

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Titan Consortium 1, LLC,

Petitioner,

v.

The Argentine Republic,

Respondent.

Civil Action No. 1:21-cv-02250 (JMC)

**Declaration of Matthew S. Rozen in Support of
Petitioner's Motion for Summary Judgment**

Pursuant to 28 U.S.C. § 1746, I, Matthew S. Rozen, declare as follows:

1. I am an attorney and am admitted to practice law in the District of Columbia and Virginia. I represent Petitioner Titan Consortium 1, LLC ("Titan") in this matter.

2. I am over the age of eighteen and make this declaration from personal knowledge based on information reviewed and/or referenced herein.

3. This declaration is submitted in support of Petitioner's Motion for Summary Judgment.

4. Attached hereto as Exhibit A is a true and correct copy of the Agreement For The Settlement Of Disputes, Waiver Of Actions And Assignment Of Rights Subject To Conditions Precedent, executed on November 17, 2020 between Titan and Teinver S.L., Transportes de Cercanías S.A., and Air Comet S.A.U.

5. Attached hereto as Exhibit B is a true and correct copy of the Agreement For The Settlement Of Disputes, Waiver Of Actions And Assignment Of Rights Subject To Conditions Precedent, executed on November 30, 2020 between Titan and Autobuses Urbanos del Sur S.A.

6. Attached hereto as Exhibit C is a true and correct copy of the Request for

Arbitration of Teinver S.A., Transportes de Cercanías S.A., and Autobuses Urbanos del Sur S.A., submitted to the International Centre for Settlement of Investment Disputes on December 11, 2008.

7. The assignment agreements in Exhibits A and B have been redacted to prevent disclosure of identifying information regarding the individuals and businesses involved in the transactions (other than the parties) and of the parties' bank account information.

8. On November 19, 2021, Titan sent copies of the assignment agreements by certified mail to Argentina's Office of the Attorney of the National Treasury, its Ministry of Foreign Affairs, and its U.S. Embassy. Titan's mailing requested that Argentina pay it the amounts owed under the Award and the Annulment Decision, along with the interest owed under the Award.

9. On September 10, 2024, Titan sent additional copies of these same assignment agreements to Argentina's counsel in this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 4, 2024
Washington, D.C.


Matthew S. Rozen