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Attorneys for Plaintiff/Judgment Creditor

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

**DECLARATION OF PAUL E. SUMMIT
IN SUPPORT OF MOTION TO STAY VACATUR OF
RESTRAINING NOTICES AND DISBURSEMENT OF FUNDS PENDING APPEAL**

PAUL E. SUMMIT, pursuant to 28 U.S.C. § 1746, declares:

1. I am a partner with the law firm of Sullivan & Worcester LLP, attorneys for plaintiff, The Export-Import Bank of the Republic of China (“Ex-Im Bank”). I submit this Declaration in support of Ex-Im Bank’s Motion to Stay Vacatur of Restraining Notices and Disbursement of Funds Pending Appeal.

2. Attached hereto as Exhibit 1 is a true and accurate copy of an e-mail exchange dated January 9, 2012, between Courtney Evanchuk, an associate with my office, and Elliot Friedman, an attorney from the law firm of Freshfields Bruckhaus Deringer LLP.

Signed under the pains and penalties of perjury this 6th day of August 2012.

/s/ Paul E. Summit

Paul E. Summit

EXHIBIT 1

Evanchuk, Courtney

From: elliot.friedman@freshfields.com
Sent: Monday, January 09, 2012 4:43 PM
To: Evanchuk, Courtney
Cc: Summit, Paul E.; brian.king@freshfields.com
Subject: RE: Briefing schedule

Thank you, Courtney. Confirmed.

Elliot

From: Evanchuk, Courtney [<mailto:cevanchuk@sandw.com>]
Sent: Monday, January 09, 2012 4:40 PM
To: FRIEDMAN, Elliot
Cc: Summit, Paul E.; KING, Brian (DBK)
Subject: Briefing schedule

Elliot,

I am writing to confirm the briefing schedule that we worked out this afternoon over the phone. The schedule is as follows:

February 6, 2012 Grenada moves
February 27, 2012 Ex-Im Bank opposes and cross-moves
March 16, 2012 Grenada replies and opposes
March 23, 2012 Ex-Im Bank replies

I will draft and circulate a joint stipulation detailing this schedule.

Thank you for confirming that Grenada and Freshfields will be submitting one filing and that there will be no piecemeal argument.

Kind regards,
Courtney

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