

**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)

MOTION FOR LEAVE TO CONDUCT JURISDICTIONAL DISCOVERY

Plaintiffs Turkcell İletişim Hizmetleri A.Ş. and East Asian Consortium B.V. (collectively, “Turkcell”), by and through their undersigned counsel, pursuant to Fed. R. Civ. P. 7 and 26(d)(1), in the event that the Court determines that the Complaint does not contain sufficient factual allegations to support general personal jurisdiction over the Defendants, respectfully move that the Court enter an Order staying this action pending the outcome of limited jurisdictional discovery and following the Order of Stay, for the reasons set forth in the accompanying Memorandum of Points and Authorities in Support of Motion for Leave to Conduct Jurisdictional Discovery, and subject to the statements above, Turkcell seeks leave to conduct limited jurisdictional discovery and file a supplemental memorandum in opposition to MTN’s Motion to Dismiss at a time reasonably following the conclusion of said discovery.

Respectfully submitted,

/s/ Read K. McCaffrey

Read K. McCaffrey, Esq. (# 413837)
David J. Farber, Esq. (# 415899)
Kristen M. Jarvis Johnson, Esq. (# 985032)
PATTON BOGGS LLP

2550 M Street, NW, Washington, DC 20037
Phone: (202) 457-6000 | Fax: (202) 457-6315
rmccaffrey@pattonboggs.com
dfarber@pattonboggs.com
kmjohnson@pattonboggs.com

Counsel for Plaintiffs

Date: August 1, 2012

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2012, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Timothy Coleman, Esq.
Mia Havel, Esq.
FRESHFIELDS BRUCKHAUS DERINGER US LLP
701 Pennsylvania Ave. NW, Suite 600
Washington, DC 20004-2692
tim.coleman@freshfields.com
mia.havel@freshfields.com

Pamila Gudkov, Esq.
Timothy Harkness, Esq.
FRESHFIELDS BRUCKHAUS DERINGER US LLP
601 Lexington Ave., 31st Floor
New York, NY 10022
mila.gudkov@freshfields.com
timothy.harkness@freshfields.com

Counsel for Defendants

/s/ Read K. McCaffrey