

**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 REQUEST TO TEMPORARILY HOLD IN ABEYANCE CONTEMPT  
SANCTIONS AND ENFORCEMENT OF THE JUDGMENT**

Plaintiff Agudas Chasidei Chabad of United States (“Chabad”) hereby advises the Court of the following.

Defendants did not respond within 60 days to the Court’s Order to Show Cause [102] in connection with Chabad’s Motion for Civil Contempt Sanctions [92]. The 60 day time period for the defendants to respond to the Order to Show Cause expired on October 18, 2011.

Nevertheless, Chabad seeks to maintain the *status quo* for 60 days to facilitate Chabad’s attempts to commence negotiations with the Russian Government, and to encourage the Russian Government to rethink its position of refusing to comply with the Court’s judgment.

Accordingly, without waiving any of Chabad’s rights or remedies, Chabad hereby requests that the Court hold in abeyance for 60 calendar days the issuance of civil contempt sanctions against defendants Russian Federation, Russian Ministry of Culture and Mass Communication, Russian State Library, and Russian State Military Archive (collectively, “Defendants”). Additionally,

Chabad will not seek to enforce the judgment against Defendants by seeking to attach any of their property in the United States or otherwise for 60 calendar days following the submission of this statement. Chabad will submit a further status report upon the expiration of the 60 days.

DATED: October 19, 2011

Respectfully submitted,

BINGHAM MCCUTCHEN, LLP

LEWIN & LEWIN, LLP

By /s/ Seth M. Gerber

By /s/ Nathan Lewin

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