

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

PAO TATNEFT,)	
)	
Petitioner,)	
)	
v.)	Civil Action No. 1:17-cv-00582-CKK
)	
UKRAINE,)	
)	
Respondent.)	

JOINT MOTION FOR A MORATORIUM ON DISCOVERY

Due to the war in Ukraine, the parties jointly move for a moratorium on discovery and all related proceedings before this Court, consistent with the parties’ right to modify ordinary discovery procedures by stipulation, pursuant to the inherent authority of the Court, and in the interest of justice. *See* Fed. R. Civ. P. 29(b); *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936). Tatneft has stipulated that discovery should be suspended until further order of the Court.

Dated: March 4, 2022

Respectfully submitted,

/s/ Jonathan I. Blackman
Jonathan I. Blackman
Cleary Gottlieb Steen & Hamilton
One Liberty Plaza
New York, New York
(212) 225-2000
(212) 225-3999 (fax)

/s/ Maria Kostytska
Maria Kostytska (D.C. Bar # 500678)
Winston & Strawn, LLP
68 rue du Faubourg Saint Honoré
Paris 75008, France
(202) 282-5841
(331) 53648220 (fax)

Counsel for Petitioner

Counsel for Respondent

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of March 2022 I caused the foregoing Motion for a Moratorium on Discovery to be electronically filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Maria Kostytska
Maria Kostytska (D.C. Bar # 500678)
Winston & Strawn, LLP
68 rue du Faubourg Saint Honoré
Paris 75008, France
(202) 282-5841
(331) 53648220 (fax)

Counsel for Respondent