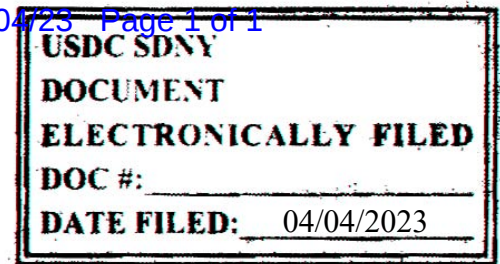




North America Europe Asia

VIA ECF

April 3, 2023

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Ukraine v. PAO Tatneft*, No. 1:21-mc-00376-JGK-SN and No. 1:22-mc-00036-JGK-SN**

Dear Judge Netburn:

The parties jointly submit this status letter pursuant to the Court's January 6, 2023 orders in Case No. 1:21-mc-00376 (Dkt. 70) and Case No. 1:22-mc-00036 (Dkt. 41). The March 4, 2022 orders in each case placed a moratorium on further discovery and discovery-related proceedings due to the war in Ukraine and upon consideration of the stipulations in the parties' joint letter brief of March 4, 2022. 1:21-mc-00376, Dkt. 57; 1:22-mc-00036 Dkt. 31.

Upon consideration of joint status letters filed by the parties on May 25, 2022, September 14, 2022, and January 4, 2023 stating that the war in Ukraine remained ongoing and that neither an end of the war nor a ceasefire was in sight, the Court has left the moratoria in place and instructed the parties to file a further status letter by April 5, 2023.

As before, the war in Ukraine remains ongoing. According to press reports, neither an end of the war nor a ceasefire is in sight.<sup>1</sup> Thus, the parties agree that the moratorium on discovery and discovery-related proceedings in each of the above-referenced cases should remain in effect pending further order of the Court.

Respectfully submitted,

/s/ Maria Kostytska  
Maria Kostytska, Partner  
WINSTON & STRAWN LLP  
*Counsel for Ukraine*

/s/ Elizabeth Wolstein  
Elizabeth Wolstein, Partner  
SCHLAM STONE & DOLAN LLP  
*Counsel for PAO Tatneft*

Cc: The Honorable John G. Koeltl (via ECF)  
All Counsel of Record (via ECF)

The moratorium on discovery and discovery-related proceedings in 21-mc-00376 and 22-mc-00036 remains in place pending further order of the Court. The parties shall file an additional joint status letter by July 10, 2023.

**SO ORDERED.**

\_\_\_\_\_  
SARAH NETBURN  
United States Magistrate Judge

Dated: April 4, 2023  
New York, New York