

ANNEX 4

to the

OPINION OF PROFESSOR GEORGE A. BERMANN

in the case of

Anatolie Stati, Gabriel Stati, Ascom Group SA and Terra Raf Trans Traiding Ltd

versus

the Republic of Kazakhstan

January 17, 2021

ANNEX 4 – DOCUMENTS, CASE LAW, SOFT LAW, AND LITERATURE

DOCUMENTS

Doc #	Date	Citation
1.		Ascom LPG Plant – Business Plan
2.		Azalia and Perkwood Invoices
3.		Contracts and Invoices Related to the Statis’ Costs on Delivery of the LPG Plant equipment
4.	2003 – 2012	Powers of Attorney granted by Mr and Mrs Petre-Mears on behalf of Perkwood to Anatolie Stati and Gabriel Stati, April 14, 2003, April 21, 2004, March 20, 2005, March 21, 2006, June 14, 2007, May 15, 2008, April 22, 2009, June 30, 2010, April 26, 2011, April 17, 2012
5.	January 31, 2005	Contract between Ascom Group S.A., Azalia Limited and TGE Gas Engineering GmbH (Tractebel Contract)
6.	December 13, 2005	Bank Statements of Perkwood Investment Limited, Rietumu Banka, Latvia, December 13, 2005 – June 6, 2012
7.	January 11, 2006	Azalia Agreement (Dkt 37-3), <i>Stati v. Republic of Kazakhstan</i> , Civ. No. 14-1638 (ABJ) (D.D.C. 2016)
8.	February 17, 2006	Sale and Purchase Agreement No. 01/01_TNG_PRK between Tolkyneftegaz LLP and Perkwood Investment Limited (Perkwood Agreement)
9.	March 27, 2006	Annex 2 to the Perkwood Agreement
10.	June 27, 2006	Joint Operating Agreement between Vitol, Ascom, TNG and Terra Raf
11.	October 25, 2006	LPG Project CAPEX (Vitol) [Ascom’s internal excel files detailing cost estimates of LPG Plant equipment]
12.	November 29, 2006	Minutes of Meeting
13.	November 30, 2006	Tristan Notes Offering Circular
14.	December 20, 2006	Indenture between Tristan Oil Ltd, Kazpolmunay LLP, and Tolkyneftegaz LLP
15.	March 2007 – December 2008	Customs Declaration Issued by Perkwood for the period March 2007 through December 2008

16.	June 30, 2007	Interim Financial Statements of Tristan, TNG and KPM for the Six Months ended June 30, 2007
17.	September 30, 2007	Interim Financial Statements of Tristan, KPM and TNG for the Nine Months ended September 30, 2007
18.	October 2, 2007	Minutes of Meeting
19.	December 31, 2007	Annual Combined and Individual Financial Statements of Tristan, KPM, and TNG for the Year ended December 31, 2007
20.	February 5, 2008	Minutes of Meeting
21.	March 31, 2008	Interim Financial Statements of Tristan, KPM and TNG for the Three Months ended March 31, 2008
22.	June 30, 2008	Interim Combined Financial Statements of Tristan, TNG and KPM for the Six Months ended June 30, 2008
23.	August 2008	Project Zenith Confidential Information Memorandum
24.	August 5, 2008	TNG Management Representation Letter for KPMG
25.	August 29, 2009	Vendor Due Diligence Report
26.	August – September, 2008	Correspondence between Artur Lungu and KPMG
27.	September 8, 2008	Draft version of the Vendor Due Diligence Report
28.	September 25, 2008	KazMunaiGas EP (KMG) Indicative Offer
29.	September 30, 2008	Interim Financial Statements of Tristan, KPM and TNG for the Nine Months ended September 30, 2008
30.	November 11, 2008	Representation Letter sent to KPMG Audit LLC by Anatolie Stati and Artur Lungu
31.	December 2, 2008	Annex 14 to the Perkwood Agreement
32.	December 11, 2008	Internal Note on the Credit Suisse Facility
33.	December 31, 2008	Annual Combined and Individual Financial Statements of Tristan, KPM, and TNG for the Year ended December 31, 2008
34.	March 2009	Minutes of Meeting
35.	March 31, 2009	Interim Financial Statements of Tristan, KPM and TNG for the Six Months ended March 31, 2009
36.	June 6-8, 2009	E-Mail Correspondence between Artur Lungu of Ascom and Adel Kambar of Renaissance Capital

