

Exhibit A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

**TURKCELL İLETİŞİM HİZMETLERİ A.Ş. and
EAST ASIAN CONSORTIUM B.V.**

Plaintiffs,

vs.

**MTN GROUP, LTD. and
MTN INTERNATIONAL (MAURITIUS) LTD.**

Defendants.

Civil Action No.: 12-cv-00479 (RBW)

NOTICE OF DEPOSITION OF UNAVAILABLE WITNESS

PLEASE TAKE NOTICE that Plaintiffs Turkcell İletişim Hizmetleri A.Ş. and East Asian Consortium B.V., by and through undersigned counsel, pursuant to Fed. R. Civ. P. 30(a)(2)(A)(iii) and 30(b) and Local Rule 30.1, will take the deposition *de bene esse* of Christian Kilowan upon oral examination before a duly authorized officer, authorized to administer oaths, commencing at 9:00 AM on Monday, April 30, 2012 at the offices of Patton Boggs LLP, 2550 M Street NW, Washington, D.C., 20037. If the deposition is not concluded on April 30, 2012, it shall continue from day to day until the parties have concluded the examination. The deposition will be recorded by audiovisual and stenographic means, pursuant to Fed. R. Civ. P. 30(b)(3), for use as discovery, as evidence at trial, or for any other purpose allowed by the Federal Rules of Civil Procedure and the Rules of this Court.

Dated April 6, 2012



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Counsel for Plaintiffs

RULE 30(a)(2)(A)(iii) CERTIFICATION

I, the undersigned, counsel for Plaintiffs Turkcell İletişim Hizmetleri A.Ş. and East Asian Consortium B.V., certify to the best of my knowledge and belief, that Christian Kilowan, a non-resident of the United States and a person not within the control of the Plaintiffs, will be present in the United States and available for deposition from April 30 through May 2, 2012.

Mr. Kilowan is expected to leave the United States at that time, and he will be thereafter outside the subpoena power of the Court and unavailable for examination in this country.

Dated April 6, 2012.



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CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2012, I served the foregoing Notice of Deposition of Unavailable Witness and Rule 30(a)(2)(A)(iii) Certification via e-mail and first-class mail, postage prepaid, to each of the following:

Timothy Coleman, Esq.

Mia Havel, Esq.

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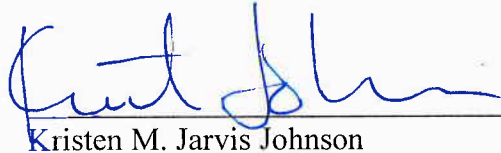
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