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*Attorneys for Plaintiff/Judgment Creditor*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE EXPORT-IMPORT BANK OF	:	
THE REPUBLIC OF CHINA,	:	06 CV 2469 (HB) (AJP)
	:	
Plaintiff/Judgment Creditor,	:	
	:	
-against-	:	<b>NOTICE OF MOTION</b>
	:	
GRENADA,	:	
	:	
Defendant/Judgment Debtor.	:	
-----X	:	

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Plaintiff/Judgment Creditor’s Motion to Stay Vacatur of Restraining Notices and Disbursement of Funds Pending Appeal, dated July 25, 2012, and upon all prior pleadings, Plaintiff/Judgment Creditor The Export-Import Bank of the Republic of China (“Ex-Im Bank”) will move this Court, the Honorable Harold J. Baer, Jr., United States District Judge, in the United States Courthouse, 500 Pearl Street, New York, New York, Room 23B, to grant a stay of vacatur of the restraining notices served by Ex-Im Bank and the disbursement of funds currently on deposit with the Clerk of this Court, and for such other relief deemed just and proper, pending Ex-Im Bank’s appeal of the Court’s June 22, 2012 Order and Opinion granting:

- A. Defendant/Judgment Debtor Grenada's Motion for Order (1) Declaring Funds Immune from Attachment or (2) Fixing Charging Lien and Directing Money Judgment for Legal Services Rendered by Freshfields Bruckhaus Deringer (Docket #68); and
- B. Joint Motion to Vacate Restraining Notices, filed by Grenada and interested third parties the Grenada Airports Authority, Grenada Ports Authority, National Water and Sewage Authority of Grenada, Grenada Solid Waste Management Authority, and Aviation Services of Grenada Ltd. (Docket #77);

and denying:

- A. Ex-Im Bank's Cross-Motion for Turnover of Funds to Plaintiff/Judgment Creditor (Docket #72); and
- B. Cross-Motion for Discovery and Turnover of Restrained Funds (Docket #85).

Ex-Im Bank respectfully requests a hearing on the issues presented in the Motion.

Dated: New York, New York  
July 25, 2012

SULLIVAN & WORCESTER LLP

By: /s/ Paul E. Summit

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