

# Yuri & Irina Starostenko *Pro se*

FAO LennoxPaton, Chambers for  
UBS (Bahamas) Ltd (In Voluntary Liquidation),  
The Defendant

VIA EMAIL  
17 May 2023

## NOTICE

### **Re: 2015 No.01451 Junkanoo Estates Ltd et al. v UBS (Bahamas) Ltd (In Voluntary Liquidation)**

Following our letter of request sent by email on 16 December 2022 at 8 AM asking for electronic copies of the documents mentioned in List of Documents of the Defendant (By Counterclaim) filed on 30 August 2018 (the “List”),

The Plaintiffs hereby give notice to the Defendant that they wish to inspect and have electronic copies of the documents mentioned in the Fifth Affidavit of Renate Raeber filed on behalf of the Defendant on 7 March 2019 (into which the List was incorporated as TAB 1) and itemised, as follows:

**from 73 to 114;**

**and**

**from 135 to 139.**



Irina Tsareva *Pro se*



Yuri Starostenko *Pro se*

**NB:** copies of the relevant pages of the Fifth Affidavit of Renate Raeber are attached to this Notice.

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<https://letsmaketheworldfairer.wordpress.com/>

COMMONWEALTH OF THE BAHAMAS  
IN THE SUPREME COURT  
COMMON LAW & EQUITY SIDE  
BETWEEN



2015/ CLE/gen/No.01451  
2014/CLE/gen/No.01620

JUNKANOO ESTATES LTD  
First Plaintiff

AND

YURI STAROSTENKO  
Second Plaintiff

AND

IRINA TSAREVA-STAROSTENKO  
Third Plaintiff

AND

UBS (BAHAMAS) LTD. (In Voluntary Liquidation)  
Defendant

(Actions and Counterclaim consolidated by Order of the Judge dated 4 November 2015)

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FIFTH AFFIDAVIT OF RENATE RAEBER

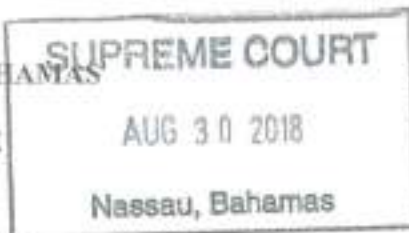
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I, **RENATE RAEBER**, of the Western District of the Island of New Providence, one of the Islands of the Commonwealth of the Bahamas, make Oath and Say as follows:

1. That I am the former Head of Business Management with UBS (Bahamas) Ltd (In Voluntary Liquidation) ("UBS") the Defendant by counterclaim, and I am now engaged by the Joint Liquidators of UBS as the Liquidation Consultant. I am duly authorised to make this Affidavit on UBS's behalf.
2. The contents of this affidavit are either within my own knowledge and are true or, where I state the source of the information, the matters so stated are true to the best of my knowledge, information and belief.
3. I make this affidavit to verify the Lists of Documents filed by UBS in this action.

# TAB 1

COMMONWEALTH OF THE BAHAMAS  
IN THE SUPREME COURT  
COMMON LAW & EQUITY SIDE



2015/ CLE/gen/No.01451  
2014/CLE/gen/No.01620

BETWEEN

JUNKANOO ESTATES LTD

First Plaintiff

AND

YURI STAROSTENKO

Second Plaintiff

AND

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**LIST OF DOCUMENTS  
OF THE DEFENDANT (By Counterclaim)**

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The following is a list of documents relating to the matters in question in this action which are or have been in possession, custody or power of the above-named Defendant and which is served in compliance with the Order made herein, on the 6<sup>th</sup> July, 2018.

