

Paul E. Summit
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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	:	06 CV 2469 (HB) (AJP)
THE REPUBLIC OF CHINA,	:	
	:	
Plaintiff/Judgment Creditor,	:	
	:	
-against-	:	NOTICE OF CROSS MOTION
	:	
GRENADA,	:	
	:	
Defendant/Judgment Debtor.	:	
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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Plaintiff/Judgment Creditor’s Cross-Motion for Turnover of Funds, dated February 27, 2012, the Declaration of Paul E. Summit in support thereof, dated February 27, 2012, the exhibits attached thereto, 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, for an order directing the immediate turnover to Ex-Im Bank of certain funds deposited into Court by Defendant/Judgment Debtor Grenada (“Grenada”) on December 8, 2011, in partial satisfaction of Ex-Im Bank’s judgment against Grenada, pursuant to CPLR § 5225(a); and for such other and further relief deemed just and proper.

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

Dated: New York, New York
February 27, 2012

SULLIVAN & WORCESTER LLP

By: /s/
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