

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.

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Civil Action No. 3:09-CV-0298-N

**MOTION FOR RELIEF FROM THE INJUNCTION CONTAINED IN  
PARAGRAPH 10(e) OF THE RECEIVERSHIP ORDER AND  
REQUEST FOR EXPEDITED HEARING**

Dr. Samuel Bukrinsky, Jaime Alexis Arroyo Bornstein, and Mario Gebel (the  
“Movants”), respectfully move this Court for an Order:

- (i) lifting the injunction contained in paragraph 10(e) of the Receivership Order; and
- (ii) granting such other relief as this Court deems just and proper.

As discussed more fully in the accompanying Brief in Support of the Motion, the  
Movants have an enormous stake in the outcome of these proceedings. Congress has determined  
that complex liquidations in cases such as this one, and the adjudication of creditor claims of the  
sort held by the Movants, should be conducted according to the comprehensive system embodied  
in the Bankruptcy Code and Federal Rules of Bankruptcy Procedure.

The Movants, therefore, respectfully request that this Court lift the injunction contained  
in paragraph 10(e) of the Receivership Order, which currently enjoins creditors from filing an  
involuntary bankruptcy petition against any of the Defendants, in order to permit the Movants to  
file an involuntary bankruptcy petition against one or more of the Defendants.

The Movants also respectfully submit that the need for this Court to consider the issues raised in the Motion is urgent. Each day that the paragraph 10(e) injunction remains in place, the Movants are denied the ability to exercise their statutory and due process rights. Moreover, until and unless this Court rules on the Motion, the Movants are unable to seek appellate review of these important issues concerning the interplay between the United States Bankruptcy Code and the federal securities laws. The Movants, therefore, respectfully request an expedited hearing.

Dated: September 10, 2009

MORGENSTERN & BLUE, LLC

By: /s/ Peter D. Morgenstern

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*Counsel for the Movants*

CERTIFICATE OF CONFERENCE

Gregory A. Blue hereby certifies that, in accordance with LR 7.1, and this Court's April 20, 2009, Order appointing an Examiner, on September 9, 2009, I notified: (i) counsel for the Securities and Exchange Commission; (ii) counsel for the IRS; (iii) counsel for the Receiver; (iv) the Examiner; (v) counsel for the Antiguan Receivers-Liquidators; and (vi) counsel for the individual defendants of the Movants' intention to seek the relief requested in this Motion. Agreement could not be reached among the parties concerning the relief requested in this Motion. Specifically, on September 9, 2009, Kevin Sadler, Esq., counsel for the Receiver, notified me that the Receiver did not consent to the relief requested herein. On the same date, Jeff Tillotson, Esq. notified me that Laura Pendergest-Holt did not consent to the relief requested herein. David Finn, Esq. informed me that James Davis does not oppose the Motion. The Examiner takes no position on the Motion. We have received no response from the other parties.

/s/ Gregory A. Blue  
Gregory A. Blue

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2009, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Gregory A. Blue  
Gregory A. Blue