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DOCUMENT

MEMO ENDORSED

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DOC #: 05/17/2016

DATE FILED: STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

ENDORSEMENT

Application granted.

Naomi Reice Buchwald,
USDS

No. 15-cv-3975 (NRB)

May 17, 2016

NOTICE OF MOTION TO STAY PENDING APPEAL

NATIONAL INDEMNITY COMPANY,

Petitioner,

v.

IRB BRASIL RESSEGUROS S.A.,

Respondent.

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of this Motion and the Declaration of G. Richard Dodge, Jr., with accompany exhibits, Respondent IRB Brasil Resseguros S.A. hereby moves, before the Honorable Naomi Reice Buchwald, United States District Judge, 500 Pearl Street, Courtroom 21A, New York, New York 10007, to the United States District Court for the Southern District for an order staying the effect of (i) the Judgment entered against it in the above-captioned case on March 15, 2016, and (ii) the Court's Memorandum and Order granting National Indemnity Company's Consolidated Petition to Confirm the Arbitration Awards in the above-captioned case and denying IRB Brasil Resseguros S.A.'s Consolidated Motion to Vacate the Arbitration Awards in the above captioned case, entered on March 10, 2016, as modified by the Court's Memorandum and Order of April 14, 2016, granting IRB Brasil Resseguros S.A.'s Motion to Amend.

Dated: April 22, 2016

MEMO ENDORSED

Respectfully submitted,

/s/ Fred W. Reinke

FRED W. REINKE

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