

Court	<b>Moscow Arbitration Court</b> 17 Bolshaya Tulsкая st., Moscow 115225
Plaintiff	<b>Myriad Rus</b> 26V (bldg. 2) Bolshaya Pochtovaya st., Moscow OGRN: 5107746035744 Telephone: +7 (495) 565-38-80 E-mail: <a href="mailto:info@myriadrus.com">info@myriadrus.com</a>
Defendants	<b><u>Gazprom's Management Board members:</u></b>  <b>Alexey Borisovich Miller</b> , born 31.01.1962; <b>Elena Alexandrovna Vasilyeva</b> , born 17.08.1959; <b>Valery Alexandrovich Golubev</b> , born 14.07.1952; <b>Alexander Nikolaevich Kozlov</b> , born 29.12.1952; <b>Andrey Vyacheslavovich Kruglov</b> , born 24.01.1969; <b>Vitaly Anatolyevich Markelov</b> , born 05.08.1963; <b>Alexander Ivanovich Medvedev</b> , born 14.08.1955; <b>Sergey Fedorovich Homyakov</b> , born 10.01.1953; <b>Oleg Evgenyevich Aksyutin</b> , born 05.05.1967; <b>Nikolay Nikolaevich Dubik</b> , born 18.05.1971; <b>Vladimir Konstantinovich Markov</b> , born 04.10.1955; <b>Elena Vladimirovna Mihaylova</b> , born 28.04.1977; <b>Vyacheslav Alexanderovich Mihalenko</b> , born 18.10.1965; <b>Sergey Frolovich Prozorov</b> , born 1985 <b>Kirill Gennadyevich Seleznev</b> , born 23.04.1974; <b>Igor Yuryevich Fedorov</b> , born 04.04.1965; <b>Vsevolod Vladimirovich Cherepanov</b> , born 25.11.1966.  16 Nametkina st., GSP-7, Moscow 117997 OGRN: 1027700070518, TIN: 7736050003 Telephone: +7 (495) 719-30-01 E-mail: <a href="mailto:gazprom@gazprom.ru">gazprom@gazprom.ru</a>
Claim amount	<b>1,271,329,548 roubles 28 kopecks</b>
Statutory fee:	<b>200,000 roubles 00 kopecks</b>

**DRAFT COMPLAINT**  
for recovery of losses

**The Plaintiff**, Myriad Rus (the "Plaintiff") is a Shareholder of PJSC Gazprom, as evidenced by the attached extract from the depository booking system.

Gazprom is the sole member of Gazprom mezhregiongaz, as evidenced by an extract from EGRUL in respect of LLC Gazprom mezhregiongaz.

Gazprom mezhregiongaz is the major shareholder and the managing company of Gazprom gazoraspredelenie.

JSC Gazprom gazoraspredelenie is a shareholder of Gazprom gazoraspredelenie Nizhny Novgorod, as evidenced by the latter's list of affiliates.

In addition, Gazprom gazoraspredelenie is a subsidiary of Gazprom and, by virtue of cl. 2.4 of its Charter, of Gazprom mezhregiongaz.

Thus Gazprom exercises full corporate control in respect of Gazprom gazoraspredelenie by virtue of holding indirectly 100% of its ordinary shares and as directly stated in its Charter.

In 2015-2016 PJSC Gazprom gazoraspredelenie Nizhny Novgorod placed an additional issue of 37,375,547 ordinary shares at RUB 51 each. This brought the number of its placed ordinary shares to 65,154,347 ordinary shares.

The following events occurred in the course of the additional share issue procedure:

The Board of Directors of Gazprom gazoraspredelenie Nizhny Novgorod met on 07.09.2015 and decided to:

1. determine the placement price of its additional shares to be RUB 51 each;
2. propose that an extraordinary General Shareholders' Meeting increase its charter capital by RUB 186,877,735 by placing 37,375,547 additional ordinary registered shares of RUB 0.005 face value each at the placement price of RUB 51 each. Placement method: closed subscription by CJSC Financial Analytical Centre, LLC Investment Partner and CJSC CityTrade;
3. convene an extraordinary General Shareholders' Meeting on 27 October 2015.

