

EXHIBIT A

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Via Electronic Mail

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Re: *Lebedev v. Blavatnik & Vekselberg*

Dear Steve and Paul:

This letter is in follow up to our prior discussions regarding Mr. Lebedev's document collection efforts, as well as to Steve's letter of August 31, 2016.

Background Information

Mr. Lebedev does not own or control ZAO Sintez Group ("Sintez Group"). As we indicated to you in our January 27 letter, he is in a position to request the voluntary compliance of Sintez Group for discovery purposes, and he has done so.

Sintez Group maintains its emails and electronic files on a server named "br01," which is located in Moscow. Mr. Lebedev's email addresses "llebedev@sintez.ru," "llebedev@headoffice.ru" and "neo@headoffice.ru" share the same email account and are stored on a server named "br03," which is also in Moscow. He has no other email accounts where potentially responsive documents would be located. Finally, certain correspondence with outside consultants (such as counsel retained for litigation) is stored on a server named "fx01," also located in Moscow.

All three servers are maintained by an outside IT company providing server services named ZAO KSO. That entity services many clients and houses the files of other clients on br01 and fx01. The only files on br03 are Mr. Lebedev's emails.

The servers named br01 and br03 were created in 2006, and fx01 was created in 2007. We understand that br01 and br03 contain some amount of historical data that was migrated onto

those servers at their creation. For example, all of Mr. Lebedev's historical emails are stored on br03, to the extent they were not deleted in the ordinary course.

Preservation Efforts

In December 2012, prior to the inception of this litigation, litigation hold notices were issued with the assistance of Mr. Lebedev's prior outside counsel to the following individuals: Mr. Lebedev, Anatoliy Brenchagov, Nikolai Melnikov, Natalia Girneva, and Nikita Belous.

In accordance with these preservation efforts, after these notices were issued, ZAO KSO did not remove any data from the br01, br03 or fx01 servers that belongs to Sintez Group or Mr. Lebedev personally.

Prior Searches and Document Productions

Mr. Lebedev has previously produced documents from his own files, as well as the files of Sintez Group.¹ We will identify which documents came from which of these sources in a subsequent letter.

Those prior productions were partially the result of prior searches Mr. Lebedev conducted of his own files, as well as searches ZAO KSO conducted on the br01 server in the winter and spring of 2016 that were coordinated and initially reviewed by Russian counsel. They were also the result of prior efforts made by Vadim Ibadov, Sintez Group's former general manager, to collect potentially relevant documents in connection with this litigation on Mr. Lebedev's behalf, dating back to 2012. Prior to his death in September 2015, Mr. Ibadov obtained documents from certain third parties, including Nikita Belous and Sovlink. Because these documents were gathered by Mr. Ibadov and stored in Sintez Group's files, they were produced from Sintez Group. We will provide you with bates ranges that identify which documents were given to Sintez Group by Mr. Belous and which documents originated from Sovlink.

¹ As we have previously explained, Mr. Lebedev has also produced documents that he had sent to litigation counsel, including Pillsbury. Since all documents that were in the possession of litigation counsel were originally in Mr. Lebedev's custody, it would be inaccurate to say that certain documents "came from Pillsbury's files," and doing so would invade the attorney-client privilege. Instead, he will disclose the original, pre-litigation custodian of any documents that may have been sent to Pillsbury.

August 15, 2016 Search

Out of an abundance of caution, Steptoe has taken steps to re-do the electronic searches to ensure that they cover all of Sintez Group's electronic files and emails stored on br01, as well as the full range of Mr. Lebedev's emails stored on br03, from 1997 to the present (where available).

Specifically, on August 15, 2016, ZAO KSO conducted a new search of Sintez Group electronic files and emails of all Sintez Group custodians, as well as Mr. Lebedev's emails, using the following terms:

1. (Access)
2. (Aragorn or Аграгорн)
3. (Alexander Fraiman or Александр Фрайман)
4. (Anastasiades or Анастасиадис)
5. (Anatoly Brenchagov or Анатолий Бренчагов)
6. (Andrei Burlinov or Андрей Бурлинов)
7. (Barents or Баренц)
8. (Bartek or Бартек)
9. (Blavatnik or Блаватник)
10. (Boris Shleenkov or Борис Шлеенков)
11. (Burlinov or Бурлинов)
12. (Coral or Корал)
13. (Fleming or Флеминг)
14. (Ilya Sanochkin or Илья Саночкин)
15. (Kuznetsov or Кузнецов)
16. (Leonid Lebedev or Леонид Лебедев)
17. (Naftaco or Нафтако)

18. (Natalia Girneva or Наталья Гирнева)
19. (Nikita Belous or Никита Белоус)
20. (Nikolai Melnikov or Николай Мельников)
21. (Nizhneartovskneftegaz or Нижнеартовскнефтегаз)
22. (NNG or ННГ)
23. (OGIP)
24. (Oil and Gas Industrial Partners)
25. (Petrosol or Петросол)
26. (Renova or Ренова)
27. (Rochester or Рочестер)
28. (Sanochkin or Саночкин)
29. (Slavneft or Славнефть)
30. (Sovlink or Совлинк)
31. (TNK or ТНК)
32. (Tyumen Oil Company or Tyumenskaya Neftyanaya Kompania or Тюменская нефтяная компания)
33. (Tyumen or Тюмен)
34. (Vekselberg or Вексельберг)
35. (Yaroslavl or Ярославль)
36. (Yaroslavl Refinery or Ярославский нефтеперерабатывающий завод)

These searches triggered approximately 4,500 non-email electronic documents; approximately 10,600 emails of Sintez Group custodians; and 26 emails of Mr. Lebedev. All of these materials have been sent to Steptoe for analysis of responsiveness and privilege.

In addition, the email files of Dmitry Zimin, who was retained in connection with the present litigation and for the purposes of litigation, were also searched using the full list of terms,

and approximately 1,100 emails were triggered. Those emails are stored on the fx01 servers, and all of those emails have been sent to Steptoe for analysis. It is anticipated, however, that the vast majority (if not all) of Mr. Zimin's emails will be privileged communications.

Back-Up Tapes

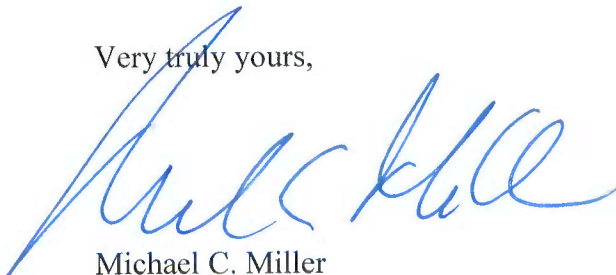
Prior to 2012, ZAO KSO routinely removed the email accounts of former Sintez Group employees from its servers and archived them on back-up tapes.

Since the litigation hold notices were issued in 2012, ZAO KSO has not deleted any materials from the servers that would be relevant to this litigation, and as such, no back-up tapes need to be reviewed after that date.

Back-up tapes would only be necessary to the extent that a former Sintez Group employee left the company prior to the time hold notices were issued in 2012 and might have possessed relevant information in his or her email files. We are currently determining whether any Sintez Group employees fit that description, and if so, whether it will be possible to search back-up tapes for their emails. ZAO KSO has confirmed that back-up tapes dated prior to 2008 are corrupted and un-readable.

Our analysis of the documents triggered in response to the August 15 search is ongoing, and we will keep you updated as to our progress. Additionally, we will follow up shortly with the additional metadata information required under the parties' ESI Stipulation.

Very truly yours,



Michael C. Miller

cc: Counsel of record