

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

INTERNATIONAL PETROLEUM
INVESTMENT COMPANY; AABAR
INVESTMENTS PJS,

Plaintiffs,

v.

THE GOLDMAN SACHS GROUP, INC.;
GOLDMAN SACHS INTERNATIONAL;
GOLDMAN SACHS (ASIA) LLC;
GOLDMAN SACHS (SINGAPORE) PTE.;
GOLDMAN SACHS (MALAYSIA) SDN
BHD; TIM LEISSNER; NG CHONG HWA
(AKA "ROGER NG"); ANDREA VELLA;
KHADEM ABDULLA AL QUBAISI;
MOHAMED AHMED BADAWY AL-
HUSSEINY; JOHN AND JANE DOES 1-50,

Defendants.

Index No. _____

SUMMONS WITH NOTICE

Plaintiffs designate New York County as the
place of trial.

Venue is in this county pursuant to CPLR §
503.

To the Above Named Defendants:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED and required to serve upon Plaintiffs' attorneys, at the address stated below, a notice of appearance or demand for complaint, within twenty (20) days after the service of this Summons, exclusive of the day of service, or within thirty (30) days after service if this Summons is not personally delivered to you within the State of New York. This Court has personal jurisdiction over this proceeding pursuant to CPLR §§ 301 and 302. Venue is proper in this Court pursuant to CPLR § 503. Plaintiffs designate New York County as the place of trial.

This action seeks redress for a massive global conspiracy on the part of the Defendants to defraud and injure Plaintiffs, as set forth in Attachment A.

The relief Plaintiffs seek includes: (a) compensatory damages in an amount to be determined at trial; (b) an award of attorneys' fees and costs; (c) punitive damages; and (d) an award of such other and further relief as the Court may deem just and proper.

YOU ARE HEREBY NOTIFIED that on your failure to appear or answer, a judgment will be entered against you by default in an amount to be determined plus interest at the rate prescribed by law and the costs of this action, and granting the relief requested above.

DATED: November 21, 2018

New York, New York

QUINN EMANUEL URQUHART & SULLIVAN LLP

By:

/s/ Michael Carlinsky

Michael Carlinsky
William Burck
Stephen Hauss (*admission pending*)
Adam Abensohn
51 Madison Avenue, 22nd Floor
New York, NY 10010
(212) 849-7000
michaelcarlinsky@quinnemanuel.com
williamburck@quinnemanuel.com
stephenhauss@quinnemanuel.com
adamabensohn@quinnemanuel.com

Attorneys for Plaintiffs

TO:
The Goldman Sachs Group, Inc.
Goldman Sachs International
Goldman Sachs (Asia) LLC
Goldman Sachs (Singapore) Pte.
Goldman Sachs (Malaysia) Sdn Bhd
Tim Leissner
Ng Chong Hwa (Aka "Roger Ng")
Andrea Vella
Khadem Abdulla Al Qubaisi
Mohamed Ahmed Badawy Al-Husseiny
John And Jane Does 1-50

ATTACHMENT A

NATURE OF ACTION

By this action, Plaintiffs International Petroleum Investment Company (“IPIC”) and Aabar Investments PJS (“Aabar”) are seeking damages and other appropriate relief for the significant financial exposure and losses that IPIC and Aabar have suffered as a result of the fraudulent and illegal acts committed by multiple individuals and entities, including, without limitation, the Defendants named herein: Goldman Sachs Group, Inc., Goldman Sachs International, Goldman Sachs (Asia) LLC, Goldman Sachs (Singapore) Pte., Goldman Sachs (Malaysia) Sdn Bhd, Tim Leissner, Ng Chong Hwa (aka “Roger Ng”), Andrea Vella (collectively, “Goldman Sachs”), Khadem Abdulla Al Qubaisi, and Mohamed Ahmed Badawy Al-Husseiny.

As set forth in the criminal indictment in Case No. 18-CR-00538-MKB and the criminal information in Case No. 18-CR-00439-MKB, both unsealed in the U.S. District Court for the Eastern District of New York on November 1, 2018, Goldman Sachs and others engaged in a massive, international conspiracy to embezzle billions of dollars from 1Malaysia Development Berhad (“1MDB”), Malaysia’s investment development fund, and to launder the proceeds of that theft through New York and elsewhere. As part of the scheme, Goldman Sachs conspired with others to bribe IPIC’s and Aabar’s former executives, Defendants Al Qubaisi (the former Managing Director of IPIC and Chairman of Aabar) and Al-Husseiny (the former CEO of Aabar), to induce them to join the conspiracy and act against the interests of IPIC and Aabar. In exchange for the bribes paid by Goldman Sachs and its co-conspirators, Al Qubaisi and Al-Husseiny agreed to manipulate and mislead IPIC and Aabar, and to misuse the companies’ names, networks, and infrastructures to further the criminal schemes and to personally benefit

Goldman Sachs, Al Qubaisi, Al-Husseiny, and their co-conspirators at IPIC's and Aabar's expense. IPIC and Aabar expressly reserve the right to name additional individuals and entities as defendants.