37.	June 10, 2009	Representation Letter sent to KPMG Audit LLC by Anatolie Stati and Artur Lungu
38.	June 11, 2009	Facility Agreement for Laren Holdings LTD arranged by Renaissance Advisory Services Limited with Stichting Security Trustee
39.	June 15, 2009	Note Transfer Agreement between Laren Holdings LTD and Avelade Holdings LTD, Renaissance Securities (Cyprus) Limited, GLG Atlas Macro Fund, GLG Atlas Value & Recovery Fund, Sputnik Group LTD, Vision Advisors III LTD
40.	June 24, 2009	Invoice from Harneys issued to Tristan Oil Ltd.
41.	June 30, 2009	Interim Financial Statements of Tristan, KPM and TNG for the Six Months ended June 30, 2009
42.	August 25, 2009	Representation Letter sent to KPMG Audit LLC by Anatolie Stati and Artur Lungu
43.	September 30, 2009	Interim Financial Statements of Tristan, KPM and TNG for the Nine Months ended September 30, 2009
44.	December 14, 2009	Representation Letter from Anatolie Stati and Artur Lungu to KPMG Audit LLC
45.	December 31, 2009	Annual Combined and Individual Financial Statements of Tristan, KPM, and TNG for the Year ended December 31, 2009
46.	March 31, 2010	Minutes of Conference Call between KPMG and the Stati Parties
47.	May 25, 2010	Representation Letter from Anatolie Stati and Artur Lungu to KPMG Audit LLC
48.	July 26, 2010	Request for Arbitration, <i>Stati et al. v. Republic of Kazakhstan</i> , Arbitration Institute of the Stockholm Chamber of Commerce
49.	May 17, 2011	First Witness Statement of Artur Lungu, ECT Arbitration
50.	May 17, 2011	FTI Consulting's Expert Report, ECT Arbitration
51.	May 18, 2011	Statis' Statement of Claim, ECT Arbitration
52.	July 22, 2011	Second Witness Statement of Artur Lungu, Montvale Arbitration
53.	December 2, 2011	Montvale's Post-Hearing Brief, Montvale Arbitration
54.	February 3, 2012	Annex II to the Procedural Order 2 on Production of Documents, February 3, 2012, Kazakhstan Document Production Request No. 108
55.	April 11, 2012	Witness Statement of Catalin Broscaru, ECT Arbitration

