

DECLARATION OF BRENOCH WIRTHLIN

I, Brenoch Wirthlin, 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 counsel for Big Sky regarding the subpoenas at issue.
3. On June 27, 2024, at 11:00 am, I had a telephone call with counsel for plaintiff Republic of Kazakhstan (“ROK”) which lasted approximately 30 minutes in an effort to resolve the instant dispute.
4. Counsel discussed the fact that Big Sky lacks any assets to pay a judgment and the possibility of a potential resolution whereby Big Sky would produce the documents demonstrating that fact but not any privileged or irrelevant documents.
5. Counsel for ROK stated that he would discuss the proposal with his client, but subsequently informed undersigned counsel that no agreement could be reached.
6. Thus, undersigned counsel certifies pursuant to LR IA 1-3(f) that despite a sincere effort to resolve or narrow the dispute during the meet-and-confer conference, the parties were unable to resolve or narrow the dispute without court intervention.
7. Accordingly, Big Sky has complied with its local and federal rule requirements to attempt to meet and confer to try to resolve the instant matter before filing the instant motion.
8. Counsel for Big Sky and ROK agreed that Big Sky could have until July 8, 2024, to file its response to the Subpoenas, which is constituted by the instant motion.
9. 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/Brenoch Wirthlin

BRENOCH WIRTHLIN