The relevant minutes of the Board of Directors (Minutes No.5/2015-2016 (163) dated 09.09.15) were published on 09 September 2015 on the disclosure website <http://www.e-disclosure.ru/portal/event.aspx?EventId=zWQnnCcdZEi5EHa9i4Uz5g-B-B>.

An extraordinary General Shareholders' Meeting of Gazprom gazoraspredelenie Nizhny Novgorod was held on 27.10.2015 and approved the decisions to:

1. Determine the maximum quantity of authorised unissued shares to be 40,000,000 shares of RUB 0.005 face value each;

2. Increase its charter capital by RUB 186,877,735 by placing 37,375,547 additional ordinary registered shares of RUB 0.005 face value each at the placement price of RUB 51 each. Placement method: closed subscription by Financial Analytical Centre, Investment Partner and CityTrade. Form of payment: cash.

The relevant minutes of the extraordinary General Shareholders' Meeting (Minutes No.2(30) dated 28.10.2015) were published on 28 October 2015 on the disclosure website <http://www.e-disclosure.ru/portal/event.aspx?EventId=Ivc3HpkvI0SzzrH6wWtdcg-B-B>

As a result of that additional issue and sale of its ordinary shares to Financial Analytical Centre, Investment Partner and CityTrade at RUB 51 per share, Gazprom gazoraspredelenie Nizhny Novgorod obtained proceeds of RUB 1,906,152,897.

The Plaintiff asserts that the said additional share issue by Gazprom gazoraspredelenie Nizhny Novgorod caused losses to Gazprom by reducing the value of the shareholding of its 100% subsidiary, Gazprom gazoraspredelenie.

The Plaintiff asserts that the decision taken by the Board of Directors of Gazprom gazoraspredelenie Nizhny Novgorod, and the decision approving the said additional share issue, for which Gazprom gazoraspredelenie voted at the General Shareholders' Meeting, were taken to Gazprom's detriment, and the said additional share issue authorised by those decisions caused losses to Gazprom. The shares so issued were placed, the issue (additional issue) closing report was registered on 09.08.2016, and the purchases of the placed shares were consummated.

The Plaintiff asserts that the additional share issue carried out on the approved terms caused losses to Gazprom in the amount of:

**1,271,329,548 roubles 28 kopecks.** *(see details of calculation on pages 8 and 9 hereof)*

The Plaintiff's position is based on the following:

The additional share issue carried out by Gazprom gazoraspredelenie Nizhny Novgorod materially diluted Gazprom's indirect corporate control over it, with Gazprom suffering a loss through devaluation of the block of shares held by Gazprom and its controlled parties (Gazprom gazoraspredelenie). Since Gazprom gazoraspredelenie did not exercise its pre-emptive right in respect of the additionally placed shares, its shareholding decreased from 75% to 31.98% as the total number of ordinary shares of Gazprom gazoraspredelenie Nizhny Novgorod rose from 27,778,800 to 65,154,347 shares.

The Plaintiff asserts that Gazprom's Management Board members were aware of, internally approved or directly authorised the decision approving the terms of the additional share issue taken by the Board of Directors of Gazprom gazoraspredelenie Nizhny Novgorod on

07.09.2015 and Gazprom gazoraspredelenie's voting at the General Shareholders' Meeting on 27.10.2015.

Gazprom gazoraspredelenie nominated and, using its votes, elected all 7 members of the Board of Directors of Gazprom gazoraspredelenie Nizhny Novgorod, all of whom concurrently serve on the boards of directors of other gas distribution companies majority owned by Gazprom gazoraspredelenie or another member of Gazprom Group. Therefore, they obviously make decisions as directly instructed by, or otherwise in the interests of, Gazprom gazoraspredelenie.

Gazprom gazoraspredelenie is a subsidiary of, and acts as instructed by, Gazprom. This is stated in cl. 2.4 of its Charter and is further confirmed by the fact that it is managed by Gazprom mezhregiongaz, a 100% subsidiary of Gazprom.

In addition, Gazprom mezhregiongaz's General Director, Kirill Gennadevich Seleznev, is a member of Gazprom's Management Board. Thus, Gazprom gazoraspredelenie acts as instructed by Gazprom by virtue of its Charter and absolute control by Gazprom.

The Plaintiff asserts that Gazprom, acting through its collective executive body – the Management Board, was, by way of indirect control through a chain of controlled legal entities, able, through the Board of Directors of Gazprom gazoraspredelenie Nizhny Novgorod consisting of members appointed by Gazprom gazoraspredelenie, influence decisions taken by that Board of Directors and cause it to take decisions in the interests of Gazprom.

