

DECLARATION OF NEIL MICKLETHWAITE

I, Neil Micklethwaite, pursuant to 28 U.S.C. §1746, declare as follows:

1. I am a solicitor admitted to practice law in England and Wales and am a principal in the international law firm of Brown Rudnick LLP. I am outside litigation counsel to Hermitage Capital Management Limited ("Hermitage"). I am responsible for advising Hermitage and its founder and Chief Executive Officer, William Browder, with respect to several civil and criminal actions involving Hermitage, its executives, and its Russian counsel which are currently pending or threatened in Russia.

2. Hermitage is an investment advisory firm. In its work, Hermitage primarily advised the Hermitage Fund, a Russia-dedicated investment fund, for which one of the world's leading banks, HSBC – HSBC Private Bank (Guernsey) Limited

("HSBC") served as the trustee. Until 2006, the Hermitage Fund was the largest fund