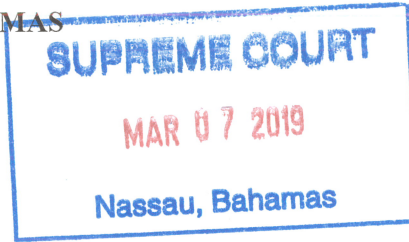


COMMONWEALTH OF THE BAHAMAS  
IN THE SUPREME COURT  
COMMON LAW & EQUITY SIDE  
BETWEEN



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.



4. The statements made in paragraphs 1, 3, and 4 of the List of Documents filed 30 August 2018, the Supplemental List of Documents filed 7 November 2018, the Second Supplemental List of Documents filed 13 December 2018 and the unfiled Third Supplemental List of Documents filed 7 March 2019 (collectively “the Lists of Documents”), are true to the best of my knowledge, information and belief. Now produced and shown to me marked **Exhibits RR-1, RR-2, RR-3** and **RR-4** are true and correct copies of the aforementioned List of Documents, respectively.
5. The statements of fact made in paragraph 2 of the said Lists of Documents are true to the best of my knowledge, information and belief.
6. The statements made in paragraph 5 of the said Lists of Documents are true to the best of my knowledge, information and belief.
7. Pursuant to an Order of the Court, made on 21 January 2019, UBS was ordered to state whether certain documents set out in the Schedule of Documents exhibited hereto, at **Exhibit RR-5**, are in its possession. To the extent that these documents have not been previously disclosed, they are now set out in the unfiled Third Supplemental List of Documents.
8. As it relates to Schedule 1 of Exhibit RR-5, to the best of my knowledge, information and belief, UBS has produced all of the contract notes, trade advices and trade receipts in its possession. UBS does not have any other contract notes in its possession, other than what has already been produced.
9. As it relates to Schedule 2 sub paragraph 1, I state as follows:
  - a. To the best of my knowledge information and belief, UBS does not have in its possession any phone/voice recordings between George Maillis (“Mr. Mallis”) and either the Second or Third Defendants, for the dates of 23 August 2012 and 18 September 2013.

b. UBS does have in its possession some of the voice recordings of telephone calls received daily from its clients prior to its liquidation. On average UBS received approximately 1,000 calls per day. These calls were logged by their date, time and the UBS agent involved. The log does not include the name of the client however. I am aware that Mr. Maillis' phone line had approximately 3,200 calls in 2012, 4,700 calls in 2013 and 8,600 calls in 2014. In the absence of the Plaintiffs providing the date, time and the name of the UBS agent with whom the purported calls were made, it is extremely difficult for UBS to identify and produce any telephone recordings between it and the Plaintiffs. This would require UBS to go through thousands of hours of telephone calls, in order to identify any potential calls with the Plaintiffs. I note that UBS is currently in liquidation and has limited man power to devote to reviewing all of its calls in order to identify the calls with the Plaintiffs', while they were its clients.

c. To the best of my knowledge information and belief UBS does not have in its possession any documents memorializing any oral communications with the Plaintiffs, other than those documents which have already been disclosed in the form of file notes.

10. As it relates to Schedule 2 sub paragraph 2, to the best of my knowledge, information and belief, other than what has already been disclosed, UBS does not have in its possession any attendance notes for any discussions held with the Plaintiffs on the dates set out at sub-paragraph 2 or otherwise.

11. As it relates to Schedule 2 sub paragraph 3, to the best of my knowledge information and belief, UBS has produced all meeting notes and/or memos in its possession that relate to the Plaintiffs, other than privileged documents that are not disclosable.

12. As it relates to Schedule 2 sub paragraph 4, to the best of my knowledge, information and belief UBS has produced all reports and/or other documents in its possession relating

to the halt trading, the set off against the First Plaintiff's account and the Plaintiff's default under the Commitment to Finance and the Mortgage.

13. As it relates to Schedule 2 sub paragraph 5, to the best of my knowledge information and belief, UBS has produced all documents in its possession relating to the Plaintiff's credit risk profile. Other than the documents already disclosed, UBS does not have any of the documents set out at sub paragraph 5 in its possession.
14. As it relates to Schedule 3 sub paragraph 1, to the best of my knowledge, information and belief, UBS has produced all of the documents in its possession relating to the proposal to the Central Bank for the RECL program.
15. As it relates to Schedule 3 sub paragraph 2, to the best of my knowledge, information and belief, other than what has already been disclosed, UBS does not have in its possession any documents or records setting out the internal controls with respect to the use of the RECL program.
16. To the best of my knowledge information and belief, UBS does not have any documents in its possession that relate to the Plaintiffs or this action that have not yet been disclosed, other than those documents which are privileged from disclosure.

SWORN to this 7<sup>th</sup> day )  
of March, A.D., 2019 )  
at Nassau, N.P., The Bahamas)



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Before me,



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NOTARY PUBLIC

COMMONWEALTH OF THE BAHAMAS

2015/ CLE/gen/No.01451

IN THE SUPREME COURT

2014/CLE/gen/No.01620

COMMON LAW & EQUITY SIDE

BETWEEN

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)

---

CERTIFICATE

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I hereby certify that the attached are true copies of Exhibits "RR-1" through "RR-5" referred to in the Affidavit of **Renate Raeber** sworn to before me this 7<sup>th</sup> day of March A.D., 2019.



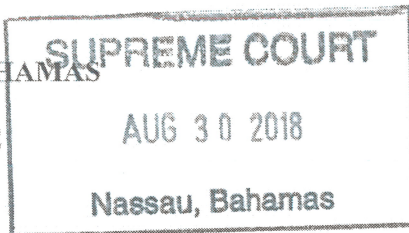
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NOTARY PUBLIC

# 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

**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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**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

from production, being documents which came into being for and in contemplation of the conduct of the claim herein.

3. The Defendant has had, but have not now, in its possession, custody or power the documents relating to the matters in question in this action enumerated in Schedule 2 hereto.
4. The documents in the said Schedule 2 were last in the Defendant's possession, custody or power on the dates borne by the said documents being the dates when they were posted to the respective recipients
5. Neither the Defendant nor its Attorneys, nor any other person on its behalf, have now, or ever had, in its possession, custody or power any document of any description whatever relating to any matter in question in this action other than the documents enumerated in Schedules 1 and 2 hereto.

## **SCHEDULE 1**

### **PART 1**

**PLEADINGS, AFFIDAVITS AND COURT DOCUMENTS**

	<b>Description</b>	<b>From</b>	<b>To</b>	<b>Date</b>	
1.	Writ of Summons			3-Oct-14	
2.	Affidavit of Service - Patrick Wright			16-Oct-14	
3.	Memorandum of Appearance			22-Oct-14	
4.	Notice of Appearance			22-Oct-14	
5.	Defence of 1st, 2nd and 3rd Defendants			4-Nov-14	
6.	Summons - Summary Judgement			5-Nov-14	
7.	Reply and Defence to Counterclaim			17-Nov-14	
8.	First Affidavit of George Maillis			17-Dec-14	
9.	Notice of Hearing			2-Feb-15	
10.	Affidavit of Yuri Starostenko			23-Mar-15	
11.	Summons - Set aside Summary Judgement Order			9-Apr-15	
12.	Notice of Intention to Act in Person (Yuri Starostenko)			9-Apr-15	
13.	Notice of Intention to Act in Person (Irina Starostenko)			9-Apr-15	
14.	Affidavit of Yuri Starostenko & Irina Starostenko			10-Apr-15	
15.	Notice of Change of Attorney			10-Apr-15	
16.	Order - Summary Judgement			15-Apr-15	

17.	Notice of Change of Attorney			22-Apr-15	
18.	Interim Order			22-Apr-15	
19.	Writ of Summons - Action 01451			16-Sep-15	
20.	Memorandum of Appearance			20-Oct-15	
21.	Notice of Appearance			20-Oct-15	
22.	Summons - Stay proceedings in Action 1620 of 2014 / Extension of time			28-Oct-15	
23.	Defence - Action 01451			3-Nov-15	
24.	Praecipe for Writ of Possession			2-Dec-15	
25.	Writ of Possession			17-Feb-16	
26.	Summons - Stay of Execution			24-Apr-17	
27.	Summons - Seeking leave to appeal			24-Apr-17	
28.	Affidavit			24-Apr-17	
29.	Summons - Setting aside Summary Judgment Order			15-May-17	
30.	Second Affidavit of Yuri Starostenko			15-May-17	
31.	Summons - Case Management			28-Jun-17	
32.	Summons - Committal Order			28-Jun-17	
33.	Fourth Affidavit of Yuri Starostenko			28-Jun-17	



34.	Summons - Stay Action 1620 of 2014			24-Oct-17	
35.	Summons - Recusal Application			27-Oct-17	
36.	Fifth Affidavit of Yuri Starostenko			27-Oct-17	
37.	Sixth Affidavit of Yuri Starostenko			27-Oct-17	
38.	Summons - Stay application			6-Nov-17	
39.	Consolidation Order			6-Nov-17	
40.	Summons - Stay Action 1620 of 2014			8-Nov-17	
41.	Statement of Claim			14-Nov-17	
42.	Ex Parte Summons			17-Nov-17	
43.	Defence - Consolidated Action			28-Nov-17	
44.	Seventh Affidavit of Yuri Starostenko			30-Nov-17	
45.	Order - Granting Leave to Appeal / Refusing Stay			27-Dec-17	
46.	Summons - leave to Appeal			27-Dec-17	
47.	Summons – Stay			27-Dec-17	
48.	Summons - set aside/vary Evans J Order			29-Dec-17	
49.	Summons for Directions			11-Jan-18	
50.	First Affidavit of Yuri Starostenko			12-Jan-18	
51.	Second Affidavit of Yuri Starostenko			18-Jan-18	



52.	Third Affidavit of Yuri Starostenko			26-Jan-18	
53.	Third Affidavit of Yuri Starostenko			30-Jan-18	
54.	Notice			2-Feb-18	
55.	Praecipe for Writ of Possession			5-Feb-18	
56.	Writ of Possession			15-Feb-18	
57.	First Notice to Produce Documents			7-May-18	
58.	Second Notice to Produce Documents			16-May-18	
59.	Affidavit of Yuri Starostenko			11-Jun-18	
60.	Summons - strike out Defence			8-Jun-18	
61.	Summons - Summary Judgement			11-Jun-18	
62.	Summons - Production of Documents			15-Jun-18	
63.	Summons - Leave to serve interrogatories			4-Jul-18	
64.	Third Notice to Produce Documents			5-Jun-18	
65.	Fourth Notice to Produce Documents			11-Jun-18	
66.	Fifth Notice to Produce Documents			12-Jun-18	
67.	Sixth Notice to Produce Documents			22-Jun-18	

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			

123.	Real Estate Listing with HG Christie re : sale of Lot number 5 Block 7 Clifton Bay Drive Lyford Cay				
124.	3 Undated file Notes – UBS (Bahamas) Ltd				

**CORRESPONDENCE**

**Letters**

	Description	From	To	Date	
125.	Letter certifying compliance with the Business License Act	Thomas Brown, Ministry of Finance	UBS (Bahamas) Ltd	2-May-12	
126.	Letter re: Demand	Marco Turnquest	Yuri and Irina Starostenko	28-Feb-14	
127.	Letter re: Breach of Commitment Letter Obligations	Irina Tsareva - Starostenko	UBS (Bahamas) Ltd Lennox Paton	5-Mar-14	
128.	Letter re: Set off	Marco Turnquest	Yuri and Irina Starostenko	11-Apr-14	
129.	Letter re: Demand	Marco Turnquest	Yuri and Irina Starostenko	11-Apr-14	
130.	Letter re: power of sale	Marco Turnquest	Yuri and Irina Starostenko	23-Apr-14	
131.	Letter re: Mortgage between UBS and Junkanoo	Charles Mackay	Marco Turnquest	29-Apr-14	
132.	Letter re: set off / Demand	Marco Turnquest	Charles Mackay	27-Aug-14	
133.	Letter re: Entering and Appearance to the action	Charles Mackay	Marco Turnquest	23-Oct-14	
134.	Letter re: filing Defence	Charles Mackay	Marco Turnquest	5-Nov-14	
135.	Letter requesting available dates for Summary Judgement hearing	Marco Turnquest	Charles Mackay	17-Dec-14	
136.	Letter re: remarks made by Yuri and Irina Starostenko	Marco Turnquest	Charles Mackay	17-Dec-14	

137.	Letter requesting available dates for Summary Judgement hearing	Marco Turnquest	Charles Mackay	13-Jan-15	
138.	Letter providing available dates for Summary Judgement Application	Charles Mackay	Marco Turnquest	13-Jan-15	
139.	Letter to listing office requesting date for Summary Judgement hearing	Marco Turnquest	Grace Bostwick, Listing Officer	15-Jan-15	
140.	Letter re: Service of Writ of Summons	Marco Turnquest	Murio Ducille	5-Oct-15	
141.	Letter re: extension of time to file Defence / stay application	Marco Turnquest	Murio Ducille	28-Oct-15	
142.	Letter requesting hearing for extension of time application	Marco Turnquest	Thomas Grant, Clerk to Justice Milton Evans	30-Oct-15	
143.	Letter requesting access to property in Lyford Cay for home inspection	Marco Turnquest	Crystal Rolle	29-Dec-15	
144.	Letter requesting adjournment of action	Irina Tsareva - Starostenko	Hon Sir Hartman Longley, Chief Justice (as he then was)	16-Feb-16	
145.	Letter requesting execution of Writ of Possession	Marco Turnquest	Jack Davis, Deputy Provost Marshall	17-May-16	
146.	Letter requesting assistance locating Court file	Irina Tsareva - Starostenko	Supreme Court Registry	23-May-16	
147.	Letter requesting date for Ex Parte Summons	Irina Tsareva - Starostenko	Grace Bostwick, Listing Office	24-May-16	
148.	Letter requesting date for Ex Parte Summons	Anthony Thompson	Grace Bostwick, Listing Office	24-May-16	
149.	Letter requesting a stay of proceedings	Irina Tsareva - Starostenko	Hon Sir Hartman Longley, Chief Justice (as he then was)	26-May-16	
150.	Letter requesting date for Ex Parte Summons	Anthony Thompson	Grace Bostwick, Listing Office	30-May-16	



