

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

SECURITIES AND EXCHANGE COMMISSION, Plaintiff,  vs. STANFORD INTERNATIONAL BANK, LTD., <i>et al.</i> ,  Defendants.	Case No. 3:09-CV-0298-N
THE OFFICIAL STANFORD INVESTORS COMMITTEE, <i>et al.</i> ,  Plaintiffs,  vs. ADAMS AND REESE, LLP, <i>et al.</i>  Defendants.	Case No. 3:11-cv-0329-N
RALPH S. JANVEY, <i>et ano.</i> ,  Plaintiffs,  vs. ADAMS & REESE, LLP, <i>et al.</i> ,  Defendants.	Case No. 3:12-CV-495-N-BG

**NOTICE OF SETTLEMENT AND BAR ORDER PROCEEDINGS**

PLEASE TAKE NOTICE that the Court-appointed Receiver for the Stanford Receivership Estate, The Official Stanford Investors Committee, and named plaintiffs Philip A. Wilkinson and Horacio Mendez, who brought an action on behalf of a putative class of Stanford certificate of deposit investors, (collectively, “Movants”) have entered into an Amended Stipulation and Settlement Agreement (“Settlement Agreement”) settling all claims relating to the above-referenced cases against Adams and Reese LLP, Robert C. Schmidt, James R. Austin, Breazeale, Sachse & Wilson, LLP, Claude F. Reynaud, Jr., but as to Claude F. Reynaud, Jr., only those limited claims as set forth and defined in the Settlement Agreement, Cordell Haymon, and Lynnette B. Frazer, Individually and as Independent Executrix of the Estate of Thomas L. Frazer (the “Settlement Agreement”).

PLEASE TAKE FURTHER NOTICE that the Movants have filed a motion to approve the settlement and enter a bar order and injunction (the “Approval Motion”) that, if entered, will permanently bar and enjoin all Stanford-Related Claims,<sup>1</sup> including claims you may possess, against Adams & Reese LLP, Robert C. Schmidt, James R. Austin, Breazeale, Sachse & Wilson,

<sup>1</sup> “Stanford-Related Claim” means any and all Claims arising out of or relating in any way to (1) certificate(s) of deposit issued by SIBL; (2) customer accounts or transactions with Stanford Financial Group or any Stanford Receivership Entity, including but not limited to STC; (3) investments in, with or through Stanford Financial Group or any Stanford Receivership Entity; (4) Individual Retirement Accounts at STC; (5) the provision of legal or other services by any A&R Party to Stanford Financial Group, any Stanford Receivership Entity, or to their officers, director, employees and agents; (6) the provision of legal or other services by BSW to Stanford Financial Group, any Stanford Receivership Entity, or to their officers, director, employees and agents; (7) Haymon’s service as an outside director of STC; (8) Thomas L. Frazer’s service as an outside director of STC; or (9) conduct related to the activities of SIBL, STC, SGC, or any Stanford Receivership Entity, including Claims arising out of or relating to retirement accounts or the sale, purchase or solicitation of any investment.

LLP, Claude F. Reynaud, Jr., but as to Claude F. Reynaud, Jr., only those limited claims as set forth and defined in the Settlement Agreement, Cordell Haymon, and/or Lynnette B. Frazer, Individually and as Independent Executrix of the Estate of Thomas L. Frazer.<sup>2</sup>

Copies of the Approval Motion and supporting papers may be obtained from the Court's docket in *SEC v. Stanford Int'l Bank, Ltd., et al.*, No. 3:09-cv-0298-N (**ECF Nos. 2134 and 2135**) (the "Receivership Action"), and are also available on the websites of the Receiver (<http://stanfordfinancialreceivership.com>), the Examiner (<http://lpf-law.com/examiner-stanford-financial-group>), and the Receiver's claims agent (<http://www.stanfordfinancialclaims.com>). **This matter affects your rights, and you may wish to consult an attorney.** Any person or entity wishing to be heard in connection with the settlement, the Approval Motion, or the bar order sought by the Movants, must do so by filing an objection with the Court in the Receivership Action no later than **July 10, 2015**. A hearing will be held on the Motion to Approve before the Honorable David C. Godbey in the United States District Court for the Northern District of Texas, United States Courthouse, 1100 Commerce Street, Dallas, Texas 75242, in Courtroom 1505, at **10:00 a.m. on July 31, 2015**.

Any objector shall be deemed to have submitted to the jurisdiction of this Court for all purposes related to the objection, the Agreement, the Settlement, and the Bar Order and Injunction. Potential objectors who do not present opposition by the time and in the manner set forth above shall be deemed to have waived the right to object (including any right to appeal) and to appear at the Hearing and shall be forever barred from raising such objections in this action or any other action or proceeding.

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning defined in the Approval Motion and Settlement Agreement.

