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November 19, 2014

VIA ECF

The Honorable Thomas P. Griesa
U.S. District Court for the Southern District of New York
United States Courthouse
500 Pearl Street, Room 1630
New York, NY 10007-1312

Re: *NML Capital Ltd. v Republic of Argentina*, 08-cv-6978 (TPG) and related cases

Dear Judge Griesa:

We write on behalf of the Euro Bondholders¹ in response to the letter dated November 6, 2014 filed by counsel to the Republic of Argentina (the “Republic”) in the above-captioned action and related actions (the “Boccuzzi November 6 Letter”), Dkt. # 708. The Boccuzzi November 6 Letter states it is “in response to Robert Cohen’s letter, dated October 8, 2014” and an amended letter from Mr. Cohen of the same date, regarding forthcoming motions from plaintiffs in numerous pre- and post-judgment actions seeking *pari passu* injunctions (the “Cohen October 8 Letters”). *Id.*

We respectfully draw the Court’s attention to the fact that the Cohen October 8 Letters were not filed electronically on the case docket in the above-captioned action; rather, they were filed on the docket for a different action, *NML Capital, Ltd. v. Republic of Argentina*, 1:03-cv-08845-TPG, and only on November 7, 2014 – the day after the Republic responded to the letters.²

We had previously informed the Court that certain letters and other correspondence were not filed electronically on the court’s docket and thus not made available contemporaneously to

¹ The Euro Bondholders are a group of investors holding euro-denominated bonds issued by the Republic of Argentina pursuant to 2005 and 2010 exchange offers (the “Euro Exchange Bonds”). The Euro Bondholders are Knighthead Capital Management, LLC; Perry Capital, LLC, Monarch Master Funding 2 (Luxembourg) S.á.r.l.; QVT Fund IV LP; QVT Fund V LP; Quintessence Fund L.P.; and Centerbridge Partners LP (each on behalf of itself or one or more investment funds or accounts managed or advised by it).

² While Case No. 1:03-cv-08845-TPG concerns the same matters as the above-captioned action, the two actions are not consolidated or formally designated as related to each other.

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all parties with an interest in the matters before Your Honor. In response, the Court issued an Order, dated August 19, 2014, Dkt. # 644 (the “August 19 Order”), directing the Clerk’s Office to designate the above-captioned action (as well as other actions identified in the Order), as ECF cases, and ordering parties to file all documents electronically, barring issues related to confidential, privileged or otherwise sensitive information. The Cohen October 8 Letters – which were not filed electronically until after the letter responding to them – raise the same issues the August 19 Order sought to resolve. Clearly, parties with an interest in the actions before the Court cannot adequately defend their interests unless they are properly and timely informed of the matters presented for the Court’s consideration.

Accordingly, we once again request that any correspondence in these matters be filed via ECF in a timely manner. We also respectfully request that the Court encourage parties to file copies of all their pleadings on the docket for *NML Capital Ltd. v Republic of Argentina*, 08-cv-6978 (TPG), which in practice has served as the primary docket for all matters concerning the *pari passu* injunctions.

We thank the Court for its attention to and consideration of this matter.

Regards,

/s/ Christopher J. Clark

Christopher J. Clark
of LATHAM & WATKINS LLP

cc: Counsel of Record (by ECF)