

Exhibit 1

Pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, Rule 26 of the United States Federal Rules of Civil Procedure, Section 1782 of Title 28 of the United States Code, and the laws and procedures of the State of Israel, and for the use in the matter *Agudas Chasidei Chabad of the United States v. Russian Federation*, Civ. Case No. 1:05-cv-01548-RCL, in the United States District Court for the District of Columbia, Agudas Chasidei Chabad of the United States (“Chabad”) requests that TAJ Art Judaica & Public Auction, Ltd. (“TAJ Art”) produce to Chabad designated documents, electronically stored information (“ESI”), and tangible things that constitute or contain matters relevant to the requests set forth herein and are in TAJ Art’s possession, custody or control.

DEFINITIONS

1. “TAJ Art” means TAJ Art Judaica & Public Auction, Ltd. and its directors, officers, managers, members, current and former employees, counsel, agents, consultants, representatives, and any other persons acting on behalf of any of the foregoing, and its affiliates, parents, subsidiaries, divisions, joint ventures, licensees, franchisees, assigns, predecessors and successors in interest, and any other legal entities, whether foreign or domestic, that are owned or controlled by TAJ Art and all predecessors and successors in interest to such entities.
2. “Plaintiff” or “Chabad” means Agudas Chasidei Chabad of the United States.
3. “Defendants” means the Russian Federation, the Russian Ministry of Culture and Mass Communication, the Russian State Library, and/or the Russian State Military Archive.
4. The terms “Document” and “Documents” are used in their broadest sense and mean, without limitation, all written, graphic, or otherwise recorded material, however produced, (including both originals and copies) including, without limitation, microfilms or other film

records or impressions, electronically stored information regardless of the form of storage medium, tape recordings or computer cards, floppy disks or printouts, any and all papers, photographs, films, recordings, memoranda, books, records, accounts, communications, letters, telegrams, correspondence, drafts, notes of meetings, notes of conversations, notes of telephone calls, inter-office memoranda or written communications of any nature, recordings of conversations either in writings or upon any mechanical or electrical recording devices, including email, notes, papers, reports, analyses, invoices, canceled checks or check stubs, receipts, minutes of meetings, time sheets, diaries, desk calendars, ledgers, schedules, licenses, financial statements, telephone bills, logs, and any differing versions of any of the foregoing, whether so denominated, formal, informal or otherwise, as well as copies of the foregoing which differ in any way, including by the addition of handwritten notations or other written or printed matter of any nature, from the original. The term specifically includes information stored in a computer database and capable of being generated in documentary form, such as electronic mail.

5. “Third Party” and “Third Parties” means any individual(s) or entity(ies) other than Plaintiff or Defendants.
6. “Communication” refers to any transmission, conveyance, or exchange of a word, statement, fact, thing, idea, Document, instruction, information, demand, or question by any medium, whether by written, oral, or other means, including but not limited to electronic communications and electronic mail.
7. “Identify” or “Identification” shall have the following meanings:
 - i. When used with reference to a Person, “Identify” or “Identification” means to state the person’s or entity’s name, present or last-known address, present or last-known

telephone number, and present or last-known position and business affiliation.

- ii. When used with reference to a Document, “Identify” or “Identification” means to state the Document’s title and subject matter, form (e.g., letter, memo, etc.), date of preparation, author(s), addressee(s), recipient(s), and name of its present custodian, as well as, where available, the Document’s Bates number.
 - iii. When used with reference to a Communication, “Identify” or “Identification” means to identify the sender(s), recipient(s), and/or participant(s) of the communication and to state the date, subject matter, and nature (e.g., telephone call, meeting, letter, etc.) of the communication. If the communication was in person, also state the location.
8. “Relating to,” “Relate to,” “Referring to” and “Refer to” mean relating to, reflecting, referring to, concerning, mentioning, pertaining to, evidencing, involving, describing, discussing, commenting on, embodying, responding to, supporting, contradicting, or constituting (in whole or in part), as the context makes appropriate.
 9. “Include” and “Including” means including without limitation.

RULES OF CONSTRUCTION

The following rules of construction apply to all discovery requests:

1. **Generally.** Unless otherwise specified, all terms shall be interpreted as they are used in the Federal Rules of Civil Procedure. The requests and terms used herein shall be construed to require the fullest and most complete disclosure permitted by law.
2. **All or Each.** The terms “all” and “each” shall be construed as all and each.
3. **And or Or.** The connectives “and” and “or” shall each be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
4. **Number.** The use of the singular form of any word includes the plural and vice versa.

