

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF XXXXXXXXXXXX

Index No. XXXXX

-----X

XXXXXXXXXXXX, Plaintiff

- against

LETTER ROGATORY

XXXXXXXXXXXX, Defendant.

-----X

THE PEOPLE OF THE STATE OF NEW YORK, UNITED STATES OF AMERICA  
To: Obergericht des Kantons Zurich, Rechtshilfe, 8023 Zurich, Switzerland

WHEREAS, a matrimonial action is now pending in our Supreme Court of the State of New York, in and for the County of XXXXXX, in which XXXXXXXX is the plaintiff and XXXXXXXXXXXXXXXX is the defendant;

And plaintiff's counsel in Switzerland is XXXXXXXXXXXXXXXXXXXXXXXX of Zurich, Switzerland; and defendant's counsel in New York is: XXXXXXXXXXXX;

And defendant XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX alleges that he has a net worth of XXXXXXXXXXXXXXXXXXXXXXXX; and in an order dated XXXXXXXXXXXXXXX, this Court extended plaintiff's right to seek further discovery with respect to alleged assets in Zurich; And justice can not be done between the parties without the testimony of and production of documents by the witness within your jurisdiction: XXXX BANK OF SWITZERLAND.

It is requested that the interrogatories below be presented to the above-named witness and its testimony taken.

ENTER

-----  
*Justice Supreme Court*

INTERROGATORIES TO XXXXXXXXXX BANK OF SWITZERLAND

To: XXXXX BANK OF SWITZERLAND, a witness on behalf of plaintiff XXXXXXXXXXXXX:

- 1) Please state your name, job title, and office address.
  
- 2) Does XXX have any information relating to XXXXXXXXXXXXXXXXXXXX, Account XXX and sub-accounts in various currencies and for various purposes, such as investments, savings or bank guarantees? If your answer is yes, please provide all account information including but not limited to opening papers, names of all beneficial owners (from the time the account was opened to date), the names of all persons who were or are bank signatories at any time, and the dates they registered or added each signatory to the account. Please furnish copies of all documents to which you referred in obtaining the information in your answer.

3) Have anyone or more of the persons and entities identified in your answer to interrogatory No. 2, or any persons or entities related to them, had directly or indirectly, any type of banking or other contractual relationship with XXX, including but not limited to relationships as account holder, owner, signatory, beneficial owner, depositor, borrower, pledgor, beneficiaire economique? If so, please furnish copies of all documents to which you referred in obtaining the information for your answer.

4) Please identify any collateral pledged to or for the benefit of XXX for loans provided to anyone or more persons or entities identified in your answer to interrogatory No. 2, or to any person or entity related to any of them. Please furnish copies of all documents to which you referred in obtaining the information for your answer.

All of the above interrogatories are for the period from January XXXX to date.