

**THE EASTERN CARIBBEAN SUPREME COURT
IN THE HIGH COURT OF JUSTICE
ANTIGUA AND BARBUDA**

Claim No. ANUHCV 2009/0149

In the Matter of Stanford International Bank Limited (In Liquidation)

-and-

**In the Matter of the International Business Corporations Act, Cap 222 of the Laws of
Antigua and Barbuda**

-and-

**In the Matter of an Application Seeking the Court’s Approval
of a Settlement Agreement with Kroll and Certain Other Parties**

**MARCUS A. WIDE AND HUGH DICKSON AS JOINT LIQUIDATORS OF STANFORD
INTERNATIONAL BANK LIMITED (In Liquidation),**
Applicants

**ORDER
Approving Kroll Settlement Agreement**

BEFORE THE HONOURABLE [] IN CHAMBERS

DATED: []

ENTERED: []

UPON READING (a) the Notice of Application dated []; (b) the [th] Affidavit of Marcus Wide[] sworn on []; and (c) the global settlement agreement (the “Agreement”) entered into as of 15 December 2015 between and among, on the one hand, (i) Ralph S. Janvey, solely in his capacity as the receiver (the “Receiver”) for Robert Allen Stanford and other persons and entities pursuant to the orders of the United States District Court for the Northern District of Texas (the “U.S. Court”) entered on 17 February 2009, 12 March 2009, and 19 July 2010 in *Securities and Exchange Commission v. Stanford International Bank, Ltd. et al.*, No. 3:09-cv-00298-N (N.D. Tex.) (the “SEC Action”); (ii) the Official Stanford Investors Committee, as defined in the order of the U.S. Court entered 10 August 2010 in the SEC Action (the “Committee”); and (iii) Marcus A. Wide and Hugh Dickson, in their capacities as the joint liquidators of Stanford International Bank Limited (in Liquidation) (“SIB”) (the “Joint Liquidators”); and, on the other hand, (iv) Kroll, LLC (f/k/a Kroll Inc.) and Kroll Associates, Inc. (collectively, “Kroll”), which defines a settlement (the “Settlement”);

AND UPON the Court reviewing the Agreement and finding that the Parties thereto seek to achieve cross border settlement and resolution of the matters which touch and concern SIB and its creditors;

AND UPON the Court approving on 8 April 2013 the terms of a Settlement Agreement and Cross Border Protocol executed on 11 March 2013 by and between the Joint Liquidators, the U.S. Department of Justice, the U.S. Securities and Exchange Commission, the U.S. Court Appointed Examiner and the Official Stanford Investors Committee (the “DOJ Settlement Agreement”);

AND UPON the Court finding that the execution of and compliance with the rights and obligations under the Agreement by the Joint Liquidators is consistent with the performance and exercise of their obligations under the DOJ Settlement Agreement and their functions and duties under the International Business Corporations Act Cap 222 of Antigua and Barbuda (the “Act”) (including under section 244(1)(a) of the Act, which concerns the disclosure of information relating to the business affairs of a banking corporation’s customer);

AND UPON HEARING counsel for the Applicant [] of [];

It is hereby **ORDERED** as follows:

1. The terms of the Agreement as attached at Appendix “A” to this Order are approved.
2. This Court hereby defers implementation of the Agreement and the Settlement, the Scheduling Order, and the Bar Order and Judgment defined therein, to the U.S. Court.
3. The costs of this application be costs in the liquidation.

By the Court
(Deputy) Registrar

**THE EASTERN CARIBBEAN SUPREME COURT
IN THE HIGH COURT OF JUSTICE
ANTIGUA AND BARBUDA**

CLAIM NO. ANUHCV2009/0110

In the Matter of Stanford Trust Company Limited (In Liquidation)

-and-

**In the Matter of the International Business Corporations Act, Cap 222 of the Laws of
Antigua and Barbuda**

-and-

**In the Matter of an Application Seeking the Court's Approval
of a Settlement Agreement with Kroll and Certain Other Parties**

