

# **EXHIBIT C**

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

LEONID L. LEBEDEV,

Plaintiff,

-against-

LEONARD BLAVATNIK and  
VIKTOR VEKSELBERG,

Defendants.

IAS Part 39  
Index No. 650369/2014

**OBJECTIONS AND RESPONSES  
TO DEFENDANTS' FIRST SET  
OF INTERROGATORIES TO  
PLAINTIFF LEONID L.  
LEBEDEV DATED MAY 1, 2016**

**PRELIMINARY STATEMENT AND GENERAL OBJECTIONS**

Leonid Lebedev ("Lebedev" or "Plaintiff") hereby submits his responses and objections to Defendants' Interrogatories dated May 1, 2016 ("Defendants' May 1, 2016 Interrogatories").

Plaintiff's responses and objections are subject to and without waiving any objection to the competency, relevancy, materiality, privilege, or admissibility of these responses and the documents referenced therein. Plaintiff's responses and objections are based on information currently available to Plaintiff through his investigation of the claims at issue. Plaintiff reserves the right to rely on facts, documents, or other evidence that may be developed or discovered at a later date. Plaintiff's responses and objections are made without prejudice to assert additional or supplemental responses or objections should Plaintiff discover additional grounds for such responses or objections. Plaintiff reserves the right to correct, revise, supplement, and/or clarify any of the responses set forth herein.

In responding to these Interrogatories, Plaintiff incorporates by reference all General Objections (“General Objections”) contained in his Objections and Responses to Defendants’ First and Second Requests for Production.

**SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORY**

**Interrogatory No. 1**

Identify each person and/or entity of which You are aware that has knowledge of information relevant to either Your claims in the Amended Complaint, Defendants’ defenses, or Defendants’ counterclaim, including (a) name, (b) title, (c) address and telephone number, and (d) general description of the subject matters of which each person and/or entity has knowledge.

**Response to Interrogatory No. 1**

Plaintiff objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege and work-product doctrine. Plaintiff further objects to this interrogatory because it seeks information beyond that required by the CPLR. Plaintiff also objects because this interrogatory is unduly burdensome as Defendants have equal or greater access to information responsive to this interrogatory. Discovery is ongoing, and Plaintiff reserves the right to amend or supplement his response to this interrogatory.

Subject to and without waiving these specific, and all General Objections, Plaintiff believes that the following are amongst the individuals who have knowledge of information relevant to this case:

<b>Name</b>	<b>Title and/or Company</b>
Leonid Lebedev	Plaintiff
Leonard Blavatnik	Defendant
Viktor Vekselberg	Defendant
Nikita Belous	Sintez Petroleum
Alexander Fraiman	Managing Director, Mergers and Acquisitions, Sovlink LLC
Mark Garber	GHP Group

Natalia Girneva	Bloomfield Group
Liam Granger	Coral Petroleum, Ltd.
Vladimir Kuznetsov	Managing Director, Renova Management AG
Theophanis Philippou	Law Firm of Nicos Chr. Anastasiades

Plaintiff also believes, but is not personally aware, that other individuals that appear on documents produced by Defendants thus far may have knowledge of information relevant to this case, including, but not limited to, certain attorneys at Curtis, Mallet-Prevost, Colt & Mosle LLP; Steve Chernys; Alex Blavatnik; and Carl Stadelhofer.

**Interrogatory No. 2**

Provide a detailed computation of each category of damages You have allegedly suffered as a result of Defendants’ alleged breaches of the Investment Agreement, the parties’ alleged joint venture, and Defendants’ alleged fiduciary duties, and identify all documents or other evidentiary material on which each computation is based, including materials bearing on the nature and extent of the injuries allegedly suffered.

**Response to Interrogatory No. 2**

Plaintiff objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege and work-product doctrine. Plaintiff also objects because this interrogatory is unduly burdensome as Defendants have equal or greater access to information responsive to this interrogatory. Discovery is ongoing, and Plaintiff reserves the right to amend or supplement his response to this interrogatory as necessary.

