



Claim No. DL 2019-000127

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
COMMERCIAL COURT (QBD)

BETWEEN:

THE REPUBLIC OF MOZAMBIQUE
(acting through its Attorney General)

Claimant

-and-

- (1) CREDIT SUISSE INTERNATIONAL
- (2) CREDIT SUISSE AG
- (3) MR SURJAN SINGH
- (4) MR ANDREW JAMES PEARSE
- (5) MS DETELINA SUBEVA
- (6) PRIVINVEST SHIPBUILDING S.A.L., ABU DHABI (BRANCH)
- (7) ABU DHABI MAR LLC
- (8) PRIVINVEST SHIPBUILDING INVESTMENTS LLC
- (9) LOGISTICS INTERNATIONAL SAL (OFFSHORE)
- (10) LOGISTICS INTERNATIONAL INVESTMENTS LLC

Defendants

DEFENCE OF THE 5TH DEFENDANT:

DETELINA SUBEVA

1. Except where she has made any express admissions Ms. Subeva denies each and every allegation made against her in the Particulars of Claim, as if they were set out and traversed separately.



2. Ms. Subeva puts the Republic to proof as to her state of knowledge and her state of mind in any of the alleged fraudulent transactions.
3. If Ms. Subeva does not plead to any issue then that is not to be taken as an express and/or implied admission, or concession, in respect of that fact, assertion, or allegation, and the Republic will be required to prove the same.
4. Ms. Subeva is presently awaiting sentencing in the US on a charge connected to the subject-matter of these proceedings. In order not to prejudice her position she does not propose to plead fully to the Particulars of Claim until such time as the criminal proceedings are concluded against her. This pleading is a holding Defence and Ms. Subeva reserves her position to amend it in the future course of these proceedings.
5. For the avoidance of doubt, Ms. Subeva denies that:
 - (a) she has been involved in any wrongdoing with the intention of injuring the Republic;
 - (b) she has received any payments as part of a conspiracy to injure the Republic; and/or,
 - (c) she has been party to an unlawful means conspiracy to injure the Republic; and/or,
 - (d) she has been in knowing receipt of money that properly belongs to the Republic, or in which it has any proprietary claim or interest; and/or,
 - (e) she is liable in the tort of deceit to the Republic.
6. Ms. Subeva denies that the Republic is entitled to the alleged, or any relief against her.



Statement of Truth

The 5th Defendant believes that the facts stated in this Defence are true.

Name: Detelina Subeva

Signed: *Detelina Subeva*

Date: ...20.12.2019.....



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LLC

Defendants

DEFENCE:
5TH DEFENDANT
