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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
THE EXPORT-IMPORT BANK OF :
THE REPUBLIC OF CHINA, :
 :
Plaintiff/Judgment Creditor, :
 :
-against- :
 :
GRENADA, :
 :
Defendant/Judgment Debtor. :
-----X

06 CV 2469 (HB) (AJP)

**NOTICE OF MOTION IN
SUPPORT OF PLAINTIFF'S
MOTION FOR CONTEMPT
SANCTIONS AND TO
COMPEL**

PLEASE TAKE NOTICE THAT, upon the Declaration of Paul E. Summit, dated August 25, 2010, the exhibits thereto, the accompanying memorandum of law, the Endorsed Letter of the Honorable Harold Baer, Jr., dated August 24, 2010, and upon all prior pleadings, plaintiff/judgment creditor The Export-Import Bank of the Republic of China will move this Court, the Honorable Harold Baer, Jr., U.S.D.J., in Courtroom 23B of the United States District Courthouse located 500 Pearl Street, New York, New York, on September 16, 2010, at 3:30 PM, or as soon thereafter as counsel may be heard, for entry of an order pursuant to Fed. R. Civ. P. 33, 37(a)(3)(B)(iii), 37(b)(2), and 69: (a) granting contempt sanctions against judgment debtor Grenada ("Grenada"); (b) compelling Grenada's complete response to Plaintiff's outstanding

discovery; and (c) requiring Grenada to pay the expenses and reasonable attorneys' fees incurred by Plaintiff in making this motion, pursuant to Fed. R. Civ. P. 37(a)(5) and 37(b)(2)(C).

PLEASE TAKE FURTHER NOTICE, that, pursuant to Fed. R. Civ. P. 6.1(c), answering papers, if any, must be served at least 7 days before the date of the hearing.

Dated: New York, New York
August 25, 2010

SULLIVAN & WORCESTER LLP

By: /s/

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