

CONFIDENTIAL—SUBJECT TO COURT ORDER

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X:		
NML CAPITAL, LTD.,	:	
	:	
Plaintiff,	:	No. 08 Civ. 6978 (TPG)
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
	:	
-----X:		
NML CAPITAL, LTD.,	:	
	:	
Plaintiff,	:	No. 09 Civ. 1707 (TPG)
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
	:	
-----X:		
NML CAPITAL, LTD.,	:	
	:	
Plaintiff,	:	No. 09 Civ. 1708 (TPG)
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
	:	
-----X:		
	:	(captions continue on following pages)

**DECLARATION OF ROBERT A. COHEN IN
SUPPORT OF PLAINTIFF’S MOTION
FOR LEAVE TO AMEND AND
SUPPLEMENT COMPLAINTS**

- Exhibit 3: The proposed Second Amended and Supplemental Complaint in *NML Capital, Ltd. v. The Republic of Argentina*, Case No. 09 Civ. 1708 (TPG) (S.D.N.Y.).
- Exhibit 4: The proposed Second Amended and Supplemental Complaint in *NML Capital*, Case No. 14 Civ. 8988 (TPG) (S.D.N.Y.).
- Exhibit 5: The Amended February 23, 2012 Order entered by this Court, on November 26, 2012, as Docket No. 425 in Case No. 08 Civ. 6978.
- Exhibit 6: The Fiscal Agency Agreement between the Republic of Argentina and Bankers Trust Company, Fiscal Agent, dated as of October 19, 1994.
- Exhibit 7: A transcript of the hearing held April 22, 2015 in *NML Capital, Ltd. v. The Republic of Argentina*, Case No. 08 Civ. 6978 (TPG) (S.D.N.Y.).
- Exhibit 8: A certified translation of Argentine Law No. 26,547, enacted December 9, 2009.
- Exhibit 9: A certified translation of Argentine Law No. 26,886, enacted September 20, 2013.
- Exhibit 10: A transcript of the hearing held August 21, 2014 in the above-captioned actions.
- Exhibit 11: A certified translation of Argentine Law No. 26,984, enacted September 11, 2014.
- Exhibit 12: An article by Katia Porzecanski published by Bloomberg titled “Argentina Deposits \$161 Million in Local Bank for Debt Payment,” dated September 30, 2014.
- Exhibit 13: A certified translation of an article published by Clarín titled “To Bypass the Griesa Ruling, Argentina Issued the Funds For A Maturing Bond Into An Account At [Banco] Nación,” dated January 2, 2015.
- Exhibit 14: A certified translation of an article published by *Ámbito Financiero* titled “Without Citibank, the Government Paid US\$ 163 Million in Bonds,” dated April 30, 2015.
- Exhibit 15: A document published by Caja de Valores titled “Caja de Valores informs,” available at http://www.cajval.sba.com.ar/pdf/informe_citi_ing.pdf

- Exhibit 16: An English version of the “Agreement for the Amicable Settlement and Compromise of Expropriations,” dated February 27, 2014, entered into by the Republic, Repsol S.A. (“Repsol”), and certain affiliates of Repsol.
- Exhibit 17: A certified translation of Argentine Finance Secretary Resolution No. 26/2014, dated April 30, 2014.
- Exhibit 18: An Official Notice, dated May 9, 2014, issued by Repsol.
- Exhibit 19: A document titled [REDACTED], produced by JPMorgan in these actions bearing the Bates numbers JPM0000888-96.
- Exhibit 20: [REDACTED], produced by Deutsche Bank in these actions bearing the Bates numbers DB002715-16.
- Exhibit 21: [REDACTED] produced by Deutsche Bank in these actions bearing the Bates numbers DB002868-69.
- Exhibit 22: [REDACTED] produced by Deutsche Bank in these actions bearing the Bates numbers DB002881-86, [REDACTED]
- Exhibit 23: [REDACTED] produced by Deutsche Bank in these actions bearing the Bates number DB000477.
- Exhibit 24: [REDACTED] produced by Deutsche Bank in these actions bearing the Bates numbers DB002009-10.
- Exhibit 25: [REDACTED] produced by Deutsche Bank in these actions bearing the Bates numbers DB000114-15.
- Exhibit 26: Excerpts from the deposition of Lisandro Miguens (JPMorgan) taken in these actions on February 27, 2015.
- Exhibit 27: [REDACTED] produced by JPMorgan in these actions bearing the Bates numbers JPM0000622-23.

