

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

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

STANFORD INTERNATIONAL BANK,  
LTD., ET AL.,

Defendants.

Case No. 3:09-CV-0298-N

IN RE:

STANFORD INTERNATIONAL BANK,  
LTD.,

Debtor in a Foreign Proceeding

Case No. 3:09-CV-0721-N

**NON-PARTY THOMAS V. SJOBLOM'S OBJECTIONS TO THE AMENDED  
JOINT MOTION OF THE SEC, RECEIVER, EXAMINER, AND OFFICIAL  
STANFORD INVESTORS COMMITTEE TO APPROVE SETTLEMENT  
AGREEMENT AND CROSS-BORDER PROTOCOL**

Pursuant to the Court's March 18, 2013 Order, non-party Thomas V. Sjoblom ("Sjoblom") respectfully submits this response and objection to the Amended Joint Motion of the SEC, Receiver, Examiner, and Official Stanford Investors Committee to Approve Settlement Agreement and Cross-Border Protocol and Brief in Support ("Joint Motion") filed in the above-captioned actions on March 12, 2013.

Sjoblom hereby adopts and incorporates herein the arguments set forth by non-party Proskauer Rose LLP ("Proskauer") and non-party Chadbourne & Parke LLP ("Chadbourne") in their respective objections to the Joint Motion filed on this date

(**Proskauer Dkt. No. 1814** in Case No. 3:09-CV-0298-N; **Proskauer Dkt. No.196** in Case No. 3:09-CV-0721-N; **Chadbourne Dkt. No. 1816** in Case No. 3:09-CV-0298-N; **Chadbourne Dkt. No. 197** in Case No. 3:09-CV-0721-N). As set forth in detail in the objections and responses to the Joint Motion submitted by Proskauer and Chadbourne, this Court should not permit further duplicative litigation of the same claims against the same defendants brought by the same parties-in-interest. Sjoblom, along with Proskauer and Chadbourne, is a named defendant in two suits brought by the Receiver and the Official Stanford Investors Committee: *Janvey v. Proskauer Rose LLP, et al.*, 12-cv-00644-N-BL (N.D. Tex.) and *Janvey v. Proskauer Rose LLP, et al.*, 13-cv-00477-N (N.D. Tex.) (the “Receiver Actions”). Sjoblom, along with Proskauer and Chadbourne, is also a named defendant in *Troice v. Proskauer Rose LLP*, 3:09-cv-01600-N (N.D. Tex.), a putative class action brought by Stanford investors that asserts some of the same claims as those asserted in the Receiver Actions. Sjoblom respectfully requests that the Court deny the Joint Motion to avoid additional duplicative litigation.

Dated: March 28, 2013

Respectfully submitted,

FISH & RICHARDSON P.C.

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*Proskauer Rose LLP, et al.,*

3:12-cv-00644-N-BL (N.D. Tex.)

**CERTIFICATE OF SERVICE**

I hereby certify that, on March 28, 2013, the foregoing document was filed electronically with the ECF system and, in accordance with Local Rule 5.1(d), a notice of electronic filing was transmitted to all counsel of record.

*s/ William B. Mateja*

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William B. Mateja