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16 January 2014

BY DHL

Ms. Mariam Gotsiridze
Ministry of Justice of Georgia
24 Gorgasali Street
Tbilisi 0146
Georgia

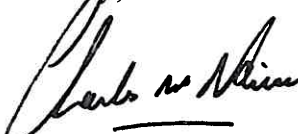
Re: Gudavadze v Georgia

Dear Ms. Gotsiridze:

Per your request, please find attached all of the original copies of the documents pertaining to the settlement of the *Gudavadze et al v Georgia et al* UNCITRAL arbitration. You will also find appended to this letter an index of all enclosed documents. We understand that you need these documents for the purpose of internal proceedings relating to the authorization of a waiver of the confidentiality obligation under the Settlement Agreement dated 6 July 2011.

Please note that all the documents that were signed by Paul Friedland or myself on behalf of Georgia gave rise to express authorizations issued by the Ministry of Justice, all of which we can produce upon request.

Sincerely,



Charles Nairac

Enclosures

Cc: Paul Friedland
Damien Nyer
Florian Quintard
White & Case LLP

Gudavadze *et al* v Georgia

**List of original documents sent by White & Case to
Ministry of Justice by letter dated 16 January 2014**

1. two copies of “Additional Deed of Agreement” dated 6 July 2011 executed by all parties thereto except Liana Zhmotova;
2. one copy of “Additional Deed of Agreement” dated 6 July 2011 executed by Liana Zhmotova only;
3. one copy of “Deed of Agreement” dated 25 August 2011 signed by Graham Huntley on behalf of Gudavadze *et al*;
4. one copy of “Deed of Agreement” dated 25 August 2011 signed by Charles Nairac on behalf of the Georgian Parties;
5. one copy of “Amendment to Settlement Agreement” dated 11 October 2011 and signed by Graham Huntley on behalf of Gudavadze *et al*;
6. one copy of “Amendment to Settlement Agreement” dated 11 October 2011 and signed by Charles Nairac on behalf of the Georgian Parties;
7. one copy of “Second Deed of Agreement” dated 11 October 2011 and signed by Graham Huntley on behalf of Gudavadze *et al*;
8. one copy of “Second Deed of Agreement” dated 11 October 2011 and signed by Charles Nairac on behalf of the Georgian Parties;
9. one copy of “Second Amendment to the Settlement Agreement” dated 30 December 2011 and signed by Graham Huntley on behalf of Gudavadze *et al*;
10. one copy of “Second Amendment to the Settlement Agreement” dated 30 December 2011 and signed by Paul Friedland on behalf of the Georgian Parties;
11. one copy of “Third Deed of Agreement” dated 30 December 2011 and signed by Graham Huntley on behalf of Gudavadze *et al*;
12. one copy of “Third Deed of Agreement” dated 30 December 2011 and signed by Paul Friedland on behalf of the Georgian Parties;
13. one copy of “Third Amendment to the Settlement Agreement dated 6 July 2011” dated 1 February 2012 and signed by Graham Huntley on behalf of Gudavadze *et al*;
14. one copy of “Third Amendment to the Settlement Agreement dated 6 July 2011” dated 1 February 2012 and signed by Charles Nairac on behalf of the Georgian Parties;
15. one copy of “Fourth Deed of Agreement Amending Additional Deed of Agreement dated 6 July 2011” dated 1 February 2012 and signed by Graham Huntley on behalf of Gudavadze *et al*;
16. one copy of “Fourth Deed of Agreement Amending Additional Deed of Agreement dated 6 July 2011” dated 1 February 2012 and signed by Charles Nairac on behalf of the Georgian Parties.

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