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

SECURITIES AND EXCHANGE	§	
COMMISSION,	§	
	§	
Plaintiff,	§	
i iainuii,	§	
v.	§	Civil Action No. 03-09CV0298-L
	§	
STANFORD INTERNATIONAL BANK,	§	
LTD., et al.	§	
Defendants.	§	
Detending	§	

NOTICE OF LIQUIDATORS' OPPOSITION TO THE U.S. RECEIVER'S MOTION TO APPOINT PRIVATE EQUITY ADVISOR

Messrs. Nigel Hamilton-Smith and Peter Wastell (collectively, "Liquidators"), acting as the duly-appointed liquidators of defendant Stanford International Bank, Ltd. ("SIB"), ¹ respectfully provide notice to the Court that they oppose the U.S. Receiver's request for an appointment of a private equity advisor [DKT No. 596] because such appointment should not be made until after the Court determines where the center of main interest ("COMI") resides for SIB – an issue that is currently pending in the Liquidator's fully-briefed chapter 15 petition for recognition as a foreign main proceeding. Because the Liquidators believe SIB's COMI is in Antigua, any appointment of a private equity advisor for SIB assets should involve the Liquidators. Thus far, the Receiver has not consulted nor included the Liquidators in any of the decision-making process associated with its request to appoint a private equity advisor. Because the Receiver has not consulted with the Liquidators, the Liquidators believe the motion should be

¹ Liquidators filed a petition for recognition pursuant to chapter 15 of the U.S. Bankruptcy Code on April 20, 2009. While that petition has not yet been granted, Liquidators are compelled to file this Notice by the U.S. Receiver's recent request.

deferred until SIB's COMI has been determined and the Liquidators have been consulted on the merits of the motion.

The Receiver has also filed two motions for expedited relief to sell certain assets on an expedited basis [DKT Nos. 623 and 629]. While the Liquidators generally believe that disposition of SIB assets such as these should not occur prior to the determination of SIB's COMI, both motions detail capital calls if the proposed sales are not approved on an expedited basis. As a result, the Liquidators do not oppose these two Motions. The Liquidator's nonopposition to the sales detailed in these two motions does not mean that the Liquidators are agreeing that the Receiver should be permitted to sell other assets prior to a resolution of the chapter 15 petition.

Dated: July 27, 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 SERVICE

I hereby certify that on July 27, 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.

/s/ Evan P. Singer

DLI-6263620v1