

reimbursement for their proportionate share of the sale proceeds. Consistent with her claim to equitable title, Miss Stanford used her own personally earned funds to make the down payment on the condominium. She makes reference to these funds, in particular, \$20,000.00, in her affidavit made an exhibit to her response. *See* Randi Stanford's Response [Doc. #666], Exhibit D, ¶5. When the response was filed, Miss Stanford could not locate the check evidencing her payment. She has since ordered and received from her bank, Bank of America, a copy of the cancelled check.

Randi Stanford now respectfully seeks leave to supplement her response to include a copy of the cancelled check in the record before the Court. Leave should be granted as Miss Stanford has sought leave prior to the Receiver's deadline for filing a reply, only seeks to supplement the evidence before the Court with a check that could not be found when the response was filed and was diligent in seeking leave soon after she received a copy of the check. She does not seek to expound on the arguments previously made, and no party will be prejudiced if this Court allows Randi Stanford leave to file the attached supplemental affidavit and exhibit. Such evidence is relevant to issues before this Court on Receiver's motion.

For the foregoing reasons, Randi Stanford respectfully requests that this Court grant her leave to file the supplemental affidavit and exhibit attached hereto.

Respectfully Submitted,

/s/ Joe Kendall

JOE KENDALL

State Bar No. 11260700

KENDALL LAW GROUP, LLP

3232 McKinney, Ste. 700

Dallas, TX 75214

(214) 744-3000 Telephone

(214) 744-3015 Facsimile

ATTORNEY FOR RANDI STANFORD

CERTIFICATE OF CONFERENCE

Elizabeth M. Carmody hereby certifies that, in accordance with LR 7.1, and this Court's April 20, 2009, Order appointing an Examiner, on August 13, 2009, I notified: counsel for (i) the Securities and Exchange Commission; (ii) the IRS; (iii) the Receiver; (iv) the Examiner; and (v) the defendants of Randi Stanford's intention to seek the relief requested in this Motion. The Securities and Exchange Commission, Receiver, and Defendants Allen Stanford, the Stanford entities and James Davis have no objection to the relief requested. I have left messages with, but have not heard back from counsel for the IRS, the Examiner or Defendant Laura Pendergest-Holt with respect to the relief requested.

/s/ Elizabeth Carmody
ELIZABETH M. CARMODY

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August, 2009, I electronically filed the foregoing Motion for Leave to File a Supplement to Randi Stanford's Response in Opposition to the Receiver's Motion for Order to Show Cause Why Randi Stanford Should Not Be Held in Contempt 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 filing system sent a "Notice of Electronic Filing" to the attorneys of record in this case who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Elizabeth Carmody
ELIZABETH M. CARMODY