IN THE UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA

AGUDAS CHASIDEI CHABAD OF UNITED STATES.

Appellee,

v.

Case No. 20-7078

Filed: 03/07/2022

RUSSIAN FEDERATION; RUSSIAN MINISTRY OF CULTURE AND MASS COMMUNICATION; RUSSIAN STATE LIBRARY; and RUSSIAN STATE MILITARY ARCHIVE,

Defendants,

STATE DEVELOPMENT CORPORATION VEB.RF,

Appellant.

MOVANT-APPELLANT'S MOTION TO STAY PENDING SUBSTITUTION OF COUNSEL

Movant-Appellant State Development Corporation VEB.RF ("VEB") respectfully moves this Court to stay proceedings in this appeal pending substitution of counsel for VEB.

Because Freshfields Bruckhaus Deringer US LLP's ("Freshfields") role as counsel to VEB will be ending, VEB is seeking substitute counsel in this matter. Therefore, VEB also respectfully requests that all further

proceedings in this appeal be stayed until VEB has obtained substitute counsel.

Dated: New York, New York

March 7, 2022

Respectfully submitted,

Filed: 03/07/2022

/s/ David Y. Livshiz
David Y. Livshiz
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Scott A. Eisman

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Attorneys for Movant-Appellant

Filed: 03/07/2022

CERTIFICATE OF COMPLIANCE

I hereby certify that:

1. This motion complies with the type-volume limitation of Fed.

R. App. P. 27(d)(2) because this motion contains 65 words, excluding

parts of the motion exempted by Fed. R. App. P. 32(f).

2. This motion complies with the typeface requirements of Fed.

R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P.

32(a)(6) because this motion has been prepared in a proportionately

spaced typeface using Microsoft Word in 14-point Century Schoolbook

font.

Dated: New York, New York

March 7, 2022

/s/ David Y. Livshiz

David Y. Livshiz

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Filed: 03/07/2022

CERTIFICATE OF SERVICE

I hereby certify that, on March 7, 2022, a copy of the foregoing motion was served via first class international mail through the United States Postal Service upon the following:

Ministry of Justice of the Russian Federation Attn: Hon. Konstantin Chuychenko, Minister 14 Zhitnaya Street GSP-1 Moscow, Russia 119991

Ministry of Culture of the Russian Federation Attn: Hon. Olga Lyubimova, Minister 7/6, Bldg. 1,2, Malyy Gnezdnikovskiy Pereulok Moscow, Russia 125993

Russian State Military Archive Attn: Vladimir N. Kyzelenkov, General Director 29 Admiral Makarov Street Moscow, Russia 125212

Russian State Library Attn: Vadim Valerievich Duda, General Director 3/5, Vozdvizhenka Street, 2nd Entrance Moscow, Russia 119019

Dated: New York, New York March 7, 2022

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