

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

VESTHEY GROUP LIMITED,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Civil Action No. 1:18-cv-01456-TFH

**DEFENDANT BOLIVARIAN REPUBLIC OF VENEZUELA'S
CONSENT MOTION FOR A STAY**

Defendant Bolivarian Republic of Venezuela (the "Republic") respectfully moves the Court, with the consent of Plaintiff, for a modest three-week stay until August 27, 2020 to allow the parties to complete the documentation of a tentative agreement for the resolution of this matter. The Republic submits the following in support of its motion:

1. On July 17, 2020, the Court ordered the Republic to advise the Court by August 6, 2020 whether it intends to enter an appearance in the above-captioned case;
2. The Republic has now entered its appearance;
3. The parties are continuing to discuss the terms of an agreement they have tentatively reached for the resolution of this matter; and
4. Plaintiff has consented to the Republic's requested stay.

Accordingly, the Republic respectfully requests that the Court grant a three-week stay of all proceedings in this case until August 27, 2020.

/s/ Joseph E. Neuhaus

Joseph E. Neuhaus (*pro hac vice* pending)

Sergio J. Galvis

James L. Bromley (*pro hac vice* pending)

SULLIVAN & CROMWELL LLP

125 Broad Street

New York, New York 10004

Telephone: (212) 558-4000

Facsimile: (212) 558-3588

neuhausj@sullcrom.com

galviss@sullcrom.com

bromleyj@sullcrom.com

/s/ Judson O. Littleton

Judson O. Littleton

(D.C. Bar No. 1027310)

SULLIVAN & CROMWELL LLP

1700 New York Avenue, N.W. Suite 700

Washington, District of Columbia, 20006

Telephone: (202) 956-7500

Facsimile: (202) 293-6330

Dated: August 6, 2020

New York, New York

*Attorneys for Defendant Bolivarian Republic
of Venezuela*