

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

**SECURITIES AND EXCHANGE
COMMISSION**

Plaintiff

v.

**STANFORD INTERNATIONAL
BANK, LTD., et al.,**

Defendants

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C. A. No. 3:09-cv-00298-N

Judge David C. Godbey

**STATEMENT OF CERTAIN PLAINTIFFS IN SUPPORT OF
AMENDED JOINT MOTION OF THE SEC, RECEIVER, EXAMINER AND
OFFICIAL STANFORD INVESTORS COMMITTEE TO APPROVE SETTLEMENT
AGREEMENT AND CROSS-BORDER PROTOCOL
AND REQUEST TO BE HEARD AT HEARING**

1. The undersigned is counsel of record for certain plaintiffs in numerous putative class action cases pending before this Court, including *Troice et al v. Willis, et al*, (Case No. 3:09-cv-01274-N) and *Troice, et al v. Proskauer Rose, et al* (Case No. 3:13-cv-00477-M) (the “Class Actions”). The undersigned also represents approximately 2,300 individual claimant victims who lost approximately \$570,000,000 in the Stanford Ponzi Scheme and are creditors in this case (this group of victims represents approximately 10% of all victims both in number and value of losses). In addition, the undersigned counsel is a member of The Official Stanford Investors Committee (the “Committee”) appointed by this Court. This statement is filed solely in our capacity as counsel for the putative Class Actions and as counsel for the individual claimants mentioned above and not on behalf of The Committee.

2. In February 2009 this Court “assume[d] exclusive jurisdiction and possession of the assets, monies, securities, property . . . and the legally recognized privileges . . . of a number of people and entities, including Stanford International Bank (“SIB”), and appointed Ralph S.

Janvey as Receiver for the property of the Stanford Estate. (SEC v. Stanford International Bank, Ltd., Case No. 3:09-cv-0298-N, Doc. No. 10, Order Appointing Receiver).

3. In May 2011 Hugh Dickson and Marcus Wide were appointed by the Eastern Caribbean Supreme Court in the High Court of Justice of Antigua and Barbuda (“Antiguan Supreme Court”) (In the Matter of Stanford International Bank, Ltd., Eastern Caribbean Supreme Court, The High Court of Justice, Antigua and Barbuda, May 12, 2011).

4. For over four years, the U.S. Receiver and the Antiguan Joint Liquidators (including the predecessor Joint Liquidators) have been battling in court over control of the assets of the Stanford Estate. The tragedy of this struggle is that both sides were paying for this battle with the assets of the estate thereby victimizing the creditors once again by continually reducing any potential recovery.

5. Recently, the U.S. Receiver and Antiguan Joint Liquidators reached certain agreements concerning these disputes that culminated in a Settlement Agreement and Cross-Border Protocol (the “Agreement”).

6. On March 12, 2013, the Antiguan Joint Liquidators, the Receiver, The Committee, the Examiner and the SEC (the “Settling Parties”) filed a motion (the “Motion”) seeking approval of the Agreement.

7. Pursuant to the Court’s scheduling order dated March 18, 2013, March 28, 2013 was set as the deadline for parties and non-parties, including Stanford victims, to submit objections or statements in connection with the Motion and the Agreement. The order provides that any party or non-party that does not file such a response to the Motion by March 28, 2013 will be barred from appearing at the hearing.

8. Accordingly, the undersigned counsel submits this statement in support of the Motion because it ends the expensive litigation between the Liquidators and the Receiver and provides a protocol that will hopefully expedite the process of securing and liquidating the assets of the estate for distribution to the victims who desperately need these funds. Ultimately, the Agreement is in the best interest of all Stanford creditors.

9. Based upon the foregoing, Plaintiffs respectfully request that this Court grant the Amended Joint Motion.

Date: March 28, 2013

Respectfully submitted,

STRASBURGER & PRICE, LLP

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CERTIFICATE OF SERVICE

On March 28, 2013, I electronically submitted the foregoing document entitled Statement of Certain Plaintiffs in Support of Amended Joint Motion of the SEC, Receiver, Examiner, and Official Stanford Investors Committee to Approve Settlement Agreement and Cross-Border Protocol and Request to Be Heard at Hearing 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/Edward F. Valdespino

Edward F. Valdespino