

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

GRAMERCY FUNDS MGMT. LLC, and )  
GRAMERCY PERU HOLDINGS LLC, )

*Petitioners,* )

v. )

Case No. 23-CV-00684(ABJ)

THE REPUBLIC OF PERU, )

*Respondent.* )

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**STIPULATED JUDGMENT**

Petitioners Gramercy Funds Management LLC and Gramercy Peru Holdings LLC (together, “Gramercy”) and Respondent the Republic of Peru (“Peru”) having agreed to a settlement, hereby stipulate to the following Judgment. The Judgment is intended to reflect the full satisfaction of all claims and remaining amounts due as alleged by Gramercy in the petition to recognize and confirm the certified and redacted arbitral award issued on December 6, 2022, and corrected on January 13, 2023, in International Centre for the Settlement of Investment Disputes Case No. UNCT/18/2 against Peru.

It is accordingly hereby **ORDERED, ADJUDGED, AND DECREED:**

1. That Peru is liable to Gramercy in the amount of \$40,000,000.00, which shall become due and payable according to the following payment schedule:

<b>Payment Date</b>	<b>Amount (USD)</b>
March 1, 2025	\$20,000,000.00
March 1, 2026	\$20,000,000.00

2. In the event that Peru fails to make payment of any of the installments as set forth in the above payment schedule, if such default is not remedied within 30 days after Gramercy gives Peru written notice of such default, all remaining payments shall accelerate and become immediately due and payable to Gramercy. The interest rate of 7.22% p.a. determined by the tribunal in the Award, compounded annually, shall apply to the total amount due and payable, with accrual starting on the day following any missed payment date set out in the payment schedule, and continuing until the date of full payment.

3. Unless and until Peru fails to make payment of any of the installments as set forth in the above payment schedule and such default is not remedied within 30 days after Gramercy gives Peru written notice of such default, Gramercy shall not initiate any action, proceeding or measure to enforce or execute on this Stipulated Judgment or the underlying Award.

4. This Stipulated Judgment shall constitute a judgment based on an order confirming an arbitral award for all legal purposes within the United States, including for purposes of the Foreign Sovereign Immunities Act.

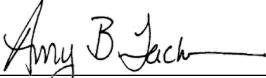
5. The Court will retain jurisdiction over the enforcement of the amounts set forth in this Judgment. Gramercy agrees to update the Court on or before final payment due on

March 1, 2026 recording Peru's satisfaction of this Judgment, at which time Gramercy will file a motion requesting that the Court dismiss this matter with prejudice.

SO ORDERED.

The Clerk of the Court is respectfully directed to enter this Judgment on the docket forthwith.

Dated: November 12, 2024

  
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Hon. Amy Berman Jackson