



Reeves waited until the day her responses were due and instead filed the instant motion to stay discovery. The Receiver cannot prosecute his case if Ms. Reeves continues to ignore the orders of this Court and refuse to participate in discovery.

Ms. Reeves' motion to stay is frivolous on its face and not in compliance with Rule 11, given that the Court entered a scheduling order in January—more than six weeks after Ms. Reeves filed her motion to dismiss—setting this matter for trial in December 2010, and closing the discovery period 90 days before trial. *See* Doc. 13 at 1-2. This order clearly evidences the Court's intent that discovery be conducted at this time. Moreover, simply filing a motion to stay discovery (on the same day discovery responses are due) does not relieve Ms. Reeves from her duty to timely respond to discovery requests.

Ms. Reeves' pattern of disregarding this Court's orders goes beyond refusing to participate in discovery. Ms. Reeves has previously admitted that in May of 2009, she sold her residence (purchased with funds or assets provided to her by Allen Stanford) and then transferred the millions of dollars in sale proceeds to entities in the Cook Islands and New Zealand. Thereafter, her lawyer informed the Receiver that “[n]either the funds nor the controlling entities are . . . subject to the jurisdiction of U.S. courts.” *See* Appendix in Support of Receiver's Show Cause Motion, No. 09-298, Doc. 701 at 8. Ms. Reeves took these actions despite having notice that this Court's orders prohibited such a disposition. *See* Receiver's Show Cause Motion, No. 09-298, Doc. 700.

### CONCLUSION

For the foregoing reasons, the Receiver respectfully requests that the Court deny Defendant's Motion to Stay Discovery Pending the Court's Ruling on Defendant's Motion to Dismiss and Brief in Support [Doc. 14], and furthers requests that Defendant Rebecca Reeves be

ordered to comply with the Receiver's discovery requests served in compliance with this Court's scheduling order. The Receiver also requests any further relief to which he may be entitled.

Dated: June 9, 2010

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler

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**CERTIFICATE OF SERVICE**

On June 9, 2010, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court.

/s/ Kevin M. Sadler

Kevin M. Sadler