**Marcus A. Wide and Hugh Dickson, in their Capacity as Joint Liquidators of Stanford
Trust Company Limited (In liquidation)**

Applicants

**ORDER
Approving Kroll Settlement Agreement**

BEFORE THE HONOURABLE [] IN CHAMBERS

DATED: []

ENTERED: []

UPON READING (a) the Notice of Application dated []; (b) the [th] Affidavit of Marcus Wide[] sworn on []; and (c) the global settlement agreement (the "Agreement") entered into as of 15 December 2015 between and among, on the one hand, (i) Ralph S. Janvey, solely in his capacity as the receiver (the "Receiver") for Robert Allen Stanford and other persons and entities pursuant to the orders of the United States District Court for the Northern District of Texas (the "U.S. Court") entered on 17 February 2009, 12 March 2009, and 19 July 2010 in *Securities and Exchange Commission v. Stanford International Bank, Ltd. et al.*, No. 3:09-cv-00298-N (N.D. Tex.) (the "SEC Action"); (ii) the Official Stanford Investors Committee, as defined in the order of the U.S. Court entered 10 August 2010 in the SEC Action (the "Committee"); and (iii) Marcus A. Wide and Hugh Dickson, in their capacities as the joint liquidators of Stanford Trust Company, Ltd. ("STC"), pursuant to the order of this Court entered 30 March 2012 (the "Joint Liquidators"); and, on the other hand, (iv) Kroll, LLC

(f/k/a Kroll Inc.) and Kroll Associates, Inc. (collectively, "Kroll"), which defines a settlement (the "Settlement");

AND UPON the Court reviewing the Agreement and finding that the Parties thereto seek to achieve cross border settlement and resolution of the matters which touch and concern STC and its creditors;

AND UPON the Court approving on 8 April 2013 the terms of a Settlement Agreement and Cross Border Protocol executed on 11 March 2013 by and between the Joint Liquidators, the U.S. Department of Justice, the U.S. Securities and Exchange Commission, the U.S. Court Appointed Examiner and the Official Stanford Investors Committee (the "DOJ Settlement Agreement");

AND UPON the Court finding that the execution of and compliance with the rights and obligations under the Agreement by the Joint Liquidators is consistent with the performance and exercise of their obligations under the DOJ Settlement Agreement and their functions and duties under the International Business Corporations Act Cap 222 of Antigua and Barbuda (the "Act") (including under section 244(1)(a) of the Act, which concerns the disclosure of information relating to the business affairs of a banking corporation's customer);

AND UPON HEARING counsel for the Applicant [] of [];

It is hereby **ORDERED** as follows:

1. The terms of the Agreement as attached at Appendix "A" to this Order are approved.
2. This Court hereby defers implementation of the Agreement and the Settlement, the Scheduling Order, and the Bar Order and Judgment defined therein, to the U.S. Court.
3. The costs of this application be costs in the liquidation.

By the Court
(Deputy) Registrar

AND UPON the Court reviewing the Agreement and finding that the Parties thereto seek to achieve cross border settlement and resolution of the matters which touch and concern SDC and its creditors;

AND UPON the Court approving on 8 April 2013 the terms of a Settlement Agreement and Cross Border Protocol executed on 11 March 2013 by and between the joint liquidators of Stanford International Bank, Ltd., the U.S. Department of Justice, the U.S. Securities and Exchange Commission, the U.S. Court Appointed Examiner and the Official Stanford Investors Committee (the "DOJ Settlement Agreement");

AND UPON the Court finding that the execution of and compliance with the rights and obligations under the Agreement by the Joint Liquidators is consistent with the DOJ Settlement Agreement and with the Joint Liquidators' functions and duties under the Companies Act 1995;

AND UPON HEARING counsel for the Applicant [] of [];

It is hereby **ORDERED** as follows:

1. The terms of the Agreement as attached at Appendix "A" to this Order are approved.
2. This Court hereby defers implementation of the Agreement and the Settlement, the Scheduling Order, and the Bar Order and Judgment defined therein, to the U.S. Court.
3. The costs of this application be costs in the liquidation.

By the Court
(Deputy) Registrar