EXHIBIT K

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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                                   :

SERGEY LEONTIEV,   :

                                 :   Case No. 1:16-cv-03595 (JSR)

           Plaintiff,   :

                                   :

           - v. -   :   **DEFENDANT'S FIRST**

                                   :   **REQUEST FOR THE**

ALEXANDER VARSHAVSKY,   :   **PRODUCTION OF**

                                   :   **DOCUMENTS AND THINGS**

           Defendant.   :   **BY PLAINTIFF**

                                   :

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Defendant Alexander Varshavsky ("Defendant"), by his undersigned attorneys,

Debevoise & Plimpton LLP, hereby requests that Plaintiff Sergey Leontiev ("Plaintiff") produce

the documents, electronically stored information and things requested herein for examination,

inspection and copying, pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure

("FRCP") and all applicable local rules, by delivering such documents to Sean Hecker at the

offices of Debevoise & Plimpton LLP, 919 Third Avenue, New York, NY 10022, within the

time provided by the FRCP, or at such other time and place as agreed upon by the parties.

DEFINITIONS AND INSTRUCTIONS

1.   The uniform definitions and rules of construction set forth in Rule 26.3 of the

Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of

New York ("Local Rules") are incorporated herein by reference.

2.   "Agreement" means any written or oral contract, understanding, promise,

agreement or agreement in principle, all exhibits or other documents ancillary thereto or referred

to therein, all documents that memorialize or express the terms of any such agreement, and all drafts of and amendments to the foregoing documents.

3.   "Cloud Entities" refers to any of the following entities and/or their parent companies, subsidiaries, affiliates and predecessors: OOO Alivikt; Ambika Investments Limited; Biovilac Limited; Dunning Finance Incorporated; OOO ELSO; ZAO Finansovaya gruppa Life; Finbay Group Limited; OOO Frilaif; Greenex Trading Limited; Grid Market Research, Inc.; OOO Kollektorskoe agentstvo Life; OOO Personal+; OOO Probiznes Holding; Valkera Investments Limited; Vennop Trading Limited; Vermenda Holdings Limited; Higold Investments Limited; Wonderworks Investments Limited; Wonderheart Assets Limited.

4.   "Complaint" means the Complaint filed by the Plaintiff in this action on May 13, 2016.

5.   "Debt" means the debt owed or claimed to be owed pursuant to the lending agreements at issue in the present action, including but not limited to the lending agreements and related documents identified in Appendices A, B, and C to the Complaint.

6.   "Thing" means any tangible object. Any request for or reference to "documents" is also a request for or reference to "things."

7.   The use of the masculine pronoun shall include the feminine and vice versa and shall be construed as necessary to bring within the scope of the request all responses that might otherwise be outside of its scope.

8.   The present tense includes the past and future tenses.

9.   If any portion of a document is considered responsive to any request, the request shall be construed as requesting production of the entire document.

10.   Except when express reference is made to another paragraph, each paragraph herein should be construed independently and not by reference to any other paragraph herein for purpose of limitation.

11.   Questions regarding the interpretation of these document requests should be resolved in favor of the broadest possible construction.

12.   Responsive documents that are to be produced include, without limitation, any correspondence, memoranda, notes, diaries, daily calendars, electronic mail messages, voicemail messages, text or SMS messages, "instant messages," Skype messages, phone application "app" messages such as WhatsApp messages, computer files, electronic or magnetic media, and/or other documents.

13.   Responsive documents are to be produced as they have been kept in the ordinary course of business or shall be organized and labeled to correspond with the enumerated requests in this demand, pursuant to FRCP 34(b). All attachments and appended or embedded links or files shall be produced if any one of them is responsive to any of these document requests.

14.   If with respect to any request there are no responsive documents, so state in writing.

15.   All electronically stored information shall be produced in the form in which it ordinarily is maintained, with the exception of e-mail as set forth below. All such electronically stored information shall include any and all associated metadata and any and all associated files, including but not limited to attachments or hyperlinked files. Exact data delivery specifications such as load file formats and metadata fields will be provided subsequently.

16.   All e-mail shall be produced in electronic form in a manner that preserves the relationship between the e-mail and all its attachments. An e-mail with all its attachments shall

be produced as a single record. Information from each e-mail header field shall be produced in a separate database field. Any attachments to an e-mail shall be produced in the electronic form in which it ordinarily is maintained. In addition, a rendering of the e-mail shall be provided in a static format that corresponds to the text format of the original e-mail (i.e., plain text e-mails rendered as .txt files, rich text e-mails rendered as .rtf files and .html e-mails rendered as .html files).

17.   Pursuant to Local Rule 26.2, if any document or part of a document responsive to this request is withheld under a claim of privilege, work-product immunity or other claimed privilege or protection from discovery, Plaintiff shall furnish a list setting forth as to each document: (a) the identity of each author or preparer of the document, including their name, title and business affiliation; (b) the identity of the addressee and of every other person who received, read, or viewed the document, including their name, title and business affiliation; (c) the date the document bears; (d) the nature of the document, *e.g.* letter, memorandum, e-mail, etc.; (e) either the title the document bears or the specific subject matter of the document, and a short description of the document sufficient to determine the validity of the assertion of the privilege; and (f) the nature of the privilege claimed. For all redactions or attachments withheld as privileged, also include identifying information, such as bates number or file path, to indicate the document of which the redacted portion or attachment is a part.

18.   If part of an otherwise responsive document contains information that is subject to a claim of privilege, those parts of the document subject to the claim of privilege shall be deleted or redacted from the document, the deleted or redacted parts shall be clearly marked as such, and the rest of the document shall be produced.

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