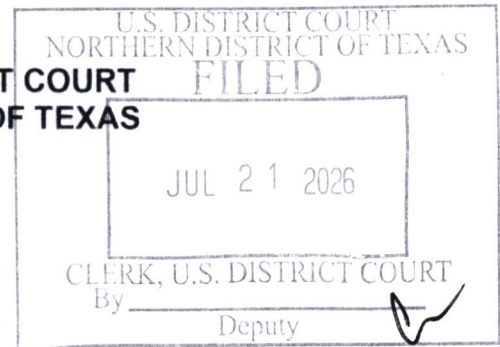


**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**



SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

STANFORD INTERNATIONAL BANK, LTD.,
ET AL.,

Defendants.

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Case No. 3:09-CV-0298-N

**JAIME R. ESCALONA'S EMERGENCY MOTION FOR EXTENSION OF CHECK
CASHING DEADLINES FOR VENEZUELAN CLAIMANTS AFFECTED BY THE
JUNE 24, 2026 EARTHQUAKES AND HUMANITARIAN CRISIS**

I. INTRODUCTION

1. Jaime R. Escalona, pro se, respectfully moves this Court on an emergency basis for an Order directing the Receiver, Ralph S. Janvey, to extend the check cashing deadlines for Venezuelan claimants holding uncashed Final Distribution checks, and to implement alternative contact methods beyond email to reach claimants affected by the devastating earthquakes that struck Caracas on June 24, 2026.

2. This motion is filed on an emergency basis because the first group of Final Distribution checks—those dated April 24, 2026—will become void on July 23, 2026,

just days from the date of this filing. A second group of checks dated April 27, 2026, will become void on July 26, 2026.

II. BACKGROUND

A. The Venezuelan Claimants

3. The Receiver's own Status Report, filed July 9, 2026 as Document 3629, acknowledges that 600 claim groups with Venezuelan addresses hold uncashed Final Distribution checks. The Receiver states that it "began proactively contacting the 600 claim groups with Venezuelan addresses that have uncashed Final Distribution checks expiring on July 27, 2026." Doc. 3629 at 2.

4. The Receiver's website, stanfordfinancialreceivership.com, now posts an "Important Advisory Regarding Uncashed Final Distribution Checks" stating that claimants with checks dated April 24, 2026, must cash them by July 23, 2026, and those with checks dated April 27, 2026, must cash them by July 26, 2026. The advisory warns that checks not negotiated by the applicable deadlines "will become void and will be rejected."

B. The Humanitarian Crisis

5. On June 24, 2026, Caracas, Venezuela, was struck by two powerful earthquakes of magnitude 7.2 and 7.5. The quakes caused widespread damage, collapsed buildings, closed the country's main airport, and led to a declared state of emergency. Power outages and cellphone signal loss were widespread. See Exhibit A (Associated Press, June 24, 2026).

6. The Receiver himself has acknowledged this crisis. In Document 3629, the Receiver stated: "The Receivership is aware of the recent natural disaster which has affected large parts of Venezuela and severely impacted the daily lives of the people of Venezuela." Doc. 3629 at 2.

7. Despite this acknowledgment, the Receiver's contact efforts appear limited to email. For survivors who have lost their homes, internet access, or whose family members may have perished, email contact is manifestly insufficient.

C. The Undersigned's Standing

8. The undersigned is the founder of COViSAL, a coalition of Stanford survivors, and represents his family as a direct claimant through a Power of Attorney notarized at the U.S. Embassy in Caracas in 2010. The undersigned resides in Caracas, Venezuela, and has personal knowledge of the conditions on the ground following the earthquakes.

9. The undersigned's representative capacity has been established through documentary evidence filed with this Court. The undersigned has also filed a Motion for Humanitarian Order for a 13th Interim Distribution, currently pending docketing, which addresses related issues concerning Venezuelan claimants.

III. LEGAL BASIS

10. This Court has broad equitable authority in receivership proceedings to order relief that serves the interests of justice and protects the beneficiaries of the estate. See *SEC v. Basic Energy & Affiliated Res., Inc.*, 273 F.3d 657, 668 (6th Cir. 2001);

SEC v. Hardy, 803 F.2d 1034, 1037–39 (9th Cir. 1986). The Fifth Circuit has affirmed the broad equitable authority of district courts to approve distribution plans that serve the interests of defrauded investors. See *SEC v. Forex Asset Mgmt. LLC*, 242 F.3d 325, 328, 331–32 (5th Cir. 2001).