1. The Defendant has in its possession, custody or power the documents relating to the matters in question in this action enumerated in Schedule 1 hereto.
2. The Defendant object to producing the documents enumerated in Part 2 of the said Schedule 1 on the ground that the same are, as appears from their nature, privileged

68.	Seventh Notice to Produce Documents			2-Jul-18	
<b>DOCUMENTS</b>					
	<b>Description</b>	<b>From</b>	<b>To</b>	<b>Date</b>	
69.	Securities Commission Certificate of Registration - Broker Dealer Class II	Securities Commission	UBS (Bahamas) Ltd	17-Feb-04	
70.	UBS (Bahamas) Ltd. - Fee Schedule			1-Apr-11	
71.	Junkanoo Estates Ltd. Register of Directors			29-Jun-11	
72.	UBS (Bahamas ) Ltd - Fee Schedule			1-Feb-12	
73.	UBS (Bahamas) Ltd Account application for Entities	UBS (Bahamas) Ltd	Junkanoo Estates Ltd	10-Aug-12	
74.	UBS (Bahamas) Ltd Application for UBS Real Estate Collateralized Loan 'RECL'	UBS (Bahamas) Ltd	Junkanoo Estates Ltd	14-Aug-12	
75.	Acceptance by Borrower	UBS (Bahamas) Ltd		23-Aug-12	
76.	UBS (Bahamas) Ltd Commitment to Finance	UBS (Bahamas) Ltd	Junkanoo Estates Ltd	23-Aug-12	
77.	Mortgage recorded at Volume 11712 page 88	Junkanoo Estates Ltd	UBS (Bahamas) Ltd	18-Sep-12	
78.	Junkanoo Estates Ltd Statement of Assets			3-Oct-12	
79.	Satisfaction of Mortgage between Junkanoo Estates Ltd and First Caribbean International Bank (Bahamas) Ltd			2-Nov-12	

80.	Junkanoo Estates Ltd. Statement of Assets	UBS (Bahamas) Ltd		31-Dec-12	
81.	Junkanoo Estates Ltd. Statement of Account (for the period 17 Aug 2012 - 31 Dec 2012)	UBS (Bahamas) Ltd		31-Dec-12	
82.	Junkanoo Estates Ltd. RECL Statement of Assets	UBS (Bahamas) Ltd		31-Dec-12	
83.	Junkanoo Estates Ltd. RECL Statement of Account (for the period 27 Sep 2012 - 31 Dec 2012)			31-Dec-12	
84.	UBS (Bahamas) Ltd. - Business License			17-Apr-13	
85.	Junkanoo Estates Ltd -Trade Confirmation (for the period 13 Jun 2013 - 26 Jun 2013)	UBS (Bahamas) Ltd		13-Jun-13	
86.	UBS (Bahamas) Ltd - Custodian Instructions ( for the period 13 Jun 2013 - 26 Jun 2013)			13-Jun-13	
87.	Junkanoo Estates Ltd. Statement of Assets	UBS (Bahamas) Ltd		30-Jun-13	
88.	Junkanoo Estates Ltd. Statement of Account (for the period 1 Jan 2013 - 30 Jun 2013)	UBS (Bahamas) Ltd		30-Jun-13	
89.	Junkanoo Estates Ltd. RECL Statement of Assets	UBS (Bahamas) Ltd		30-Jun-13	
90.	Junkanoo Estates Ltd. RECL Statement of Account (for the period 1 Jan 2013 - 30 Jun 2013)	UBS (Bahamas) Ltd		30-Jun-13	

