

**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

**PLAINTIFF’S RESPONSE TO RECEIVER’S MOTION  
FOR APPROVAL OF FINAL DISTRIBUTION PLAN**

Plaintiff Securities and Exchange Commission (“SEC”) opposes the Request for Supplemental Award of Professional Fees and Expenses contained in the Receiver’s Motion for Approval of Final Distribution Plan. Doc. 3522. The SEC incorporates herein by reference, and includes in the accompanying Appendix (Doc. 3535), its Response and Appendix (Docs. 3435, 3436) filed in opposition to the Receiver’s Motion for Supplemental Award of Professional Fees and Expenses and Brief in Support. Doc. 3423.

The SEC respectfully requests that the Court deny the Receiver’s Request for Supplemental Award of Professional Fees and Expenses for the reasons set forth in its prior submission.

September 10, 2025.

Respectfully submitted,

s/ Jason J. Rose  
JASON J. ROSE  
Texas Bar No. 24007946

U.S. Securities and Exchange Commission  
Fort Worth Regional Office  
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UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION

**CERTIFICATE OF SERVICE**

I certify that on September 10, 2025, I electronically filed the foregoing document with the Clerk of the Court for the Northern District of Texas, Dallas Division, using the CM/ECF system. The ECF system will send a "Notice of Electronic Filing" to all counsel of record who has consented in writing to accept service of this document by electronic means.

A paper copy of this motion has also been sent to Defendant Robert Allen Stanford at the address for him on the Bureau of Prisons "Inmate Locator" website, as follows:

R. Allen Stanford, Pro Se  
Inmate #35017183  
Coleman II USP  
Post Office Box 1034  
Coleman, FL 33521

s/ Jason J. Rose  
Jason J. Rose