

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
NML CAPITAL, LTD.	:	03 Civ. 8845 (TPG)
	:	05 Civ. 2434 (TPG)
	:	06 Civ. 6466 (TPG)
Plaintiff,	:	07 Civ. 1910 (TPG)
	:	07 Civ. 2690 (TPG)
- against -	:	07 Civ. 6563 (TPG)
	:	08 Civ. 2541 (TPG)
THE REPUBLIC OF ARGENTINA,	:	08 Civ. 3302 (TPG)
	:	08 Civ. 6978 (TPG)
Defendant.	:	09 Civ. 1707 (TPG)
	:	09 Civ. 1708 (TPG)
-----	X	

PROPOSED ORDER

WHEREAS a hearing was held before this Court on February 25, 2015 regarding non-parties Deutsche Bank AG, Deutsche Bank America Holding Corp., Deutsche Bank Securities Inc., Deutsche Bank Trust Company America and Taunus Corporation (collectively “DB”) and JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.’s (collectively “JPMC”) failure to comply with subpoenas served on them by NML Capital, Ltd. (“NML”) on February 9, 2015 (the “Subpoenas”) seeking information about the imminent issuance by the Republic of Argentina (“Argentina”) of approximately \$2.0 billion in Bonar 2024 bonds (the “Bonar 2024s”)

IT IS, THEREFORE, HEREBY ORDERED:

THAT DB and JPMC shall:

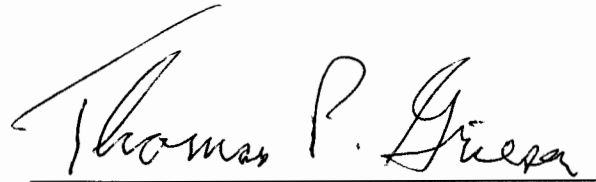
- (a) immediately produce to NML’s counsel any and all readily available documents responsive to the Subpoenas but, in any event, documents sufficient to describe the flow of funds with respect to the Bonar 2024s from DB and JPMC to Argentina; and

(b) produce by Noon on February 26, 2015 to NML's counsel all remaining documents in their possession, custody and control responsive to the Subpoenas by email or hand delivery; and

(c) produce a witness or witnesses for a deposition at 3:00 pm on February 26, 2015 at the offices of Quinn Emanuel Urquhart & Sullivan LLP, 51 Madison Avenue, 22nd Floor, New York, New York 10010 to testify as to all topics identified in the Subpoenas.

SO ORDERED:

Dated: New York, New York
February 25, 2015

A handwritten signature in cursive script, reading "Thomas P. Griesa". The signature is written in black ink and is positioned above a horizontal line.

Thomas P. Griesa
U.S. District Judge