

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK
X-----X

SURF HORIZON LIMITED,
A Cyprus Special Purpose Corporation
332 Patrician Chambers
3035 Limassol, Cyprus

Plaintiff,

Index No. 650130/2018

PAUL J. MANAFORT, JR.,
10 St. James Place
Palm Beach Gardens, FL 33418

(Sherwood, J.)

and

RICHARD W. GATES, III
206 Virginia Avenue
Richmond, Virginia 23226,

**STIPULATION AND
ORDER**

Defendants,

and

PERICLES EMERGING MARKET PARTNERS,
L.P.
c/o Alexander Lawson and Kris Beighton
KPMG
Century Yard
Cricket Square
Grand Cayman KY1-1106
Cayman Islands,

Nominal Defendant.

X-----X

WHEREAS, on March 6, 2018, Schlam Stone and Dolan LLP (“SSD”) filed an emergency motion by order to show cause seeking to withdraw from representing defendant Richard W. Gates III (the “Motion”) due to an apparent conflict that has arisen in representing both Mr. Gates and defendant Paul J. Manafort, and for a concomitant stay of the action;

WHEREAS, SSD requested Mr. Gates's consent to its withdrawal but did not receive a response;

WHEREAS, Mr. Gates previously gave his written consent that SSD may continue to represent Mr. Manafort in the event of a conflict between the two individual defendants and SSD's withdrawal as counsel for Mr. Gates;

WHEREAS, SSD notified Mr. Gates by email on March 5 and again on March 6, 2018, that the firm would be presenting the Motion to the Court on March 7, 2018, and informed him of the Court's address and the likely time the parties would be seeking to be heard by the Court;

WHEREAS, Mr. Gates has had an opportunity to be heard on the Motion, but did not submit any opposition either in writing or orally;

WHEREAS, the nominal defendant, Pericles Emerging Market Partners, L.P., has not yet been served with the Complaint;

WHEREAS, before filing the Motion, SSD notified Plaintiff's counsel by email on March 6, 2018 that SSD would be presenting the Motion to the Court on March 7, 2018, and requested Plaintiff's consent to the relief requested in the Motion;

WHEREAS, Plaintiff does not oppose SSD's request to withdraw as counsel for Mr. Gates;

WHEREAS, the parties have agreed on the extent of a stay of the action that avoids prejudicing any party and fosters judicial economy;

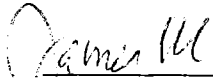
IT IS HEREBY STIPULATED AND AGREED BETWEEN THE PARTIES,

through their undersigned counsel as follows:

1. Upon the Court's so-ordering of this **Stipulation**, Schlam Stone & Dolan LLP is terminated as counsel for defendant **Richard W. Gates III** in this action.
2. This action, and all pending proceedings and deadlines, are stayed as to all parties for 60 days after the date this **Stipulation** is so-ordered, to allow Mr. Gates 30 days to retain substitute counsel, and another 30 days after that for the individual defendants to respond to the Complaint. The current deadline of March 21, 2018, under the parties' prior stipulation is superseded by this **Stipulation** and Order and, upon the so-ordering of this **Stipulation**, shall be null and void.
3. This stipulation may be signed in counterparts, and facsimile and electronic signatures shall be deemed as original.


Dated: March 7, 2018
New York, New York

BRYAN CAVE LLP

By: 
James M. Altman
1290 Avenue of the Americas
New York, NY 10104
Telephone: (212) 541-2000
Facsimile: (212) 541-4630
Jmaltman@bryancave.com

Attorneys for Plaintiff Surf Horizon Limited

SCHLAM STONE & DOLAN LLP

By: 
Jeffrey M. Jeilender, Esq.
Elizabeth Wolstein, Esq.
26 Broadway, 19th Floor
New York, NY 10004
Telephone: (212) 344-5400
Email: jeilender@schlamstone.com
Email: ewolstein@schlamstone.com

*Attorneys for Defendants Paul J. Manafort
Jr. and Richard W. Gates, III*

SO ORDERED

J. S. C.