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

RALPH S. JANVEY, IN HIS CAPACITY AS

COURT-APPOINTED RECEIVER FOR THE

STANFORD INTERNATIONAL BANK, LTD.,

ET AL.

Plaintiff,

Plaintiff,

Case No. 03:09-CV-1946-N

V.

CHRISTOPHER AITKEN AND STEPHEN

THACKER,

Defendants.

AGREED MOTION TO DISMISS WITH PREJUDICE

Pursuant to Rule 41 of the Federal Rules of Civil Procedure, Plaintiff Ralph S. Janvey, in his capacity as Court-appointed Receiver for Stanford International Bank, Ltd. and Stanford Group Company, et al., and Defendants Christopher Aitken ("Aitken") and Stephen Thacker ("Thacker") submit this agreed Motion to Dismiss, with Prejudice and without costs, all claims by Plaintiff against Defendants Aitken and Thacker in the above-referenced case.

PRAYER

The parties have reached a settlement agreement to resolve their disputes and respectfully request that all claims by Plaintiff against Defendants Aitken and Thacker in the above-referenced case be dismissed, with prejudice and without costs, and that the Court enter the attached Agreed Order of Dismissal.

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler

Kevin M. Sadler
Texas Bar No. 17512450
kevin.sadler@bakerbotts.com
Robert I. Howell
Texas Bar No. 10107300
robert.howell@bakerbotts.com
David T. Arlington
Texas Bar No. 00790238
david.arlington@bakerbotts.com
1500 San Jacinto Center
98 San Jacinto Blvd.
Austin, Texas 78701-4039
(512) 322-2500
(512) 322-2501 (Facsimile)

Timothy S. Durst
Texas Bar No. 00786924
tim.durst@bakerbotts.com
2001 Ross Avenue
Dallas, Texas 75201
(214) 953-6500
(214) 953-6503 (Facsimile)

ATTORNEYS FOR RECEIVER RALPH S. JANVEY

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Phil C. Appenzeller

Phil C. Appenzeller, Jr. State Bar No. 24003710 Steven A. Harr State Bar No. 09035600 500 N. Akard Street, Suite 3800 Dallas, Texas 75201 214.855.7500 (Telephone) 214.855.7584 (Facsimile)

ATTORNEYS FOR CHRISTOPHER AITKEN AND STEPHEN THACKER

CERTIFICATE OF SERVICE

On June 10, 2010, 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 will serve all counsel of record electronically or by other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Kevin M. Sadler Kevin M. Sadler