

Paul E. Summit (PS 6263)  
Andrew T. Solomon (AS 9200)  
Emily A. Samuels (ES 0302)  
SULLIVAN & WORCESTER LLP  
1290 Avenue of the Americas, 29<sup>th</sup> Floor  
New York, NY 10104  
(212) 660-3000

*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, :  
 :  
-against- :  
 :  
GRENADA, :  
 :  
Defendant/Judgment Debtor. :  
-----X

**06 CV 2469 (HB) (AJP)**

**NOTICE OF MOTION IN  
SUPPORT OF PLAINTIFF'S  
MOTION TO IMPLEMENT  
SANCTIONS**

**PLEASE TAKE NOTICE THAT**, based on Plaintiff's Memorandum of Law in Support of its Motion to Implement Sanctions, the Declaration of Paul E. Summit in support thereof, the exhibits attached thereto, and upon all prior pleadings, the undersigned will move this Court, the Honorable Harold Baer, Jr., in the United States Courthouse, 500 Pearl Street, New York, New York, in Courtroom 23B on a date and time to be set by the Court, for the entry of an order implementing the \$1,000 per day sanction award against Grenada.

**PLEASE TAKE FURTHER NOTICE**, that Grenada must serve its answering papers pursuant to Rule 6.1 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.

Dated: New York, New York  
February 25, 2011

SULLIVAN & WORCESTER LLP

By: /s/ \_\_\_\_\_

Paul E. Summit (PS 6263)

Andrew T. Solomon (AS 9200)

Emily A. Samuels (ES 0302)

1290 Avenue of the Americas, 29th Floor

New York, NY 10104

T. 212.660.3000

F. 212.660.3001

*Attorneys for Plaintiff/Judgment Creditor*