

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

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|--|---|--------------------------|
| SECURITIES AND EXCHANGE COMMISSION, | § | |
| | § | |
| Plaintiff, | § | |
| | § | |
| v. | § | Case No.: 3-09-CV-0298-N |
| | § | |
| STANFORD INTERNATIONAL BANK, LTD., | § | |
| STANFORD GROUP COMPANY, | § | |
| STANFORD CAPITAL MANAGEMENT, LLC, | § | |
| R. ALLEN STANFORD, JAMES M. DAVIS, and | § | |
| LAURA PENDERGEST-HOLT, | § | |
| | § | |
| Defendants. | § | |

**JOINT MOTION OF THE SEC AND RECEIVER FOR AN ORDER APPROVING
ABBREVIATED BRIEFING SCHEDULE**

On January 14, 2010 the Receiver and the SEC filed a Joint Motion for Entry of a Second Amended Order Appointing Receiver. The Receiver and the SEC now request that the Court enter an order for an abbreviated briefing schedule.

The Court’s local rules require that a response to a motion be filed within 21 days after the motion is filed, N.D. Tex. R. 7.1(e), and that a reply be filed within 14 days after the response is filed. N.D. Tex. R. 7.1(f). Based on the Court’s broad equitable powers to tailor procedures when administering a receivership, the Receiver requests that:

- (a) Responding parties have 10 days to file a response after the date the Joint Motion for Entry of a Second Amended Order Appointing Receiver is filed.
- (b) The Receiver and SEC waive their right to file a reply. The Court will not require a reply to be filed.
- (c) The Court may act on the Second Amended Order Appointing Receiver after the 10 day deadline has expired.

For the reasons stated herein, the Receiver and SEC request that this motion be granted and that the Court enter an order granting an abbreviated briefing schedule.

Dated: January 14, 2010

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler

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**ATTORNEYS FOR RECEIVER
RALPH S. JANVEY**

CERTIFICATE OF CONFERENCE

Counsel for the Receiver conferred with attorneys who have made appearances on behalf of parties to this case.

Counsel for the Receiver conferred with David B. Reece, counsel for the SEC, who stated that the SEC does not oppose the filing of this motion and relief sought herein.

Counsel for the Receiver provided the motion to Jeffrey M. Tillotson, counsel for Laura Pendergest-Holt, who stated that Ms. Holt opposes the filing of this motion and relief sought herein.

Counsel for the Receiver conferred with Ruth Schuster, counsel for R. Allen Stanford, who stated that Mr. Stanford opposes the filing of this motion and relief sought herein.

Counsel for the Receiver conferred with Manuel Lena, counsel for the DOJ (Tax), who stated that he does not oppose the filing of this motion and relief sought herein.

Counsel for the Receiver provided the motion to David Finn, counsel for James Davis, but has not received a response to requests to confer on this motion and relief sought herein.

Counsel for the Receiver conferred with John Little, Court-appointed Examiner, , who stated that he does not oppose the filing of this motion and relief sought herein.

Counsel for the Receiver conferred with Joe Kendall, counsel for Susan Stanford, who stated that Mrs. Stanford takes no position on the filing of this motion and relief sought herein.

/s/ Kevin M. Sadler
Kevin M. Sadler

CERTIFICATE OF SERVICE

On January 14, 2010 I electronically submitted the foregoing motion and the proposed order with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Kevin M. Sadler
Kevin M. Sadler