56.	May 5, 2012	Second Witness Statement of Artur Lungu, ECT Arbitration
57.	May 7, 2012	Statis' Reply Memorial on Jurisdiction and Liability, ECT Arbitration
58.	May 7, 2012	Second Witness Statement of Anatolie Stati, ECT Arbitration
59.	May 28, 2012	Statis' Reply Memorial on Quantum, ECT Arbitration
60.	May 28, 2012	FTI Consulting's Supplemental Expert Report, ECT Arbitration
61.	October 1, 2012	Hearing on Jurisdiction and Liability, ECT Arbitration, Day 1, Transcript of the Hearing
62.	October 2, 2012	Anatolie Stati's Oral Testimony, ECT Arbitration, Transcript of the Hearing
63.	November 6, 2012	Notice of Arbitration, Vitol Arbitration
64.	December 17, 2012	Sharing Agreement and Assignment of Rights entered into by the Statis and the Noteholders
65.	January 25, 2013	FTI Consulting's Expert Report Amended, ECT Arbitration
66.	January 28, 2013	Hearing on Quantum, Day 1, ECT Arbitration, Transcript of the Hearing
67.	January 31, 2013	Hearing on Quantum, Day 4, ECT Arbitration, Transcript of the Hearing
68.	March 15, 2013	Statement of Claim, Vitol Arbitration
69.	April 8, 2013	Statis' First Post-Hearing Brief, ECT Arbitration
70.	April 8, 2013	FTI Consulting's Post-Hearing Report, ECT Arbitration
71.	May 10, 2013	Statement of Reply and Defence, Vitol Arbitration
72.	June 3, 2013	Statis' Second Post-Hearing Brief, ECT Arbitration
73.	October 11, 2013	Witness Statement of Artur Lungu, Vitol Arbitration
74.	October 11, 2013	Expert Report of Charles River Associates, Vitol Arbitration
75.	October 11, 2013	Claimant's Memorial, Vitol Arbitration
76.	December 19, 2013	Award, <i>Stati et al. v. Republic of Kazakhstan</i> , Arbitration Institute of the Stockholm Chamber of Commerce
77.	January 21, 2014	Witness Statement of Raymond Leslie Martin

78.	January 22, 2014	Witness Statement of Ian Roper Taylor
79.	February 27, 2014	Second Witness Statement of Artur Lungu, Vitol Arbitration
80.	March 19, 2014	Kazakhstan's Statement of Claim, Swedish Set-Aside Proceedings
81.	August 29, 2014	Reasons for Judgment, August 29, 2014 [<i>Vitol FSU BV v. Ascom Group SA</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, 2014 FOLIO 406].
82.	October 29, 2014	Hearing Transcript, Vitol Arbitration, Day 1
83.	March 27, 2015	<i>Ex Parte</i> Petition for Discovery in Aid of a Foreign Proceeding Pursuant to 28 U.S.C. § 1782, <i>In re Application of Republic of Kazakhstan for an Order Directing Discovery from Clyde & Co. LLP Pursuant to 28 U.S.C. § 1782</i> , Case No. 15 Misc. 0081 (SHS) (S.D.N.Y. 2015)
84.	April 22, 2015	Partial Award, Vitol Arbitration
85.	June 22, 2015	Opinion and Order, <i>In re Application of Republic of Kazakhstan for an Order Directing Discovery from Clyde & Co. LLP Pursuant to 28 U.S.C. 1782</i> , Case No. 15 Misc. 0081 (SHS) (S.D.N.Y. 2015)
86.	August 27, 2015	First Witness Statement of Franjo Zaja [<i>Stati et al. v. The Republic of Kazakhstan</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, CL-2014-000070]
87.	October 1, 2015	Expert Report of Thomas Gruhn of Deloitte, Swedish Set-Aside Proceedings
88.	October 5, 2015	Kazakhstan's Amended Statement of Claim, Swedish Set-Aside Proceedings
89.	October 30, 2015	Statis' Rebuttal Submission, Swedish Set-Aside Proceedings
90.	November 23, 2015	Kazakhstan's Brief and Preliminary Statement of Evidence, Swedish Set-Aside Proceedings
91.	February 15, 2016	Letter from KPMG Audit LLC to A. Stati
92.	February 26, 2016	Letter from A. Stati to KPMG Audit LLC
93.	February 29, 2016	Email from KPMG Audit LLC to Ascom
94.	March 2, 2016	Email from Ascom to KPMG Audit LLC
95.	March 10, 2016	Letter from KPMG Audit LLC to A. Stati
96.	April 1, 2016	Kazakhstan's Submission, Swedish Set-Aside Proceedings

