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, \$
Civil Action No. 3:09-cv-0724-N

vs. \$
JAMES R. ALGUIRE, ET AL., \$
Defendant. \$

DEFENDANT JASON GREEN'S MOTION TO COMPEL ARBITRATION AND TO DISMISS

For the reasons set forth in the accompanying Brief, Jason Green moves for an Order compelling arbitration of all claims asserted in the Receiver's First Amended Complaint pursuant to 9 U.S.C. §§ 2-4, and dismissing or staying all proceedings in this action against him. In the alternative, Green moves to dismiss all claims asserted in the Receiver's First Amended Complaint pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6).

Respectfully submitted,

WINSTEAD PC

By: /s/ John P. Kincade
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ATTORNEYS FOR DEFENDANT, JASON GREEN

CERTIFICATE OF CONFERENCE

I hereby certify that I asked counsel for the Receiver on January 16, 2010 whether the Receiver would agree to the requested relief to arbitrate the dispute against Jason Green. As of this filing, the Receiver has not yet responded.

/s/ John P. Kincade
One of Counsel

CERTIFICATE OF SERVICE

I certify that on the 19th day of January 2010, I electronically submitted the foregoing document with the clerk of the 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/ John P. Kincade
One of Counsel