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

	X	
In re	: :	Chapter 15
Stanford International Bank, Ltd.,	:	Case No. 09-0721 (DCG)
Debtor in a Foreign Proceeding.	:	
	X	

LIQUIDATORS' MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEF

Liquidators Peter Wastell and Nigel Hamilton-Smith ("<u>Liquidators</u>"), move for permission to file a Supplemental Brief in further support of their Petition for Recognition of Foreign Main Proceeding Pursuant to Chapter 15 of the Bankruptcy Code ("<u>Supplemental</u> <u>Brief</u>"). The Supplemental Brief addresses arguments made by the U.S. Receiver in its brief filed on July 9, 2009 and by the Examiner in its brief filed on July 8, 2009.

For these reasons, Liquidators respectfully request that the Court grant them leave to file the attached Supplemental Brief in support of their Petition. Dated: July 6, 2009.

Respectfully submitted,

/s/ Weston C. Loegering

Weston C. Loegering State Bar No. 12481550 Gregory M. Gordon State Bar No. 08435300 Craig F. Simon State Bar No. 00784968 Greg Weselka State Bar No. 00788644 Daniel P. Winikka State Bar No. 00794873 JONES DAY 2727 N. Harwood St. Dallas, Texas 75201 Telephone: (214) 220-3939 Facsimile: (214) 969-5100

Attorneys for Nigel Hamilton-Smith and Peter Wastell as Liquidators of Stanford International Bank, Ltd.

CERTIFICATE OF CONFERENCE

I hereby certify that on July 13, 2009, counsel for Liquidators conferred with, or attempted to confer with, counsel for the SEC, the U.S. Receiver, the Examiner, Mr. Stanford, Ms. Pendergest-Holt and the IRS regarding the relief requested in this Motion. Counsel to the SEC, the U.S. Receiver, the Examiner and the IRS stated that they do not oppose the relief requested in the Motion. As of the time of the filing of this Motion, Liquidators have not received a response from counsel to Mr. Stanford, Mr. Davis or Ms. Pendergest-Holt.

Greg Weselka

CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2009, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Evan P. Singer

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