

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

METINVEST B.V.,¹

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 17-____ ()

**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:

1. 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 (the “English 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 “High Court”).

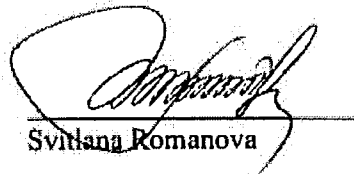
3. This statement is respectfully submitted as required under section 1515(c) of title 11 of the United States Code (as amended, the “Bankruptcy Code”) in support of the *Verified Petition for Recognition of Foreign Proceeding and Related Relief* seeking, among other things, recognition by this Court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

¹ 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 Nassaulaan 2A, 2514 JS, ‘S-Gravenhage, The Netherlands.

4. To the best of my knowledge, the English Proceeding and the proceeding in respect of the Debtor's scheme of arrangement sanctioned by the High Court on June 30, 2016, which this court recognized on June 30, 2016,² are the only known "foreign proceedings" 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 17th day of January, 2017, in Kiev, Ukraine


Svitlana Romanova

² See *In re Metinvest B.V.*, Case No. 16-11424 (LSS) (Bankr. D. Del. June 30, 2016) [D.I. 24].