

**In the United States Court of Appeals
for the District of Columbia Circuit**

PAO TATNEFT,
PETITIONER - APPELLEE,

v.

UKRAINE,
RESPONDENT - APPELLANT.

*ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA, NO. 1:17-CV-00582-CKK*

JOINT MOTION TO STAY

MARIA KOSTYTSKA
GEOFFREY P. EATON
1901 L Street N.W.
Washington, DC 20036
(202) 282-5000
mkostytska@winston.com
geaton@winston.com

Counsel for Appellant

JONATHAN I. BLACKMAN
MARK E. McDONALD
One Liberty Plaza
New York, New York 10006
(212) 225-2000
jblackman@cgsh.com
memcdonald@cgsh.com

NOWELL D. BAMBERGER
2112 Pennsylvania Avenue, NW
Washington, DC 20037
(202) 974-1930
nbamberger@cgsh.com

Counsel for Appellee

Due to the war in Ukraine, the parties jointly move for a stay of the appellate proceedings before this Court. For good cause, the Court may extend the time prescribed by the Federal Rules of Appellate Procedure “to perform any act,” with limited exceptions not relevant here. Fed. R. App. P. 26(b). Tatneft has stipulated to a moratorium on discovery in the underlying D.C. District Court proceeding until further order of that court. *See* Fed. R. Civ. P. 29(b). The situation in Ukraine provides good cause for a stay of appellate proceedings while the stipulated moratorium on discovery remains in effect.

Thus, the parties request that the briefing schedule entered on March 2, 2022 be stayed until further order of the Court.

Respectfully submitted this 4th day of March 2022.

/s/ Maria Kostytska
MARIA KOSTYTSKA
GEOFFREY P. EATON
1901 L Street N.W.
Washington, DC 20036
(202) 282-5000
mkostytska@winston.com
geaton@winston.com

Counsel for Appellant

/s/ Jonathan I. Blackman
JONATHAN I. BLACKMAN
MARK E. McDONALD
One Liberty Plaza
New York, New York 10006
(212) 225-2000
jblackman@cgsh.com
memcdonald@cgsh.com

NOWELL D. BAMBERGER
2112 Pennsylvania Avenue, NW
Washington, DC 20037
(202) 974-1930
nbamberger@cgsh.com

Counsel for Appellee

CERTIFICATE OF COMPLIANCE

1. This brief complies with the type-volume limitation of Fed. R. App. P. 27(d)(2) because:
 - ☒ this brief contains 122 words, excluding the parts of the brief exempted by Fed. R. App. P. 32(f).
2. This brief complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because:
 - ☒ this brief has been prepared in a proportionally spaced typeface using Microsoft Office Word 2013 in 14-point Times New Roman.

/s/ Maria Kostytska

MARIA KOSTYTSKA

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2022, I filed the foregoing document via the Court's ECF filing system, and caused it to be served electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Maria Kostytska

MARIA KOSTYTSKA