11. The 2013 Cross-Border Protocol (Doc. 1793, Page 8, Section 2) mandates that Swiss funds "will only be distributed to the creditor-victims of the Stanford Ponzi scheme, and not to other parties." Allowing victim funds to revert to the estate due to a natural disaster—rather than due to any fault of the victims—contravenes the spirit and text of this binding international agreement.

12. Courts in this Circuit have recognized the equitable priority of defrauded investors in receivership distributions. See *U.S. Commodity Futures Trading Comm'n v. PrivateFX Glob. One*, 778 F. Supp. 2d 775, 786 (S.D. Tex. 2011) ("as an equitable matter in receivership proceedings arising out of a securities fraud, the class of fraud victims takes priority").

13. Basic principles of due process and fundamental fairness require that claimants be given a meaningful opportunity to receive their distributions. A 90-day check cashing window—already compressed from the 180-day window used in the 11th Interim Distribution—is insufficient when a natural disaster has destroyed the infrastructure through which claimants would receive notice and negotiate their checks.

IV. THE RECEIVER'S CONTACT METHODS ARE INSUFFICIENT

14. The Receiver's advisory states that claimants were contacted "by email." For Venezuelan survivors affected by the earthquakes, email contact is inadequate for the following reasons: (a) Power outages and cellphone signal loss were widespread following the earthquakes. Many survivors lack reliable internet access. (b) Survivors who lost their homes may not have access to devices or email accounts. (c) Elderly survivors—a significant portion of the Stanford victim population—may have difficulty accessing email under normal circumstances, let alone after a disaster. (d) In the most tragic cases, survivors who perished in the earthquakes cannot respond to emails. Their families need time to locate relevant documents, settle estates, and contact the Receivership.

15. The Receiver has access to multiple contact methods, including physical addresses, telephone numbers, and in some cases, bank account information for wire transfers. Email alone is insufficient under the present circumstances.

V. REQUEST FOR RELIEF

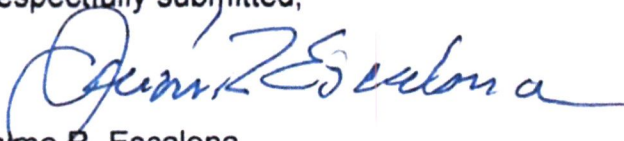
WHEREFORE, the undersigned respectfully requests that the Court:

1. Direct the Receiver to extend the check cashing deadlines for all Venezuelan claimants by a minimum of 180 days from the date of this Order, or in the alternative, 180 days from the documented date of delivery of their respective checks;

2. Direct the Receiver to employ multiple contact methods—including telephone, physical mail, courier services, and consular assistance—to reach Venezuelan claimants, rather than relying solely on email;
3. Direct the Receiver to preserve and segregate the funds attributable to any Venezuelan claimant who cannot be reached, pending confirmation of the claimant's status or valid claim by their heirs or legal representatives;
4. Direct the Receiver to file a status report within 14 days detailing its efforts to contact the 600 Venezuelan claim groups and the results of those efforts; and
5. Grant such other relief as the Court deems just and proper.

Dated: July 20, 2026

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jaime R. Escalona", written over a horizontal line.

Jaime R. Escalona

Pro Se

On behalf of my Family's Claim & COViSAL

P.O. Box 150995, Austin, Texas 78715-0995

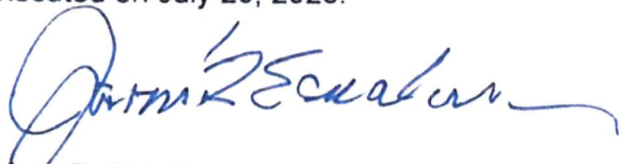
Email: jaenrodes@covisal.org

Tel: (512) 704-4400

VERIFICATION AND DECLARATION UNDER 28 U.S.C. § 1746

I, Jaime R. Escalona, declare under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. § 1746(1), that I am executing this declaration outside the United States, and that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on July 20, 2026.

A handwritten signature in blue ink, appearing to read "Jaime R. Escalona", with a long horizontal flourish extending to the right.

Jaime R. Escalona

Exhibit A



A powerful 7.1-magnitude earthquake shook Venezuela on Wednesday evening, collapsing buildings in the capital of Caracas. (AP/ Juan Arraez)

BY REGINA GARCIA CANO AND JUAN PABLO ARRAEZ

Updated 11:32 PM GMT-4, June 24, 2026

CARACAS, Venezuela (AP) — Powerful back-to-back earthquakes struck Venezuela on Wednesday evening, causing widespread damage, collapsing buildings and sending panicked residents into the streets.