INSTRUCTIONS

1. **Requested Items.** TAJ Art is requested to produce for inspection, copying, testing or sampling all items specified in the “Documents and Tangible Things Requested” below in TAJ Art’s possession, custody or control or otherwise known or available to TAJ Art or to TAJ Art’s agents, employees, representatives, investigators, attorneys, accountants, and consultants at the time and place indicated.
2. **Completeness.** Each request calls for and requires production of the complete document, or tangible thing in its entirety, including attachments, without abbreviation, redaction or expurgation.
3. **Objections.** All grounds for an objection to a request shall be stated with specificity. Any ground not stated in a timely objection is waived. TAJ Art may not object to a request merely because it involves an opinion or contentions that relates to fact or the application of law to fact.
4. **Breadth.** The request for a specific item or for a communication with a specific person shall not be read to narrow the scope of any other request.
5. **Compliance.** If any request cannot be complied with in full, it shall be complied with to the extent possible, with an explanation as to why full compliance is not possible.
6. **Productions.** TAJ Art shall produce documents as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the request. Producing documents as they are kept in the usual course of business includes producing documents in text searchable and/or electronic format if they are kept in text searchable and/or electronic format. Draft language, editorial comments and other deleted matter (embedded data or embedded edits) shall not be removed unless it contains privileged information, in which case a claim of privilege shall be made in accordance with

instructions below.

7. **Privilege.** Where a claim of privilege is asserted as a basis for not producing a document, ESI, or portion thereof, and such document, ESI, or portion thereof is not provided on the basis of such assertion, (1) TAJ Art shall identify the nature of the privilege (including work product) which is being claimed and, if the privilege is governed by state law, indicate the state's privilege rule being invoked; and (2) the following information shall be provided in the objection, unless divulgence of such information would cause disclosure of the allegedly privileged information:

- i. the type of document or ESI, e.g., letter, e-mail, interoffice memorandum, or notes;
- ii. the general subject matter of the document or ESI;
- iii. the date of the document or ESI; and
- iv. such other information as is sufficient to identify the document or ESI for a subpoena *duces tecum*, including:
 - a. the author of the document or ESI,
 - b. the addresses of the document or ESI, and any other recipients shown therein, and
 - c. where not apparent, the relationship of the author, addresses, and recipients to each other.

This information shall be furnished in writing at the time of the response to such discovery or disclosure.

8. **Discarded or Destroyed Items.** In the event that any item requested has been discarded or destroyed, other than in the ordinary course of business, TAJ Art shall identify such item and specify (i) the date of its destruction; (ii) the reason for its destruction; (iii) the person

authorizing its destruction; and (iv) the custodian of the document immediately preceding its destruction.

9. **Continuing Effect.** These requests are of continuing effect. If after such production TAJ Art become aware of or acquires additional documents, ESI, or tangible things that are responsive to this request, TAJ Art shall promptly produce them.

REQUESTS FOR DOCUMENTS AND TANGIBLE THINGS

1. All Documents constituting, concerning or relating to the manuscript described as “‘Meshivat Nefesh’ authored by Great Sage and Kabbalist, Rabbi Yaakov Tzemach [and] Owned by The Rabbi Rashab and later by The Rabbi Rayatz. With a Special Letter Appended to it,” which is Lot No. 102 in Auction No. 7, and is publicized at the following URL: <https://il.bidspirit.com/ui/lotPage/taj-art/source/catalog/auction/29987/lot/18781/share?lang=en> (hereafter referred to as “Lot 102”), including, but not limited to, the original of that manuscript.
2. All Documents concerning or relating to the Person or Persons who made Lot 102 available to TAJ Art for auction.
3. All Documents concerning or relating to TAJ Art’s understanding of the provenance of Lot 102.
4. All Documents concerning, relating to, or incorporating one or more Communications between TAJ Art and the Person or Persons who made Lot 102 available for auction.
5. Insofar as Lot 102 is no longer in TAJ Art’s possession, custody, or control, all Documents relating to the disposition of Lot 102, including but not limited to documents sufficient to Identify the purchaser of Lot 102.
6. All Documents concerning, relating to, or reflecting TAJ Art’s activities, including Communications, involving Judaica currently in the possession of Russia, including

particularly, but not limited to, any such Judaica associated with Chabad.

REQUEST FOR TESTIMONY UNDER OATH

1. The Court requests that, in accordance with the laws and procedures specified by the laws of Israel, Chabad and its legal representatives be authorized to take testimony from TAJ Art Judaica & Public Auction, under oath, limited to the following topics.
2. All circumstances surrounding TAJ Art's possession of the manuscript described as "Meshivat Nefesh' authored by Great Sage and Kabbalist, Rabbi Yaakov Tzemach [and] Owned by The Rabbi Rashab and later by The Rabbi Rayatz. With a Special Letter Appended to it," which is Lot No. 102 in Auction No. 7, and is publicized at the following URL: <https://il.bidspirit.com/ui/lotPage/taj-art/source/catalog/auction/29987/lot/18781/share?lang=en> (hereafter referred to as "Lot 102").
3. The Person or Persons who made Lot 102 available to TAJ Art for auction.
4. The provenance of Lot 102.
5. Communications between TAJ Art and the Person or Persons who made Lot 102 available for auction.
6. Insofar as Lot 102 is no longer in TAJ Art's possession, the disposition of Lot 102, including but not limited to the identity of the purchaser of Lot 102.
7. TAJ Art's activities, including Communications, involving Judaica currently in the possession of Russia, including particularly, but not limited to, any such Judaica associated with Chabad.