

DECHERT LLP
1095 Avenue of the Americas
New York, New York 10036-6797
Telephone: (212) 698-3500
Facsimile: (212) 698-3599
Michael J. Sage
Brian E. Greer
Nicole B. Herther-Spiro

Attorneys for Standard Chartered Bank

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
	:
ARCAPITA BANK B.S.C.(C.), <i>et al.</i> ,	: Case No. 12-11076 (SHL)
	:
Debtors.	: Jointly Administered
	:
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**STANDARD CHARTERED BANK’S FOURTH LIMITED OBJECTION AND
RESERVATION OF RIGHTS TO THE DEBTORS’ CASH MANAGEMENT MOTION**

Standard Chartered Bank (“**Standard Chartered**”), through its undersigned counsel, hereby asserts this fourth limited objection and reservation of rights (this “**Fourth Limited Objection**”)¹ to the *Motion for Interim and Final Orders (A) Authorizing Debtors to (I) Continue Existing Cash Management System, Bank Accounts, and Business Forms and (II) Continue Ordinary Course Intercompany Transactions; and (B) Granting an Extension of Time to Comply With the Requirements of Section 345(b) of the Bankruptcy Code* [Dkt. No. 12] (the “**Cash Management Motion**”) filed by the above-captioned debtors and debtors in possession (the

¹ Standard Chartered Bank’s initial Limited Objection to the Cash Management Motion [Dkt. No. 73] (the “**First Limited Objection**”), Second Limited Objection to the Cash Management Motion [Dkt. No. 109] (the “**Second Limited Objection**”), and Third Limited Objection to the Cash Management Motion [Dkt. No. 172] (the “**Third Limited Objection**”, together with the First Limited Objection and the Second Limited Objection, the “**Previous Objections**”) are hereby incorporated as if fully set forth herein.

“Debtors”) for approval on a sixth interim basis and respectfully represents and states as follows:²

LIMITED OBJECTION AND RESERVATION OF RIGHTS

1. Standard Chartered is the Debtors’ sole secured creditor and the beneficiary of an express trust under its Equitable Mortgages³ with certain of the Debtors and Cayman Islands law. Standard Chartered and the Debtors have not resolved the issues set forth in the Previous Objections – including the Debtors’ attempted use of property required to be held in an express trust for the sole benefit of Standard Chartered.

2. To date, Standard Chartered has not yet received a draft of the proposed order or the proposed budget. Standard Chartered objects to the entry of a sixth interim order to the extent the form of order and sixth interim budget are not acceptable to Standard Chartered and objects to the entry of any final order.

3. Standard Chartered reserves its rights to make additional objections at the hearing and reserves its rights to object to the entry of any further interim orders and/or a final order that would permit disbursements of funds from the Subsidiary Guarantors and their non-Debtor subsidiaries to AIHL or Arcapita Bank for the benefit of structurally subordinated unsecured creditors.

WHEREFORE, for the foregoing reasons, Standard Chartered respectfully requests that the Court (a) deny the Cash Management Motion unless the form of order and budget are

² By filing this Fourth Limited Objection, Standard Chartered is not acknowledging the propriety of these chapter 11 cases or that the Court should continue to exercise jurisdiction over each of the Debtors. Standard Chartered reserves the right to request that the Court dismiss, or abstain from, these chapter 11 cases.

³ Capitalized terms used but not defined herein shall have the meaning ascribed to them in Standard Chartered’s First Limited Objection.

acceptable to Standard Chartered and (b) grant Standard Chartered such other and further relief
as the Court deems appropriate.

Dated: New York, New York
June 19, 2012

DECHERT LLP

By: /s/ Brian E. Greer
Michael J. Sage
Brian E. Greer
Nicole B. Herther-Spiro
1095 Avenue of the Americas
New York, New York 10036-6797
Telephone: (212) 698-3500
Facsimile: (212) 698-3599
michael.sage@dechert.com
brian.greer@dechert.com
nicole.herther-spiro@dechert.com

Attorneys for Standard Chartered Bank