

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

A.D. TRADE BELGIUM S.P.R.L.,

Plaintiff/Judgment Creditor,

v.

REPUBLIC OF GUINEA,

Defendant/Judgment Debtor.

Case No. 1:23-mc-00358

**DECLARATION OF IDAN PERETZ IN SUPPORT OF
MOTION FOR WRIT OF ATTACHMENT FIERI FACIAS**

I, IDAN PERETZ, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am Vice President of Plaintiff/Judgment Creditor A.D. Trade Belgium S.P.R.L. (“A.D. Trade”).

2. I make this declaration in support of A.D. Trade’s Motion for an Order Authorizing the Issuance of a Writ of Attachment Fieri Facias Pursuant to 28 U.S.C. § 1610(c).

3. Arbitral tribunals convened by the International Chamber of Commerce’s International Court of Arbitration (“ICC”) in Paris, France, issued two arbitration awards in favor of A.D. Trade against the Republic of Guinea (“Guinea”) dated November 22, 2017 (“2017 Award”) and February 3, 2020 (“2020 Award”). On December 8, 2017, after the issuance of the 2017 Award, the President of the Tribunal de Grande Instance of Paris, France issued an order of recognition, or “exequatur,” in favor of A.D. Trade and against Guinea for the 2017 Award, resulting in an enforceable French judgment (“2017 Judgment”).



4. Guinea has not voluntarily paid the 2017 Award, the 2020 Award, or the 2017 Judgment.

5. As part of A.D. Trade's efforts to enforce the 2017 Judgment, the Enforcement Court of Paris authorized A.D. Trade's counsel in France to serve through its bailiff a writ of summons for execution on a parcel of real property located at 9 rue Léon Delhomme in Paris, France, owned by Guinea ("Paris Property").

6. The Enforcement Court of Paris scheduled an auction of the Paris Property for April 6, 2023, in a decision dated December 8, 2022 ("April 6 Auction").

7. On April 6, 2023, shortly before the April 6 Auction, I spoke by telephone with Guinea's ambassador to France and Guinea's French counsel. That call lasted approximately 30 minutes. On that call, Guinea's ambassador to France and Guinea's French counsel made a request, purportedly on behalf of Guinea, that A.D. Trade lift the attachment on the Paris Property in exchange for payment of EUR 2.5 million in partial satisfaction of the 2017 Judgment.

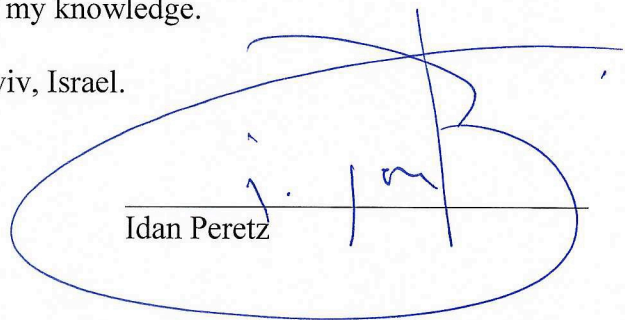
8. Guinea never made that payment of EUR 2.5 million.

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9. To date, Guinea has not voluntarily paid A.D. Trade any amount owed under the 2017 Award, the 2017 Judgment, or the 2020 Award. Nor has Guinea paid any amount owed under the D.C. District Court Judgment. To A.D. Trade's knowledge, Guinea has not taken any steps to try to pay the D.C. District Court Judgment; indeed, A.D. Trade has received no communications from Guinea in relation to the D.C. District Court Judgment, let alone any communications evidencing an intent to pay.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 23, 2023, in Tel-Aviv, Israel.


Idan Peretz