

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

PREVEZON HOLDINGS LTD., *et al.*,

Defendants,

ALL RIGHT, TITLE AND INTEREST IN THE  
REAL PROPERTY AND APPURTENANCES  
KNOW AS THE 20 PINE STREET  
CONDOMINIUM, 20 PINE STREET, NEW  
YORK, NEW YORK 10005, UNIT 1816 (“20  
PINE STREET, UNIT 1816”), *et al.*,

Defendants *in Rem.*

Case No. 1:13-cv-06326 (TPG)

ECF CASE

**NOTICE OF MOTION TO STRIKE  
AND FOR A PROTECTIVE ORDER  
OR, IN THE ALTERNATIVE, FOR  
DISCOVERY PURSUANT TO FED.  
R. CIV. P. 56(d)**

**PLEASE TAKE NOTICE** that Defendants Prevezon Holdings Ltd., Prevezon Alexander, LLC, Prevezon Soho USA, LLC, Prevezon Seven USA, LLC, Prevezon Pine USA, LLC, Prevezon 1711 USA, LLC, Prevezon 1810 LLC, Prevezon 2009 USA, LLC, and Prevezon 2011 USA, LLC, through their attorneys Baker & Hostetler LLP and Baker Botts L.L.P., move this Court, before the Honorable Thomas P. Griesa, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, for an order striking the argument set forth at pages 13-15 of the Plaintiff’s memorandum in support of its partial summary motion (Dkt. 398) (and the accompanying facts in its Rule 56.1 Statement) and entering a protective order pursuant to Fed. R. Civ. P. 26(c) barring the deposition of HSBC Suisse or, in the alternative and under Fed. R. Civ. P. 56(d), ordering Plaintiff to produce documents and witnesses from HSBC Suisse and William F. Browder and

his Hermitage Fund prior to Defendants' deadline to respond to the motion for partial summary judgment.

Dated: November 9, 2015  
New York, New York

Respectfully submitted,

*s/ Mark A. Cymrot*

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