In addition, the Board of Directors of Gazprom gazoraspredelenie Nizhny Novgorod, as disclosed in its Quarterly report for the 3rd quarter of 2015 (pgs 25–30), consists of employees of Gazprom mezhregiongaz.

The Plaintiff asserts that the members of Gazprom's Management Board were informed of the said additional share issue and its terms, and authorised it or failed to take steps to prevent Gazprom from incurring a loss, i.e. failed to act in its interests as required by art. 71 of the Federal Law "On Joint-Stock Companies":

*"Members of a company's board of directors (supervisory board), its sole executive body (director, General Director), provisional sole executive body, members of its collective executive body (management board, directorate), or its managing organisation or officer must exercise their rights and fulfil their duties acting in its interests, in **good faith and reasonably.**"*

The Plaintiff asserts that the said additional issue and sale of ordinary shares of Gazprom gazoraspredelenie Nizhny Novgorod entailed consequences, such as losses for Gazprom, unrelated to entrepreneurial risks and suggesting that members of Gazprom's Management

Board acted unreasonably and in bad faith when approving or refraining from stopping the procedure of additional share issue.

The Plaintiff asserts that a "good manager" acting in good faith and reasonably would not undertake any actions causing, inevitably and predictably, his company to suffer a material loss and give up corporate control over a big and profitable joint-stock company.

The Plaintiff refers to the fact that the procedure of increasing a joint-stock company's charter capital is a complex procedure and may be stopped by it at any stage until it makes agreements for sale of placed securities.

The terms and consequences of the said additional share issue were known once the Board of Directors' resolution was taken on 07.09.2015, and its consequences were not a matter of chance and could have been evaluated positively and accurately before it started.

Members of Gazprom's Management Board were informed about the said additional share issue, as witnessed by letter No. 01/05-7773 dated 16.10.2015 by which one of them, E.V. Mihaylova, replied to an enquiry from the Russian Ministry of Economic Development.

A "good manager" fully aware of a corporate action taking place in a controlled company and informed of its adverse effects for Gazprom such as the devaluation of 20,834,100 ordinary shares held by Gazprom gazoraspredelenie from RUB 2,416,755,600 to RUB 1,145,426,051.72.

*(see details of calculation on pages 10 and 11 hereof)*

The total amount by which the shareholding in Gazprom gazoraspredelenie Nizhny Novgorod devaluated after the said additional issue and sale of shares is: **1,271,329,548 roubles 28 kopecks.**

*(see details of calculation on pages 10 and 11 hereof)*

### Legal basis

Art. 12 of the Russian Civil Code provides for recovery of losses as a way to protect civil rights.

Art. 53, cl. 3 of the Russian Civil Code reads:

*"Any person authorised by a law, another statutory act or the constitutive document of a legal entity to act on its behalf must act in its interests **in good faith and reasonably. The same duty is owed by members of its collective bodies (supervisory or other board, management board, etc.)"***

Art. 53.1, cl. 1, para. 2 of the Russian Civil Code reads:

"Any person authorised by a law, another statutory act or the constitutive document of a legal entity to act on its behalf shall be held liable if shown to have exercised his rights or fulfilled his duties acting **in bad faith or unreasonably**, in particular if his actions (inaction) went beyond the customary terms of civil-law transactions or **normal entrepreneurial risk**."

Art. 53.1, cl. 2 of the Russian Civil Code extends the liability provided for by art. 53.1, cl. 1 thereof to members of legal entities' collective bodies.

Art. 71, cl. 5, para. 1 of Federal Law "On Joint-Stock Companies" reads:

*"A company or its shareholder (shareholders) aggregating at least 1 percent of its placed ordinary shares **may bring a legal action against** any member of its board of directors (supervisory board), its sole executive body (director, General Director), provisional sole executive body (director, General Director), any **member of its collective executive body (management board, directorate), or its managing organisation (officer) for recovery of losses caused to it in the case specified in the first paragraph of clause 2 of this article.**"*

Art. 71, cl. 2, para. 1 of the Federal Law "On Joint-Stock Companies" reads:

*"Members of a company's board of directors (supervisory board), sole executive body (director, General Director), provisional sole executive body, **members of its collective executive body (management board, directorate), or its managing organisation or officer are liable to it for any loss caused to it by their wrongful actions (inaction), unless other causes of liability are provided for by federal laws.**"*

Thus, this claim seeks to prove the following matters:

1. Bad faith or unreasonable actions of members of Gazprom's Management Board;
2. Causation between bad faith or unreasonable actions of members of Gazprom's Management Board and the losses incurred through devaluation of the shareholding in Gazprom gazoraspredelenie Nizhny Novgorod.
3. The existence and extent of Gazprom's losses;

1.