The 7.2 and 7.5 magnitude earthquakes roiled the region, with buildings evacuated in cities as far away as Brazil's Amazon, about 1,700 kilometers (1,050 miles) from Caracas.

In a brief address to the nation late Wednesday, acting President Delcy Rodríguez said the earthquakes caused damages in several states, but she did not give any figures on the number of homes and buildings affected, or on injuries or fatalities.

The earthquakes damaged the country's main airport, Simón Bolívar International Airport, severely enough to lead to its closure, she said, adding that classes were being canceled for several days "We urge our population to remain calm," Rodríguez said. "We urge unity."

Rodríguez also asked all health care professionals in the country to report to hospitals to assist anyone who was injured. The Ministry of Education late Wednesday said some schools would be used as shelters and donation centers.

In the coastal state of Falcon, Gov. Victor Clark said 32 people had been hospitalized and more than four hours after the earthquake there were still 15 people trapped.

The U.S. Geological Survey initially said the first earthquake had a magnitude of 7.1, later revising that to 7.2. Its epicenter was west of the community of Morón, located along the country's Caribbean coast, about 168 kilometers (104 miles) west of Caracas. The quake had a depth of 22 kilometers (13.6 miles).

The USGS reported an even larger 7.5-magnitude earthquake just a minute later. The second quake had a depth of 10 kilometers (6.2 miles) and its epicenter was 16 kilometers (10 miles) southwest of Morón.

The quakes, among the strongest to strike Venezuela in more than a century, struck shortly after 6 p.m. People evacuated swaying buildings in the capital Caracas, many visibly shocked as they saw entire walls that had collapsed, making furniture visible from the street. Dust columns could also be seen in two neighborhoods of the capital, where restaurants and other businesses are typically busy.

'We all had to leave our houses'

People remained on the streets for hours, even after sunset. Some sat on the ground hugging their pets as dust gathered around them. Collapsed buildings, toppled electric poles and debris blocked streets. Parts of the capital lost power and cellphone signal.

"It started off gently and then gradually grew, and in the end, we all had to leave our houses, go outside and gather together," Caracas resident Hector Ricci said.

Rodríguez, who declared a state of emergency, said subway and natural gas services in Caracas were canceled. She also urged Venezuelans to report any damages through a government app.

The lack of cellphone signal in parts of Venezuela deepened the distress of many families, particularly those among the more than 7.7 million people who have left the country during its protracted crisis

Impact felt throughout Venezuela

Interior Minister Diosdado Cabello said the quake could be felt in several states. The Altamira neighborhood in Caracas had "alarming situations" with collapsed homes and buildings, he said, suggesting people were injured in the earthquake and asking motorists to give way to ambulances and other emergency vehicles.

"We understand that some people may be desperate, but we are acting according to protocols to activate aid and rescue efforts to help those who need it most," Cabello said on state television. "Be very careful with children and the elderly; call each other and check that no one has been harmed."

He also urged people to remain outside as aftershocks could further damage some structures.

Strong earthquakes are unusual in Venezuela.

Garcia Cano reported from Bogotá, Colombia. Associated Press writers Clara Preve in Buenos Aires, Astrid Suarez in Bogota, Colombia, Mauricio Savarese in Sao Paulo and Anna-Catherine Brigida and Megan Janetsky in Mexico City contributed to this report.

JUAN PABLO ARRAEZ

Arraez is a Venezuelan video journalist working for The Associated Press since 2018.

<https://apnews.com/article/venezuela-earthquake-caracas-7179acaee70a9c543f953852f15d4814>

Exhibit B

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

SECURITIES AND EXCHANGE COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 3:09-CV-0298-N
	§	
STANFORD INTERNATIONAL BANK, LTD., ET AL.,	§	
	§	
Defendants.	§	

**RECEIVER'S STATUS REPORT REGARDING
PAYMENTS ISSUED PURSUANT TO THE FINAL DISTRIBUTION PLAN**

Receiver Ralph S. Janvey (the “Receiver”) hereby submits this Status Report regarding Payments Issued Pursuant to the Final Distribution Plan, respectfully stating as follows:

