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 KNOWN AS THE 20 PINE STREET CONDOMINIUM, 20 PINE STREET, NEW YORK, NEW YORK 10005, UNIT 1816, et al.,

Defendants in Rem.

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

ECF CASE

NOTICE OF DEFENDANTS'
MOTION FOR RENEWED
REQUEST FOR AN ORDER TO
SHOW CAUSE WHY WILLIAM
BROWDER SHOULD NOT BE HELD
IN CONTEMPT AND WHY THE
GOVERNMENT SHOULD NOT BE
SANCTIONED

PLEASE TAKE NOTICE, that based upon accompanying memorandum of law, and the Declaration of Mark A. Cymrot in support, 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, Prevezon 2011 USA, LLC, Ferencoi Investments Ltd., and Kolevins, Ltd. (collectively, the "Defendants"), by and through their counsel, 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 to Show Cause why William Browder Should not be Held in Contempt and why the Government Should not be Sanctioned..

Dated: December 11, 2015

New York, New York

Respectfully submitted,

s/ Mark A. Cymrot

BAKER & HOSTETLER LLP

45 Rockefeller Plaza New York, NY 10111 Telephone: (212) 589-4

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

John W. Moscow Mark A. Cymrot

Attorneys for Defendants