151.	Letter requesting available dates for stay application	Yuri Starostenko	Marco Turnquest, Chizelle Cargill	31-Oct-17	
152.	Letter requesting extension of time to file Defence	Chizelle Cargill	Irina and Yuri Starostenko, Phillip Hilton	20-Nov-17	
153.	Letter requesting available dates for leave to appeal / stay applications	Yuri Starostenko	Marco Turnquest, Chizelle Cargill	27-Dec-17	
	<b>Emails</b>				
	<b>Description</b>	<b>From</b>	<b>To</b>	<b>Date</b>	<b>Time</b>
154.	Email	Irina Tsareva	George Maillis	14-Apr-13	4:44:25 PM
155.	Email exchange regarding trade advice/gold	George Maillis	Irina Tsareva	15-Apr-13	3:48:00 PM
156.	Email exchange regarding signing of futures contract	George Maillis/ Irina Tsareva	Irina Tsareva/ George Maillis	17-Apr-13	9:53:00 AM
157.	Email exchange regarding future investments	Irina Tsareva/ George Maillis	George Maillis/ Irina Tsareva	18-Apr-13	9:48:00 AM
158.	Email exchange regarding future investments	George Maillis/ Irina Tsareva	Irina Tsareva/ George Maillis	18-Apr-13	3:19:00 PM
159.	Email exchange regarding future investments	Irina Tsareva/ George Maillis	George Maillis/ Irina Tsareva	19-Apr-13	10:39:00 AM
160.	Email chain regarding possible investments (4 emails)	Irina Tsareva/ George Maillis	George Maillis/ Irina Tsareva	17-May-13	10:12:00 AM
161.	Email exchange regarding investment securities/request for fees	Irina Tsareva/ George Maillis	George Maillis/ Irina Tsareva	3-Jun-13	12:30:00 PM
162.	Email regarding trade requests / trading fees	George Maillis	Irina Tsareva	12-Jun-13	5:03:00 PM
163.	Email regarding Investment in Securities	Irina Tsareva	George Maillis	12-Jun-13	3:44:00 PM
164.	Email exchange regarding Investment in Securities	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	13-Jun-13	4:31:00 PM

165.	Email exchange regarding Investment in Securities	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	13-Jun-13	4:11:00 PM
166.	Email exchange regarding Investment in Securities	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	13-Jun-13	12:41:00 PM
167.	Email exchange regarding Investment in Securities	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	13-Jun-13	4:02:00 PM
168.	Email exchange regarding Investment in Securities	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	13-Jun-13	12:38:00 PM
169.	Email exchange regarding Investment in Securities	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	13-Jun-13	12:29:00 PM
170.	Email regarding trade requests / trading fees	Irina Tsareva	George Maillis	13-Jun-13	12:25:00 PM
171.	Email regarding investment in securities / confirmation on rates	George Maillis	Irina Tsareva	13-Jun-13	12:26:47 PM
172.	Email chain regarding trade request / trading fees (8 emails)	Irina Tsareva	George Maillis	13-Jun-13	12:40:00 PM
173.	Email exchange regarding stop loss trading confirmation	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	14-Jun-13	9:48:00 AM
174.	Email exchange regarding trading requests	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	14-Jun-13	9:23:00 AM
175.	Email exchange regarding request for withdrawal/ deposit balance	George Maillis/ Irina Tsareva	Irina Tsareva/ George Maillis	14-Jun-13	10:37:00 AM
176.	Email regarding stop loss confirmation	George Maillis	Irina Tsareva	14-Jun-13	10:55:10 AM
177.	Email regarding fees	Irina Tsareva	George Maillis	14-Jun-13	5:00:09 PM
178.	Email from regarding active trading fees	Irina Tsareva/ George Maillis	George Maillis/ Irina Tsareva	14-Jun-13	5:00:00 PM



179.	Email exchange regarding trade requests / trading fees.	George Maillis/ Irina Tsareva	Irina Tsareva / George Maillis	17-Jun-13	12:13:00 PM
180.	Email exchange regarding trade requests / trading fees.	George Maillis/ Irina Tsareva	Irina Tsareva / George Maillis	17-Jun-13	10:45:00 AM
181.	Email exchange regarding trading fees	George Maillis/ Irina Tsareva	Irina Tsareva/ George Maillis	17-Jun-13	1:04:00 PM
182.	Email exchange regarding discounted fees	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	18-Jun-13	9:48:00 AM
183.	Email exchange regarding trade requests	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	18-Jun-13	9:49:00 AM
184.	Email exchange regarding trade requests	George Maillis/ Irina Tsareva	Irina Tsareva / George Maillis	19-Jun-13	10:31:00 AM
185.	Email exchange requesting confirmation of trade	George Maillis/ Irina Tsareva	Irina Tsareva / George Maillis	19-Jun-13	9:53:00 AM
186.	Email regarding trade requests and bank fees	Irina Tsareva	George Maillis	19-Jun-13	9:38:00 AM
187.	Email exchange regarding trade requests	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	19-Jun-13	1:54:00 PM
188.	Email requesting short VXX trade	Irina Tsareva	George Maillis	19-Jun-13	12:49:00 PM
189.	Email exchange regarding trade requests	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	19-Jun-13	10:31:00 AM
190.	Email exchange regarding trade requests	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	19-Jun-13	9:53:00 AM
191.	Email from Irina Tsareva requesting to short trade.	Irina Tsareva/ George Maillis	George Maillis/ Irina Tsareva	19-Jun-13	12:49:00 PM
192.	Email regarding trading information on Gold	Irina Tsareva	George Maillis	20-Jun-13	9:46:00 AM
193.	Email regarding trading information	George Maillis	Irina Tsareva	20-Jun-13	9:20:00 AM

194.	Email regarding trade request	Irina Tsareva	George Maillis	20-Jun-13	2:59:00 PM
195.	Email regarding trade request	George Maillis	Irina Tsareva	20-Jun-13	2:51:00 PM
196.	Email regarding trade request	Irina Tsareva	George Maillis	20-Jun-13	2:11:00 PM
197.	Email regarding efficient trade requests	Irina Tsareva	George Maillis	21-Jun-13	12:52:00 PM
198.	Email regarding efficient trade requests	George Maillis	Irina Tsareva	21-Jun-13	12:16:00 PM
199.	Email regarding efficient trade requests	Irina Tsareva	George Maillis	21-Jun-13	11:54:00 AM
200.	Email regarding trade request	Irina Tsareva	George Maillis	21-Jun-13	11:27:00 AM
201.	Email Regarding trade request	George Maillis	Irina Tsareva	21-Jun-13	11:32:00 AM
202.	Email Regarding trade request	Irina Tsareva	George Maillis	21-Jun-13	11:27:00 AM
203.	Email regarding request to cancel trade	George Maillis	Irina Tsareva	21-Jun-13	11:43:00 AM
204.	Email regarding trade request	George Maillis	Irina Tsareva	21-Jun-13	11:32:00 AM
205.	Email regarding trade request	Irina Tsareva	George Maillis	21-Jun-13	11:27:00 AM
206.	Email attaching Exchange Traded Funds (ETF) screen shots	George Maillis	Irina Tsareva	21-Jun-13	1:52:00 PM
207.	Email regarding trade requests	George Maillis	Irina Tsareva	24-Jun-13	10:34:00 AM
208.	Email regarding trade requests	Irina Tsareva	George Maillis	24-Jun-13	9:52:00 AM



209.	Email regarding confirmation of stop loss sale of shares	George Maillis	Irina Tsareva	25-Jun-13	3:52:00 PM
210.	Email regarding trade options	George Maillis	Irina Tsareva	25-Jun-13	4:34:00 PM
211.	Email regarding stop loss trade request	Irina Tsareva	George Maillis	26-Jun-13	9:00:00 AM
212.	Email regarding trading options	Irina Tsareva	George Maillis	26-Jun-13	9:02:00 AM
213.	Email requesting trade and operations update	Irina Tsareva	George Maillis	26-Jun-13	4:03:00 PM
214.	Email exchange regarding trade confirmation	George Maillis/ Irina Tsareva	Irina Tsareva / George Maillis	26-Jun-13	3:50:00 PM
215.	Email exchange regarding stop loss trade update	George Maillis/ Irina Tsareva	Irina Tsareva / George Maillis	26-Jun-13	3:48:00 PM
216.	Email exchange regarding stop loss trading request	George Maillis/ Irina Tsareva	Irina Tsareva / George Maillis	26-Jun-13	2:22:00 PM
217.	Email regarding stop loss trading request	Irina Tsareva	George Maillis	26-Jun-13	2:09:00 PM
218.	Email exchange regarding update on new trade position	George Maillis/ Irina Tsareva	Irina Tsareva/ George Maillis	26-Jun-13	10:52:00 AM
219.	Email regarding fixed rate trading fees	George Maillis	Irina Tsareva	26-Jun-13	5:08:00 PM
220.	Email regarding fixed rate trading fees	Irina Tsareva	George Maillis	26-Jun-13	4:51:00 PM
221.	Email regarding update on trades / recap of fees	George Maillis	Irina Tsareva	26-Jun-13	4:12:00 PM
222.	Email regarding trading recap / account balances	Irina Tsareva	George Maillis	27-Jun-13	10:18:00 AM

223.	Email regarding trading recap and account balances	George Maillis	Irina Tsareva	27-Jun-13	9:52:00 AM
224.	Email regarding trading recap and account balances	Irina Tsareva	George Maillis	27-Jun-13	9:18:00 AM
225.	Email regarding direct market access trading / trading information	Irina Tsareva	George Maillis	28-Jun-13	1:25:00 PM
226.	Email regarding trading information on Gold	George Maillis	Irina Tsareva	28-Jun-13	1:33:00 PM
227.	Email regarding trading	Irina Tsareva	George Maillis	2-Jul-13	9:37:00 AM
228.	Emails exchanging pleasantries	Irina Tsareva	George Maillis	3-Jul-13	11:46:00 AM
229.	Email referring to missed trade / forwarding articles	Irina Tsareva	George Maillis	3-Jul-13	9:08:00 AM
230.	Email scheduling call to discuss trades	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	8-Jul-13	9:26:00 AM
231.	Email regarding call to discuss trades	Irina Tsareva	George Maillis	8-Jul-13	4:06:00 PM
232.	Email requesting call re: trade executions and fees	Irina Tsareva	George Maillis	8-Jul-13	9:17:00 AM
233.	Email advising of office closure	George Maillis	Irina Tsareva	9-Jul-13	
234.	Email regarding trading in US Limited Partnership securities	George Maillis	Irina Tsareva	11-Jul-13	10:10:00 AM
235.	Email regarding trading options	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	11-Jul-13	9:37:00 AM
236.	Email regarding trade options	Irina Tsareva	George Maillis	11-Jul-13	9:33:00 AM
237.	Email regarding trade options	George Maillis	Irina Tsareva	11-Jul-13	9:14:00 AM



238.	Email requesting trading information	Irina Tsareva	George Maillis	11-Jul-13	8:53:00 AM
239.	Email regarding trade options	Irina Tsareva	George Maillis	11-Jul-13	10:37:00 AM
240.	Email regarding trading options and direct market access	Irina Tsareva	George Maillis	12-Jul-13	10:20:00 AM
241.	Email regarding trading options	George Maillis	Irina Tsareva	12-Jul-13	10:05:00 AM
242.	Email regarding trading options study	Irina Tsareva	George Maillis	12-Jul-13	9:21:00 AM
243.	Email regarding trading options	George Maillis	Irina Tsareva	12-Jul-13	10:55:00 AM
244.	Email regarding direct market access trading	Irina Tsareva	George Maillis	12-Jul-13	11:46:00 AM
245.	Email exchange regarding stop loss request / confirmation of purchase	Irina Tsareva	George Maillis	16-Jul-13	10:26:00 AM
246.	Email regarding stop loss request / confirmation of purchase	Irina Tsareva	George Maillis	16-Jul-13	8:59:00 AM
247.	Email exchange regarding stop loss request / confirmation of purchase	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	16-Jul-13	9:59:00 AM
248.	Email exchange regarding confirmation to cancel trade	George Maillis/ Irina Tsareva	Irina Tsareva / George Maillis	16-Jul-13	8:55:00 AM
249.	Email exchange regarding execution of trade	George Maillis/ Irina Tsareva	Irina Tsareva /George Maillis	16-Jul-13	9:55:00 AM
250.	Email requesting stop loss trade of NUGT	Irina Tsareva	George Maillis	16-Jul-13	9:47:00 AM
251.	Email regarding meeting to discuss trading	Irina Tsareva	George Maillis	16-Jul-13	12:47:00 PM

