

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

SECURITIES AND EXCHANGE COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 03:09-CV-298-N
	§	
STANFORD INTERNATIONAL BANK, LTD.,	§	
ET AL.,	§	
	§	
Defendants.	§	

**RECEIVER’S RESPONSE TO THE DEPARTMENT OF JUSTICE’S  
MOTION TO INTERVENE (DOC NO. 601)  
AND APPLICATION FOR STAY OF DISCOVERY (DOC. NO. 602)**

Receiver Ralph S. Janvey does not oppose the Department of Justice’s Motion to Intervene or Application for Stay of Discovery. The purpose of the DOJ’s requested relief is to ensure that defendants in the parallel criminal action will not be permitted to use civil discovery in this enforcement action to circumvent the limitations on criminal discovery. Memorandum in Support of Application for Stay at 5. The DOJ specifically “does not seek to stay or otherwise restrict other aspects of this civil proceeding, including . . . the work and function of the Court appointed Receivership.” Application for Stay at 1.

An important aspect of the Receiver’s work is the undertaking of litigation needed to recover assets of the Receivership Estate for eventual distribution to the victims of the Stanford fraud. The difficulty of this task increases as time passes. Even a brief delay in the Receiver’s work would likely stunt his ability to marshal Receivership property and lessen the victims’ potential recoveries. With the understanding that the relief requested by the DOJ will have no impact on the Receiver’s litigation regarding asset recovery, the Receiver does not oppose the Motion to Intervene or Application for Stay of Discovery.

Dated: August 6, 2009

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler

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**ATTORNEYS FOR RECEIVER  
RALPH S. JANVEY**

### **CERTIFICATE OF SERVICE**

On August 6, 2009, I electronically submitted the foregoing document with the clerk of the court of 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 the Court-appointed Examiner John J. Little and all counsel and/or pro se parties of record electronically or by another means authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Kevin M. Sadler  
Kevin M. Sadler