

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

Plaintiff Agudas Chasidei Chabad of United States ("Chabad") hereby requests, without waiving any of its rights or remedies, that the Court hold in abeyance until March 1, 2012, 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"). Chabad will not seek to enforce the judgment against Defendants by requesting attachment of any Russian property in the United States or otherwise on or before March 1, 2012.

Since Chabad's filing of its prior request for a 60 day stay, Chabad and the Russian Government have engaged in direct discussions regarding the Archive and Library. Chabad is making the current request to facilitate these ongoing discussions.

Chabad will submit a further status report on or before March 1, 2012.

DATED: December 16, 2011

Respectfully submitted,

BINGHAM MCCUTCHEN, LLP

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By /s/ Seth M. Gerber

By /s/ Nathan Lewin

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