252.	Email regarding meeting to discuss trading	Irina Tsareva	George Maillis	16-Jul-13	1:36:00 PM
253.	Email regarding cancelling stop loss	George Maillis	Irina Tsareva	16-Jul-13	10:57:00 AM
254.	Email exchange regarding stop loss request / cancellation	George Maillis	Irina Tsareva	16-Jul-13	9:10:00 AM
255.	Email regarding trade changes / direct access trading	George Maillis	Irina Tsareva	16-Jul-13	11:33:00 AM
256.	Email regarding trade changes / direct access trading	Irina Tsareva	George Maillis	16-Jul-13	11:17:00 AM
257.	Email regarding trade changes / direct access trading	George Maillis	Irina Tsareva	16-Jul-13	10:04:00 AM
258.	Email request cancelling stop loss	Irina Tsareva	George Maillis	16-Jul-13	10:58:00 AM
259.	Email regarding Direct Market Access	Irina Tsareva	George Maillis	16-Jul-13	11:53:00 AM
260.	Email regarding trade modifications / overall operations	Irina Tsareva	George Maillis	16-Jul-13	12:20:00 PM
261.	Email regarding meeting with George Maillis and Marsha Adderley	Irina Tsareva	George Maillis	16-Jul-13	6:57:00 PM
262.	Email regarding trade request	George Maillis	Irina Tsareva	16-Jul-13	9:39:00 AM
263.	Email regarding trade request	Irina Tsareva	George Maillis	16-Jul-13	9:42:00 AM
264.	Email chain regarding trade process (18 emails)	Irina Tsareva	George Maillis	16-Jul-13	11:54:00 AM



265.	Email exchange requesting trade Orders be sent to Marsha Adderley	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	18-Jul-13	11:08:00 AM
266.	Email requesting trading update	Irina Tsareva	Marsha Alddlerly	18-Jul-13	11:50:00 AM
267.	Email exchange regarding trading flat fee	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	18-Jul-13	10:54:00 AM
268.	Email regarding trading flat fee	Irina Tsareva	Marsha Alddlerly	18-Jul-13	10:45:00 AM
269.	Email chain regarding potential trades (8 emails)	Irina Tsareva	Marsha Adderley/George Maillis	18-Jul-13	12:20:00 PM
270.	Email chain regarding trade request/flat fee (3 emails; 18 July through 19 July 2013)	Irina Tsareva	Marsha Adderley	19-Jul-13	9:53:00 AM
271.	Email regarding stop loss	Irina Tsareva	Marsha Adderley	19-Jul-13	10:29:00 AM
272.	Email regarding trade request	Irina Tsareva	Marsha Adderley	23-Jul-13	9:47:00 AM
273.	Email chain regarding trade request and stop loss (5 emails)	Lynette Martinborough	Irina Tsareva	23-Jul-13	10:48:00 AM
274.	Email chain regarding trade request and cancellation of trade request (3 emails)	Lynette Martinborough	Irina Tsareva/Marsha Adderley	23-Jul-13	2:35:00 PM
275.	Email chain regarding trade request (3 emails)	Irina Tsareva	Lynette Martinborough	23-Jul-13	11:02:00 AM
276.	Email chain regarding trade request (3 emails)	Lynette Martinborough	Irina Tsareva	23-Jul-13	11:10:00 AM
277.	Email chain regarding trade request / cancellation (4 emails)	Irina Tsareva	Lynette Martinborough	23-Jul-13	2:37:00 PM
278.	Email chain regarding trade request / cancellation (3 emails)	Irina Tsareva	Lynette Martinborough	24-Jul-13	10:06:00 AM

279.	Email exchange regarding trade request (2 emails)	Irina Tsareva	Marsha Adderley	25-Jul-13	1:12:00 PM
280.	Email chain regarding trade request (8 emails)	Irina Tsareva	Marsha Adderley	25-Jul-13	1:12:00 PM
281.	Email chain regarding trade request (8 emails)	Irina Tsareva	Marsha Adderley	25-Jul-13	2:24:00 PM
282.	Email chain regarding trade request (3 emails)	Irina Tsareva	Jamaal Wright	26-Jul-13	1:29:00 PM
283.	Email chain regarding purchase and sale of trade (5 emails)	Irina Tsareva	Lynette Martinborough	26-Jul-13	2:04:00 PM
284.	Email chain regarding trade request (3 emails)	Irina Tsareva	Lynette Martinborough	26-Jul-13	2:11:00 PM
285.	Email chain regarding stop loss and sale of trade (5 emails)	Irina Tsareva	Jamaal Wright	26-Jul-13	3:45:00 PM
286.	Email chain regarding trading terms that client uses (3 emails)	Irina Tsareva	Marsha Adderley	26-Jul-13	4:07:00 PM
287.	Email chain regarding trade request (3 emails)	Irina Tsareva	Marsha Adderley	31-Jul-13	12:29:00 PM
288.	Email chain regarding signing of fund master agreement (6 emails)	Jamaal Wright	Irina Tsareva	1-Aug-13	11:24:00 AM
289.	Email chain regarding trade request / stock purchase (9 emails)	Irina Tsareva	Jamaal Wright/Lynette Martinborough	6-Aug-13	10:10:00 AM
290.	Email chain regarding trade request (3 emails)	Irina Tsareva	Marsha Adderley	6-Aug-13	12:14:00 PM
291.	Email chain regarding trade request and stop loss (6 emails)	Marsha Adderley	Irina Tsareva	6-Aug-13	12:54:00 PM



292.	Email chain regarding trade request and stop loss (5 emails)	Marsha Adderley	Irina Tsareva	6-Aug-13	12:44:00 PM
293.	Email exchange requesting trade Orders be sent to Marsha Adderley	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	12-Aug-13	9:41:00 AM
294.	Email regarding trade request	Irina Tsareva	Marsha Aldderly	12-Aug-13	10:06:00 AM
295.	Email Exchange regarding stop loss and purchase request	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	12-Aug-13	10:13:00 AM
296.	Email exchange regarding stop loss request	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	12-Aug-13	10:09:00 AM
297.	Email regarding purchase request	Irina Tsareva	Marsha Adderly	12-Aug-13	10:35:00 AM
298.	Email regarding purchase request	George Maillis	Irina Tsareva	12-Aug-13	10:38:00 AM
299.	Email regarding purchase request at stop loss	Irina Tsareva	George Maillis	12-Aug-13	10:40:00 AM
300.	Email confirming purchase request at stop loss	George Maillis	Irina Tsareva	12-Aug-13	10:43:00 AM
301.	Email request to modify stop loss	Irina Tsareva	George Maillis	12-Aug-13	10:55:00 AM
302.	Email regarding modifying stop loss	George Maillis	Irina Tsareva	12-Aug-13	11:01:00 AM
303.	Email requesting updated position / account balance	Irina Tsareva	George Maillis	14-Aug-13	12:30:00 PM
304.	Email exchange regarding trade request	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	14-Aug-13	2:11:00 PM
305.	Email exchange regarding trade request	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	14-Aug-13	1:19:00 PM

306.	Email exchange regarding trade request and confirmation	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	14-Aug-13	12:41:00 PM
307.	Email exchange regarding trade request	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	14-Aug-13	12:33:00 PM
308.	Email exchange regarding trade request	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	14-Aug-13	2:21:00 PM
309.	Email requesting updated position and account balance	Irina Tsareva	Marsha Alddlerly	14-Aug-13	12:31:00 PM
310.	Email exchange regarding trade requests	Jamaal Wright / Irina Tsareva	Irina Tsareva / Jamaal Wright	14-Aug-13	12:07:00 PM
311.	Email requesting stop loss	Irina Tsareva	Jamaal Wright	14-Aug-13	12:06:00 PM
312.	Email confirming purchase	Jamaal Wright	Irina Tsareva	14-Aug-13	12:02:00 PM
313.	Email requesting purchase	Irina Tsareva	Marsha Alddlerly	14-Aug-13	11:59:00 AM
314.	Email exchange confirming sale and requesting balance update	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	14-Aug-13	2:38:00 PM
315.	Email regarding account balance update	George Maillis	Irina Tsareva	14-Aug-13	2:39:00 PM
316.	Email regarding account balance update	Irina Tsareva	George Maillis	14-Aug-13	2:41:00 PM
317.	Email exchange requesting updated position and sale	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	14-Aug-13	2:31:00 PM
318.	Email exchange regarding stop loss request / updated position	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	14-Aug-13	2:12:00 PM
319.	Email exchange regarding cancelling trade request	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	15-Aug-13	3:28:00 PM
320.	Email exchange regarding cancelling trade request	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	15-Aug-13	3:27:00 PM



321.	Email regarding trade request	Irina Tsareva	George Maillis	15-Aug-13	3:05:00 PM
322.	Email re: Trade request	Irina Tsareva	Marsha Adderley	15-Aug-13	1:41:00 PM
323.	Email re: Trade request	George Maillis	Irina Tsareva	15-Aug-13	1:44:00 PM
324.	Email exchange re: trade requests / Direct Market Access	Irina Tsareva/ GeorgeMaillis	George Maillis / Irina Tsareva	15-Aug-13	1:54:00 PM
325.	Email chain re: clear trade instructions / direct market access (7 emails)	Irina Tsareva/ GeorgeMaillis / Marsha Adderley	George Maillis / Marsha Adderley/ Irina Tsareva	15-Aug-13	3:01:00 PM
326.	Email regarding trade request	Irina Tsareva	George Maillis	16-Aug-13	9:59:00 AM
327.	Email exchange regarding trade request	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	16-Aug-13	10:06:00 AM
328.	Email regarding trade request	Irina Tsareva	George Maillis	16-Aug-13	10:00:00 AM
329.	Email cancelling trade request	Irina Tsareva	George Maillis	16-Aug-13	10:32:00 AM
330.	Email exchange regarding stop loss trading change	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	16-Aug-13	2:04:00 PM
331.	Email exchange regarding trading request and balance update	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	16-Aug-13	2:20:00 PM
332.	Email exchange regarding update on trade position	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	16-Aug-13	2:15:00 PM
333.	Email regarding account balance update ; interest on loan; flat fee rates	George Maillis	Irina Tsareva	16-Aug-13	3:05:00 PM
334.	Email exchange regarding cancelling stop loss request/ balance update	George Maillis/ Irina Tsareva	Irina Tsareva / George Maillis	16-Aug-13	2:37:00 PM

335.	Email exchange regarding cancelling stop loss request	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	16-Aug-13	2:32:00 PM
336.	Email requesting stop loss trade	Irina Tsareva	George Maillis	16-Aug-13	2:30:00 PM
337.	Email exchange regarding trade request	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	16-Aug-13	2:07:00 PM
338.	Email requesting to move stop loss	Irina Tsareva	George Maillis	16-Aug-13	2:18:00 PM
339.	Email regarding trade request	Irina Tsareva	George Maillis	16-Aug-13	2:01:00 PM
340.	Email regarding trade request	Irina Tsareva	George Maillis	16-Aug-13	2:15:00 PM
341.	Email requesting position on stop loss	Irina Tsareva	George Maillis	16-Aug-13	2:19:00 PM
342.	Email confirming purchase / stop loss	George Maillis	Irina Tsareva	16-Aug-13	2:20:00 PM
343.	Email regarding flat fee / updated account balance	Irina Tsareva	George Maillis	16-Aug-13	3:23:00 PM
344.	Email regarding stop loss and providing balance update	George Maillis	Irina Tsareva	19-Aug-13	3:15:00 PM
345.	Email exchange regarding stop loss and balance update	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	19-Aug-13	3:13:00 PM
346.	Email exchange confirming purchase and requesting stop loss	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	19-Aug-13	2:50:00 PM
347.	Email regarding trade request	George Maillis	Irina Tsareva	19-Aug-13	2:49:00 PM
348.	Email regarding trade request	Irina Tsareva	George Maillis	19-Aug-13	2:46:00 PM
349.	Email exchange regarding trade request and stop loss position	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	19-Aug-13	3:47:00 PM



350.	Email regarding purchase request	Irina Tsareva	George Maillis	19-Aug-13	3:45:00 PM
351.	Email confirming purchase order	George Maillis	Irina Tsareva	19-Aug-13	2:49:00 PM
352.	Email confirming purchase order and stop loss request	Marsha Adderley	Irina Tsareva	19-Aug-13	4:22:00 PM
353.	Email confirming stop loss request	Irina Tsareva	Marsha Adderly	19-Aug-13	4:25:00 PM
354.	Email chain re: trading activity/ Mortgage Default/ updated balance (9 emails)	Irina Tsareva / George Maillis	George Maillis / Irina Tsareva	19-Aug-13	10:20:00 AM
355.	Email re: trade requests	Irina Tsareva	George Maillis	19-Aug-13	3:44:00 PM
356.	Email exchange re: trade request / trade confirmation	Irina Tsareva / George Maillis	George Maillis / Irina Tsareva	19-Aug-13	3:48:00 PM
357.	Email exchange re: trading activity/ Mortgage Default/ updated balance	Irina Tsareva / George Maillis	George Maillis / Irina Tsareva	19-Aug-13	10:46:00 AM
358.	Email re: trade request / trade confirmation	Irina Tsareva / George Maillis	George Maillis / Irina Tsareva	19-Aug-13	2:50:00 PM
359.	Email exchange regarding account balance	Irina Tsareva	George Maillis	19-Aug-13	10:21:00 AM
360.	Email regarding stop loss request	Irina Tsareva	Marsha Adderley	20-Aug-13	10:00:00 AM
361.	Email regarding stop loss request	Irina Tsareva	Marsha Adderley	20-Aug-13	1:45:00 PM
362.	Email exchange confirming amended stop loss purchase	Marsha Adderley/ Irina Tsareva	Irina Tsareva/ Marsha Adderley	20-Aug-13	1:46:00 PM
363.	Email exchange regarding stop loss request	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	20-Aug-13	1:58:00 PM
364.	Email request to move NUGT position stop loss	Irina Tsareva	Marsha Adderley	20-Aug-13	2:06:00 PM