97.	May 11, 2016	Order, <i>Stati v. Republic of Kazakhstan</i> , Civ. No. 14-1638 (ABJ) (D.D.C. 2016)
98.	May 18, 2016	Statis' Comments on the Court's recitals, Swedish Set-Aside proceedings
99.	May 18, 2016	Stati Parties' Request for the Dismissal of Evidence, Swedish Set-Aside Proceedings
100.	June 2, 2016	Expert Report of Ernst Kallweit of Tractebel, Swedish Set-Aside Proceedings
101.	July 15, 2016	Statis' Submission, Swedish Set-Aside Proceedings
102.	August 30, 2016	Statis' Submission, Swedish Set Aside Proceedings
103.	September 8, 2016	Hearing Transcript, Svea Court of Appeal, Swedish Set Aside Proceedings, Day 1
104.	September 27, 2016	Hearing Transcript, Svea Court of Appeal, Swedish Set Aside Proceedings, Day 7
105.	October 6, 2016	Hearing Transcript, Svea Court of Appeal, Swedish Set Aside Proceedings, Day 13
106.	December 9, 2016	Judgment of the Svea Court of Appeal, Swedish Set-Aside Proceedings
107.	January 12, 2017	Expert Report of Dipl. Ing. Ernst Kallweit of Tractebel [<i>Stati et al. v. The Republic of Kazakhstan</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, CL-2014-000070]
108.	January 12, 2017	Expert Report of Deloitte, [<i>Stati et al. v. The Republic of Kazakhstan</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, CL-2014-000070]
109.	January 12, 2017	Second Witness Statement of Franjo Zaja [<i>Stati et al. v. The Republic of Kazakhstan</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, CL-2014-000070]
110.	January 13, 2017	Legal Opinion of Dr. Patrik Schöldström
111.	February 3, 2017	Kazakhstan's Motion to Quash the Svea Court of Appeal's Judgment, Swedish Set-Aside Proceedings (Swedish Supreme Court's case no. Ö 613-17)
112.	June 6, 2017	Approved Judgment of Justice Knowles [<i>Stati et al. v. The Republic of Kazakhstan</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, CL-2014-000070]
113.	June 12, 2017	Statis' Grounds of Appeal, English Recognition Proceedings [<i>Stati et al. v. The Republic of Kazakhstan</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, CL-2014-000070]
114.	June 27, 2017	Reasons of Mr. Justice Knowles (Form N460HC), High Court of Justice of England and Wales [<i>Stati et al. v. The Republic of Kazakhstan</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, CL-2014-000070]

115.	June 28, 2017	Statis' Response to Kazakhstan's Notice of Supplemental Authority, <i>Stati v. Republic of Kazakhstan</i> , Civ. No. 14-1638 (ABJ) (D.D.C. 2016)
116.	July 6, 2017	<i>Rietumu Banka hit with heavy fine over laundering scheme in France</i> , The Baltic Times, July 6, 2017, https://www.baltictimes.com/rietumu-banka-hit-with-heavy-fine-over-laundering-scheme-in-france/
117.	August 30, 2017	Decision of the District Court of Luxembourg, Luxembourg Exequatur Proceedings
118.	September 8, 2017	Decision of the District Court of Amsterdam, Dutch Exequatur Proceedings
119.	September 26, 2017	Statis' Points of Defence, English Recognition Proceedings
120.	September 29, 2017	Statis' Ex Parte Application to the Brussels Dutch-Speaking Court of First Instance
121.	October 5, 2017	<i>Republic of Kazakhstan v. Stati et al.</i> , No. 17-cv-02067 (D.D.C. 2017), ECF 1
122.	November 7, 2017	Kazakhstan's Points of Reply, English Recognition Proceedings
123.	November 13, 2017	Statis' Supplemental Submission in Opposition to Motion for Reconsideration, <i>Stati v. Republic of Kazakhstan</i> , Civ. No. 14-1638 (ABJ) (D.D.C. 2016)
124.	December 11, 2017	Statis' Ex Parte Application before the Rome Court of Appeal
125.	December 11, 2017	Order of the Brussels Court of First Instance, Belgian Exequatur Proceedings
126.	January 19, 2018	Expert Report of Thomas Gruhn of Deloitte
127.	January 23, 2018	Judgment of the Amsterdam District Court, Dutch Attachment Proceedings
128.	February 23, 2018	List of Documents disclosed by the Statis [<i>Stati et al. v. The Republic of Kazakhstan</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, CL-2014-000070]
129.	March 23, 2018	Memorandum Opinion, <i>Stati v. Republic of Kazakhstan</i> , Civ. No. 14-1638 (ABJ) (D.D.C. 2016)
130.	May 4, 2018	Statis' Reply on Kazakhstan's Opposition, Luxembourg Exequatur Proceedings
131.	May 11, 2018	Decision of Mr Justice Knowles, High Court of Justice of England and Wales [<i>Stati et al. v. The Republic of Kazakhstan</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, CL-2014-000070]
132.	May 21, 2018	Transcript of the Hearing [<i>Stati et al. v. The Republic of Kazakhstan</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, CL-2014-000070]
133.	May 25, 2018	Judgment of the Dutch-speaking court of first instance in Brussels, Belgian Protective Garnishment Proceedings

