

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

**AGREED MOTION FOR APPROVAL OF STIPULATION OF SETTLEMENT**

Nigel Hamilton-Smith and Peter Wastell (the “Antiguan Liquidators”) and U.S. Receiver Ralph S. Janvey (the “U.S. Receiver”) (collectively, the “Parties”; individually, each is a “Party”), in their official court-appointed capacities and through their counsel, respectfully submit this Agreed Motion for Approval of Stipulation of Settlement to the Court, and attach hereto as Exhibit “A” the executed Stipulation of Settlement. The Parties have agreed, subject to approval of the Stipulation both by this Court and the Antiguan Court (as defined in the Stipulation), to settle the pending litigation between them regarding Stanford International Bank Ltd. in the United States, Canada, United Kingdom and Antigua and Barbuda.<sup>1</sup> The Parties’ Agreement is for the purpose of avoiding further expense and is in the best interests of those with claims against Stanford International Bank.

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<sup>1</sup> At the Parties’ joint request and to give them time in which to seek approval of the Agreement in both this Court and the Antiguan Court, the Court cancelled the hearing on the Antiguan Liquidators’ Petition that had been scheduled for January 21-22, 2010. Likewise, for the same reason, the East Caribbean Court of Appeal granted a postponement of the hearing of the Antiguan Appeal, which had previously been scheduled in February 2010.

Dated: May 19, 2010.

Respectfully Submitted,

BAKER BOTTS L.L.P.

/s/ Kevin Sadler

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Respectfully submitted,

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Attorneys for Nigel Hamilton-Smith and  
Peter Wastell as Liquidators of Stanford  
International Bank Ltd.

**CERTIFICATE OF CONFERENCE**

The Movants have conferred with counsel for S.E.C. and with the Examiner, who advise that they do not oppose the Motion or Stipulation of Settlement.

/s/ Kevin Sadler

**CERTIFICATE OF SERVICE**

I hereby certify that on May 19, 2010, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Kevin Sadler