



this application, IKB relies on its memorandum of law and the Declaration of Conrad Walker with accompanying exhibits, submitted herewith. A proposed Order is attached hereto.

WHEREFORE, IKB respectfully prays that this Court enter an order:

1. Granting IKB's application for discovery from Respondent pursuant to 28 U.S.C. § 1782;
2. Authorizing IKB to take discovery from Putnam relating to the issues identified in its application, including (a) issuing the subpoenas for the deposition of Respondent and the production of documents in the form attached to the proposed order as Tab A; and (b) issuing additional subpoenas for the production of documents and/or additional depositions of Respondent as IKB may reasonably deem appropriate and as are consistent with the Federal Rules of Civil Procedure;
3. Directing Respondent to comply with such subpoenas in accordance with the Federal Rules of Civil Procedure and the Rules of this Court;
4. Appointing the undersigned to issue, sign and serve such subpoenas upon Respondent, and ordering that testimony in this matter may be taken before any certified court reporter authorized to take testimony and administer oaths and that such court reporters are hereby authorized to take testimony in this matter.
5. Ordering IKB to deliver copies of this order and any subpoenas issued pursuant to this order to the civil proceedings pending in London, England.

Respectfully submitted,

IKB Deutsche Industriebank AG

By one of its attorneys,



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