134.	May 28, 2018	Part 7 Claim form filed by the National Bank of Kazakhstan and Kazakhstan, High Court of England
135.	June 11, 2018	Disclosure Statement of Anatolie Stati, English Enforcement Proceedings
136.	June 22, 2018	Statis' Pleading Notes for the Hearing before the Amsterdam Court of Appeal, Dutch Exequatur Proceedings
137.	July 9, 2018	Witness Statement by James Crawford of TGE
138.	July 10, 2018	Email from the Statis to Herbert Smith Freehills LLP
139.	July 10, 2018	Witness Statement of Nuran Kairakbayev [<i>Stati et al. v. The Republic of Kazakhstan</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, CL-2014-000070]
140.	August 10, 2018	Order of the English Court of Appeal
141.	September 28, 2018	Statis' First Submission, Belgium Exequatur Proceedings
142.	October 17, 2018	Statis' Statement of Defence before the Rome Court of Appeal
143.	October 25, 2018	Statis' Reply on Kazakhstan's Rejoinder, Luxembourg Exequatur Proceedings
144.	November 6, 2018	Decision of the Amsterdam Court of Appeal, Dutch Exequatur Proceedings
145.	November 21, 2018	Fourth Witness Statement of Philip Maitland Carrington
146.	November 22, 2018	Kazakhstan's Application for Indemnity Costs [<i>Stati et al. v. The Republic of Kazakhstan</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, CL-2014-000070]
147.	December 7, 2018	Statis' Rebuttal Submission, Italian Exequatur Proceedings
148.	January 14, 2019	Statis' Submissions, Belgian Conservatory Garnishment Appeal Proceedings
149.	January 31, 2019	Statis' Second Submission, Belgium Exequatur Proceedings
150.	February 4, 2019	Statis' Reply to Kazakhstan's Second Rejoinder, Luxembourg Exequatur Proceedings
151.	February 4, 2019	Affidavit of Ruslan Ashenov, an investigator of the Economic Investigation Service of the State Revenue Committee of the Ministry of Finance of Kazakhstan, certified translation
152.	February 6, 2019	Expert Opinion of TPA Global
153.	February 27, 2019	Judgment of the Rome Court of Appeal (No. 1490/2019), Italian Exequatur Proceedings

