

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

in the case of:

CRYSTALLEX INTERNATIONAL CORP, Plaintiff, v BOLIVARIAN REPUBLIC OF VENEZUELA, : Defendant.	Case 1:17-CV-00151-LPS
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Mr. Ivan Freites
and the Lead Plaintiff in Case 1:23-CV-00989-JLH (Appellants)

Notice of Appeal

Notice is hereby given that Mr. Ivan Freites and the Lead Plaintiff in Case 1:23-CV-00989-JLH (Appellants) , the appellants in the above-named case, hereby appeal to the United States Court of Appeals for the Third Circuit from the following orders:

1. Oral Order 1218: Entered on July 9, 2024, denying Appellants' motion for relief from judgment. This order was issued on the grounds that "Mr. Freites, as a non-party who neither appeared nor moved to intervene, cannot file motions seeking substantive relief in this case. The Court also determined that the motion was untimely as it was filed outside the one-year window for Rule 60(b) motions. Furthermore, Mr. Freites did not present any new evidence and only provided conclusory statements about purported conflicts of interest".

2. Oral Order 1226: Entered on July 22, 2024, denying Ivan R. Freites' motion for reconsideration. The Court found that "Mr. Freites did not raise any new points of evidence or law and reiterated that as a non-party who neither appeared nor moved to intervene, he cannot

file motions seeking substantive relief. Additionally, the Court upheld the finding that the original motion was untimely and agreed with Crystallex that Mr. Freites' letters to the Court are correspondence and not motions, and should be docketed accordingly."

Dated: August 8th, 2024

Respectfully submitted,

Mr. Ivan Freites

Signature 1



Lead Plaintiff in Case 1:23-CV-00989-JLH

Signature 2



cc: All Counsel of Record

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Notice of Appeal was served via the Court's Clerk electronic filing system (CM/ECF) on all counsel of record.

Mr. Ivan Freites