

DEFINITIONS

Wherever they hereafter appear the following words and phrases have the following meanings:

1. "Agent" shall mean any agent, employee, officer, director, attorney, independent contractor or any other person acting, or purporting to act, at the discretion of or on behalf of another.
2. "Correspondence" or "communication" shall mean all written or verbal communications, by any and all methods, including without limitation, letters, memoranda, and/or electronic mail, by which information, in whatever form, is stored, transmitted or received; and, includes every manner or means of disclosure, transfer or exchange, and every disclosure, transfer or exchange of information whether orally or by document or otherwise, face-to-face, by telephone, telecopies, e-mail, text, modem transmission, computer generated message, mail, personal delivery or otherwise.
4. "Document" shall mean all written and graphic matter, however produced or reproduced, and each and every thing from which information can be processed, transcribed, transmitted, restored, recorded, or memorialized in any way, by any means, regardless of technology or form. It includes, without limitation, social media posts, correspondence, memoranda, notes, notations, diaries, papers, books, accounts, newspaper and magazine articles, advertisements, photographs, videos, notebooks, ledgers, letters, telegrams, cables, telex messages, facsimiles, contracts, offers, agreements, reports, objects, tangible things, work papers, transcripts, minutes, reports and recordings of telephone or other conversations or communications, or of interviews or conferences, or of other meetings, occurrences or transactions, affidavits, statements, summaries, opinions, tests, experiments, analysis, evaluations, journals, balance sheets, income statements, statistical records, desk calendars, appointment books, lists, tabulations, sound recordings, data processing input or output, microfilms, checks, statements, receipts, summaries, computer printouts, computer programs, text messages, e-mails, information kept in computer hard drives, other computer drives of any kind, computer tape back-up, CD-ROM, other computer disks of any kind, teletypes, telecopies, invoices, worksheets, printed matter of every kind and description, graphic and oral records and representations of any kind, and electronic "writings" and "recordings" as set forth in the Federal Rules of Evidence, including but not limited to, originals or copies where originals are not available. Any document with any marks such as initials, comments or notations of any kind of not deemed to be identical with one without such marks and is produced as a separate document. Where there is any question about whether a tangible item otherwise described in these requests falls within the definition of "document" such tangible item shall be produced.
5. "Employee" includes a past or present officer, director, agent or servant, including any attorney (associate or partner) or paralegal.
6. "Including" means including without limitations.

7. "Person(s)" includes natural persons, proprietorships, governmental agencies, corporations, partnerships, limited partnerships, limited liability companies, limited companies, trusts, joint ventures, groups, associations, organizations or any other juridical, legal or business entity. When used in reference to a Person who is a "citizen" of the United States, it shall mean any Person formed, organized or incorporated under the laws of the United States or of any state, territory or possession of the United States, and shall also be deemed to include any agency, department or subdivision of the Government of the United States.

8. "You" or "Your" hereinafter means Hamad bin Jassim bin Jaber Al Thani, and any alias, employee, agent, attorney, consultant, or other representative of said individual, or related entities of said individual, including, without limitation, proprietorships, corporations, partnerships, limited partnerships, limited companies, limited liability companies, joint ventures, groups, associations, organizations or any other juridical, legal or business entities, where said individual is an officer or director thereof or where 10% or more of the ownership interests or voting interests of the same is held, directly or indirectly, by said individual, or trusts of which said individual, directly or indirectly, is a trustee or beneficiary or of which said individual, directly or indirectly owns or controls trust shares.

INSTRUCTIONS

1. Unless indicated otherwise, the Relevant Period for this Request is from January 1, 2013 to present. A Document should be considered to be within the relevant time frame if it refers or relates to communications, meetings or other events or documents that occurred or were created within that time frame, regardless of the date of creation of the responsive Document.

2. This Request calls for the production of all responsive Documents in your possession, custody or control without regard to the physical location of such documents.

3. If any Document requested was in your possession or control, but is no longer in your possession or control, state what disposition was made of said Document, the reason for such disposition, and the date of such disposition.

4. For the purposes of reading, interpreting, or construing the scope of these requests, the terms used shall be given their most expansive and inclusive interpretation. This includes, without limitation the following:

a) Wherever appropriate herein, the singular form of a word shall be interpreted as plural and vice versa.

b) "And" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope hereof any information (as defined herein)

which might otherwise be construed to be outside the scope of this discovery request.

- c) "Any" shall be understood to include and encompass "all" and vice versa.
- d) Wherever appropriate herein, the masculine form of a word shall be interpreted as feminine and vice versa.
- e) "Including" shall mean "including without limitation."

5. If you are unable to answer or respond fully to any document request, answer or respond to the extent possible and specify the reasons for your inability to answer or respond in full. If you have no documents responsive to a particular Request, you shall so state.

6. Unless instructed otherwise, each Request shall be construed independently and not by reference to any other Request for the purpose of limitation.

7. The words "relate," "relating," "relates," or any other derivative thereof, as used herein includes concerning, referring to, responding to, relating to, pertaining to, connected with, comprising, memorializing, evidencing, commenting on, regarding, discussing, showing, describing, reflecting, analyzing or constituting.

8. "Identify" means, with respect to any "person," or any reference to the "identity" of any "person," to provide the name, home address, telephone number, business name, business address, business telephone number and a description of each such person's connection with the events in question.

9. "Identify" means, with respect to any "document," or any reference to stating the "identification" of any "document," provide the title and date of each such document, the name and address of the party or parties responsible for the preparation of each such document, the name and address of the party who requested or required the preparation and on whose behalf it was prepared, the name and address of the recipient or recipients to each such document and the present location of any and all copies of each such document, and the names and addresses of all persons who have custody or control of each such document or copies thereof.