154.	March 29, 2019	Affidavit of Ms. Daniele Geronzi and Ms. Cecilia Carrara of Legance, Italian Exequatur Proceedings
155.	April 1, 2019	Witness Declaration of Philip Maitland Carrington
156.	April 3, 2019	The Oral Videotaped Deposition of Artur Lungu, <i>In Re Application of Republic of Kazakhstan for Order Directing Discovery from Artur Lungu Pursuant to 28 U.S.C. § 1782</i> , Misc. Action No. 4:19-mc-00423 (S.D. Tex. 2019)
157.	April 15, 2019	Statis' Submission, Belgian Exequatur Proceedings
158.	April 16, 2019	Statis' Motion after Interim Judgment, Dutch Exequatur Proceedings
159.	May 5, 2019	First Declaration of Mr. Alexander Foerster of Mannheimer Swartling
160.	May 9, 2019	Affidavit of Matthew Kirtland of Norton Rose, <i>In Re Application of Republic of Kazakhstan for Order Directing Discovery from Artur Lungu Pursuant to 28 U.S.C. § 1782</i> , Misc. Action No. 4:19-mc-00423 (S.D. Tex. 2019)
161.	July 2, 2019	Judgment the London High Court on Costs, July 2, 2019, [<i>Stati et al. v. The Republic of Kazakhstan</i> , In the High Court of Justice, Queen's Bench Division, Commercial Court, CL-2014-000070]
162.	July 5, 2019	Letter from Dr Patricia Nacimiento, Herbert Smith Freehills LLP (at the time Herbert Smith Freehills Germany LLP) to KPMG Audit LLC
163.	June 6, 2019	Statis' Submission, Luxembourg Exequatur Proceedings
164.	June 28, 2019	Judgment of the French-speaking Court of First Instance of Brussels, Belgian Executory Garnishment Proceedings
165.	August 2, 2019	Letter of De Brauw Blackstone Westbroek N.V. to the Amsterdam Court of Appeal, Dutch Exequatur Proceedings
166.	August 5, 2019	Letter from S. Zhumashev, KPMG Audit LLC, to A. Stati
167.	August 15, 2019	Expert Opinion of Professor T.F.E. Tjong Tjin Tai
168.	August 19, 2019	Expert Opinion of PwC
169.	August 21, 2019	Letter from A. Clarke, KPMG Audit LLC, to A. Stati
170.	August 21, 2019	Letter from A. Clarke, KPMG Audit LLC, to Dr. Patricia Nacimiento of Herbert Smith Freehills LLP (at the time Herbert Smith Freehills Germany LLP)
171.	August 22, 2019	Kazakhstan's Exhibits 123A and 123B, Dutch Exequatur Proceedings
172.	August 27, 2019	Statis' Pleading Notes for the Hearing, Dutch Exequatur Proceedings

173.	September 6, 2019	Letter from G. Pisica to KPMG Audit LLC
174.	September 6, 2019	Letter from Nauta to DeBrauw
175.	September 20, 2019	Letter from A. Clarke, KPMG Audit LLC, to G. Pisica
176.	September 24, 2019	Letter from the Statis to the Luxembourg Court of Appeal
177.	September 25, 2019	Letter from G. Pisica to KPMG Audit LLC
178.	October 3, 2019	Letter from A. Clarke, KPMG Audit LLC, to G. Pisica
179.	October 11, 2019	Kazakhstan's letter to the Brussels Court of First Instance, Belgium Exequatur Proceedings
180.	October 17, 2019	Kazakhstan's letter to NautaDulith Avocats Luxembourg S.A.R.L
181.	October 25, 2019	Statis' Letter to the Brussels Court of First Instance, Belgium Exequatur Proceedings
182.	November 6, 2019	Kazakhstan's Letter to Brussels Court of First Instance, Belgium Exequatur Proceedings
183.	November 13, 2019	Letter of De Brauw Blackstone Westbroek N.V. to NautaDulith N.V.
184.	November 21, 2019	Letter from the Statis to the Luxembourg Court of Appeal
185.	November 25, 2019	Kazakhstan's Statement of Claim, in the Svea Court of Appeal's case no. ÖÄ 7709-19
186.	November 25, 2019	Expert Opinion of BDO
187.	November 28, 2019	Kazakhstan's Letter to Luxembourg Court of Appeal, Luxembourg Exequatur Proceedings
188.	December 10, 2019	Kazakhstan's Letter to Luxembourg Court of Appeal, Luxembourg Exequatur Proceedings
189.	December 16, 2019	Statis' Letter to Luxembourg Court of Appeal, Luxembourg Exequatur Proceedings
190.	December 19, 2019	Judgment of the Luxembourg Court of Appeal, Luxembourg Exequatur Proceedings
191.	December 20, 2019	Decision of the French-language court of First Instance of Brussels, Belgium Exequatur Proceedings
192.	January 20, 2020	Statis' Submission, Swedish Enforcement Proceedings
193.	January 21, 2020	Legal Opinion of Professor C. Schreuer
194.	January 21, 2020	Expert Opinion of PwC

