

**EXHIBIT 20**

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

-----x	:	
NOREX PETROLEUM LIMITED	:	Index No. 650591/2011
	:	
Plaintiff,	:	I.A.S. Part 3
	:	Honorable Eileen Bransten
	:	
-against-	:	
	:	
LEONARD BLAVATNIK, et al.,	:	
	:	
Defendants.	:	
	:	
-----x	:	

**MEMORANDUM OF LAW IN SUPPORT OF ALFA GROUP CONSORTIUM'S  
MOTION TO DISMISS THE FIRST AMENDED COMPLAINT**

Law § 1314. For these reasons, Alfa Consortium must be dismissed from this lawsuit with prejudice.

### **FACTS**

Plaintiff Norex is a Cypriot corporation with its principal place of business in Canada. *See Norex Petroleum Ltd. v. Access Indus. Inc.*, 416 F.3d 146, 150 (2d Cir. 2010). The present Complaint alleges that the Defendants conspired to commit tortious acts in Russia for the purpose of stripping Norex's controlling interest in Yugraneft, a Russian oil company that owned a valuable oil field in Western Siberia. (Compl. ¶ 1.) Norex alleges it suffered harm at the hands of the Defendants, which Norex identifies as follows: (1) a pair of Russian "Billionaire Oligarchs" and two companies they purportedly control, *Id.* ¶¶ 5-8; (2) a Russian corporation and its former CEO, *Id.* ¶¶ 12, 17; (3) a Russian "unincorporated association" formed by non-party, non-New York resident "Russian billionaire magnates," *Id.* ¶ 10; and (4) a British corporation, *Id.* ¶ 13.

Norex alleges that Alfa Consortium is an "unincorporated association." *Id.* ¶ 10. In fact, Alfa Consortium is comprised of at least nine major holding companies with interests in financial services, oil and gas production, technology, telecommunications and retail trade (the "Holding Companies"). *See* Affidavit of Pavel NazariYan ("NazariYan Aff.") ¶ 5. Alfa Consortium is not registered as a legal entity in Russia under applicable state regulations, but rather it is a collection of the Holding Companies, each of which is in turn comprised of separately incorporated and independently-run companies. *Id.* ¶ 5, 7. None of the Holding Companies are incorporated in or have a primary place of business in New York. *Id.* ¶ 19. Alfa Consortium's most recent annual report, dated 2009, includes 17 contact addresses and phone numbers for the