

IN THE UNITED STATES COURT OF APPEALS
FOR THE SECOND SOUTHERN DISTRICT OF NEW YORK

NML CAPITAL, LTD., <i>et al.</i> ,	:	15-3675-cv(L); 15-3651-cv; 15-3608-cv;
	:	15-3609-cv; 15-3661-cv; 15-3652-cv;
Plaintiffs-Appellees,	:	15-3646-cv; 15-3659-cv; 15-3618-cv;
	:	15-3622-cv; 15-3626-cv; 15-3682-cv;
and	:	15-3628-cv; 15-3656-cv; 15-3715-cv;
	:	15-3653-cv; 15-3657-cv; 15-3616-cv;
ROSAS DE COHEN, <i>et al.</i> ,	:	15-3617-cv; 15-3629-cv; 15-3612-cv;
	:	15-3624-cv; 15-3645-cv; 15-3625-cv;
Plaintiffs,	:	15-3640-cv; 15-3713-cv; 15-3643-cv;
	:	15-3638-cv; 15-3668-cv; 15-3630-cv;
v.	:	15-3614-cv; 15-3621-cv; 15-3664-cv;
	:	15-3649-cv; 15-3666-cv; 15-3642-cv;
THE REPUBLIC OF ARGENTINA,	:	15-3672-cv; 15-3663-cv; 15-3632-cv;
	:	15-3623-cv; 15-3633-cv; 15-3634-cv;
Defendant-Appellant.	:	15-3679-cv; 15-3647-cv; 15-3641-cv;
	:	15-3648-cv; 15-3660-cv; 15-3670-cv; 15-
	:	3678-cv

**CERTAIN PLAINTIFFS’ MEMORANDUM OF LAW IN OPPOSITION TO
EMERGENCY MOTION FOR LIMITED REMAND PURSUANT TO FRAP 12.1(b)**

The Plaintiffs-Appellees in *Banca Arner S.A. and Brantford Holding S.A. v. The Republic of Argentina*, 15 Civ. 1508 (TPG), and *Paolo Ercolani and Paola Aiello v. The Republic of Argentina*, 15 Civ. 4654 (TPG) (collectively, “Plaintiffs”), through their attorneys McDermott Will & Emery LLP, hereby oppose the emergency motion of the Republic of Argentina (the “Republic” or “Argentina”) for a limited remand pursuant to Federal Rules of Appellate Procedure 12.1 (b).

To avoid duplication of effort and undue repetition, Plaintiffs join the Response in Opposition to the Emergency Motion submitted by NML Capital, Ltd., et al. (the “NML Appellees”), Dkt. 79 in No. 15-3675-cv (L), as well as the Memorandum of Law in Opposition to Emergency Motion for Limited Remand Pursuant to FRAP 12.1(b), filed by Duane Morris

LLP, on February 23, 2016, on behalf of certain plaintiffs, Dkt. 99 in No. 15-3675-cv (L).

Dated: February 23, 2016
New York, New York

Respectfully submitted,

McDERMOTT WILL & EMERY LLP

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