10. In producing Documents, if the original of any Document cannot be located, a copy shall be produced in lieu thereof, and shall be legible and bound or stapled in the same manner as the original.

11. Any copy of a Document that is not identical shall be considered a separate document.

12. If any requested Document cannot be produced in full, produce the Document to the extent possible, specifying each reason for your inability to produce the remainder of the

Document stating whatever information, knowledge or belief which you have concerning the portion not produced.

13. If any Document requested was at any one time in existence but is no longer in existence, then so state, specifying for each Document (a) the type of document; (b) the types of information contained thereon; (c) the date upon which it ceased to exist; (d) the circumstances under which it ceased to exist; (e) the identity of all persons having knowledge of the circumstances under which it ceased to exist; and (f) the identity of all persons having knowledge or who had knowledge of the contents thereof and each individual's address.

14. All Documents shall be produced in the same order as they are kept or maintained by you in the ordinary course of business.

15. You are requested to produce all drafts and notes, whether typed, handwritten or otherwise, made or prepared in connection with the requested Documents, whether or not used.

16. Documents attached to each other shall not be separated.

17. Documents shall be produced in such fashion as to identify the department, branch or office in whose possession they were located and, where applicable, the natural person in whose possession they were found, and business address of each Document's custodian(s).

18. If any Document responsive to the request is withheld, in all or part, based upon any claim of privilege or protection, whether based on statute or otherwise, state separately for each Document, in addition to any other information requested: (a) the specific request which calls for the production; (b) the nature of the privilege claimed; (c) its date; (d) the name and address of each author; (e) the name and address of each of the addresses and/or individual to whom the Document was distributed, if any; (f) the title (or position) of its author; (g) type of tangible object, *e.g.*, letter, memorandum, telegram, chart, report, recording, disk, etc.; (h) its title and subject matter (without revealing the information as to which the privilege is claimed); (i) with sufficient specificity to permit the Court to make full determination as to whether the claim of privilege is valid, each and every fact or basis on which you claim such privilege; and (j) whether the document contained an attachment and to the extent you are claiming a privilege as to the attachment, a separate log entry addressing that privilege claim.

19. If any Document requested herein is withheld, in all or part, based on a claim that such Document constitutes attorney work product, provide all of the information described in Instruction No. 18 and also identify the litigation in connection with which the Document and the information it contains was obtained and/or prepared.

20. Plaintiff does not seek and does not require the production of multiple copies of identical Documents.

21. This Request is deemed to be continuing. If, after producing these Documents, you obtain or become aware of any further information, Documents, things, or information responsive to this Request, you are required to so state by supplementing your responses and producing such additional Documents to Plaintiff.

DOCUMENTS REQUESTED

DOCUMENT REQUEST NO. 1

A copy of your passport from January 1, 2013- present.

DOCUMENT REQUEST NO. 2

All documents relating to your international travel from January 1, 2013 – present.

DOCUMENT REQUEST NO. 3

All documents relating to communications between you and any Persons residing in, with addresses in or who are citizens of the United States.

DOCUMENT REQUEST NO. 4

All documents relating to communications between any Persons in any way associated with the government of Qatar and Persons residing in, with addresses in or who are citizens of the United States.

DOCUMENT REQUEST NO. 5

All documents relating to or evidencing any money or other things of value exchanged between you and any Persons residing in, with addresses in or who are citizens of the United States.

DOCUMENT REQUEST NO. 6

All documents relating to or evidencing any money or other things of value exchanged between any Persons in any way associated with the government of Qatar and any Persons residing in, with addresses in or who are citizens of the United States.

DOCUMENT REQUEST NO. 7

All documents relating to or evidencing any business or financial transaction between you and any Persons residing in, with addresses in or who are citizens of the United States.

DOCUMENT REQUEST NO. 8

All documents relating to or evidencing any business or financial transaction between

any Persons in any way associated with the government of Qatar and any Persons residing in, with addresses in or who are citizens of the United States.

DOCUMENT REQUEST NO. 9

All documents that relating to or that reflect any communications with any Persons residing in, with addresses in or who are citizens of the United States.

DOCUMENT REQUEST NO. 10

All documents relating to any Persons that are not individuals and of which you, or any Person associated with the Government of Qatar, at any time during the period from December 1, 2013 to present have held or now hold, directly or indirectly, 10% or more of the ownership interests or voting interests, or are a trustee, beneficiary, or directly or indirectly have held during such relevant holding period or now hold trust shares, and which Person during the relevant holding period resided in, had an address in or was a citizen of the United States or during the relevant holding period had or now has business or financial interests in the United States or with Persons residing in, with addresses in or who are citizens of the United States.

DOCUMENT REQUEST NO. 11

All filings with any agency, department or subdivision of the United States government, including United States federal tax returns and other information returns filed by you, on your behalf or referring to you relating to any fiscal period falling at any time during the fiscal period December 1, 2013 to the present, and all supporting documents in any way relating thereto.

DOCUMENT REQUEST NO. 12

All documents relating to telephone records relating to calls between you and any Persons residing in, with addresses in or citizens of the United States.

DOCUMENT REQUEST NO. 13

All documents relating to calendars, schedules or appointments that reflect meetings, calls, or other communications or interactions between you, or any Persons associated with the Government of Qatar, and any Persons residing in, with addresses in or citizens of the United States.

DOCUMENT REQUEST NO. 14

All documents identifying any location you resided or stayed overnight, or held meetings or conferences, in the United States.

DOCUMENT REQUEST NO. 15

All documents reflecting entries in contact lists, phone lists or address books maintained by, for or on behalf of you or any person associated with the Government of Qatar that refer to Persons residing in, with addresses in or citizens of the United States.