## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re;

METINVEST B.V.,<sup>1</sup>

Chapter 15

Case No. 16-<u>10105(LS</u>)

Debtor in a Foreign Proceeding.

## STATEMENT OF SVITLANA ROMANOVA IN SUPPORT OF VERIFIED PETITION FOR RECOGNITION OF FOREIGN PROCEEDING AND RELATED RELIEF

I, Svitlana Romanova, Chief Legal Officer and a member of the Executive Committee of Metinvest Holding LLC, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

I. I am over the age of 18 and, if called upon, could testify as to the facts set forth in this statement, except for those portions specified as being otherwise.

2. I am the duly appointed foreign representative of Metinvest B.V. (the "**Debtor**") in connection with a proceeding concerning a scheme of arrangement (the "**Scheme**") under part 26 of the English Companies Act 2006 currently pending before the High Court of Justice of England and Wales (the "**English Proceeding**").

3. This statement is respectfully submitted as required under section 1515(c) of title 11 of the United States Code (as amended, the "Bankruptcy Code") in support of the *Verified Petition for Recognition of Foreign Proceeding and Related Relief* seeking, among other things, recognition by this Court of the English Proceeding as a "foreign nonmain proceeding" under section 1517 of the Bankruptcy Code and enforcement of the Scheme in the United States.

<sup>&</sup>lt;sup>1</sup> The last four digits of the Metinvest B.V. United States Tax Identification Number are 3839. The address of the registered office of Metinvest B.V. is Alexanderstraat 23, 2514 JM, The Hague, Netherlands.

4. To the best of my knowledge, the English Proceeding is the only restructuring proceeding of any kind concerning the Debtor and, thus, is the only known "foreign proceeding" with respect to the Debtor, as that term is defined in section 101(23) of the Bankruptcy Code.

5. I declare under penalty of perjury under the laws of the United States of America that, based upon my knowledge, information and belief as set forth herein, the foregoing is true and correct.

Executed this 12 day of January, 2016, in <u>*Kyiv*</u>, *Watacine* 

(Myhana-Romanova)