

Paul E. Summit
Andrew T. Solomon
SULLIVAN & WORCESTER LLP
1290 Avenue of the Americas, 29th 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	:	06 CV 2469 (HB) (AJP)
THE REPUBLIC OF CHINA,	:	
	:	
Plaintiff/Judgment Creditor,	:	
	:	NOTICE OF CROSS MOTION
-against-	:	
	:	
GRENADA,	:	
	:	
Defendant/Judgment Debtor.	:	
-----X	:	

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Opposition to Joint Motion to Vacate Restraining Notices and in Support of Cross Motion for Discovery and Turnover of Restrained Funds, dated April 3, 2012, the Declaration of Paul E. Summit in support thereof, dated April 3, 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 (a) directing discovery to resolve the issues arising out of the joint motion by Grenada and various interested third parties to vacate restraining notices and (b) the turnover to Ex-Im Bank of certain funds restrained pursuant to Ex-Im Bank’s enforcement efforts, 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
April 3, 2012

SULLIVAN & WORCESTER LLP

By: /s/
Paul E. Summit
Andrew T. Solomon
1290 Avenue of the Americas, 29th Floor
New York, NY 10104
T. 212.660.3000
F. 212.660.3001

*Attorneys for Plaintiff/Judgment Creditor The Export
Import Bank of the Republic of China*

TO:
Stephen D. Greenblatt, Esq.
The Law Office of Stephen D. Greenblatt
480 Broadway, Suite 328
Saratoga Springs, NY 12866

*Attorneys for Interested Third Parties Grenada Airports Authority,
Aviation Services of Grenada Ltd., Grenada Ports Authority,
National Water and Sewage Authority of Grenada, and
Grenada Solid Waste Management Authority*

Brian E. Maas, Esq.
Frankfurt Kurnit Kelin & Selz PC
488 Madison Avenue
New York, New York 10022

Attorneys for Defendant/Judgment Debtor Grenada