365.	Email exchange confirming purchase	Marsha Adderley/ Irina Tsareva	Irina Tsareva / Marsha Adderley	20-Aug-13	10:40:00 AM
366.	Email exchange regarding purchase request	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	20-Aug-13	10:24:00 AM
367.	Email exchange confirming trade cancellation	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	20-Aug-13	10:19:00 AM
368.	Email regarding request to cancel trade	Marsha Adderley	Rene Baumgartner	20-Aug-13	10:18:00 AM
369.	Email providing trade update	Rene Baumgartner	Irina Tsareva	20-Aug-13	10:16:00 AM
370.	Email regarding trade position update	Irina Tsareva	Marsha Adderley	20-Aug-13	11:29:00 AM
371.	Email regarding trade position update	Marsha Adderley	Irina Tsareva	20-Aug-13	11:25:00 AM
372.	Email regarding trade position update	Irina Tsareva	Marsha Adderley, Lynette Martinborough	20-Aug-13	11:21:00 AM
373.	Email regarding stop loss request and trade position update	Irina Tsareva	Marsha Adderley	20-Aug-13	11:07:00 AM
374.	Email exchange regarding trade / stop loss request	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	20-Aug-13	2:09:00 PM
375.	Email regarding trade / stop loss request	Irina Tsareva	Marsah Adderley	20-Aug-13	2:07:00 PM
376.	Email regarding Direct Market Access request by Irina Tsareva	George Maillis	Irina Tsareva	20-Aug-13	3:56:00 PM
377.	Email requesting Direct Market Access platform	Irina Tsareva	Marsha Adderley	20-Aug-13	1:17:00 PM
378.	Email requesting Direct Market Access platform	Irina Tsareva	Carl DeFelice,	20-Aug-13	1:10:00 PM
379.	Email regarding Direct Market Access platform	Carl DeFelice,	Irina Tsareva	20-Aug-13	1:09:00 PM



380.	Email requesting Direct Market Access platform	Irina Tsareva	Carl DeFelice,	20-Aug-13	1:05:00 PM
381.	Email regarding trade request	Irina Tsareva	Marsha Adderley	20-Aug-13	12:50:00 PM
382.	Email regarding trade request	Irina Tsareva	Marsha Adderley	20-Aug-13	12:53:00 PM
383.	Email providing purchase update	George Maillis	Irina Tsareva	20-Aug-13	1:03:00 PM
384.	Email exchange regarding trade request	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	20-Aug-13	1:08:00 PM
385.	Email exchange confirming stop loss request	Lynette Martinborough/ Irina Tsareva	Irina Tsareva / Lynette Martinborough	20-Aug-13	2:48:00 PM
386.	Email exchange confirming stop loss request	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	20-Aug-13	2:09:00 PM
387.	Email regarding trade / stop loss request	Irina Tsareva	Marsha Adderley	20-Aug-13	2:07:00 PM
388.	Email regarding stop loss confirmation	Irina Tsareva	George Maillis	20-Aug-13	11:33:00 AM
389.	Email regarding stop loss confirmation	Irina Tsareva	Marsha Adderley	20-Aug-13	11:36:00 AM
390.	Email exchange regarding trade request and stop loss confirmation	Marsha Adderley / Irina Tsareva	Irina Tsareva / Marsha Adderley	20-Aug-13	11:44:00 AM
391.	Email exchange regarding trade request and stop loss confirmation	Lynette Martinborough/ Irina Tsareva	Irina Tsareva / Lynette Martinborough	20-Aug-13	11:39:00 AM
392.	Emails regarding trade request and stop loss confirmation	Irina Tsareva	Marsha Adderley	20-Aug-13	11:33:00 AM
393.	Email regarding correct memo for trade position	Marsha Adderley	Irina Tsareva	20-Aug-13	11:50:30 AM

394.	Email regarding correct memo for trade position	Irina Tsareva	Marsha Adderley	20-Aug-13	11:55:00 AM
395.	Email regarding correct memo for trade position	Irina Tsareva	Marsha Adderley	20-Aug-13	11:50:00 AM
396.	Email exchange re: trade confirmation and stop loss request	Irina Tsareva/ GeorgeMaillis	George Maillis / Irina Tsareva	20-Aug-13	1:32:00 PM
397.	Email exchange re: Direct Market Access / flat fee rates	George Maillis / Irina Tsareva	Irina Tsareva / George Maills	20-Aug-13	10:29:00 AM
398.	Email chain regarding reverse stock split (3 emails; 19 August - 20 August, 2013)	Marsha Adderley	Irina Tsareva	20-Aug-13	9:14:00 AM
399.	Email re: adding email account	Irina Tsareva	Marsha Adderley	21-Aug-13	9:33:00 AM
400.	Email chain re: Account Balance (4 emails)	Irina Tsareva / Marsha Adderley	Marsha Adderley / Irina Tsareva	21-Aug-13	10:20:00 AM
401.	Email chain re: trading request / cancelling trade orders/ meeting request (10 emails)	George Maillis / Irina Tsareva	Irna Tsareva / George Maillis	21-Aug-13	12:53:00 PM
402.	Email exchange re: Meeting request / Conditional Flat Fee	George Maillis	Irina Tsareva	21-Aug-13	1:12:00 PM
403.	Email exchange re: trading request / request for clarification	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	21-Aug-13	11:54:00 AM
404.	Email exchange re: trade requests/ request for clarification	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	21-Aug-13	12:18:00 PM
405.	Email re: Direct Market Access / ongoing trading disagreement	Irina Tsareva	George Maillis	21-Aug-13	11:00:00 AM



406.	Email exchange re: trade and stop loss requests / request for a call	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	21-Aug-13	12:30:00 PM
407.	Email exchange re: trade and stop loss requests / request for a call	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	21-Aug-13	12:39:00 PM
408.	Email chain regarding request for account balance (6 emails)	Irina Tsareva	Lynette Martinborough	21-Aug-13	10:27:00 AM
409.	Email chain regarding email indemnity form / change of email address (3 emails)	Irina Tsareva	Lynette Martinborough	21-Aug-13	10:07:00 AM
410.	Email chain regarding trade requests/stop loss (12 emails)	Irina Tsareva	George Maillis/Marsha Adderley	21-Aug-13	3:03:18 PM
411.	Email exchange regarding new email address / electronic trading access	Irina Tsareva	Marsha Adderley	21-Aug-13	10:56:53 AM
412.	Email regarding trade requests	Irina Tsareva	Marsha Adderley	21-Aug-13	11:02:49 AM
413.	Email exchange regarding trade requests	George Maillis	Irina Tsareva/Marsha Adderley	21-Aug-13	11:10:55 AM
414.	Email regarding confirmation of trade request	Irina Tsareva	Irina Tsareva/Marsha Adderley	21-Aug-13	11:11:25AM
415.	Email chain regarding trade request and stop loss (3 emails)	Irina Tsareva	George Maillis/Marsha Adderley	21-Aug-13	11:18:09 AM
416.	Email chain regarding trade request and stop loss (6 emails)	Irina Tsareva	George Maillis/Marsha Adderley	21-Aug-13	12:28:11 PM
417.	Email chain regarding trade requests / stop losses / price adjustment (9 emails)	Irina Tsareva	George Maillis/Marsha Adderley	21-Aug-13	12:49:19 PM



418.	Email chain regarding trade request (5 emails)	Irina Tsareva	George Maillis/Marsha Adderley	21-Aug-13	10:47:24 AM
419.	Email exchange regarding change of email address / trade request	Irina Tsareva	Marsha Adderley	21-Aug-13	10:07:36 AM
420.	Email exchange re: trade request / confirmation of trade	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	22-Aug-13	1:18:00 PM
421.	Email exchange regarding trade request	Irina Tsareva	Marsha Adderley/George Maillis	22-Aug-13	1:17:08 PM
422.	Email exchange regarding trade request	George Maillis	Irina Tsareva/Marsha Adderley	22-Aug-13	1:18:17 PM
423.	Email halt trading / direct access (6 emails)	George Maillis	Irina Tsareva	22-Aug-13	4:31:00 PM
424.	Email chain regarding trade request and cancellation (3 emails)	Irina Tsareva	George Maillis/Marsha Adderley	22-Aug-13	2:41:52 PM
425.	Email chain regarding proper trade requests (12 emails)	Irina Tsareva	George Maillis/Marsha Adderley	22-Aug-13	3:04:06 PM
426.	Email chain regarding proper trade requests (12 emails)	George Maillis	Irina Tsareva/Marsha Adderley	22-Aug-13	4:41:01 PM
427.	Email regarding trade request	Irina Tsareva	Marsha Adderley/George Maillis	22-Aug-13	12:52:58 PM
428.	Email exchange re: trade / stop loss request	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	23-Aug-13	11:04:00 AM
429.	Email exchange re: trade request / confirmation of trade	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	23-Aug-13	10:54:00 AM
430.	Email exchange regarding trade request	George Maillis	Irina Tsareva	23-Aug-13	10:54:00 AM

431.	Email chain re: trade requests (3 emails)	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	27-Aug-13	1:16:00 PM
432.	Email exchange re: cancelling trade requests	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	27-Aug-13	1:31:00 PM
433.	Email chain regarding trade request and cancellations (8 emails)	George Maillis	Irina Tsareva/Irina Tsareva	27-Aug-13	1:32:00 PM
434.	Email chain regarding confirmation to trade security (3 emails)	Lynette Martinborough	Irina Tsareva/Irina Tsareva	27-Aug-13	10:37:00 AM
435.	Email chain regarding trade request (8 emails)	Jamaal Wright	Irina Tsareva/Irina Tsareva	27-Aug-13	2:04:00 PM
436.	Email re: trading	George Maillis	Irina Tsareva	28-Aug-13	3:12:00 PM
437.	Email re: trading (Italian)	Irina Tsareva	George Maillis	28-Aug-13	4:05:00 PM
438.	Email regarding signing authority	Lynette Martinborough	Irina Tsareva/Irina Tsareva	29-Aug-13	10:29:00 AM
439.	Email chain regarding trade requests / flat fee (3 emails; 28 August - 30 August, 2013)	George Maillis	Marsha Adderley	30-Aug-13	9:06:00 AM
440.	Email regarding amendment to Power of Attorney	Lynette Martinborough	Irina Tsareva/Irina Tsareva	30-Aug-13	11:03:00 AM
441.	Email regarding account balance and cash withdrawal	Irina Tsareva	George Maillis, Marsha Adderley, Lynette Martinborough	30-Aug-13	1:53:00 PM
442.	Email chain regarding trade request and cancellation (7 emails)	Irina Tsareva	Jamaal Wright	4-Sep-13	1:19:00 PM
443.	Email chain regarding trade request and cancellation (20 emails)	George Maillis	Irina Tsareva/Marsha Adderley	10-Sep-13	3:20:00 PM



444.	Email chain regarding trading losses	George Maillis	Irina Tsareva/Marsha Adderley	19-Sep-13	10:51:00 AM
445.	Email regarding trade request and cancellation (6 emails)	Lynette Martinborough	Irina Tsareva/Irina Tsareva, Marsha Adderley, George Maillis	30-Sep-13	12:35:00 PM
446.	Email re: Complaint report to management	George Maillis	Irina Tsareva	7-Oct-13	11:41:00 AM
447.	Email re: trade / stop loss request	Irina Tsareva	George Maillis	9-Oct-13	10:59:00 AM
448.	Email re: virtual trading	George Maillis	Irina Tsareva	9-Oct-13	11:03:00 AM
449.	Email re: virtual trading	Irina Tsareva	George Maillis	9-Oct-13	11:09:00 AM
450.	Email regarding request to unblock electronic trading	Irina Tsareva	George Maillis	9-Oct-13	11:40:00 AM
451.	Email exchange regarding meeting / trade losses (9 October - 10 October, 2013)	Fabian Jenny	Irina Tsareva	10-Oct-13	4:16:00 PM
452.	Email chain re: trade requests (5 emails)	Irina Tsareva / George Maillis	George Maillis / Irina Tsareva	11-Oct-13	3:19:00 PM
453.	Email chain regarding trade confirmations / 8 October meeting (5 emails; 9 October - 23 December, 2013)	George Maillis	Irina Tsareva/Marsha Adderley	23-Dec-13	11:07:18 AM
454.	Email to UBS team	Irina Tsareva	Marsha Adderley	2-Jan-14	1:24:00 PM
455.	Email exchange re: request for original waiver document / contact with head office	Irina Tsareva/ George Maillis	George Maillis / Irina Tsareva	24-Jan-14	4:24:00 PM
456.	Email re: request for original waiver document / contact with head office	George Maillis	Irina Tsareva	24-Jan-14	4:17:00 PM



457.	Email exchange re: account balance / returning book	George Maillis	Irina Tsareva	29-Jan-14	10:06:00 AM
458.	Email re: account balance / returning book	Irina Tsareva	George Maillis	29-Jan-14	10:08:00 AM
459.	Email re: contract notes	Irina Tsareva	Fabian Jenny	30-Jan-14	9:50:00 AM
460.	Email regarding request to update financial status	George Maillis	Irina Tsareva	12-Feb-14	11:03:23 AM
461.	Email regarding follow up on completion of financial information request form	George Maillis	Irina Tsareva	21-Feb-14	3:25:17 PM
462.	Email re: Supreme Court Order dated 8 May 2015	Chizelle Cargill	Irina Starostenko	23-Jun-15	
463.	Email re: removal from Lyford Cay Property	Irina Starostenko	Marco Turnquest, Chizelle Cargill	8-Jun-16	
464.	Email re: request for available dates	Chizelle Cargill	Irina Starostenko	23-May-17	3:22:00 PM
465.	Email re: Request for available dates (attaching letter)	Irina Starostenko	Chizelle Cargill	23-May-17	12:59:00 PM
466.	Email exchange re: perfecting consolidation Order	Irina Starostenko/ Chizelle Cargill	Chizelle Cargill/ Irina Starostenko	25-Oct-17	
467.	Email re: perfecting Consolidation Order	Irina Starostenko	Chizelle Cargill	25-Oct-17	
468.	Email re: request for extension to file Defence	Irina Starostenko	Chizelle Cargill	22-Nov-17	9:41:00 AM
469.	Email re: Defence filed by UBS (Bahamas) Ltd (In Liquidation)	Irina Starostenko	Chizelle Cargill	28-Nov-17	5:07:00 PM
470.	Email re: Defence filed by UBS (Bahamas) Ltd (In Liquidation)	Chizelle Cargill	Irina Starostenko	28-Nov-17	4:37:00 PM

