

DECLARATION OF W. SCOTT LAWLER

I, W. Scott Lawler, declare under penalty of perjury:

1. I make this Declaration in support of the Objection to Subpoenas and Motion to Quash or Modify Subpoenas filed by Big Sky Energy Corporation (“Big Sky”).
2. I am the sole officer of Big Sky.
3. I am also the attorney for Big Sky.
4. Big Sky has no other employees.
5. Big Sky has had no business operations since 2015.
6. Big Sky owns no real property.
7. Big Sky has no bank accounts.
8. Big Sky has no accounts receivable.
9. Big Sky has had no corporate proceedings since 2015.
10. Big Sky has no cash or cash equivalents.
11. Big Sky has no investments.
12. Big Sky has no inventory.
13. Big Sky has no fixtures, furniture, machinery, automobiles, watercraft, aircraft, collectibles, intellectual property, notes receivable, tax refunds, or interest in insurance policies.
14. Big Sky has no beneficial interests in any insurance policies or annuities.
15. Big Sky has no beneficial interests in any trusts.
16. Big Sky has no interest in any other entity.
17. Virtually all of the documents sought in the subpoenas at issue (“Subpoenas”) were sought previously by the Republic of Kazakhstan (“Kazakhstan”) in ICSID Case No. ARB/17/22 which was an arbitration between Kazakhstan and Big Sky. Big Sky was denied the requested documents in that arbitration.
18. Moreover, the documents at issue were also sought but Kazakhstan in case no. MC-19-00035-PHX-DWL in the federal District Court of the District of Arizona, which was an

application pursuant to 17 U.S.C. § 1782 for document discovery. Kazakhstan's request for the documents at issue was denied in that proceeding as well.

19. It is improper for Kazakhstan to attempt a third bite at the apple seeking the same documents in the instant proceeding under the pretense of seeking to enforce a judgment.

20. I declare under the penalty of perjury the foregoing is true and correct to the best of my knowledge and belief.

Dated this 8th day of July, 2024.

/s/W. Scott Lawler

W. SCOTT LAWLER