Cl. 2 and cl. 3 of Ruling N 62 dated 30.07.2013 of the Plenum of the Supreme Arbitration Court of Russia describe the criteria of bad faith and unreasonable conduct, respectively.

According to cl. 2, sub-cl. 5 of the said Ruling, bad faith of a director is deemed proven, in particular, where he:

*"knew or should have known that his actions (inaction) were not, when taken, in the interests of the legal entity, for example, made (voted for the approval of) a transaction on*

*terms obviously adverse for it or with a party obviously unable to perform the relevant obligation (a "fly-by-night company", etc.)".*

In the situation described herein, it is obvious that two member of Gazprom's Management Board, E.V. Mihaylova and K.G. Seleznev, were fully informed about the terms of the additional share issue: E.V. Mihaylova prepared and signed the reply to an enquiry from the Russian Ministry of Economic Development, while K.G. Seleznev serves as General Director of Gazprom mezhregiongaz, the managing company of Gazprom gazoraspredelenie.

The Plaintiff asserts that the other members of Gazprom's Management Board, who regularly contact and meet as such, also have correct information on, and were involved in the decision-making in respect of, the additional share issue by Gazprom gazoraspredelenie Nizhny Novgorod.

The terms of the additional share issue approved by the Board of Directors of Gazprom gazoraspredelenie Nizhny Novgorod were known, their consequences were predictable with certainty and predictably led to devaluation of the shareholding in Gazprom gazoraspredelenie Nizhny Novgorod owned by Gazprom gazoraspredelenie, a 100% subsidiary of Gazprom.

Thus the Plaintiff asserts that bad faith of Gazprom's Management Board members is proven by the fact that their actions obviously inflicted losses on Gazprom through devaluation of the shareholding in Gazprom gazoraspredelenie Nizhny Novgorod following the additional share issue, approved and controlled by the controlling shareholder. The harmfulness of that corporate action was obvious before shares were sold in its end – already when the Board of Directors of Gazprom gazoraspredelenie Nizhny Novgorod made its decision on 07.09.2015.

As for unreasonable actions of an executive body, the Supreme Arbitration Court ruled (cl.3 of the Ruling), that they are deemed proven, in particular, where a director:

*"1) made a decision ignoring any information known to him and relevant in that situation;  
2) before making a decision, failed to take such steps to obtain information requisite and sufficient therefor as are customary for business practice under similar circumstances, in particular if it is proven that a reasonable director would, under the given circumstances, delay the decision until more information is gathered;"*

The Plaintiff asserts that Gazprom's Management Board members were at least as well informed on the additional share issue as the Plaintiff itself and therefore acted unreasonably in allowing the additional share issue to proceed and Gazprom gazoraspredelenie not to exercise its pre-emptive right to buy the shares so issued thus losing control over Gazprom gazoraspredelenie Nizhny Novgorod.

A "reasonable director" considering an additional share issue on such terms would instruct Gazprom gazoraspredelenie, as a controlled party, to vote against the approval of such terms as they would obviously inflict losses on Gazprom.

## 2.

The additional share issue increased the number of placed ordinary shares by more than 130% and, because the majority shareholder did not participate in it (did not exercise its preemptive right to buy shares), diluted its corporate control over the company by more than 2.3 times (from 75% to 31.98%).

Furthermore, because of the dilution, Gazprom gazoraspredelenie's shareholding would be evaluated with a minority discount, instead of a control premium.

Given that, the Plaintiff asserts that the causation between the additional share issue carried out by Gazprom gazoraspredelenie Nizhny Novgorod on certain terms and the devaluation of Gazprom gazoraspredelenie's shareholding in it is obvious and proven.

