

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

RALPH S. JANVEY, IN HIS CAPACITY AS §
COURT-APPOINTED RECEIVER FOR §
THE STANFORD INTERNATIONAL §
BANK, LTD., ET AL. §

Plaintiff, §

v. §

REBECCA REEVES §

Defendant. §

CASE NO. 3:09-cv-2151-N

**REBECCA REEVES-STANFORD'S NOTICE OF FILING AFFIDAVIT
IN SUPPORT OF MOTION TO DISMISS PLAINTIFF'S ORIGINAL COMPLAINT
FOR LACK OF PERSONAL JURISDICTION**

The undersigned counsel for Rebecca Reeves-Stanford respectfully submits this attached Affidavit in Support of Rebecca Reeves-Stanford's Motion to Dismiss Plaintiff's Original Complaint for Lack of Personal Jurisdiction.

Respectfully submitted,

By: s/ Jeronimo Valdez
R. JERONIMO VALDEZ
Texas State Bar No. 24042079
jvaldez@vwlegal.com

VALDEZ | WASHINGTON LLP
Highland Park Place
4514 Cole Avenue, Suite 600
Dallas, Texas 75205
(214) 361-7800 – Telephone
1 (469) 327-2629 – Facsimile

AND

Bradford M. Cohen
Apparing Pro Hac Vice
Florida Bar No. 118176
lawronin@aol.com
Vanessa L. Prieto
Appearing Pro Hac Vice
Florida Bar No. 124613
lawvlp@aol.com

BRADFORD COHEN LAW
1132 SE 3rd Avenue
Fort Lauderdale, Florida 33316
Telephone: 954-523-7774
Facsimile: 954-523-2656

ATTORNEYS FOR REBECCA REEVES-STANFORD

CERTIFICATE OF SERVICE

I certify that on January 6, 2010 I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the Court's electronic case filing system. The electronic case filing system sent a "Notice of Electronic Filing" to all attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

s/ Jeronimo Valdez
R. JERONIMO VALDEZ

EXHIBIT A

DEFENDANT, REBECCA REEVES-STANFORD'S, AFFIDAVIT IN SUPPORT OF MOTION TO DISMISS PLAINTIFF'S ORIGINAL COMPLAINT FOR LACK OF PERSONAL JURISDICTION

STATE OF FLORIDA)
) SS:
COUNTY OF BROWARD)

BEFORE ME, personally appeared REBECCA REEVES-STANFORD, who upon being sworn is stated to have personal knowledge of the facts set forth below:

1. I am one the Defendants in this matter, I am over the age of eighteen (18) years old, and I make these statements based upon my personal knowledge.

2. I have been to the State of Texas, but I do not own any real property in the State of Texas. I have not transacted business including employment in the State of Texas since 1982. At that time I worked in a fitness center.

3. I do not have any minimum contacts with the State of Texas whatsoever, nor have I ever availed myself of any of the protections of the State of Texas, aside from raising defenses to the allegations brought against me by Mr. Janvey.

4. The sole connection between Texas and me is the fact that I am being sued by the Receiver in this action, which is more specifically described in my Motion to Dismiss filed herein for lack of personal jurisdiction, as well as other factors to be considered by the Court.

FURTHER AFFIANT SAYETH NAUGHT.

Rebecca Reeves-Stanford
REBECCA REEVES-STANFORD

SWORN TO AND SUBSCRIBED before me this 10th day of December, 2009, by REBECCA REEVES-STANFORD, who is X personally known to me or provided , as identification.

Nadia F. Gonzalez
NOTARY PUBLIC, STATE OF FLORIDA