471.	Email re: Supreme Court Order dated 21 December 2017	Irina Starostenko	Chizelle Cargill	21-Dec-17	3:48:00 PM
472.	Email re: Supreme Court Order dated 21 December 2017 (attaching draft Order)	Chizelle Cargill	Irina Starostenko	21-Dec-17	12:58:00 PM
473.	Email re: Supreme Court Order dated 21 December 2017	Chizelle Cargill	Justice Milton Evans, Irina Starostenko, Phillip Lundy	22-Dec-17	9:06:00 AM
474.	Email re: Supreme Court Order dated 21 December 2017 (attaching draft Order)	Irina Starostenko	Marco Turnquest, Chizelle Cargill	22-Dec-17	8:12:00 AM
475.	Email re: Supreme Court Order dated 21 December 2017	Irina Starostenko	Chizelle Cargill	27-Dec-17	12:43:00 PM
476.	Email re: Supreme Court Order dated 21 December 2017	Chizelle Cargill	Irina Starostenko	27-Dec-17	12:15:00 PM
477.	Email requesting immediate access to Lyford Cay Property	Irina Starostenko	Chizelle Cargill	2-Mar-18	1:18:00 PM
478.	Email re: request to access Lyford Cay Property	Chizelle Cargill	Irina Starostenko	2-Mar-18	10:51:00 AM
479.	Emails re: eviction and access to Lyford Cay Property	Irina Starostenko	Chizelle Cargill	2-Mar-18	10:00:00 AM
480.	Email re: deed of release and request to access Lyford Cay Property	Chizelle Cargill	Irina Starostenko	9-Mar-18	
481.	Email requesting immediate access to Lyford Cay Property	Irina Starostenko	Chizelle Cargill	11-Mar-18	
482.	Email re: removing personal belongings from Lyford Cay Property	Chizelle Cargill	Irina Starostenko	13-Mar-18	5:56:00 PM

483.	Email attaching letter re: access to Lyford Cay Property	Irina Starostenko	Chizelle Cargill	16-Mar-18	
484.	Email re: removing personal belongings from Lyford Cay Property (attaching Deed of Release)	Chizelle Cargill	Irina Starostenko	19-Mar-18	2:47:00 PM
485.	Email attaching letter re: access to Lyford Cay Property	Irina Starostenko	Marco Turnquest, Chizelle Cargill	19-Mar-18	12:08:00 PM
486.	Email re: access to Lyford Cay Property	Irina Starostenko	Chizelle Cargill	20-Mar-18	
487.	Email from Irina Tsareva to George Maillis, re. investing in gold	Irina Tsareva	George Maillis	15-Apr-18	5:16:35 PM
488.	Email re: removing personal belongings from Lyford Cay Property	Chizelle Cargill	Irina Starostenko	16-Apr-18	
489.	Email re: access to Lyford Cay Property	Irina Starostenko	Chizelle Cargill	18-Apr-18	
490.	Email re: removing personal belongings from Lyford Cay Property	Chizelle Cargill	Irina Starostenko	25-Apr-18	
491.	Email re: removing personal belongings from Lyford Cay Property	Chizelle Cargill	Irina Starostenko	25-Apr-18	

**PART 2**

Confidential letters, notes and documents between the Defendant and its attorneys for the purpose of giving and receiving advice on the matters in question in this action; statements and proofs of



witnesses and other correspondence and documents brought into existence sole for the purpose of this action.

**SCHEDULE 2**

**NIL.**

**NOTICE TO INSPECT**

**TAKE NOTICE** that the documents in the above list, other than those listed in Part 2 of Schedule 1 and Schedule 2 may be inspected on or before 20<sup>th</sup> September, 2018 at the offices of the Attorneys of the above-named Plaintiff at Lennox Paton, 3 Bayside Executive Park, West Bay Street & Blake Road, New Providence, The Bahamas, from Monday to Friday, between the hours of 9:30 a.m. and 4:30 p.m.

**DATED** this 30<sup>th</sup> day of August A.D 2018

**LENNOX PATON**  
3 Bayside Executive Park  
West Bay Street & Blake Road  
Nassau, New Providence  
The Bahamas

Attorneys for the Defendant by Counterclaim

To: Irina Starostenko  
Yuri Starostenko  
New Providence, The Bahamas

Priderock Chambers  
Suite #200  
Priderock Corporate Centre  
East & Bay Streets  
Nassau, N.P., The Bahamas

**COMMONWEALTH OF THE BAHAMAS  
IN THE SUPREME COURT**

**COMMON LAW & EQUITY SIDE**

**BETWEEN**

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

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**2015/ CLE/gen/No.01451**

**2014/CLE/gen/No.01620**

**LENNOX PATON**  
Building 3 Bayside Executive Park  
Blake Road and West Bay Street  
New Providence  
The Bahamas

**Attorneys for the Defendant by Counterclaim**

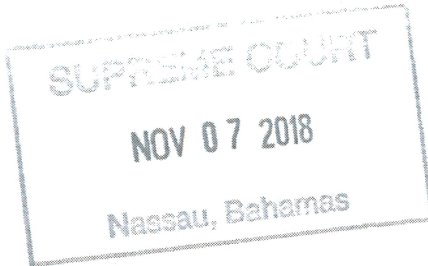
# TAB 2



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

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

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The following is a supplemental 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

from production, being documents which came into being for and in contemplation of the conduct of the claim herein.

3. The Defendant has had, but have not now, in its possession, custody or power the documents relating to the matters in question in this action enumerated in Schedule 2 hereto.
4. The documents in the said Schedule 2 were last in the Defendant's possession, custody or power on the dates borne by the said documents being the dates when they were posted to the respective recipients
5. Neither the Defendant nor its Attorneys, nor any other person on its behalf, have now, or ever had, in its possession, custody or power any document of any description whatever relating to any matter in question in this action other than the documents enumerated in Schedules 1 and 2 hereto.

## SCHEDULE 1

### PART 1

**DOCUMENTS**

	<b>Description</b>	<b>From</b>	<b>To</b>	<b>Date</b>	
1.	UBS (Bahamas) Ltd Security Trail Contracts			13-Jun-13	
2.	UBS (Bahamas) Ltd Security Trail Contracts			24-Jun-13	
3.	UBS (Bahamas) Ltd Security Trail Contracts			26-Jun-13	
4.	UBS (Bahamas) Ltd Security Trail Contracts			16-Jul-13	
5.	UBS (Bahamas) Ltd Security Trail Contracts			19-Jul-13	
6.	UBS (Bahamas) Ltd Security Trail Contracts			23-Jul-13	
7.	UBS (Bahamas) Ltd Security Trail Contracts			25-Jul-13	
8.	UBS (Bahamas) Ltd Security Trail Contracts			26-Jul-13	
9.	UBS (Bahamas) Ltd Security Trail Contracts			31-Jul-13	
10.	UBS (Bahamas) Ltd Security Trail Contracts			1-Aug-13	
11.	UBS (Bahamas) Ltd Security Trail Contracts			2-Aug-13	
12.	UBS (Bahamas) Ltd Security Trail Contracts			6-Aug-13	
13.	UBS (Bahamas) Ltd Security Trail Contracts			7-Aug-13	
14.	UBS (Bahamas) Ltd Security Trail Contracts			9-Aug-13	
15.	UBS (Bahamas) Ltd Security Trail Contracts			12-Aug-13	



16.	UBS (Bahamas) Ltd Security Trail Contracts			14-Aug-13	
17.	UBS (Bahamas) Ltd Security Trail Contracts			16-Aug-13	
18.	UBS (Bahamas) Ltd Security Trail Contracts			19-Aug-13	
19.	UBS (Bahamas) Ltd Security Trail Contracts			20-Aug-13	
20.	UBS (Bahamas) Ltd Security Trail Contracts			21-Aug-13	
21.	UBS (Bahamas) Ltd Security Trail Contracts			23-Aug-13	
22.	Minutes of Meeting discussing the way forward			18-Mar-14	
23.	6 Undated file Notes – UBS (Bahamas) Ltd				
24.	Undated file note attaching client waiver				
25.	Undated file note attaching signed declaration regarding investments				
26.	Undated file note attaching letter to sent to Starotenkos regarding complaint investigation / margin call				

**EMAILS**

	<b>Description</b>	<b>From</b>	<b>To</b>	<b>Date</b>	<b>Time</b>
27.	Email regarding account reopening/wire transfer for appraisal/adjusting insurance policies	George Maillis	Irina Tsareva	13-Aug-12	9:21:00 AM
28.	Email exchange requesting residential information	George Maillis	Irina Tsareva	14-Aug-12	10:26:23AM
29.	Email chain regarding wire confirmation/appraisal confirmation	George Maillis	Irina Tsareva	15-Aug-12	1:59:45 PM

30.	Email regarding completion of appraisal report	George Maillis	Irina Tsareva	22-Aug-12	1:48:03 PM
31.	Email chain regarding commitment to finance Jazz House (8 emails)	George Maillis	Irina Tsareva	23-Aug-12	3:35:47 PM
32.	Email regarding insurance receipt from NUA	George Maillis	Irina Tsareva	18-Oct-12	11:04:42 AM
33.	Email chain regarding opportunity to begin futures trading (4 emails)	George Maillis/ Irina Tsareva	Irina Tsareva/ George Maillis	11-Apr-13	3:43:08 PM
34.	Email chain regarding trade expectations / delay (2 emails)	George Maillis / Irina Tsareva	Irina Tsareva / George Maillis	16-Apr-13	10:40:39 AM
35.	Email exchange regarding signing of futures contract (3 emails)	George Maillis/ Irina Tsareva	Irina Tsareva/ George Maillis	17-Apr-13	9:54:06 AM
36.	Email regarding trade requests	Irina Tsareva/ George Maillis	George Maillis/ Irina Tsareva	18-Apr-13	10:14:46 AM
37.	Email chain regarding advice from UBS on possible investment (if fees permit trade) (4 emails)	Irina Tsareva/ George Maillis	George Maillis/ Irina Tsareva	17-May-13	11:06:32 AM
38.	Email regarding bank fees / investment in securities	Irina Tsareva	George Maillis	3-Jun-13	12:30:09 PM
39.	Email chain regarding investment in securities (6 emails)	Irina Tsareva	George Maillis	13-Jun-13	12:42:46 PM
40.	Email chain regarding investment securities/request for costs of transaction/ confirmation of fees (22 emails)	Irina Tsareva/ George Maillis	George Maillis/ Irina Tsareva	14-Jun-13	11:12:01 AM

41.	Email chain regarding future investments (15 emails)	Irina Tsareva/ George Maillis	George Maillis/ Irina Tsareva	19-Jun-13	11:39:29 AM
42.	Email chain regarding request "to short trade" (2 emails)	Irina Tsareva/ George Maillis	George Maillis/ Irina Tsareva	19-Jun-13	4:17:32 PM
43.	Email chain regarding trade request and cancellation/direct access/best trade methods (6 emails)	George Maillis	Irina Tsareva	24-Jun-13	10:34:47 AM
44.	Email chain regarding account balance / trade requests (5 emails)	Irina Tsareva/ George Maillis and Marsha Adderley	George Maillis/ Irina Tsareva	17-Jul-13	11:24:18 AM
45.	Email chain regarding trade requests/stop loss request (10 emails)	Irina Tsareva/ Marsha Adderley,	George Maillis/ Irina Tsareva	12-Aug-13	11:19:48 AM
46.	Email chain regarding trade requests/stop loss request (6 emails)	Irina Tsareva/ Marsha Adderley	Jamaal Wright/Irina Tsareva	14-Aug-13	12:14:31 PM
47.	Email chain regarding update on balance and trade requests/stop loss requests (22 emails)	Irina Tsareva/Marsha Adderley	George Maillis and Marsha Adderley/ Irina Tsareva	14-Aug-13	2:41:20 PM
48.	Email exchange regarding trade advice	George Maillis	Irina Tsareva/ Marsha Adderley	21-Aug-13	1:21:45PM
49.	Email exchange regarding Stop loss	Irina Tsareva	Marsha Adderley	21-Aug-13	2:37:04 PM
50.	Email exchange regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	21-Aug-13	1:20:11 PM
51.	Email chain regarding trade requests/purchases (3 emails)	George Maillis	George Maillis/ Marsha Adderley	21-Aug-13	1:28:23 PM



52.	Email chain regarding trade requests ( 3 emails)	Irina Tsareva	George Maillis/ Marsha Adderley	21-Aug-13	1:28:39 PM
53.	Email regarding trade request/trading fee	Irina Tsareva	Irina Tsareva/ Marsha Adderley	21-Aug-13	11:50:21 AM
54.	Email chain regarding stop loss trading request	George Maillis	Irina Tsareva/ Marsha Adderley	21-Aug-13	11:22:27 AM
55.	Email regarding trading requests/ trade of 1k NUGT	George Maillis	Irina Tsareva/ Marsha Adderley	21-Aug-13	11:54:41 AM
56.	Email regarding trading requests/ trade of 1k NUGT	Irina Tsareva	George Maillis/ Marsha Adderley	21-Aug-13	11:59:32 AM
57.	Email exchange regarding trade order types/trade requests	Irina Tsareva	George Maillis/ Marsha Adderley	21-Aug-13	12:10:07 PM
58.	Email chain regarding trading requests/order not processed (4 Emails)	George Maillis	Irina Tsareva/ Marsha Adderley	21-Aug-13	12:18:38 PM
59.	Email regarding confirmation of trade	Irina Tsareva	George Maillis/ Marsha Adderley	21-Aug-13	12:18:47
60.	Email chain regarding trading request/meeting to discuss trading losses (7 emails)	Irina Tsareva	George Maillis/ Marsha Adderley	21-Aug-13	1:49:38 PM
61.	Email scheduling meeting to discuss trades	Irina Tsareva	George Maillis/ Marsha Adderley	21-Aug-13	2:44:15 PM
62.	Email chain regarding stop loss trading request/cancellation (5 emails)	Irina Tsareva	George Maillis/ Marsha Adderley	21-Aug-13	1:33:33 PM
63.	Email chain regarding trading request and stop loss orders/cancellation (13 emails)	Irina Tsareva	George Maillis/ Marsha Adderley	21-Aug-13	1:47:15 PM