The terms of the additional share issue were approved by the Board of Directors elected by Gazprom gazoraspredelenie and then ratified by the General Shareholders' Meeting, at which Gazprom gazoraspredelenie voted affirmatively.

Gazprom gazoraspredelenie is under 100% control of Gazprom, and is managed by Gazprom mezhregiongaz, whose General Director is Gazprom's Management Board member – Kirill Gennadyevich Seleznev.

Therefore, the Plaintiff asserts that Gazprom's Management Board members in some way authorised the additional share issue by Gazprom gazoraspredelenie Nizhny Novgorod and that authorisation resulted in material losses for Gazprom.

The way in which Gazprom suffered losses because of the additional share issue by Gazprom gazoraspredelenie Nizhny Novgorod can be outlined as follows:

1. The additional share issue was authorised;
2. The additional share issue took place without Gazprom gazoraspredelenie's participation;
3. Gazprom gazoraspredelenie's control over Gazprom gazoraspredelenie Nizhny Novgorod reduced from 75% to 31.98%;
4. Gazprom gazoraspredelenie's 20,834,100 ordinary shares in Gazprom gazoraspredelenie Nizhny Novgorod devaluated as the latter's control over the former more than halved.

### **The amount of losses is calculated as follows**

Report No. 5541 dated 23.04.2015 prepared by LLC Stremlenie pursuant to agreement No. Upr6-152/15 dated 09.04.2015 between it and Gazprom gazoraspredelenie and provided to Gazprom's Management Board member E.V. Mihaylova in her capacity as Deputy General Director for corporate and property relations of Gazprom mezhregiongaz, evaluates one ordinary share of Gazprom gazoraspredelenie Nizhny Novgorod at 51 roubles. That Report was prepared before, and was used for the purposes of, the additional share issue.

The Plaintiff estimated losses based on the following:

1. In its report, the appraiser (*Stremlenie*) used average control premiums and minority discounts from Factset Mergerstat Review.
2. The price of RUB 51 reflects a 33.7% minority discount (the Report sought to establish the value of one share - see page 156 thereof)

To estimate the loss, the Plaintiff took the undiscounted value of one ordinary share, i.e. 76 roubles 92 kopecks.

Based on the value of one ordinary share and the median control premium of 50.8%, specified and applied in the aforesaid Appraisal Report (page 155), the Plaintiff determined that, before the additional share issue, the controlling block of 20,834,100 shares in Gazprom gazoraspredelenie Nizhny Novgorod (75%) was worth **2,416,755,600 roubles 00 kopecks**, and the value of one share within the 75% block was 116 roubles 00 kopecks.

Then, based on the value of one ordinary share without discounts and premiums, the Plaintiff obtained a valuation for Gazprom gazoraspredelenie Nizhny Novgorod of 2,136,830,769 roubles 23 kopecks, added the proceeds received by it from the additional share issue – 1,906,152,897 roubles 00 kopecks, and thus determined that, after receiving the proceeds from the additional share issue, it was worth 4,042,983,666 roubles 23 kopecks.

Based on the company's value after the additional share issue, the Plaintiff determined that one share without discounts and premiums was worth 62 roubles 05 kopecks after the additional share issue.

To evaluate Gazprom gazoraspredelenie's block of 20,834,100 shares representing, after the additional share issue, a 33.98% stake, the Plaintiff applied the 11.4% minority discount specified in Report No. 5541 arriving at 54 roubles 98 kopecks as the value of one ordinary share within that block.

By multiplying the value of one share reduced for the minority discount by the number of shares held by Gazprom gazoraspredelenie, the Plaintiff determined that, after the additional share issue, its shareholding was worth **1,145,426,051 roubles 72 kopecks**.

The Plaintiff asserts that the difference between the values of Gazprom gazoraspredelenie's shareholding before and after the additional share issue is Gazprom's loss incurred through devaluation of such shareholding.

The total amount of losses was: **1,271,329,548 roubles 28 kopecks**.

### Alternative calculation of losses based on net assets value

As an alternative evaluation of the 20,834,100 shares in Gazprom gazoraspredelenie Nizhny Novgorod held by Gazprom gazoraspredelenie, as at the date of the resolution to make the additional share issue and as at the registration date of the issue closing report, the Plaintiff considers it possible to use net assets value.

