UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  

DEVINCCI SALAH HOURANI, et al., )  
)  
Plaintiffs,  
)  
)  
v.  
)  
No. 1:10-cv-01618-TFH  
ALEXANDER V. MIRTCHEV, et al., )  
)  
Defendants.  

DECLARATION OF WARREN ANTHONY FITCH

1. I am an attorney licensed to practice law in the District of Columbia and am a partner in the Washington, D.C. office of Bingham McCutchen LLP. I represent defendants Alexander Mirtchekv and Krull Corporation in the above-captioned matter. I have personal knowledge of the matters addressed below.

2. On or about December 16, 2010, I was served with Plaintiffs’ Motion for Leave to Take Jurisdictional Discovery and an accompanying memorandum of law. In support of their motion, Plaintiffs filed two documents that purport to be official documents of the Government of Kazakhstan. Plaintiffs attached those documents (in Russian) as Exhibit 4 and Exhibit 5 to their supporting memorandum. Plaintiffs also attached English translations of these documents as Exhibit 2 and Exhibit 3, respectively, to their supporting memorandum.

3. In their filing, Plaintiffs claimed that the documents constituting Exhibits 4 and 2 and Exhibits 5 and 3 are signed, respectively, by the President of the Republic of Kazakhstan (President Nursultan Nazarbayev) and by the Republic of Kazakhstan’s Ambassador to the United States (Ambassador Erlan A. Idrissov).

4. Shortly after receiving Exhibits 4 and 5, I sent them to counsel for the Republic of Kazakhstan to determine their authenticity. I received two documents in response to my inquiry.
5. The first document is from Makhmud Bazarkulovich Kasymbekov, Chief of Staff of the President of the Republic of Kazakhstan. In this document, Mr. Kasymbekov states that Plaintiffs’ Exhibit 4 is a falsified document. Attached as Exhibit A are true and correct copies of Mr. Kasymbekov’s document in Russian and a certified English translation of that document that was commissioned by Bingham McCutchen.

6. The second document is from His Excellency Eraln A. Idrissov. In this document, Ambassador Idrissov states that Plaintiffs’ Exhibit 5 is a forgery. Attached as Exhibit B are a transmittal letter from counsel for the Embassy of Kazakhstan, a true and correct copy of Ambassador Idrissov’s document in Russian, and an English translation prepared by a native Russian speaker who is a professional staff member of counsel for the Embassy of Kazakhstan.

On this 6th day of January, 2011, I declare under the penalty of perjury that the foregoing is true and correct.

Warren Anthony Fitch