The Court approved the Final Distribution Plan on November 25, 2025, authorizing approximately \$339 million for distribution.¹ [Doc. 3555 (original Order Approving Receiver’s Final Distribution Plan); Doc. 3562 (Order amending Final Distribution Plan).] On April 3, 2026, the Receiver submitted the Schedule of Payments to Be Made to Eligible Investor CD Claimants Pursuant to the Final Distribution Plan, which listed 14,200 claim groups as eligible to receive such payments. [Doc. 3573.] The Receivership has thus far issued Final Distribution payments to 13,900 of those claim groups, leaving only payments to 300 claim groups that remain to be issued under that Plan. The Final Distribution payments that have issued to date total \$334 million. As of July 1, 10,000 groups have cashed \$265 million in Final Distribution payments, representing 79% of all payments issued under that Plan.

¹ All figures provided in this Response are approximate, unless otherwise noted.

Of the 13,900 claim groups to which the Receiver has sent Final Distribution payments thus far, payments were issued to 5,600 claim groups via wire (\$175 million), to 2,200 claim groups by physical check via regular mail (\$10 million), and to 6,200 claim groups by physical check via courier (\$149 million). For the 5,600 claim groups to which the Receivership sent Final Distribution payments via wire, 2,000 were claim groups with addresses in foreign countries, and 3,600 were claim groups with addresses in the United States (with several of them, whether foreign or domestic, utilizing their counsel in the United States to receive payments). For the 8,300 claim groups to which the Receivership sent physical checks via mail or courier pursuant to the Final Distribution Plan, 3,800 were claim groups with addresses in foreign countries, and 4,500 were claim groups with addresses in the United States.

Because certain claim groups to which the Receivership issued physical checks have uncashed Final Distribution payments that will become void and will revert to the Receivership Estate during July 2026, the Receivership has sent e-mail messages to them to remind them to cash their checks prior to the void dates or, if they have not yet received those checks, to contact the Receivership prior to the void dates to request a reissuance. In particular, in June 2026, the Receivership e-mailed 600 claim groups with domestic mailing addresses that had uncashed Final Distribution checks expiring on July 24, 2026. In addition, the Receivership is aware of the recent natural disaster which has affected large parts of Venezuela and severely impacted the daily lives of the people of Venezuela. Accordingly, in July 2026, the Receivership began proactively contacting the 600 claim groups with Venezuelan addresses that have uncashed Final Distribution checks expiring on July 27, 2026.

Dated: July 9, 2026

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler

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ATTORNEYS FOR RECEIVER RALPH S. JANVEY

CERTIFICATE OF SERVICE

On July 9, 2026, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I will serve the Court-appointed Examiner, all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Kevin M. Sadler

Kevin M. Sadler

Exhibit C

Important Advisory Regarding Uncashed Final Distribution Checks - The Receiver recently contacted by email certain claimants whose Final Distribution checks remain uncashed according to the Receiver's records because those checks are approaching the deadline to be cashed. Such checks will become void and the funds represented by those checks will revert to the Receivership if they are not cashed timely. [See Case No. 3:09-CV-0298-N (N.D. Tex.), Doc. 3555 (original Order Approving Receiver's Final Distribution Plan), Doc. 3562 (Order amending Final Distribution Plan)].

Claimants who received checks dated April 24, 2026 must cash those checks by July 23, 2026. Claimants who received checks dated April 27, 2026 must cash those checks by July 26, 2026. Checks not negotiated by the applicable deadlines will become void and will be rejected if presented for payment after the applicable deadline.

Any claimant who desires to request a reissuance of their Final Distribution check must submit their request and provide all information necessary to process that request before the applicable deadlines. Claimants who do not timely request reissuance will not be eligible to receive a reissued payment.

Since the filing of the Final Distribution Schedule on March 9, 2026, the Receivership has received and processed approximately 9,000 emails from claimants concerning issues related to distribution payments, and the Receivership continues to address those matters as quickly as possible.

Source: <https://stanfordfinancialreceivership.com/#AdvisoryUncashed>

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USDC NORTHERN DISTRICT OF TEXAS
1100 COMMERCE STREET
ROOM 1502
DALLAS TX 75242

(214) 753-2200

REF:

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DEPT:

PC: CASE 3:09-CV-00298-N



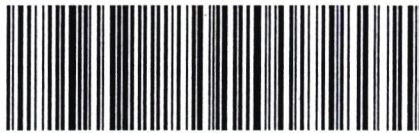
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AD KIPA

TX-US DFW



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