

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

HULLEY ENTERPRISES LTD., YUKOS
UNIVERSAL LTD., AND VETERAN
PETROLEUM LTD.,

Petitioners,

v.

THE RUSSIAN FEDERATION,

Respondent.

Case No. 1:14-cv-01996-BAH

THE RUSSIAN FEDERATION'S
MOTION FOR LEAVE TO FILE A SUR-REPLY
IN OPPOSITION TO PETITIONERS' MOTION TO STRIKE

Exhibit C:

***Yukos Capital SàRL v. Feldman*, No. 15-cv-4964-LAK, Feldman Rule 26(a)(1) Initial Disclosures, Confirming The Oligarch "Mikh[a]il Brudno" Is An Individual With Discoverable Information Regarding Topics Such As The 2011 GML Agreement**

Exhibit A

Defendant, Counterclaim-Plaintiff and Third-Party Plaintiff Daniel Caleb Feldman (“Feldman”), by and through his undersigned counsel, hereby serves the following initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) and based on information reasonably available to him as of this date. Mr. Feldman reserves the right to supplement and/or modify these disclosures as he obtains information through discovery or otherwise becomes aware of additional individuals, documents, data compilation or tangible things that may contain discoverable information. Mr. Feldman further reserves the right to object to the use of the disclosures herein on the grounds of relevancy, competency, materiality, admissibility, hearsay, or for any other reason. Further, Mr. Feldman provides these disclosures without waiving any applicable privilege, including but not limited to the attorney-client and work product privileges.

By making these initial disclosures, Mr. Feldman in no way represents that he has identified every witness, document, data compilation, or other tangible thing that he may use to support his claims and anticipated defenses. Rather, these disclosures represent a good faith effort by Mr. Feldman to identify information currently available to him that falls within the scope of Rule 26(a)(1). These disclosures also do not include information that may be used solely for impeachment purposes.

These initial disclosures are organized to correspond to the general categories set forth in Rule 26(a)(1). All of the disclosures set forth below are made subject to the above reservations and qualifications. Pursuant to Rule 26(e), Mr. Feldman will supplement these initial disclosures as necessary.

A. INDIVIDUALS WITH DISCOVERABLE INFORMATION

i. **Rule 26(a)(1)(A)(i):** The names, addresses (work and home), and telephone numbers (work and home) of individuals likely to have discoverable information that Mr. Feldman may use to support his claims or defenses are:

Name	Last Known Address and Telephone Number	Subject Matter
Daniel Feldman	May be contacted through counsel only.	Claims and defenses at issue in this litigation.
Armen Mikayelyan	Unknown	Current director of Yukos entities with knowledge as to the claims and defenses at issue in this litigation.
Rudolf Mahitaryan	Unknown	Current director of Yukos entities with knowledge as to the claims and defenses at issue in this litigation.
Cleanthis Georgiades	Cyprus	Current YHIL director with knowledge as to alleged political contributions and separate indemnity coverage.
Harlan Malter	Unknown	Current director of Yukos entities with knowledge as to the claims and defenses at issue in this litigation.
Sergi Ketcha	Unknown	Current director of Yukos entities with knowledge as to the claims and defenses at issue in this litigation.
Martin Parr	c/o Morrison Cohen LLP 909 Third Avenue New York, New York 10022	Current director of Yukos entities with knowledge as to the claims and defenses at issue in this litigation.
Dimitri Marinson	Unknown	Current director of Yukos entities with knowledge as to the claims and defenses at issue in this litigation.
Robert Foresman	680 Milton Road Rye, New York 10580	Current investor in Promneftstroy with knowledge of Promneftstroy and its legal proceedings.
Stephen Lynch	438 Route 22, Number 22 North Salem, New York 10560	Founder of OOO Monte-Valle and investor in Promneftstroy with knowledge of Promneftstroy and its legal proceedings.



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