

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

AGUDAS CHASIDEI CHABAD OF
UNITED STATES,

Plaintiff,

vs.

RUSSIAN FEDERATION; RUSSIAN
MINISTRY OF CULTURE AND MASS
COMMUNICATION; RUSSIAN STATE
LIBRARY; and RUSSIAN STATE
MILITARY ARCHIVE,

Defendants.

CASE NO. 1:05-CV-01548-RCL

PLAINTIFF'S STATEMENT TO THE COURT

Plaintiff Agudas Chasidei Chabad of the United States ("Chabad") hereby advises the Court that efforts by the United States Department of State to negotiate on a government-to-government basis with the Russian Government over the past few months, with which Chabad has cooperated, have not heretofore resulted in transfer of any portion of the Collection to Chabad in the United States. Chabad hereby reserves its right to pursue and enforce the remedies that the Court has granted and respectfully requests that the status conference scheduled for June 10, 2013, be continued to June 20, 2013, in order to accommodate the schedules of Chabad's counsel and client representatives.

DATED: June 6, 2013

Respectfully submitted,

BINGHAM MCCUTCHEN, LLP

LEWIN & LEWIN, LLP

By /s/ Seth M. Gerber

Marshall B. Grossman (*Pro Hac Vice*)

Seth M. Gerber (*Pro Hac Vice*)

The Water Garden, 1620 26th Street

Santa Monica, CA 90404

Telephone: (310) 907-1000

By /s/ Nathan Lewin

Nathan Lewin (D.C. Bar No. 38299)

Alyza D. Lewin (D.C. Bar No. 445506)

1775 Eye Street NW, Suite 850

Washington, DC 20006

Telephone: (202) 828-1000

Attorneys for Plaintiff Agudas Chasidei Chabad of United States