

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

BLASKET RENEWABLE INVESTMENTS,
LLC,

Petitioner,

v.

KINGDOM OF SPAIN,

Respondent.

Civil Action No. 23-cv-2701 (RC)

**DECLARATION OF MATTHEW S. ROZEN IN SUPPORT OF PETITIONER'S
MOTION FOR RELIEF PURSUANT TO 28 U.S.C. § 1610(C) AND 28 U.S.C. § 1963**

Pursuant to 28 U.S.C. § 1746, I, Matthew S. Rozen, declare as follows:

1. I am an attorney and am admitted to practice law in the District of Columbia and Virginia. I represent Petitioner Basket Renewable Investments LLC (“Basket”) in this matter.

2. I am over the age of eighteen and make this declaration from personal knowledge based on information reviewed and/or referenced herein.

3. This declaration is submitted in support of Petitioner’s Motion for Relief Pursuant to 28 U.S.C. § 1610(c) and 28 U.S.C. § 1963.

4. On December 16, 2024, Basket served Spain with post-judgment interrogatories and document requests to identify executable assets to satisfy the judgment. On January 14, 2025, Spain served Basket with Spain’s Responses and Objections to Basket’s First Post-Judgment Interrogatories and Document Requests, a true and correct copy of which is attached hereto as Exhibit A.

5. On December 19, 2024 Basket also served nonparty subpoenas on the Federal Reserve Bank of New York and The Clearing House Payments Company LLC, seeking

information about Spain's transactions conducted through those entities' interbank payment systems and any relevant information retained by the entities about Spain's accounts. Spain filed a motion to quash these subpoenas in the U.S. District Court for the Southern District of New York. *See Kingdom of Spain v. Basket Renewable Invs. LLC*, No. 1:25-mc-00008 (S.D.N.Y.). A true and correct copy of Spain's Memorandum of Law in Support of its Motion to Quash Non-Party Subpoenas is attached hereto as Exhibit B. A true and correct copy of Spain's Reply in Support of its Motion to Quash Non-Party Subpoenas is attached hereto as Exhibit C.

6. The parties met and conferred on February 12, 2025 to discuss Spain's objections to the postjudgment discovery served on it. During that meeting, counsel for Spain stated that until this Court issues an order under 28 U.S.C. § 1610(c) recognizing that "a reasonable period of time has elapsed following the entry of judgment," Spain would not produce any information in response to Basket's interrogatories and document requests, and would not discuss the substance of its other objections to those interrogatories and document requests.

7. Basket is unaware of executable assets of Spain in this District sufficient to satisfy the approximately \$36 million judgment against it.

8. On information and belief, Spain has substantial attachable assets in the State of New York.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 11, 2025
Washington, D.C.


Matthew S. Rozen