

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE EXPORT-IMPORT BANK OF THE
REPUBLIC OF CHINA,

Judgment Creditor,

-against-

GRENADA,

Judgment Debtor.

:
:
: 06-CV-2469 (HB) (AJP)
:
: **AFFIDAVIT OF STEVEN D.**
: **GREENBLATT IN SUPPORT**
: **OF JOINT MOTION TO VACATE**
: **RESTRAINING NOTICES**
:

I, STEVEN D. GREENBLATT, state under penalty of perjury as follows:

1. I am an attorney with The Law Office of Steven D. Greenblatt, 480 Broadway, Suite 328, Saratoga Springs, New York, 12866, and am counsel to the Grenada Airports Authority (“GAA”), the National Water and Sewage Authority (“NWSA”), the Solid Waste Management Authority (“SWMA”), the Grenada Ports Authority (“GPA”), and Aviation Services of Grenada Ltd. (“ASG”) (together, the “Statutory Corporations”), which, along with Judgment Debtor Grenada, have filed a Joint Motion to Vacate Restraining Notices (“Joint Motion”) in the above-captioned matter. I am a member in good standing of the Bar of the State of New York and am admitted to practice law before the United States District Court of the Southern District of New York. I make this affidavit from personal knowledge except as to statements made on information and belief, and as to such statements, I believe them to be true.

2. Attached hereto as **Exhibit A** is a true and correct copy of a Restraining Notice allegedly served in the above-captioned matter by judgment creditor The Export-Import Bank of the Republic of China (“EX-IM”) on Princess Cruise Lines, Ltd.

3. Attached hereto as **Exhibit B** is a true and correct copy of a Restraining Notice allegedly served in the above-captioned matter by EX-IM on Virgin Atlantic Airways.

4. Attached hereto as **Exhibit C** is a true and correct copy of a Restraining Notice allegedly served in the above-captioned matter by EX-IM on Delta Airlines, Inc.

5. Attached hereto as **Exhibit D** is a true and correct copy of a Restraining Notice allegedly served in the above-captioned matter by EX-IM on Caribbean Airlines Limited.

6. Attached hereto as **Exhibit E** is a true and correct copy of a Restraining Notice allegedly served in the above-captioned matter by EX-IM on Cunard Cruise Line.

7. Attached hereto as **Exhibit F** is a true and correct copy of a Restraining Notice allegedly served in the above-captioned matter by EX-IM on MSC Cruises.

8. Attached hereto as **Exhibit G** is a true and correct copy of a Restraining Notice allegedly served in the above-captioned matter by EX-IM on Disney Cruise Lines.

9. Attached hereto as **Exhibit H** is a true and correct copy of a Restraining Notice allegedly served in the above-captioned matter by EX-IM on the International Air Transport Association at a Garden City, New York address.

10. Attached hereto as **Exhibit I** is a true and correct copy of a Restraining Notice allegedly served in the above-captioned matter by EX-IM on the International Air Transport Association at a Washington D.C. address.

11. Attached hereto as **Exhibit J** is a true and correct copy of a Restraining Notice allegedly served in the above-captioned matter by EX-IM on BWIA International Airways Limited.

12. Attached hereto as **Exhibit K** is a true and correct copy of a Restraining Notice allegedly served in the above-captioned matter by EX-IM on the Mediterranean Shipping Company (USA) Inc.

13. Attached hereto as **Exhibit L** is a true and correct copy of a Restraining Notice served in the above-captioned matter by EX-IM on British Airways PLC.

14. Attached hereto as **Exhibit M** is a true and correct copy of the Affidavit of Rodney George dated March 16, 2012 and submitted in support of the Joint Motion.

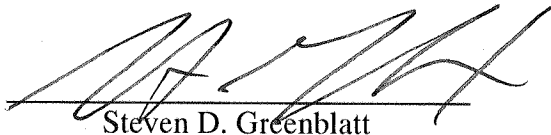
15. Attached hereto as **Exhibit N** is a true and correct copy of the Affidavit of Terrance Smith dated March 16, 2012 and submitted in support of the Joint Motion.

16. Attached hereto as **Exhibit O** is a true and correct copy of the Affidavit of Ambrose Phillip dated March 16, 2012 and submitted in support of the Joint Motion.


17. Attached hereto as **Exhibit P** is a true and correct copy of the Affidavit of Karen Roden-Layne dated March 16, 2012 and submitted in support of the Joint Motion.

18. Attached hereto as **Exhibit Q** is a true and correct copy of the Affidavit of Leslie Scott dated March 16, 2012 and submitted in support of the Joint Motion.

Dated: March 20, 2012


Steven D. Greenblatt

Sworn to before me this
20th day of March, 2012


Notary Public

EMILY G. MULLER
Notary Public, State of New York
Qualified in Saratoga County
Reg. No. 6023000
Commission Expires April 12, 2015