

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NML CAPITAL, LTD.,

Plaintiff,

v.

Civil Action Nos.  
08 Civ. 6978 (TPG)  
09 Civ. 1707 (TPG)  
09 Civ. 1708 (TPG)

THE REPUBLIC OF ARGENTINA,

Defendant.

-----x

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

Plaintiff,

v.

Civil Action Nos.  
09 Civ. 8757 (TPG)  
09 Civ. 10602 (TPG)

THE REPUBLIC OF ARGENTINA,

Defendant.

-----x

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

Plaintiff,

v.

Civil Action Nos.  
10 Civ. 1602 (TPG)  
10 Civ. 3507 (TPG)

THE REPUBLIC OF ARGENTINA,

Defendant.

-----x (captions continued on next page)

**NOTICE OF CROSS-MOTION TO QUASH  
AND/OR LIMIT THE SUBPOENAS AT ISSUE**

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

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.  
-----X

Civil Action Nos.  
10 Civ. 3970 (TPG)  
10 Civ. 8339 (TPG)

BLUE ANGEL CAPITAL I LLC,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.  
-----X

Civil Action Nos.  
10 Civ. 4101 (TPG)  
10 Civ. 4782 (TPG)

PABLO ALBERTO VARELA, et. al.,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.  
-----X

Civil Action No.  
10 Civ. 5338 (TPG)

OLIFANT FUND, LTD.,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.  
-----X

Civil Action No.  
10 Civ. 9587 (TPG)

**PLEASE TAKE NOTICE** that upon the Declaration of Philippe Zimmerman, dated October 23, 2015 and the exhibits annexed thereto, the Declaration of Bernardo Iriberry, dated October 23, 2015, and the accompanying Memorandum of Law, dated October 23, 2015, non-parties Deutsche Bank AG – New York Branch, Deutsche Bank Americas Holding Corp. (subpoenaed as Deutsche Bank America Holding Corp.), Deutsche Bank Securities Inc., Deutsche Bank Trust Company Americas and DB USA Corporation f/k/a Taunus Corporation (collectively, the “DB Entities”), will move this Court, pursuant to Federal Rules of Civil Procedure 26(c)(1) and 45(d), for an order quashing and/or limiting the subpoenas dated May 5, 2015 served by plaintiffs NML Capital, Ltd., Aurelius Capital Master, Ltd., ACP Master Ltd., Aurelius Opportunities Fund II, LLC, Blue Angel Capital I LLC, Pablo Alberto Varela, et al., and Olifant Fund, Ltd. on the DB Entities, and for such other relief as this Court deems just and proper.

Dated: October 23, 2015  
New York, New York

Respectfully submitted,  
  
MOSES & SINGER LLP

By:  /s/ Philippe Zimmerman

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