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VIA ECF

July 27, 2022

The Honorable Richard J. Leon
U.S. District Court for the
District of Columbia
333 Constitution Avenue N.W.
Washington D.C. 20001

RE: *A.D. TRADE Belgium S.P.R.L. v. Republic of Guinea*, No. 1:22-cv-00245

Dear Judge Leon:

We write on behalf of the Plaintiff A.D. TRADE Belgium S.P.R.L. (“A.D. Trade”) in the above-referenced action to respectfully request that the Court decide Plaintiff’s pending Motion for Default Judgment (the “Motion”) [Dkt. 17].

As A.D. Trade explained in the Motion, the Republic of Guinea (“Guinea”) owes A.D. Trade more than US \$70 million based in its failure to pay A.D. Trade for services dating back to 2011. For the last 12 years, A.D. Trade has been trying to recover the money it is owed, including through two arbitrations and subsequent enforcement proceedings in France. Having recently discovered movable property of Guinea in the United States, A.D. Trade commenced this action on January 31, 2022, to begin enforcement proceedings here. Because Guinea has utterly ignored this action and has defaulted, A.D. Trade filed the Motion on June 11, 2022.

Meanwhile, earlier this year, another creditor of Guinea that already had obtained a U.S. court judgment took steps to levy on the same property of Guinea that A.D. Trade had identified. That proceeding was resolved by settlement in April 2022. Given those developments, A.D. Trade is concerned that Guinea may now be in the process of dissipating its U.S. property to avoid enforcement efforts by other creditors like A.D. Trade. Therefore, A.D. Trade respectfully requests that the Court decide the Motion at its earliest convenience so that, if judgment is entered against Guinea, A.D. Trade can commence execution proceedings without further delay.

Undersigned counsel is available to answer any questions that the Court may have.

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Respectfully submitted,

/s/ Josef M. Klazen

Josef M. Klazen

Attorney for Plaintiff

A.D. TRADE Belgium S.P.R.L.