64.	Email chain regarding stop loss (4 emails)	Irina Tsareva	Marsha Adderley	21-Aug-13	2:48:23 PM
65.	Email chain regarding cancellation of stop loss/moving stop loss (6 emails)	George Maillis	Irina Tsareva/ Marsha Adderley	21-Aug-13	2:56:43 PM
66.	Email regarding trade request	Irina Tsareva	George Maillis/ Marsha Adderley	21-Aug-13	1:15:33 PM
67.	Email chain regarding trade request/order cancellation /meeting to discuss cancellation (12 emails)	George Maillis	Irina Tsareva	21-Aug-13	1:12:02 PM
68.	Email chain regarding trade request/stop loss (5 emails)	Irina Tsareva	George Maillis/ Marsha Adderley	21-Aug-13	1:02:49 PM
69.	Email chain regarding trading request/order cancellation/ meeting to discuss stop loss (11 emails)	Irina Tsareva	George Maillis/ Marsha Adderley	21-Aug-13	12:56:13 PM
70.	Email chain regarding requests / stop loss request (12 emails)	Irina Tsareva	Marsha Adderley	21-Aug-13	3:17:35 AM
71.	Email exchange regarding trade request/confirmation of order	Irina Tsareva	George Maillis/ Marsha Adderley	22-Aug-13	1:17:08 PM
72.	Email chain regarding trade requests/stop losses/acceptable stop loss trade (11 emails)	Irina Tsareva	George Maillis/ Marsha Adderley	22-Aug-13	3:04:06 PM
73.	Email chain regarding trade requests / ongoing business relationship (12 emails)	Goerge Maillis	Inrina Tsareva	22-Aug-13	4:04:25PM
74.	Email requesting trading request	Irina Tsareva	George Maillis/ Marsha Adderley	23-Aug-13	11:01:28 AM
75.	Email chain requesting stop loss/confirmation of stop loss request (11 emails)	Irina Tsareva	Jamaal Wright/Marsha Adderley/George Maillis	23-Aug-13	3:55:30 PM



76.	Email exchange regarding trade request of NUGT	Irina Tsareva	George Maillis/ Marsha Adderley	23-Aug-13	3:20:20 PM
77.	Email chain regarding trade request (5 emails)	Irina Tsareva	Jamal Wright/George Maillis/Marsha Adderley	23-Aug-13	3:27:07 PM
78.	Email exchange regarding trade requests	Irina Tsareva	Lynette Martinborough/Ja maal Wright	23-Aug-13	12:05:22 PM
79.	Email chain regarding trade requests/advice on executions (4 emails)	George Maillis	Irina Tsareva/ Marsha Adderley	23-Aug-13	12:14:14 PM
80.	Email chain regarding trade disagreement/direct market access (4 emails)	Irina Tsareva	George Maillis	23-Aug-13	1:27:11 PM
81.	Email chain requesting stop loss (5 emails)	Irina Tsareva	George Maillis/ Marsha Adderley	26-Aug-13	10:34:47 AM
82.	Email exchange requesting stop loss	George Maillis	Irina Tsareva/ Marsha Adderley	26-Aug-13	9:30:19 AM
83.	Email exchange requesting stop loss	George Maillis	Irina Tsareva/ Marsha Adderley	26-Aug-13	9:45:35 AM
84.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	27-Aug-13	9:45:38 AM
85.	Email chain regarding trade request and cancellation (3 emails)	Irina Tsareva	George Maillis/Marsha Adderley/Lynette Martinborough	27-Aug-13	10:51:53 AM
86.	Email chain regarding trade request/ approval to trade security UVXY (4 emails)	Irina Tsareva	Lynette Martinborough	27-Aug-13	10:46:06 AM
87.	Email chain regarding trade request/cancellation of NUGT orders (5 emails)	George Maillis	Irina Tsareva/Marsha Adderley/Lynette Martinborough	27-Aug-13	1:31:44 AM
88.	Email chain regarding trading requests/ modification of stop loss (14 emails)	Irina Tsareva	Lynette Martinborough	28-Aug-13	4:19:31 PM



89.	Email regarding trade request/request account balance	Irina Tsareva	George Maillis/ Marsha Adderley	28-Aug-13	12:43:16 PM
90.	Email chain requesting stop loss/moving stop/trading request (7 emails)	Irina Tsareva	Jamaal Wright/Marsha Adderley	28-Aug-13	2:50:13 PM
91.	Email chain regarding trade request/stop loss/stop loss change (5 emails)	Irina Tsareva	Lynette Martinborough	28-Aug-13	2:01:25 PM
92.	Email chain regarding indemnity form/change of email address/power of attorney (9 emails)	Irina Tsareva	Lynette Martinborough	30-Aug-13	11:32:04 AM
93.	Email chain regarding trade request/account balance clarification (25 emails)	George Maillis	Irina Tsareva/Marsha Adderley/Lynette Martinborough	30-Aug-13	2:15:28 PM
94.	Email chain regarding trade request/stop losses/ trade modifications /meeting (24 emails)	Irina Tsareva	George Maillis/Marsha Adderley/Lynette Martinborough	30-Aug-13	2:08:18 PM
95.	Email chain regarding trade requests/order cancellation (3 emails)	Irina Tsareva	Lynette Martinborough	3-Sep-13	12:22:10 PM
96.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	3-Sep-13	9:56:16 AM
97.	Email chain regarding trading requests/stop loss (4 emails)	George Maillis	Irina Tsareva/Lynette Martinborough/M arsha Adderley	3-Sep-13	10:09:39 AM
98.	Email chain regarding trade requests/stop loss/confirmation of trade request (4 emails)	George Maillis	Irina Tsareva	3-Sep-13	11:59:06 AM
99.	Email exchange regarding insurance renewal	George Maillis	Irina Tsareva	4-Sep-13	9:03:15 AM

100.	Email chain regarding trade request/order cancellation (7 emails)	Irina Tsareva	Jamaal Wright	4-Sep-13	1:19:00 PM
101.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	4-Sep-13	12:28:26 PM
102.	Email exchange regarding insurance renewal/proof of payment	George Maillis	Irina Tsareva	4-Sep-13	9:03:15 AM
103.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	5-Sep-13	10:17:57 AM
104.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	5-Sep-13	10:31:40 AM
105.	Email chain regarding trade requests (3 emails)	George Maillis	Irina Tsareva/Lynette Martinborough/Marsha Adderley	5-Sep-13	10:41:00 AM
106.	Email chain regarding trade requests/stop loss (3 emails)	Irina Tsareva	Lynette Martinborough/George Maillis/Marsha Adderley	5-Sep-13	10:42:25 AM
107.	Email regarding trade request/ stop loss request	George Maillis	Irina Tsareva	5-Sep-13	12:34:31 PM
108.	Email chain regarding trade request/stop loss/confirmation of stop (10 emails)	George Maillis	Irina Tsareva	5-Sep-13	12:53:44 PM
109.	Email chain requesting stop loss/trade request (8 emails)	George Maillis	Irina Tsareva/Marsha Adderley/Lynette Martinborough	5-Sep-13	2:27:15 PM
110.	Email chain regarding trade request/order cancellation (4 emails)	George Maillis	Irina Tsareva/Marsha Adderley	6-Sep-13	11:41:32 AM
111.	Email exchange regarding trade request NUGT/stop loss/trade confirmation	Irina Tsareva	George Maillis/Marsha Adderley	6-Sep-13	1:06:45 PM



112.	Email regarding trade request/ stop loss	George Maillis	Irina Tsareva/Marsha Adderley/Lynette Martinborough	6-Sep-13	2:40:16 PM
113.	Email regarding trade request/stop loss	Irina Tsareva	George Maillis/Marsha Adderley/Lynette Martinborough	6-Sep-13	2:43:45 PM
114.	Email regarding stop loss/trade request	George Maillis	Irina Tsareva/Marsha Adderley/Lynette Martinborough	6-Sep-13	3:07:10 PM
115.	Email chain regarding trade and stop loss request/stop loss confirmation/stop loss modification/order cancellation (20 emails)	Irina Tsareva	George Maillis/Marsha Adderley/Lynette Martinborough	6-Sep-13	3:38:00 PM
116.	Email chain regarding trading request/cancellation (3 emails)	Irina Tsareva	George Maillis/Marsha Adderley	6-Sep-13	11:40:42 AM
117.	Email exchange regarding trading request/order confirmation	George Maillis	Irina Tsareva	9-Sep-13	1:03:37 PM
118.	Email chain regarding trade requests/cancellation of DUST order (4 emails)	George Maillis	Irina Tsareva/Marsha Adderley	9-Sep-13	3:25:18 PM
119.	Email regarding account balance/requesting electronic access	Irina Tsareva	George Maillis/Marsha Adderley	9-Sep-13	5:42:32 PM
120.	Email regarding trade request	Irina Tsareva	Marsha Adderley	9-Sep-13	1:01:51 PM
121.	Email chain regarding trade request 5k NUGT/stop loss (4 emails)	George Maillis	Irina Tsareva/Marsha Adderley	9-Sep-13	10:20:28 AM
122.	Email exchange requesting stop loss of NUGT	George Maillis	Irina Tsareva/Marsha Adderley	9-Sep-13	10:25:40 AM



123.	Email exchange requesting stop loss of NUGT/stop loss adjustment	George Maillis	Irina Tsareva/Marsha Adderley	9-Sep-13	10:31:45 AM
124.	Email chain regarding stop loss/stop loss adjustment and execution/account balance request (5 emails)	Irina Tsareva	George Maillis/Marsha Adderley	9-Sep-13	10:44:10 AM
125.	Email exchange regarding trade request/order confirmation	George Maillis	Irina Tsareva/Marsha Adderley	9-Sep-13	10:06:12 AM
126.	Email regarding cane toads in Lyford Cay	George Maillis	Irina Tsareva	9-Sep-13	9:07:56 AM
127.	Email exchange regarding trading requests	Irina Tsareva	George Maillis	9-Sep-13	10:07:46AM
128.	Email chain regarding trade request 16k DUST/trade execution/confirming purchase (6 emails)	George Maillis	Irina Tsareva/Marsha Adderley	10-Sep-13	10:11:24 AM
129.	Email chain regarding trade request 15k DUST/trade request modification/order cancellation 5 emails)	George Maillis	Irina Tsareva/Marsha Adderley	10-Sep-13	3:19:48 PM
130.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	10-Sep-13	2:36:52 PM
131.	Email regarding trade request 15k DUST	Irina Tsareva	George Maillis/Marsha Adderley	10-Sep-13	2:40:11 PM
132.	Email exchange regarding trade request DUST 15K/cancellation	Irina Tsareva	George Maillis/Marsha Adderley	10-Sep-13	2:45:00 PM
133.	Email chain regarding trade request 16k DUST/stop execution/order confirmation (7 emails)	Irina Tsareva	George Maillis/Marsha Adderley	10-Sep-13	11:04:19 AM

134.	Email chain regarding trade request (3 emails)	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	2:50:37 PM
135.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	12:00:18 PM
136.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	2:46:54 PM
137.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	12:00:18 PM
138.	Email regarding trade request NUGT	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	12:35:06 PM
139.	Email chain regarding trade request of DUST (4 emails)	George Maillis	Irina Tsareva/Marsha Adderley	11-Sep-13	12:15:17 PM
140.	Email chain regarding trade request of NUGT/execution (3 emails)	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	12:47:14 AM
141.	Email chain regarding trade requests of DUST 4k (8 emails)	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	1:34:42 PM
142.	Email regarding trade request DUST 20K	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	2:05:25 PM
143.	Email exchange regarding trade request and stop loss DUST 20k	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	2:11:21 PM
144.	Email chain regarding trade request and stop loss/stop loss amendment (4 emails)	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	2:17:05 PM
145.	Email chain regarding trade request/stop loss (4 emails)	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	2:18:59 PM
146.	Email chain regarding trade request DUST/stop loss request (3 emails)	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	10:55:58 AM



147.	Email regarding trade request	Irina Tsareva	Lynette Martinborough	11-Sep-13	12:52:40 PM
148.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	3:17:26 PM
149.	Email chain regarding trade request DUST/order cancellation/balance request (3 emails)	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	3:26:34 PM
150.	Email regarding trade market	Irina Tsareva	George Maillis/Marsha Adderley	11-Sep-13	3:29:29 PM
151.	Email regarding trade request	Irina Tsareva	Marsha Adderley/George Maillis	12-Sep-13	10:11:35 AM
152.	Email regarding trade request	Irina Tsareva	Marsha Adderley/ George Maillis	12-Sep-13	10:21:33 AM
153.	Email chain regarding trade request 4k DUST(3 emails)	Irina Tsareva	Marsha Adderley/George Maillis	12-Sep-13	10:21:46 AM
154.	Email chain regarding trade request (3 emails)	Irina Tsareva	Marsha Adderley/George Maillis	12-Sep-13	10:25:28 AM
155.	Email requesting order cancellation	Irina Tsareva	Marsha Adderley/George Maillis	12-Sep-13	10:33:13 AM
156.	Email chain regarding trade request (3 emails)	Irina Tsareva	Marsha Adderley/George Maillis	12-Sep-13	10:42:20 AM
157.	Email chain regarding trade request/order cancellation (5 emails)	Irina Tsareva	Marsha Adderley/George Maillis	12-Sep-13	10:36:34 AM
158.	Email regarding trade request	Irina Tsareva	Marsha Adderley/George Maillis	12-Sep-13	10:39:39 AM
159.	Email regarding trade request 4k DUST	Irina Tsareva	Marsha Adderley/George Maillis	12-Sep-13	10:41:52 AM
160.	Email exchange regarding stop loss trade request	Irina Tsareva	Marsha Adderley	12-Sep-13	11:30:43 AM



