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

FEB 1 7 2009

CLERK, U.S. DISTRICT COURT

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

STANFORD INTERNATIONAL BANK, LTD., STANFORD GROUP COMPANY, STANFORD CAPITAL MANAGEMENT, LLC, R. ALLEN STANFORD, JAMES M. DAVIS, and LAURA PENDERGEST-HOLT

Defendants.

Case No.:

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3-09CV0298-L

MOTION FOR ORDER APPOINTING RECEIVER

Plaintiff Securities and Exchange Commission ("Commission") moves this Court for the appointment of a Receiver for Defendants Stanford International Bank, Ltd., Stanford Group Company, Stanford Capital Management, LLC, R. Allen Stanford, James M. Davis, and Laura Pendergest-Holt (collectively "Defendants"), with the power to marshal, conserve and, where necessary, operate the assets. This Motion for Order Appointing Receiver is based on the Commission's Complaint, supporting memorandum, declarations and exhibits thereto, and the argument of counsel.

Dated: February 16, 2009

Respectfully submitted,

STEPHEN J. KOROTASH

Oklahoma Bar No. 5102

J. KEVIN EDMUNDSON

Texas Bar No. 24044020

DAVID B. REECE

Texas Bar No. 242002810

MICHAEL D. KING

Texas Bar No. 24032634 D. THOMAS KELTNER Texas Bar No. 24007474

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Filed 02/17/2009