

**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.

§
§
§
§
§
§
§
§
§
§
§

Case No. 3:09-CV-00298-N

**RECEIVER’S REPLY IN SUPPORT OF MOTION FOR AUTHORIZATION TO
DISPOSE OF RECORDS AND EQUIPMENT [DKT. 3525]**

The Receiver’s Motion for Authorization to Dispose of Records and Equipment is unopposed, but for Magness’s frivolous objection. Like with his “objection” to the Receiver’s Final Distribution Motion, Magness’s objection is no objection at all. Instead, it is another sur-reply in which Magness claims he needs an amorphous and unidentified set of documents to support his efforts to relitigate. *See* Dkt. 3537. However, Magness is not entitled to relitigate matters conclusively adjudicated against him. *See* Dkts. 3501, 3526. Nor is Magness entitled to discovery in support of that futile effort, discovery which has been long mooted by ten-plus years of litigation.

No documents or information in the possession of the Receivership can change the fact that the Fifth Circuit has seen enough evidence to hold that “had Magness not been one of the largest investors and not been given special—dare we say, preferential—treatment from SIB, he would not have received the \$79 million for which repayment has been ordered. His funds would have

remained with SIB, and what was left of them seized by the Receiver” and that Magness acted with “unclean hands.” *Janvey v. GMAG, L.L.C.*, 98 F.4th 127, 143–44 (5th Cir. 2024), *cert. denied*, *GMAG, L.L.C. v. Janvey*, 145 S. Ct. 1141 (2025). Magness cannot relitigate those findings, which establish as a matter of law that Magness is not similarly situated to other Investor CD Claimants.

Magness also makes no attempt to articulate what specific records or information he claims to need and does not articulate any reason for his request separate and apart from his goal to relitigate. Magness’s objection also makes no mention that the Receiver’s motion has built into it a process to address any party’s reasonable and legitimate request for the Receivership’s information and records. The Court should reject Magness’s objection to the Receiver’s Motion for Authorization to Dispose of Records and Equipment.

CONCLUSION & PRAYER

For the foregoing reasons, the Receiver respectfully requests that the Court overrule the objections made by Magness and grant the Receiver’s requested relief in his Motion for Authorization to Dispose of Records and Equipment. The Receiver also requests such other and further relief to which he may be justly entitled.

Dated: September 23, 2025

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler
 Kevin M. Sadler
 Texas Bar No. 17512450
 kevin.sadler@bakerbotts.com
 1001 Page Mill Road
 Building One, Suite 200
 Palo Alto, California 94304-1007
 T: (650) 739-7500
 F: (650) 739-7699

Scott D. Powers
Texas Bar No. 24027746
scott.powers@bakerbotts.com
David T. Arlington
Texas Bar No. 00790238
david.arlington@bakerbotts.com
Brendan A. Day
Texas Bar No. 24052298
brendan.day@bakerbotts.com
Mary Margaret Roark
Texas Bar No. 24102418
marymargaret.roark@bakerbotts.com
401 South 1st Street, Suite 1300
Austin, Texas 78704-1296
T: (512) 322-2500
F: (512) 322-2501

ATTORNEYS FOR RECEIVER RALPH S. JANVEY

CERTIFICATE OF SERVICE

I certify that on September 23, 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 “Notice of Electronic Filing” to all counsel of record who have consented in writing to accept service of this document by electronic means.

I further certify that on September 23, 2025, I served a true and correct copy of the foregoing document and the notice of electronic filing by United States Postal Service Certified Mail, Return Receipt requested, to the persons noticed below who are non-CM/ECF participants:

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

/s/ Kevin M. Sadler

Kevin M. Sadler