

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

TROY LILLIE, et al.,

Plaintiffs

v.

STANFORD TRUST COMPANY, et al.,

Defendants.

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Civil Action No. 3:13-CV-03127-N

**SECOND SUPPLEMENTAL JOINT STATUS REPORT OF THE PARTIES  
WITH RESPECT TO CLASS NOTICE**

Pursuant to the Court's Orders regarding class certification (Dkt. Nos. 201, 213), and the Parties' Joint Status Reports (Dkt. No. 202, 203) relating to Class Notice issues, the undersigned Parties<sup>1</sup> submit the following second supplemental Joint status report.

1. The Parties have exchanged drafts of the proposed Class Notice and final edits are being made. It is expected that the form of the Class Notice will be agreed to by all Parties.
2. SEI provided to Plaintiffs' counsel a list of the names and addresses of all persons that had activity reflected on SEI's Trust 3000 system related to SIBL CDs in their Stanford Trust account during the Class Period. Class Counsel has contacted the counsel for the Receiver to verify whether updated contact information may be obtained in advance of the Class Notice being mailed. The Receiver and his expert are currently reviewing the possibility of providing such updated contact information to SEI and Class Counsel as

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<sup>1</sup> "Parties" collectively refers to (i.) Class Counsel, Preis Gordon, A.P.L.C., on behalf of the Lillie Class; (ii.) SEI Investments Company and SEI Private Trust Company (collectively "SEI"); (iii.) Continental Casualty Company; (iv.) Certain Underwriters at Lloyd's, London Subscribing to Policy Nos. FD0805144, FD0805145, FD0805146 and FD080514; (v.) Arch Insurance Company; (vi.) Indian Harbor Insurance Company; (vii.) Nutmeg Insurance Company; and (viii.) Allied World Assurance Company (U.S.) Inc..

this information would assist the parties in providing the best practicable notice to persons that fall within the definition of the Class or should otherwise receive notice of the potential prescription issues under Louisiana Law.

Date: September 15, 2016

Respectfully submitted,

<u>/s/ Phillip W. Preis</u> Phillip W. Preis  PREIS GORDON, APLC Phillip W. Preis (La. Bar Roll No. 10706) Post Office Box 2786 (70821-2786) 450 Laurel Street, Suite 2150 (70801-1817) Baton Rouge, Louisiana Phone: (225) 387-0707 Fax: (225) 344-0510 Email: phil@preislaw.com  <b>Attorney for Lillie Class</b>	<u>/s/ T. Gregory Jackson</u> T. Gregory Jackson  MORGAN, LEWIS & BOCKIUS LLP T. Gregory Jackson (TX Bar No. 24004718) Kirstin D. Dietel (TX Bar No. 24032019) 1717 Main Street Suite 3200 Dallas, TX 75201-7347 Telephone: +1.214.466.4000 Facsimile: +1.214.466.4001 Greg.jackson@morganlewis.com <a href="mailto:kirstin.dietel@morganlewis.com">kirstin.dietel@morganlewis.com</a>  J. Gordon Cooney, Jr. ( <i>admitted pro hac vice</i> ) (PA Bar No. 42636) Elizabeth H. Fay ( <i>admitted pro hac vice</i> ) (PA Bar No. 32955) 1701 Market Street Philadelphia, PA 19103-2921 <a href="mailto:gordon.cooney@morganlewis.com">gordon.cooney@morganlewis.com</a> <a href="mailto:elizabeth.fay@morganlewis.com">elizabeth.fay@morganlewis.com</a>  <b>Attorneys for Defendants SEI Investments Company and SEI Private Trust Company</b>
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<p><u>/s/ Robert E. Torian</u>  Robert E. Torian, LA# 18468  NEUNERPATE  One Petroleum Center, Suite 200  1001 West Pinhook Road  Lafayette, Louisiana 70503  Telephone: 337.237.7000  Facsimile: 337.233.9450  <a href="mailto:rtorian@NeunerPate.com">rtorian@NeunerPate.com</a></p> <p><b>Attorneys for Defendant Continental Casualty Company</b></p>	<p><u>/s/ Stefan Dandelles</u>  Stefan Dandelles  KAUFMAN DOLOWICH VOLUCK  55 E. Monroe Street, Suite 2950  Chicago, IL 60603  Telephone: 312.646.6745  Facsimile: 312.896.9403  <a href="mailto:sdandelles@kdvlaw.com">sdandelles@kdvlaw.com</a></p> <p><b>Attorneys for Defendants Certain Underwriters at Lloyd's, London Subscribing to Policy Nos. FD0805144, FD0805145, FD0805146 and FD0805149</b></p>
<p><u>/s/ David W. Crowe</u>  David W. Crowe (Tx. Bar No. 05164250)  John W. Arnold (Tx. Bar No. 00795231)  BAILEY CROWE KUGLER &amp; ARNOLD, LLP  901 Main Street, Suite 6550  Dallas, TX 75202  Telephone: 214.231.0555  Facsimile: 214.231.0556  <a href="mailto:dcrowe@bcklaw.com">dcrowe@bcklaw.com</a>  <a href="mailto:jarnold@bcklaw.com">jarnold@bcklaw.com</a></p> <p><b>Attorneys for Defendants Arch Insurance Company and Indian Harbor Insurance Company</b></p>	<p><u>/s/ Seth A. Schmeeckle</u>  Seth A. Schmeeckle, LA #27076  Daniel B. Centner, LA #24441  LUGENBUHL, WHEATON, PECK, RANKIN &amp; HUBBARD  601 Poydras Street, Suite 2775  New Orleans, LA 70130  Telephone: 504.568.1990  Facsimile: 504.310.9195  <a href="mailto:sschmeeckle@lawla.com">sschmeeckle@lawla.com</a>  <a href="mailto:dcentner@lawla.com">dcentner@lawla.com</a></p> <p><b>Attorneys for Defendant Nutmeg Insurance Company</b></p>
<p><u>/s/ Daniel J. Standish</u>  Daniel J. Standish <i>admitted pro hac vice</i>  Parker J. Lavin (<i>admitted pro hac vice</i>)  WILEY REIN LLP  1776 K Street NW  Washington, DC 20006  Telephone: 202.719.7000  <a href="mailto:dstandish@wileyrein.com">dstandish@wileyrein.com</a>  <a href="mailto:plavin@wileyrein.com">plavin@wileyrein.com</a></p> <p><b>Attorneys for Indian Harbor Insurance Company</b></p>	<p><u>/s/ Judy Y. Barrasso</u>  Judy Y. Barrasso, LA #2814  BARRASSO USDIN KUPPERMAN FREEMAN &amp; SARVER LLC  909 Poydras Street, 24th Floor  New Orleans, LA 70112  Telephone: 504.589.9700  Facsimile: 504.589.9920  <a href="mailto:jbarrasso@barrassousdin.com">jbarrasso@barrassousdin.com</a></p> <p><b>Attorneys for Defendant Allied World Assurance Company (U.S.) Inc.</b></p>

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 15, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following ECF participants or by such other means as authorized by the Court and the Federal Rules of Civil Procedure.

s/ Phillip W. Preis  
Phillip W. Preis