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(DE 143), and to withdraw or dismiss its notice of appeal dated December 6, 2019 (DE 154).

4. This agreement is made so that the Receiver and ING Bank can continue their efforts to work cooperatively in an attempt to reach an acceptable resolution with respect to the funds on deposit with ING Bank and subject to a freezing order of the Dutch Public Prosecutor's Office.
5. This agreement is expressly made without any waiver of any procedural or substantive rights of the Receiver and ING Bank, which they expressly reserve. Any further motion by the Receiver for turnover and/or other relief against nonparty ING Bank shall be on notice to ING Bank.
6. The Receiver and ING Bank will jointly submit a report to the Court regarding this matter on or before the close of business on January 6, 2020.

As always, the Receiver and ING Bank remain available to discuss these or any other pending matters at the Court's convenience.

Dated: December 9, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on all counsel of record by way of:

- Certified Mail
- Facsimile
- Federal Express
- Hand Delivery
- E-Mail
- E-Service

on this December 9, 2019.

By: /s/ Carlos R. Soltero
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