195.	April 2, 2020	Witness Statement of Nuran Kairakbayev
196.	April 22, 2020	Approved Judgement of Mr Justice Teare [<i>National Bank of Kazakhstan et al. v. The Bank of New York Mellon et al.</i> , In the High Court of Justice, Queen’s Bench Division, Commercial Court, FL-2018-000007]
197.	May 4, 2020	Ruling of Mr Justice Teare [<i>National Bank of Kazakhstan et al. v. The Bank of New York Mellon et al.</i> , In the High Court of Justice, Queen’s Bench Division, Commercial Court, FL-2018-000007]
198.	June 17, 2020	Decision of the Svea Court of Appeal, Swedish Enforcement Proceedings (case no. ÖÄ 7709-19)
199.	July 8, 2020	Order of the English Court of Appeal on the NBK and Kazakhstan’s PTA application
200.	July 8, 2020	Order of the English Court of Appeal on the Statis’ PTA application
201.	July 14, 2020	Judgment of the Amsterdam Court of Appeal, Dutch Exequatur Proceedings
202.	July 20, 2020	Second Declaration of Alexander Foerster of Mannheimer Swartling
203.	July 27, 2020	Expert Opinion of Alexander Layton QC
204.	July 29, 2020	Expert Report of Ian Clemmence of PwC: Review of the application of TNG and KPM funds by the Stati Parties
205.	July 29, 2020	Expert Report of Ian Clemmence of PwC: Review of transactions by the Stati Parties for characteristics of money laundering risks
206.	July 30, 2020	Legal Opinion by Stefan Cassella of Streamhouse AG
207.	August 23, 2020	Legal Opinion of Dr Patrick Schöldström
208.	September 10, 2020	Order of the Dutch-speaking Court of First Instance of Brussels, Belgian Renewal Garnishment Proceedings
209.	October 30, 2020	Witness Declaration of Arnaud Nuyts, Belgian Counsel for Kazakhstan
210.	October 14, 2020	Witness Statement of Albert Marsman, Dutch Counsel for Kazakhstan
211.	November 13, 2020	Kazakhstan’s Opposition to the Renewal Order, November 13, 2020
212.	November 17, 2020	Judgment of the Court of Appeal Brussels, Belgian Exequatur Proceedings
213.	November 27, 2020	Judgement of the Supreme Court of Gibraltar [<i>Tolkynneftegaz LLP, Orynbasar Kybygul v. Terra Raf Trans Trading Ltd., Anatolie Stati, Gabriel Stati, Tristan Oil Limited</i> , in the Supreme Court of Gibraltar, 2020/ORD/072]
214.	December 2, 2020	Letter from Kazakhstan to the District Court of Luxembourg, Luxembourg Attachment Proceedings

215.	December 3, 2020	Witness Declaration of François Kremer, Luxembourg Counsel for Kazakhstan
216.	December 3, 2020	Letter from the Statis to the District Court of Luxembourg, Luxembourg Attachment Proceedings, December 3, 2020
217.	January 8, 2021	Judgment of the Luxembourg District Court, Luxembourg Attachment Proceedings
218.	January 17, 2021	Affidavit of Matthew Kirtland of Norton Rose Fulbright US LLP

