not agree to enter into a Tolling Agreement to toll limitations for the claims of all of the Stanford victims pending resolution of the appeal of this Court's Order dismissing the instant case under SLUSA.

The undersigned filed the six state court cases out of an abundance of caution based on the Fifth Circuit's holding in *Newby*, 542 F. 3d 463, at 471-472 (5th Cir. 2008) questioning the viability of the "cross jurisdictional" theory of class action tolling, in particular whether federal class actions toll limitations for state law claims for absent class members. While the undersigned cannot imagine that said holding applies to a situation where (as here) the federal class action asserted the *exact same* state law claims as the later-filed state court lawsuit, the undersigned is not willing to take that risk for its clients.

The undersigned did not make these filings lightly, but given the Lawyer Defendants' refusal to toll limitations, the undersigned was left with no choice. Castillo Snyder P.C. owes

duties to its clients to zealously represent them in this Stanford tragedy.

The undersigned further advises the Court that all of its clients listed as named plaintiffs in the six lawsuits have agreed, in writing, to allow Castillo Snyder P.C. to dismiss these individual cases if and when the Fifth Circuit reverses this Court's SLUSA dismissal so that they can rejoin the putative class as absent class members.

Finally, the undersigned advises the Court that its clients will oppose consolidation of the six state court lawsuits for any purpose, and will prosecute each of the six lawsuits individually as separate, stand alone lawsuits with separate discovery, depositions, damage models and pre-trial and trial proceedings.

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFFS
AND THE PUTATIVE CLASS**

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of January, 2012. I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. The electronic case files system sent a "Notice of Electronic Filing" to all counsel of records, each of whom have consented in writing to accept this Notice as service of this document by Electronic means.

s/ Edward C. Snyder