Subject to and without waiving these specific, and all General Objections, Plaintiff states as follows: As detailed in the Amended Complaint, Plaintiff owned a 15% stake in the Oil Business (as defined therein). At the very least, Plaintiff is entitled to his corresponding share of the proceeds from the sale of TNK-BP to Rosneft, which, on information and belief, is more than \$2 Billion. Because Defendants breached their obligations to Plaintiff, only Defendants are

currently aware of the full amount of damages to which Plaintiff is entitled. Plaintiff has requested that Defendants produce documents sufficient to show all proceeds of the Oil Business, but Defendants have yet to comply. Plaintiff is also entitled to pre-judgment interest on the Rosneft proceeds, and any other damages that come to light during the course of this litigation.

**Interrogatory No. 3**

Identify by category, custodian, and location all Documents of which You are aware that may support or relate to any claims or defenses in this action.

**Response to Interrogatory No. 3**

Plaintiff objects to this request to the extent it seeks privileged, confidential, or proprietary information, or information otherwise protected from disclosure. Plaintiff objects to this interrogatory because it seeks information beyond that required by the CPLR. Plaintiff further objects to this request to the extent that it seeks information protected by the attorney-client privilege and work-product doctrine. Plaintiff also objects because this interrogatory is unduly burdensome as Defendants have equal or greater access to information responsive to this interrogatory. Plaintiff also objects because this request is overly broad, unduly burdensome and seeks documents and information that are not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Discovery is ongoing, and Plaintiff reserves the right to amend or supplement his response to this interrogatory as necessary.

Subject to and without waiving these specific, and all General Objections, Plaintiff states as follows: Plaintiff has personal knowledge of the existence of documents that relate to this case within his own personal files, the files of ZAO Sintez Group and the files of Pillsbury. He anticipates that other relevant documents may exist in the personal and professional files of the

Defendants, as well as in the files of any or all of the entities and individuals referenced in Plaintiff's January 20, 2016 letter regarding discovery of non-parties.

**Interrogatory No. 4**

Identify the custodian of each of the Documents You produced in this action on April 13, 2016, and all Documents You produce in this action in the future.

**Response to Interrogatory No. 4**

Plaintiff objects to this request to the extent it seeks privileged, confidential, or proprietary information, or information otherwise protected from disclosure. Plaintiff objects to this interrogatory because it seeks information beyond that required by the CPLR. Plaintiff further objects to this request to the extent that it seeks information protected by the attorney-client privilege and work-product doctrine. Plaintiff also objects because this request is overly broad, unduly burdensome and seeks documents that are not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Discovery is ongoing, and Plaintiff reserves the right to amend or supplement his response to this interrogatory as necessary.

Subject to and without waiving these specific, and all General Objections, Plaintiff states as follows: With respect to the documents that have been produced to date, all of those documents originated from ZAO Sintez Group. Some portion of those documents may have also been shared with Pillsbury. That means duplicate copies within Plaintiff's production to date were created by either Pillsbury or ZAO Sintez Group. Revealing which entity prepared particular duplicates would unfortunately also reveal that Pillsbury had a particular document in its possession. On grounds of privilege, Plaintiff declines to reveal which materials made their way to Pillsbury or whether any particular materials did not. Nevertheless, Plaintiff confirms that the original source of all documents produced to date was ZAO Sintez Group.

Dated: New York, New York  
June 17, 2016

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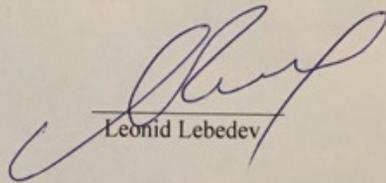
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**VERIFICATION**

I, Leonid Lebedev, hereby verify that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information and belief.



Leonid Lebedev