CASE LAW, SOFT LAW, AND LITERATURE

Doc. #	Document Name	Country
1.	AAA R. 22(a), 32(a)	INTL
2.	Aloysius Llamzon & Anthony Sinclair, “Investor Wrongdoing in Investment Arbitration: Standards Governing Issues of Corruption, Fraud, Misrepresentation and Other Investor Misconduct, in ICC Congress Series No. 18, Legitimacy: Myths, Realities, Challenges,” in Albert Jan Van den Berg (ed), <i>Legitimacy: Myths, Realities, Challenges, ICCA Congress Series, Volume 18</i> (Kluwer Law International, 2015)	US
3.	<i>Aoude v. Mobil</i> , 892 F.2d 1115 (1st Cir. 1989)	US
4.	<i>ARMA, S.R.O. v. BAE Systems Overseas, Inc.</i> , 961 F.Supp.2d 245 (D.D.C. 2013)	US
5.	<i>Bloomberry Resorts & Hotels Inc. v. Global Gaming Phil. LLC</i> , No. 1432/2017 (SGH, Jan. 3, 2020)	SING
6.	Bogdan, M., <i>Svensk internationell privat- och processrätt</i> , JUNO ed. 8	SWE
7.	<i>Bonar v. Dean Witter Reynolds, Inc.</i> , 835 F.2d 1378 (11th Cir. 1988)	US
8.	Brussels Court of Appeal, January 9, 1990, Journal des tribunaux 1990	BELG
9.	Bundesgerichtshof [BGH] [Federal Court of Justice] Jan. 30, 2013, III ZB 40/12 (Ger.)	GER
10.	C. Carrara, <i>New York Convention 60 years later: a neverending search for a balance between comitas and internationality</i> , in <i>Rivista dell’Arbitrato</i> , 41–59 (2018)	IT
11.	Catherine A. Rogers, <i>Ethics in International Arbitration</i> (2013)	US
12.	Catherine A. Rogers, <i>Fit and Function in Legal Ethics: Developing a Code of Conduct for International Arbitration</i> , 23 <i>Mich. J. Int’l L.</i> 341 (2002)	US
13.	<i>Cementownia “Nowa Huta” S.A. v. Republic of Turkey</i> , ICSID Case No. ARB(AF)/06/2, Award, September 17, 2009	INTL

14.	Chester Brown, “The Relevance of the Doctrine of Abuse of Process in International Adjudication,” 2 TDM (2011)	
15.	<i>Chevron Corp. v. Donziger</i> , 866 F. Supp. 2d 235 (S.D.N.Y. 2012)	US
16.	<i>China Minmetals Materials Import and Export Co. Ltd v. Chi Mei Corp.</i> , 334 F. 3d 274 (3d. Cir. 2003)	US
17.	<i>Churchill Mining PLC and Planet Mining Pty Ltd v. Republic of Indonesia</i> , ICSID Case No. ARB/12/14 and 12/40, Award, December 6, 2016	INTL
18.	CIETAC Art. 35(1)	INTL
19.	<i>Cooper v. Floyd</i> , 9 N.C. App. 645, 649, 177 S.E.2d 442 (1970)	US
20.	<i>Corporacion Mexicana de Mantenimiento Integral, S. de R.L. de C.V v. Pemex Exploracion y Produccion</i> , 832 F.3d 92 (2d Cir. 2016)	US
21.	Council of Bars and Law Societies of Europe (CCBE), Charter of Core Principles of the European Legal Profession and Code of Conduct for European Lawyers, Core Principles	EU
22.	Council of Europe Recommendation No. R(2000)21, Principle III(4)	EU
23.	Cour d’appel [CA] [regional court of appeal] Paris, 1e ch., Jan. 16, 2018, 15/21703 (Fr.)	FRA
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