

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NML CAPITAL, LTD.,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

AURELIUS CAPITAL MASTER, LTD. and
ACP MASTER, LTD.,

Plaintiffs,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

AURELIUS OPPORTUNITIES FUND II, LLC
and AURELIUS CAPITAL MASTER, LTD.,

Plaintiffs,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

08 Civ. 6978 (TPG)
09 Civ. 1707 (TPG)
09 Civ. 1708 (TPG)

09 Civ. 8757 (TPG)
09 Civ. 10620 (TPG)

10 Civ. 1602 (TPG)
10 Civ. 3507 (TPG)

(captions continued on next page)

**PLAINTIFFS' MOTION FOR DECLARATORY
AND SUPPLEMENTAL INJUNCTIVE RELIEF**

AURELIUS CAPITAL MASTER, LTD. and :
AURELIUS OPPORTUNITIES FUND II, : 10 Civ. 3970 (TPG)
LLC, : 10 Civ. 8339 (TPG)
Plaintiffs, :
v. :
THE REPUBLIC OF ARGENTINA, :
Defendant. x

BLUE ANGEL CAPITAL I LLC, :
Plaintiff, : 10 Civ. 4101 (TPG)
: 10 Civ. 4782 (TPG)
v. :
THE REPUBLIC OF ARGENTINA, :
Defendant. :
----- x
OLIFANT FUND, LTD., :
Plaintiff, : 10 Civ. 9587 (TPG)
v. :
THE REPUBLIC OF ARGENTINA, :
Defendant. :
----- x
PABLO ALBERTO VARELA, et al., :
Plaintiff, : 10 Civ. 5338 (TPG)
v. :
THE REPUBLIC OF ARGENTINA, :
Defendant. :
----- x

Plaintiffs NML Capital, Ltd., Aurelius Capital Master, Ltd., ACP Master, Ltd., Aurelius Opportunities Fund II, LLC, Blue Angel Capital I LLC, Olifant Fund, Ltd., Pablo Alberto Varela, Lila Ines Burgueno, Mirta Susana Dieguez, Maria Evangelina Carballo, Leandro Daniel Pomilio, Susana Aquerreta, Maria Elena Corral, Teresa Munoz De Corral, Norma Elsa Lavorato, Carmen Irma Lavorato, Cesar Ruben Vazquez, Norma Haydee Gines, and Marta Azucena Vazquez move for this Court to enter the attached proposed orders granting Plaintiffs declaratory and supplemental injunctive relief.

Dated: May 30, 2014

GIBSON, DUNN & CRUTCHER LLP
Theodore B. Olson
Matthew D. McGill
Jason J. Mendro
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 955-8500

Respectfully submitted,

By:

DECHERT LLP

Robert A. Cohen
Eric C. Kirsch
1095 Avenue of the Americas
New York, N.Y. 10036-6796
(212) 698-3500

Attorneys for Plaintiff NML Capital, Ltd.

GOODWIN PROCTER LLP
Robert D. Carroll
53 State Street
Boston, MA 02109
(617) 570-1000

Attorneys for Plaintiff Olifant Fund, Ltd.