

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|                                     |   |                                   |
|-------------------------------------|---|-----------------------------------|
| -----                               |   | X                                 |
| NML CAPITAL, LTD.,                  | : |                                   |
|                                     | : |                                   |
| Plaintiff,                          | : | 08 Civ. 6978 (TPG)                |
|                                     | : | 09 Civ. 1707 (TPG)                |
|                                     | : | 09 Civ. 1708 (TPG)                |
| v.                                  | : |                                   |
|                                     | : |                                   |
| THE REPUBLIC OF ARGENTINA,          | : |                                   |
|                                     | : |                                   |
| Defendant.                          | : |                                   |
| -----                               |   | X                                 |
| AURELIUS CAPITAL MASTER, LTD. and   | : |                                   |
| ACP MASTER, LTD.,                   | : | 09 Civ. 8757 (TPG)                |
|                                     | : | 09 Civ. 10620 (TPG)               |
| Plaintiffs,                         | : |                                   |
|                                     | : |                                   |
| v.                                  | : |                                   |
|                                     | : |                                   |
| THE REPUBLIC OF ARGENTINA,          | : |                                   |
|                                     | : |                                   |
| Defendant.                          | : |                                   |
| -----                               |   | X                                 |
| AURELIUS OPPORTUNITIES FUND II, LLC | : |                                   |
| and AURELIUS CAPITAL MASTER, LTD.,  | : | 10 Civ. 1602 (TPG)                |
|                                     | : | 10 Civ. 3507 (TPG)                |
| Plaintiffs,                         | : |                                   |
|                                     | : |                                   |
| v.                                  | : |                                   |
|                                     | : |                                   |
| THE REPUBLIC OF ARGENTINA,          | : |                                   |
|                                     | : |                                   |
| Defendant.                          | : |                                   |
|                                     | : | (captions continued on next page) |
| -----                               |   | X                                 |

**DECLARATION OF CHRISTOPHER B. LEACH IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO NON-PARTY CITIBANK, N.A.'S  
MOTION BY ORDER TO SHOW CAUSE TO VACATE THE JULY  
28, 2014 ORDER OR TO MODIFY THE INJUNCTION, AND FOR A  
STAY FOR CLARIFICATION**

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----- X  
AURELIUS CAPITAL MASTER, LTD. and :  
AURELIUS OPPORTUNITIES FUND II, LLC, : 10 Civ. 3970 (TPG)  
: 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

I, Christopher B. Leach, declare under penalty of perjury that the following is true and correct:

1. I am a member in good standing of the bars of Washington, D.C. and the state of New York. My firm, Gibson, Dunn & Crutcher LLP, is counsel to plaintiff NML Capital, Ltd. (“NML”).

2. I make this declaration in support of the Memorandum of Law In Opposition to Non-Party Citibank, N.A.’s Motion By Order To Show Cause To Vacate The July 28, 2014 Order Or To Modify The Injunction, And For A Stay filed by NML, Aurelius Capital Master, Ltd., Aurelius Opportunities Fund II, LLC, ACP Master, Ltd., Blue Angel Capital I LLC, Pablo Alberto Varela, et al., and Olifant Fund, Ltd.

3. I make this Declaration to put before this Court certain documents related to Plaintiffs’ Memorandum of Law.

4. Attached to this Declaration as Exhibits 1 through 14 are true and correct copies of the following documents:

| <u>Ex.</u> | <u>Document</u>  |
|------------|--|
| A.         | Fiscal Agency Agreement Between The Republic of Argentina and Bankers Trust Company, Fiscal Agent (Oct. 19, 1994)            |
| B.         | Hearing Transcript, <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 08-cv-6978 (TPG) (S.D.N.Y. July 22, 2014)        |
| C.         | Hearing Transcript, <i>Aurelius Capital Master, Ltd. v. Republic of Argentina</i> , No. 14-2689 (2d Cir. Sept. 18, 2014)     |
| D.         | Law 26984, Sovereign Payment. Debt Restructuring., Official Gazette of the Argentine Republic (Sept. 12, 2014) <sup>1</sup>  |
| E.         | Presidency of the Nation Argentine Republic, Legal Notice: Holders of Argentine Debt Securities, N.Y. TIMES (Sept. 22, 2014) |

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<sup>1</sup> Unless otherwise noted, for all Spanish language documents referenced in this declaration, the exhibits contain a certified translation and the original Spanish document.

- | <u>Ex.</u> | <u>Document</u>  |
|------------|--|
| F.         | Prospectus Supplement to Prospectus Dated December 27, 2004 Issued By The Republic of Argentina (Jan. 10, 2005)  |
| G.         | Listing Memorandum for 8.75% Bonos del Tesoro of the Republic of Argentina due May 9, 2002 (Nov. 24, 1998)   |
| H.         | Listing Supplement to Offering Circular dated February 1, 2001, for 11.75% Bonos del Tesoro a Mediano Plazo of the Republic of Argentina due 2006 (May 29, 2001) |
| I.         | Listing Memorandum for Floating Rate Bonos del Tesoro of the Republic of Argentina due July 21, 2003 (May 25, 2000)  |
| J.         | Prospectus Supplement to Debt Consolidation Prospectus Dated May 22, 2001 Issued by The Republic of Argentina (May 24, 2001)                                     |

Dated: Washington, D.C.  
September 25, 2014.



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Christopher B. Leach