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August 22, 2017

BY ECF, FAX AND HAND DELIVERY

The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 705
New York, NY 10007-1312

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: *Aug 23 2017*

Re: **NTT DoCoMo, Inc. v. Tata Sons Limited**
16-cv-07809 (PGG)

Dear Judge Gardephe:

We write on behalf of Petitioner NTT Docomo, Inc. ("Docomo") and Respondent Tata Sons Limited ("Tata") to jointly request that the Court extend the stay of proceedings in this case until December 31, 2017, to allow the remaining steps to be taken to implement the parties' negotiated resolution of their dispute. As the parties previously informed this Court, the negotiated resolution has been approved by the High Court of Delhi in New Delhi, India (the "Delhi High Court"), and the parties are hopeful that it can be fully implemented by the end of this year.

On February 23, 2017, the parties agreed to the terms and conditions of the negotiated resolution (the "Consent Terms"), and further agreed to suspend all enforcement proceedings outside of India for a period of six months. On that basis, the parties jointly requested on March 13, 2017, that this Court stay proceedings in this case until August 28, 2017, "so that the parties will have time to obtain Indian court approval of a negotiated resolution of their dispute and take the necessary steps to implement the resolution." On March 15, 2017, the Court "so ordered" the parties' joint request for a stay until August 28, 2017, and directed the parties to "update the Court every 90 days as to the status of the proceedings in India."

On June 13, 2017, the parties updated this Court that, on April 28, 2017, the Delhi High Court had approved the Consent Terms, which provided that Tata would remit to Docomo payment in accordance with the terms of the arbitral award at issue and Docomo would tender its shares in Tata Teleservices Limited to Tata upon receipt of the remittance. The Consent Terms conditioned the payment and tender of shares on (i) approval by the Competition Commission of India and (ii) issuance of a Withholding Tax Certificate by the Indian tax authorities. The parties further informed the Court that, on May 24, 2017, the Competition Commission of India had approved the transaction.

At this time, the parties are still awaiting the issuance of the Withholding Tax Certificate from the Indian tax authorities, who are believed to now be expediting the necessary review and certification process. Based on this development, the parties are currently negotiating an amendment to the Consent Terms that would suspend all enforcement proceedings

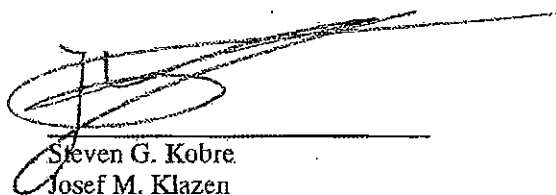
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outside India for an additional four months, or until December 31, 2017, so that the Withholding Tax Certificate may be issued without the parties having to resume their litigation in the meantime.

Consistent with their intent to suspend enforcement proceedings for an additional four months, the parties respectfully request that this Court extend the stay in this action until December 31, 2017. The parties respectfully submit that an extension of the stay under the present circumstances would avoid potentially unnecessary litigation before this Court and thereby promote efficiencies of time and cost.

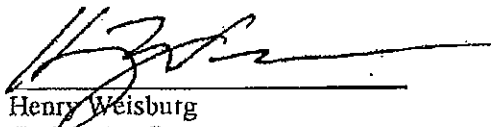
The parties thank the Court for its consideration of this submission. The parties are available to discuss the matters addressed in this joint letter should the Court find it helpful.

Respectfully Submitted,



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