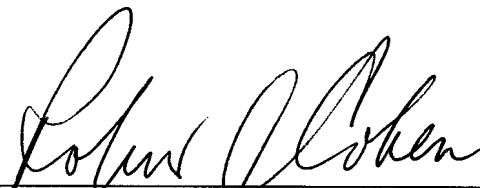
- Exhibit 28: [REDACTED], produced by JPMorgan in these actions bearing the Bates numbers JPM0000811-12.
- Exhibit 29: [REDACTED] produced by JPMorgan in these actions bearing the Bates numbers JPM0000658-59.
- Exhibit 30: [REDACTED], produced by JPMorgan in these actions bearing the Bates numbers JPM0000837-38.
- Exhibit 31: Excerpts from the deposition of Jeanmarie Genirs (Deutsche Bank) taken in these actions on February 26, 2015.
- Exhibit 32: A certified translation of a Press Release issued by the Argentine Ministry of the Economy titled “Invitation to Bid,” dated April 21, 2015.
- Exhibit 33: A certified translation of Argentine Joint Resolution No. 31/2015 & 10/2015.
- Exhibit 34: A Bloomberg Message from Deutsche New York Syndicate, dated April 21, 2015.
- Exhibit 35: [REDACTED]
- Exhibit 36: A certified translation of an article published by La Política Online titled “Deutsche Bank and Marathon, Behind Kicillof’s Debt Placement,” dated April 22, 2015.
- Exhibit 37: A certified translation of a Press Release issued by the Argentine Ministry of the Economy titled “Results of BONAR 2024 Tender,” dated April 21, 2015.
- Exhibit 38: A certified translation of an article by Pablo Wende published by *Ámbito Financiero* titled “Government Was Able to Place US\$ 1.415 Billion (But Paid Almost 9% per year),” dated April 22, 2015.
- Exhibit 39: A certified translation of an article by Esteban Rafele published by *Cronista* titled “At High Rates, Argentina Covered 50% of Key Debt That Will Come Due in October,” dated April 24, 2015.
- Exhibit 40: A certified translation of Press Release No. 15741 issued by Merval, dated April 21, 2015.

- Exhibit 41: A certified translation of an article by Paola Quain published by Perfil titled “Pepa and Szpigiel, the Operators Behind the 'Financial Summer',” dated May 3, 2015.
- Exhibit 42: A certified translation of a statement issued by Prensa Argentina titled “Kicillof: 'The Bids Received for BONAR 24 Exceeded Expectations',” dated April 24, 2015.
- Exhibit 43: An article published by the Buenos Aires Herald titled “CFK: 'We'll Never Honour International Usury or Scam',” dated April 28, 2015.
- Exhibit 44: A certified translation of an article published by La Nación titled “Kicillof: 'They Must Be Annoyed',” dated April 23, 2015.
- Exhibit 45: A certified translation of a statement published by Alejandro Vanoli on his official Twitter account on April 23, 2015, at 11:24 AM, available at <https://twitter.com/VanoliAlejandro/status/591306648511246337>.
- Exhibit 46: A certified translation of an excerpt of the Regulations of the Argentine Comisión Nacional de Valores, including Article 70.
- Exhibit 47: A certified translation of a Resolution of the Argentine Comisión Nacional de Valores, dated December 10, 2014.
- Exhibit 48: A certified translation of an article by Ignacio Olivero Doll published by *Ámbito Financiero* titled “Bonar: Issuance Built Up Steam Thanks To the Dollars From Abroad,” dated April 22, 2015.
- Exhibit 49: A certified translation of an article by Javier Blanco published by *La Nación* titled “No relief in 2015: Debt Issue Raises Less Than 10% of What Was Hoped,” dated December 13, 2014.
- Exhibit 50: [REDACTED] produced by Deutsche Bank in these actions bearing the Bates numbers DB001684

4. I declare under penalty of perjury that to the best of my knowledge the

foregoing is true and correct.

Executed in New York, New York
on this 12th day of May, 2015



Robert A. Cohen