

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NML CAPITAL, LTD.,	:	
	:	08 Civ. 6978 (TPG)
Plaintiff,	:	09 Civ. 1707 (TPG)
	:	09 Civ. 1708 (TPG)
v.	:	14 Civ. 8601 (TPG)
	:	14 Civ. 8988 (TPG)
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.	:	
-----	X	
	:	
	:	(captions continued on next page)

[PROPOSED] ORDER

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AURELIUS CAPITAL MASTER, LTD. and	:	10 Civ. 3970 (TPG)
AURELIUS OPPORTUNITIES FUND II, LLC,	:	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.	:	14 Civ. 8947 (TPG)
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----	X	
OLIFANT FUND, LTD.,	:	
	:	
Plaintiff,	:	10 Civ. 9587 (TPG)
	:	
v.	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----	X	
AURELIUS CAPITAL PARTNERS, LP AND	:	
AURELIUS CAPITAL MASTER, LTD.	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	14 Civ. 8946 (TPG)
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----	X	

-----X	:	
FFI FUND, LTD. AND FYI LTD.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	14 Civ. 8630 (TPG)
	:	
Defendant.	:	
-----X	:	

It is HEREBY ORDERED that the injunctions entered in the above-captioned actions (the "Injunctions") shall be vacated upon the occurrence of two conditions precedent:

(1) The Republic repeals all legislative obstacles to settlement with the FAA bondholders, including the Lock Law and the Sovereign Payment Law;

(2) The Republic must make full payment in accordance with the specific terms of the Agreement in Principle it has entered into with the Plaintiffs in the above-captioned actions, dated February 28, 2016 (the "AIP"). The Republic must also notify the court (with simultaneous copy of notice provided to Plaintiffs) once Plaintiffs have all received full payment. For the avoidance of doubt, if Plaintiffs do not receive full payment in accordance with the specific terms of the AIP for any reason, including if Plaintiffs terminate the AIP on or after April 14, 2016 at 12:00 noon EST in accordance with the terms of the AIP, the Injunctions shall remain in place.

SO ORDERED

Dated: New York, New York
_____, 2016

Thomas P. Griesa
United States District Judge