161.	Email chain regarding trade request/account balance request (5 emails)	Irina Tsareva	Marsha Adderley/ George Maillis	12-Sep-13	11:34:15 AM
162.	Email chain regarding trade request of DUST/stop loss request (6 emails)	Irina Tsareva	Marsha Adderley/George Maillis	12-Sep-13	1:38:26 PM
163.	Email regarding trade request	Irina Tsareva	Marsha Adderley/George Maillis	12-Sep-13	1:39:35 AM
164.	Email chain regarding trade request 16k DUST/trade execution (3 emails)	Irina Tsareva	George Maillis/Marsha Adderley	12-Sep-13	12:53:40 PM
165.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	12-Sep-13	11:59:10 AM
166.	Email chain regarding trade request/stop loss request (4 emails)	Irina Tsareva	George Maillis/Marsha Adderley	12-Sep-13	2:02:28 PM
167.	Email chain regarding trade request 4k DUST/trade executions/account balance (7 emails)	Irina Tsareva	George Maillis/Marsha Adderley	12-Sep-13	2:18:20 PM
168.	Email regarding trade request 16K DUST	Irina Tsareva	George Maillis/Marsha Adderley	12-Sep-13	12:33:29 PM
169.	Email chain regarding trade request 4k DUST/stop loss request/order cancellations (11 emails)	Irina Tsareva	Marsha Adderley	12-Sep-13	2:42:06 PM
170.	Email chain regarding trade request DUST/trade modification (4 emails)	George Maillis	Irina Tsareva	13-Sep-13	1:53:16 PM
171.	Email chain regarding trade requests/trade execution (4 emails)	George Maillis	Irina Tsareva/Marsha Adderley	13-Sep-13	1:06:54 PM
172.	Email requesting stop loss	Irina Tsareva	George Maillids/Marsha Adderley	13-Sep-13	1:09:08 PM

173.	Email regarding stop loss request	George Maillis	Irina Tsareva/Marsha Adderley	13-Sep-13	1:10:36 PM
174.	Email regarding stop losses	George Maillis	Irina Tsareva	13-Sep-13	1:21:41 PM
175.	Email chain regarding trade request/stop losses DUST 16k (5 emails)	Irina Tsareva	George Maillis/Marsha Adderley	13-Sep-13	1:22:26 PM
176.	Email exchange regarding stop losses	Irina Tsareva	George Maillis	13-Sep-13	1:26:03 PM
177.	Email regarding trade request DUST 8k	Irina Tsareva	George Maillis/Marsha Adderley	13-Sep-13	1:44:08 PM
178.	Email regarding trade request Dust 16K	Irina Tsareva	George Maillis/Marsha Adderley	13-Sep-13	12:00:18 PM
179.	Email regarding trade request dust 16K	Irina Tsareva	George Maillis/Marsha Adderley	13-Sep-13	11:36:21 AM
180.	Email chain regarding trade requests/volume of trades/Martha requests meeting (12 emails)	Irina Tsareva	George Maillis/Marsha Adderley	13-Sep-13	3:51:45 PM
181.	Email exchange regarding trade request DUST 8k	George Maillis	Irina Tsareva/Marsha Adderley	13-Sep-13	1:46:38 PM
182.	Email regarding trade request of NUGT	Irina Tsareva	George Maillis/Marsha Adderley	13-Sep-13	9:59:07 AM
183.	Email chain regarding trade request/stop loss/account balance (5 emails)	Irina Tsareva	George Maillis/Marsha Adderley/ Lynette Martinborough	13-Sep-13	10:26:33 AM
184.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	13-Sep-13	12:29:43 PM
185.	Email exchange regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	13-Sep-13	12:31:12 PM



186.	Email chain regarding trade request NUGT/ correction (3 emails)	George Maillis	Irina Tsareva/Marsha Adderley	13-Sep-13	12:32:34 PM
187.	Email chain regarding trade request NUGT/stop loss (5 emails)	Irina Tsareva	George Maillis/Marsha Adderley	13-Sep-13	12:42:15 PM
188.	Email exchange regarding insurance payment/ credit officer visit	Irina Tsareva	George Maillis	13-Sep-13	3:47:20 PM
189.	Email chain regarding trade requests/ copy of executions/meeting to discuss trades (8 emails)	Irina Tsareva	George Maillis/Marsha Adderley	13-Sep-13	3:39:05 PM
190.	Email regarding credit officer visit/insurance payment	George Maillis	Irina Tsareva	13-Sep-13	3:39:50 PM
191.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	13-Sep-13	10:52:06 AM
192.	Email chain regarding trade request/order confirmation (4 emails)	George Maillis	Irina Tsareva/Marsha Adderley	13-Sep-13	11:08:52 AM
193.	Email regarding trade request	George Maillis	Irina Tsareva/Marsha Adderley	13-Sep-13	11:11:10 AM
194.	Email regarding trade request	Irina Tsareva	Marsha Adderley	13-Sep-13	12:51:37 PM
195.	Email regarding trade confirmation	George Maillis	Irina Tsareva/Marsha Adderley	13-Sep-13	12:54:52 PM
196.	Email chain regarding trade request (3 emails)	Irina Tsareva	George Maillis/Marsha Adderley	13-Sep-13	1:01:18 PM
197.	Email chain regarding insurance payment/annual review/credit officer visit (3 emails)	George Maillis	Irina Tsareva	16-Sep-13	9:12:37 AM
198.	Email exchange regarding trade request 2K NUGT/order confirmation	George Maillis	Irina Tsareva/Marsha Adderley	16-Sep-13	10:03:05 AM



199.	Email regarding trade request of 2k NUGT	George Maillis	Irina Tsareva/Marsha Adderley	16-Sep-13	10:04:46 AM
200.	Email regarding credit officer's visit/property valuation/insurance payment	Irina Tsareva	George Maillis	16-Sep-13	9:28:55 AM
201.	Email chain regarding trade requests/stop loss (5 emails)	Irina Tsareva	George Maillis/Marsha Adderley	16-Sep-13	11:36:04 AM
202.	Email chain regarding trade requests/stop loss (8 emails)	George Maillis	Irina Tsareva/Marsha Adderley	16-Sep-13	1:58:48 PM
203.	Email exchange regarding trade request/order confirmation	Irina Tsareva	George Maillis/Marsha Adderley	16-Sep-13	2:41:17 PM
204.	Email chain regarding trade request of DUST/stop loss request and amendment(12 emails)	Irina Tsareva	George Maillis/Marsha Adderley/Lynette Martinborough	16-Sep-13	3:20:36 PM
205.	Email chain regarding trade request/account balance sheet/stop loss request (18 emails)	Irina Tsareva	George Maillis/Marsha Adderley/Lynette Martinborough	16-Sep-13	3:38:49 PM
206.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	16-Sep-13	10:48:57 AM
207.	Email chain regarding trade request NUGT/stop loss/stop loss removal (12 emails)	Irina Tsareva	George Maillis/Marsha Adderley	16-Sep-13	12:22:16 PM
208.	Email regarding order amendment	Irina Tsareva	George Maillis/Marsha Adderley	16-Sep-13	11:01:10 AM
209.	Email regarding stop loss amendment	Irina Tsareva	George Maillis/Marsha Adderley	16-Sep-13	11:45:27 AM
210.	Email chain regarding trade request NUGT/stop loss (6 emails)	Irina Tsareva	George Maillis/Marsha Adderley	16-Sep-13	12:27:39 PM

211.	Email regarding trade request DUST 4K	Irina Tsareva	George Maillis/Marsha Adderley	16-Sep-13	12:48:28 PM
212.	Email chain regarding trade request DUST 4k/stop loss (7 emails)	Irina Tsareva	George Maillis/Marsha Adderley	16-Sep-13	1:29:56 PM
213.	Email chain regarding trade request DUST/order cancellation (7 emails)	Irina Tsareva	George Maillis/Marsha Adderley/Lynette Martinborough	16-Sep-13	2:53:33 PM
214.	Email requesting stop loss	Irina Tsareva	George Maillis/Marsha Adderley/Lynette Martinborough	16-Sep-13	3:04:59 PM
215.	Email requesting trade update/BTC issue	Irina Tsareva	George Maillis/Marsha Adderley/Lynette Martinborough	16-Sep-13	2:44:31 PM
216.	Email chain regarding trade request 16k DUST/request stop loss/amend stop loss (7 emails)	George Maillis	Irina Tsareva/Marsha Adderley	17-Sep-13	10:12:46 AM
217.	Email chain regarding trade request/stop loss request/trade executions (5 emails)	George Maillis	Irina Tsareva/Marsha Adderley	17-Sep-13	10:14:17 AM
218.	Email exchange regarding trade request	George Maillis	Irina Tsareva/Marsha Adderley	17-Sep-13	10:18:56 AM
219.	Email chain regarding trade request/execution/order cancellation (5 emails)	George Maillis	Irina Tsareva/Marsha Adderley	17-Sep-13	10:51:06 AM
220.	Email regarding trade request	Irina Tsareva	George Maillis/Marsha Adderley	17-Sep-13	9:47:00 AM
221.	Email chain regarding trade request /stop loss (4 emails)	Irina Tsareva	George Maillis/Marsha Adderley	17-Sep-13	10:04:11 AM



222.	Email chain regarding trade request/order limit/order confirmation/stop loss enquiry (9 emails)	Irina Tsareva	George Maillis/Marsha Adderley	18-Sep-13	12:37:25 PM
223.	Email regarding trade request to sell all	Irina Tsareva	George Maillis/Marsha Adderley	18-Sep-13	2:00:52 PM
224.	Email chain regarding trade request/ stop loss/insurance (12 emails)	George Maillis	Irina Tsareva	18-Sep-13	1:58:21 PM
225.	Email chain regarding trade requests/ trade executions (10 emails)	Irina Tsareva	George Maillis	19-Sep-13	12:49:19 PM
226.	Email regarding AUM account below 50% threshold	George Maillis	Irina Tsareva	19-Sep-13	9:34:45 AM
227.	Email exchange regarding AUM restoration/halt of trading/meeting	Irina Tsareva	George Maillis	19-Sep-13	9:43:25 AM
228.	Email to Marsha regarding approval of flat fee and balance request	Irina Tsareva	Marsha Adderley	19-Sep-13	10:10:40 AM
229.	Email regarding meeting cancellation/conference call	George Maillis	Irina Tsareva	24-Sep-13	2:20:21 PM
230.	Email requesting response to information from UBS credit officer	George Maillis	Irina Tsareva	24-Sep-13	4:26:12 PM
231.	Email chain regarding credit officer (3 emails)	George Maillis	Irina Tsareva	25-Sep-13	3:19:51 PM
232.	Email exchange regarding payment of property taxes	Irina Tsareva	George Maillis	26-Sep-13	1:25:13 PM
233.	Email regarding payment of property taxes	George Maillis	Irina Tsareva	26-Sep-13	1:06:13 PM
234.	Email regarding meeting with Irina	George Maillis	Irina Tsareva	8-Oct-13	12:23:10 PM



235.	Email exchange regarding stop loss request	George Maillis	Irina Tsareva	9-Oct-13	11:03:17 AM
236.	Emails regarding trading history (2 emails)	Irina Tsareva	Fabian Jenny	19-Dec-13	12:02 AM
237.	Email chain regarding trading record (4 emails)	Irina Tsareva	George Maillis	27-Dec-13	9:27:28 AM
238.	Email exchange regarding request for statements / meeting	George Maillis	Irina Tsareva	3-Mar-14	5:00:46PM
239.	Email attaching opinion letter from HG Christie regarding value of property	Sherry Burrows	Tiffany Lowe	18-Mar-15	12:31PM
240.	Email chain regarding request for fixed rates and trade volumes (13 emails)	George Maillis	Irina Tsareva	27-Jun-13	9:52:33 AM
241.	Email chain regarding trade volumes and frequent trade requests (16 emails)	Irina Tsareva	George Maillis	16-Jul-13	11:53:47 AM
242.	Email chain regarding trade requests (6 emails)	Marsha Adderley	Irina Tsareva	19-Aug-13	4:31:47 PM
243.	Email chain regarding DMA platform and trading complaint (5emails)	George Maillis	Irina Tsareva	20-Aug-13	3:56:32 PM
244.	Email exchange regarding contract notes	Irina Tsareva/ Fabian Jenny	Fabian Jenny/ Irina Tsareva	30-Jan-14	10:30:53 AM
245.	Email chain regarding request for financial information and hold mail account status (5 emails)	George Maillis	Irina Tsareva	12-Feb-14	4:56.26 PM

**PART 2**

Confidential letters, notes and documents between the Defendant and its attorneys for the purpose of giving and receiving advice on the matters in question in this action; statements and proofs of witnesses and other correspondence and documents brought into existence sole for the purpose of this action.

**SCHEDULE 2**

NIL.

**NOTICE TO INSPECT**

**TAKE NOTICE** that the documents in the above list, other than those listed in Part 2 of Schedule 1 and Schedule 2 may be inspected at the offices of the Attorneys of the above-named Plaintiff at Lennox Paton, 3 Bayside Executive Park, West Bay Street & Blake Road, New Providence, The Bahamas, from Monday to Friday, between the hours of 9:30 a.m. and 4:30 p.m.

