EXHIBIT 75

to humanity. Khan was one of the funders of, and is a member of the Initiative Group for, the

creation of the Babi Yar Holocaust Memorial Center in Ukraine.

INTERROGATORY NO. 19

Identify all individuals and/or entities whom you, Alfa or the Other Entities have
contracted or otherwise tasked to conduct government or public relations in any country and/or
to respond on your behalf to press inquiries, public appearance requests, requests for your
attendance at meetings, or other public relations matters, and state whether it was you, Alfa or
one of the Other Entities that tasked or contracted the identified individual or entity.

RESPONSE TO INTERROGATORY NO. 19

Plaintiffs object to this Interrogatory as overly broad, unduly burdensome, and seeking

information that is not relevant to the issues in the Action. Subject to the foregoing objections,

Plaintiffs respond as follows:

Plaintiffs have been assisted in connection with government public relations matters by

Stuart Bruseth, Director of Communications at LetterOne, as tasked by LetterOne. In addition,

Plaintiffs Fridman and Aven have been assisted in connection with government and public

relations matters by BGR Group and by Richard Burt, a non-executive director of LetterOne,

working as a sub-contractor to BGR Group, and by Teneo, in each case as tasked by LetterOne.

INTERROGATORY NO. 20

For each element of damage that you claim in this action, including, but not limited to,
the injuries claimed at Paragraphs 10 and 33 of the Complaint, identify separately and with
specificity the complete nature of your injury, the amount of damage and how you calculate it,
all facts relating to or supporting the allegation of injury, and all documents that refer or relate to,
contain information concerning, or upon which you rely to show the damages you claim in this
action.

RESPONSE TO INTERROGATORY NO. 20

Plaintiffs object to this Interrogatory as overly broad, unduly burdensome, and premature.

Subject to the foregoing objections, Plaintiffs respond as follows:

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