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VIA ELECTRONIC FILING AND FEDEX

Hon. Scott S. Harris, Clerk  
Hon. Danny Bickell, Deputy Clerk  
Supreme Court of the United States  
One First Street, N.E.  
Washington, D.C. 20543

Re: Request for Consolidation in *Russian Federation v. Hulley Enterprises Ltd., et al.*, No. 25-549

Dear Mr. Harris and Mr. Bickell:

Counsel for Petitioner respectfully notes the substantive overlap between the question presented in the above-captioned case and the first question presented in the petition for certiorari filed in *Kingdom of Spain v. Basket Renewable Investments, LLC*, No. 24-1130 (U.S. May 1, 2025).

Russia's petition and Spain's petition are both now fully briefed. In *Basket*, the Court has invited the Solicitor General to provide the views of the United States regarding the overlapping question presented in both cases. See Order, *Kingdom of Spain v. Basket Renewable Invs., LLC*, No. 24-1130 (U.S. Oct. 6, 2025).

Based on this overlap, the Court may consider whether it would be appropriate to align consideration of the two petitions and consolidate these cases. See, e.g., Pet. 33–37, *Russian Federation v. Hulley Enterprises Ltd., et al.*, No. 25-549 (U.S. Nov. 3, 2025) (explaining why both cases are proper vehicles for ensuring a full ventilation of the interpretation of 28 U.S.C. §1605(a)(6)).

In the alternative, the Court may also consider holding either Spain's petition or Russia's petition pending the disposition of the other. See Reply 12, *Russian Federation v. Hulley Enterprises Ltd., et al.*, No. 25-549 (U.S. Dec. 19, 2025) (addressing the "GVR" option).

Respectfully, Counsel for Petitioner would appreciate the distribution of this letter as soon as practical. Thank you for the opportunity to address the Court on these issues.

Respectfully,

/s/ David P. Rosenberg  
David P. Rosenberg  
*Counsel of Record*

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CC: [All Counsel of Record via the Court's Electronic Filing System and FedEx]