**DATED** this 7<sup>th</sup> day of November A.D 2018

**LENNOX PATON**  
3 Bayside Executive Park  
West Bay Street & Blake Road  
Nassau, New Providence  
The Bahamas

Attorneys for the Defendant by Counterclaim

To: Irina Starostenko  
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Priderock Chambers  
Suite #200  
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Nassau, N.P., The Bahamas

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

BETWEEN

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)

---

SUPPLEMENTAL LIST OF DOCUMENTS  
OF THE DEFENDANT (By Counterclaim)

---

2015/ CLE/gen/No.01451

2014/CLE/gen/No.01620

*Lennox Paton*  
LENNOX PATON

Building 3 Bayside Executive Park  
Blake Road and West Bay Street  
New Providence  
The Bahamas

Attorneys for the Defendant by Counterclaim



# TAB 3

COMMONWEALTH OF THE BAHAMAS

2015/ CLE/gen/No.01451

IN THE SUPREME COURT

2014/CLE/gen/No.01620

COMMON LAW & EQUITY SIDE

BETWEEN

JUNKANOO ESTATES LTD

First Plaintiff

SUPREME COURT

AND

DEC 13 2018

Nassau, Bahamas

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

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The following is the second supplemental 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.

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 from production, being documents which came into being for and in contemplation of the conduct of the claim herein.
3. The Defendant has had, but have not now, in its possession, custody or power the documents relating to the matters in question in this action enumerated in Schedule 2 hereto.
4. The documents in the said Schedule 2 were last in the Defendant's possession, custody or power on the dates borne by the said documents being the dates when they were posted to the respective recipients
5. Neither the Defendant nor its Attorneys, nor any other person on its behalf, have now, or ever had, in its possession, custody or power any document of any description whatever relating to any matter in question in this action other than the documents enumerated in Schedules 1 and 2 hereto.

## SCHEDULE 1

### PART 1



**DOCUMENTS**

	<b>Description</b>	<b>From</b>	<b>To</b>	<b>Date</b>	
1.	Licence to Swiss Bank Corporation (Overseas) Limited to transact banking business and to carry on trust business			20-Nov-68	
2.	Certificate of Change of Name and Incorporation – UBS (Bahamas) Ltd formerly Swiss Bank Corporation (Overseas) Limited			29-Jun-98	
3.	Central Bank of The Bahamas Authorized Dealers Guidelines: Opening and Classification of Accounts			21-May-02	
4.	Securities Commission Licence – Cherise Cox-Nottage			29-Jun-05	
5.	Securities Commission Licence – Kevin Lee Price			29-Jun-05	
6.	Securities Commission Licence – Marcia “Marsha” Adderley			29-Jun-05	
7.	Securities Commission Licence – George Maillis			27-Nov-07	
8.	Securities Commission Licence – Thibaud Halewyck			23-Jun-10	
9.	Securities Commission Licence – Fabian Felix Jenny			5-Jul-10	
10.	Email from the Securities Commission of The Bahamas to UBS re: invoice for registration fees for UBS’s employees	Davina Williams	Shevette Seymour	8-Jan-13	
11.	Securities Commission of The Bahamas settled invoice re: registration fees – UBS (Bahamas) Ltd			9-Jan-13	

12.	Letter from the Central Bank of The Bahamas approving Real Estates Collateralized Loan Offering	Gerard Horton	Cherise Cox-Nottage	21-May-13	
13.	Memorandum – Junkanoo Estates Ltd. RECL Summary Update			13-Jan-14	

**PART 2**

Confidential letters, notes and documents between the Defendant and its attorneys for the purpose of giving and receiving advice on the matters in question in this action; statements and proofs of witnesses and other correspondence and documents brought into existence sole for the purpose of this action.

**SCHEDULE 2**

NIL.

**NOTICE TO INSPECT**

**TAKE NOTICE** that the documents in the above list, other than those listed in Part 2 of Schedule 1 and Schedule 2 may be inspected at the offices of the Attorneys of the above-named Plaintiff at Lennox Paton, 3 Bayside Executive Park, West Bay Street & Blake Road, New Providence, The Bahamas, from Monday to Friday, between the hours of 9:30 a.m. and 4:30 p.m.

**DATED** this 13<sup>th</sup> day of December A.D 2018

**LENNOX PATON**  
3 Bayside Executive Park  
West Bay Street & Blake Road  
Nassau, New Providence  
The Bahamas

Attorneys for the Defendant by Counterclaim

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New Providence, The Bahamas

---

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East & Bay Streets  
Nassau, N.P., The Bahamas



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

BETWEEN

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)

---

SECOND SUPPLEMENTAL LIST OF DOCUMENTS  
OF THE DEFENDANT (By Counterclaim)

---

2015/ CLE/gen/No.01451

2014/CLE/gen/No.01620

*Lennox Paton*  
LENNOX PATON

Building 3 Bayside Executive Park  
Blake Road and West Bay Street  
New Providence  
The Bahamas

Attorneys for the Defendant by Counterclaim

# TAB 4

COMMONWEALTH OF THE BAHAMAS

2015/ CLE/gen/No.01451

IN THE SUPREME COURT

2014/CLE/gen/No.01620

COMMON LAW & EQUITY SIDE

BETWEEN

**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)**

---

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

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The following is the second supplemental 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.

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 from production, being documents which came into being for and in contemplation of the conduct of the claim herein.
3. The Defendant has had, but have not now, in its possession, custody or power the documents relating to the matters in question in this action enumerated in Schedule 2 hereto.
4. The documents in the said Schedule 2 were last in the Defendant's possession, custody or power on the dates borne by the said documents being the dates when they were posted to the respective recipients
5. Neither the Defendant nor its Attorneys, nor any other person on its behalf, have now, or ever had, in its possession, custody or power any document of any description whatever relating to any matter in question in this action other than the documents enumerated in Schedules 1 and 2 hereto.

## **SCHEDULE 1**

### **PART 1**

**DOCUMENTS**

	<b>Description</b>	<b>From</b>	<b>To</b>	<b>Date</b>	
1.	Letter regarding meeting with the Central Bank of the Bahamas concerning the RECL product.	Cherise Cox Nottage, Stephen McKinney	Gerard Horton, Sharon Campbell	16-Dec-11	
2.	Email re: Central Bank RECL approval	Cherise Cox-Nottage	Sharon Campbell	17-Apr-12	
3.	Email re: Central Bank RECL approval	Sharon Campbell	Cherise Cox Nottage	18-Apr-12	
4.	Letter to the Central Bank re: Junkanoo Estates Ltd. Loan Application	Yolande Julien	The Manager, Exchange Control	6-Sep-12	
5.	Letter of instruction to Glinton Sweeting O'Brian for preparation of mortgage.	Cherise Cox-Nottage, Stephen McKinney	Bryan Glinton	17-Sep-12	
6.	Letter from the Central Bank of the Bahamas granting approval to Junkanoo Estates Ltd. to borrow 1.4M from UBS (Bahamas) Ltd.	The Manager of Exchange Control, Central Bank	Yolande Julien	25-Sep-12	
7.	Letter regarding mortgage from Junaknoo Estates Ltd. to UBS	Yolande Julien	Cherise Cox-Nottage	26-Sep-12	
8.	Letter regarding mortgage from Junaknoo Estates Ltd. to UBS	Yolande Julien	Cherise Cox-Nottage	5-Oct-12	
9.	Letter regarding satisfaction of mortgage between Junkanoo Estates Ltd and CIBC First Caribbean International Bank	Yolande Julien	Cherise Cox-Nottage	9-Nov-12	
10.	Letter re: Transfer Confirmation	Renate Raeber	Lynette Martinborough	11-Jan-13	
11.	Declaration regarding Investments in reportable futures and options positions, delivery notices and exchanges of futures			16-Apr-13	
12.	Email re: report on client complaints/halt trading	George Maillis	Beat Paoletto, Fabian Jenny	2-Oct-13	

13.	UBS (Bahamas) Ltd RECL Credit Application & Workflow Checklist - Credit Review for Junkanoo Estates Ltd.			3-Oct-13	
14.	Bahamas First - Renewal Policy Schedule			4-Jul-14	
15.	Letter from the Securities Commission re: license re-categorization for UBS (Bahamas) Ltd	Omara Bingham	Beat Roman Paoletto	3-Nov-14	
16.	Letter from the Securities Commission re: license re-categorization for UBS (Bahamas) Ltd	Omara Bingham	Beat Roman Paoletto	21-Nov-14	
17.	Email re: license reissuance from the Securities commission	Omara Bingham	Fareda Sands	24-Nov-14	
18.	Letter from the securities Commission re: license re-categorization for UBS (Bahamas) Ltd	Sandra Duncombe, Kadesha Hanna	Luc Godfroid	16-Jun-16	
19.	File Note re: halt of trading (Undated)				

**PART 2**

Confidential letters, notes and documents between the Defendant and its attorneys for the purpose of giving and receiving advice on the matters in question in this action; statements and proofs of witnesses and other correspondence and documents brought into existence sole for the purpose of this action.

**SCHEDULE 2**

NIL.

**NOTICE TO INSPECT**



**TAKE NOTICE** that the documents in the above list, other than those listed in Part 2 of Schedule 1 and Schedule 2 may be inspected at the offices of the Attorneys of the above-named Plaintiff at Lennox Paton, 3 Bayside Executive Park, West Bay Street & Blake Road, New Providence, The Bahamas, from Monday to Friday, between the hours of 9:30 a.m. and 4:30 p.m.

**DATED** this 7<sup>th</sup> day of March A.D 2019

**LENNOX PATON**  
3 Bayside Executive Park  
West Bay Street & Blake Road  
Nassau, New Providence  
The Bahamas

Attorneys for the Defendant by Counterclaim

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

**BETWEEN**

**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)**

---

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

---

**2015/ CLE/gen/No.01451**

**2014/CLE/gen/No.01620**

**LENNOX PATON**  
Building 3 Bayside Executive Park  
Blake Road and West Bay Street  
New Providence  
The Bahamas

**Attorneys for the Defendant by Counterclaim**

# TAB 5



## Schedule 1

The documents referred to in Regulation 72 of the Securities Industry Regulations, 2012 (SIR 2012) as “*contract notes*” relating to all the transactions of sale or purchase of securities carried out by the Defendant on behalf of the First Plaintiff in the period 12th June 2013 to 18th September 2013, which are called “*execution reports*” in “*the regulatory instruments of the applicable marketplace*” within the meaning of Regulation 77 of the SIR 2012, the Rules of the New York Stock Exchange (NYSE) adopted by 22nd June 2010 (NYSE-2010-46) applicable to all Exchange Contracts made on the NYSE, in particular Rule 123(f), which provides for the details of each execution report, inclusive the following data elements:

1. Order identifier that uniquely identifies the order;
2. Symbol;
3. Number of shares or quantity of security;
4. Transaction price;
5. Time the trade was executed;
6. Executing broker badge number, or alpha symbol as may be used from time to time, in regard to its side of the contract;
7. Executing broker badge number, or alpha symbol as may be used from time to time, of the contra side to the contract;
8. Clearing firm number, or alpha symbol as may be used from time to time, in regard to its side of the contract;
9. Clearing firm number, or alpha symbol as may be used from time to time, in regard to the contra side of the contract;
10. Whether the account for which the order was executed was that of a member or member organization or of a non-member or non-member organization;
11. Identification of member or member organization which recorded order details;

12. Date the order was entered into an Exchange system;
13. Indication as to whether this is a modification to a previously submitted report;
14. Special Trade Indication, if applicable;
15. Online Comparison System (OCS) Control Number;
16. Such other information as the Exchange may from time to time require.

## **Schedule 2**

The documents relating to the relationship between the Defendant and the Plaintiffs, and more particularly originals, duplicates or copies of:

1. the Plaintiffs' oral communications, including fixed phone/voice recordings:
  - a. on 23rd August 2012, when Mr. George Maillis sent to the Plaintiffs an email inviting them to countersign the Defendant's Commitment to Finance;
  - b. on 18th September 2013, when the Defendant received trading orders from the Plaintiffs;
2. attendance notes made by the Defendant of discussions with the Plaintiffs, in particular:
  - a. on 4th October 2012;
  - b. on 18th September 2013;
  - c. on 8th October 2013;
  - d. on 8th March 2014;
3. meeting notes regarding the Plaintiffs, without them present;
4. reports capturing the following steps and decisions made by the Defendant in:
  - a. the issue of "halt of trading" in effect on the First Plaintiff's account 32377 at the Defendant and the request that the Plaintiffs to provide additional collateral (margin call) on 19th September 2013;

- b. the debit of US\$526,323.49 standing to the First Plaintiff's credit in its account 32377 at the Defendant in April 2014;
  - c. the use US\$526,323.49 in its favour for the purposes of set-off in April 2014;
  - d. the establishment of failures by the Plaintiffs to comply with qualified obligations as being their defaults under the Commitment to Finance and the Mortgage;
5. reports notes, files mentioning or relating to the Plaintiffs' activity, risk profile, suitability analysis, pending or contemplated actions;

### **Schedule 3**

The documents relating to the Defendant's financial offering called Real Estate Collateralized Loan ("RECL") program to non-resident buyers of homes in the Bahamian second home market, and more particularly originals, duplicates or copies of:

1. proposal to the Central Bank of The Bahamas for the RECL program;
2. records and internal controls in respect of use of the RECL program;



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

**BETWEEN**

**JUNKANOO ESTATES LTD**

**First Plaintiff**

**AND**

**YURI STAROSTENKO**

**Second Plaintiff**

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**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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**2015/CLE/gen/No.01451**

**2014/CLE/gen/No.01620**

  
**LENNOX PATON**

Chambers

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Attorneys for the Defendant by Counterclaim