91.	Junkanoo Estates Ltd - Trade Confirmation (for the period 16 Jul 2013 - 31 Jul 2013)	UBS (Bahamas) Ltd		16-Jul-13	
92.	UBS (Bahamas) Ltd - Custodian Instructions ( for the period 16 Jul 2013 - 31 Jul 2013)			16-Jul-13	
93.	Junkanoo Estates Ltd - Trade Confirmation (for the period 1 Aug 2013 - 28 Aug 2013)	UBS (Bahamas) Ltd		1-Aug-13	
94.	UBS (Bahamas) Ltd - Custodian Instructions ( for the period 1 Aug 2013 - 28 Aug 2013)			1-Aug-13	
95.	Junkanoo Estates Ltd - Trade Confirmation (for the period 3 Sep 2013 - 18 Sep 2013)	UBS (Bahamas) Ltd		3-Sep-13	
96.	UBS (Bahamas) Ltd - Custodian Instructions ( for the period 3 Sep 2013 - 18 Sep 2013)			3-Sep-13	
97.	Junkanoo Estates Ltd. Statement of Assets	UBS (Bahamas) Ltd		31-Dec-13	
98.	Junaknoo Estates Ltd. Statement of Account (for the period 7 Jul 2013 - 31 Dec 2013)	UBS (Bahamas) Ltd		31-Dec-13	
99.	Junkanoo Estates Ltd. RECL Statement of Assets	UBS (Bahamas) Ltd		31-Dec-13	
100.	Junkanoo Estates Ltd. RECL Statement of Account (for the period 1 Jul 2013 - 31 Dec 2013)	UBS (Bahamas) Ltd		31-Dec-13	

101.	Performance Details - Junkanoo Estates Ltd Investment Account			31-Dec-13	
102.	Open Agreement to List & Market Lyford Cay Property - MC Realty			28-Apr-14	
103.	Junkanoo Estates Ltd. Statement of Assets	UBS (Bahamas) Ltd		30-Jun-14	
104.	Junkanoo Estates Ltd. Statement of Account (for the period 1 Jan 2014 - 30 Jun 2014)	UBS (Bahamas) Ltd		30-Jun-14	
105.	Junknoo Estates Ltd. RECL Statement of Assets	UBS (Bahamas) Ltd		30-Jun-14	
106.	Junkanoo Estates Ltd. RECL Statement of Account ( for the period 1 Jan 2014 - 30 Jun 2014)	UBS (Bahamas) Ltd		30-Jun-14	
107.	Junkanoo Estates Ltd. Statement of Account ( for the period 1 Jul 2014 - 3 Sep 2014)	UBS (Bahamas) Ltd		2-Sep-14	
108.	Open Agreement to List & Market Lyford Cay Property - Bahamas Realty			17-Oct-14	
109.	Junkanoo Estates Ltd. RECL Statement of Assets	UBS (Bahamas) Ltd		31-Dec-14	
110.	Junkanoo Estates Ltd. RECL Statement of Account (for the period 1 Jul 2014 - 31 Dec 2014)	UBS (Bahamas) Ltd		31-Dec-14	
111.	Junkanoo Estates Ltd. RECL Statement of Assets	UBS (Bahamas) Ltd		31-Mar-15	



112.	Junkanoo Estates Ltd. RECL Statement of Account (for the period 1 Jan 2015 - 31 Mar 2015)	UBS (Bahamas) Ltd		31-Mar-15	
113.	Junkanoo Estates Ltd. RECL Statement of Assets	UBS (Bahamas) Ltd		30-Jun-15	
114.	Junkanoo Estates Ltd. RECL Statement of Account (for the period 1 Jan 2015 - 30 Jun 2015)	UBS (Bahamas) Ltd		30-Jun-15	
115.	Appraisal of Lot number 5 Block 7 Clifton Bay Drive Lyford Cay			29-Apr-16	
116.	Appraisal of Lot number 5 Block 7 Clifton Bay Drive Lyford Cay			26-Dec-17	
117.	UBS (Bahamas) Ltd Direct Access Clients (DAC) Review Form				
118.	UBS (Bahamas) Ltd Dealing Procedure Manual				
119.	UBS (Bahamas) Ltd Direct Access Clients - Client Advisor Information				
120.	UBS (Bahamas) Ltd. - Agreement on Direct Access to UBS Transaction Products				
121.	UBS (Bahamas) Ltd Terms and Conditions				
122.	UBS Real Estate Collateralized Loan - Terms and Conditions	UBS (Bahamas) Ltd			

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**LENNOX PATON**

Chambers

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Attorneys for the Defendant by Counterclaim