

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

TITAN CONSORTIUM 1, LLC,

Petitioner,

v.

THE ARGENTINE REPUBLIC,

Respondent.

Case No. 1:21-cv-02250 (JMC)

MOTION TO DISMISS

The Republic of Argentina (the “Republic”), by and through its undersigned counsel, respectfully moves for dismissal with prejudice of the Petition to Enforce Arbitral Award (August 24, 2021), ECF No. 1, pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim because the action is time-barred. In support of this motion, the Republic submits the accompanying Memorandum of Law in Support of its Motion to Dismiss, the Declaration of Rathna J. Ramamurthi, and all exhibits.

Dated: New York, New York
January 14, 2022

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