This method of evaluating ordinary shares is provided for by clause 9 of the Rules for Determining the Estimated Price of Securities Not Traded in an Organised Securities Market for the purposes of chapter 25 of the Tax Code of the Russian Federation, approved by order No.10-66/pz-n dated 09.11.2010 of the Russian Federal Service for Financial Markets (the "Rules").

According to cl. 9 of the Rules, the estimated price of a non-traded share in a joint-stock company is determined by dividing the company's net assets value less any net assets attributable to its placed preferred shares by the **total number of its placed ordinary shares**.

Gazprom gazoraspredelenie Nizhny Novgorod's net assets value is published by it on the disclosure website:

<http://fedresurs.ru/companies/275A8CBD9D7601F872D4E805D2D5418B>

The date of the resolution to make the additional issue is 07.09.2015 on which date a meeting of the Board of Directors determined the essential terms of the additional issue. According to announcement No. 00115286 published by Gazprom gazoraspredelenie Nizhny Novgorod, its net assets value as at 30.09.2015 was 6,205,791,000 roubles 00 kopecks.

The registration date of the ordinary share issue (additional issue) report, i.e. the closing date of the additional issue, is 09.08.2016. According to announcement No. 01192355 published by Gazprom gazoraspredelenie Nizhny Novgorod, its net assets value as at 30.09.2016 was 8,809,311,000 roubles 00 kopecks.

The total number of placed ordinary shares was 27,778,800 as at 07.09.2015 and 65,154,347 as at 09.08.2016.

Given the above data, the net assets-based value of one share was:

as at 07.09.2015 –  $6,205,791,000 / 27,778,800 =$  **223 rouble 40 kopecks;**

as at 09.08.2016 –  $8,809,311,000 / 65,154,347 =$  **135 roubles 21 kopecks;**

Based on the value of one share, the Plaintiff evaluates the 20,834,100 ordinary shares in Gazprom gazoraspredelenie Nizhny Novgorod held by Gazprom gazoraspredelenie as follows:

as at 07.09.2015 –  $223.40 * 20,834,100 =$  **4,654,337,940 roubles 00 kopecks;**

as at 09.08.2016 –  $135.21 * 20,834,100 =$  **2,816,978,661 roubles 00 kopecks;**

Thus, based on such alternative calculation, the value of 20,834,100 shares in Gazprom gazoraspredelenie Nizhny Novgorod reduced from RUB 4,654,337,940 to RUB 2,816,978,661, i.e. by:

**RUB 1,837,359,279** representing Gazprom's losses from the additional share issue by Gazprom gazoraspredelenie Nizhny Novgorod.

However, the net assets-based evaluation of one share or a shareholding disregards any control ratios applied in evaluating blocks of ordinary voting shares, and some other factors taken into account by Stremlenie in appraising one ordinary share for the purposes of the additional issue.

Therefore, the Plaintiff asserts that the value derived from Appraisal Report No. 5541 is more correct and fair for estimating the devaluation of Gazprom gazoraspredelenie's block of ordinary shares in Gazprom gazoraspredelenie Nizhny Novgorod and, accordingly, losses caused by its additional share issue to Gazprom.

Based on the aforesaid and by virtue of Russian law, Myriad Rus

**ASKS THE COURT:**

To recover from Gazprom's Management Board members:

Alexey Borisovich Miller, born 31.01.1962;  
Elena Alexandrovna Vasilyeva, born 17.08.1959;  
Valery Alexandrovich Golubev, born 14.07.1952;  
Alexander Nikolaevich Kozlov, born 29.12.1952;  
Andrey Vyacheslavovich Kruglov, born 24.01.1969;  
Vitaly Anatolyevich Markelov, born 05.08.1963;  
Alexander Ivanovich Medvedev, born 14.08.1955;  
Sergey Fedorovich Homyakov, born 10.01.1953;  
Oleg Evgenyevich Aksyutin, born 05.05.1967;  
Nikolay Nikolaevich Dubik, born 18.05.1971;  
Vladimir Konstantinovich Markov, born 04.10.1955;  
Elena Vladimirovna Mihaylova, born 28.04.1977;  
Vyacheslav Alexanderovich Mihalenko, born 18.10.1965;  
Sergey Frolovich Prozorov, born 1985  
Kirill Gennadyevich Seleznev, born 23.04.1974;  
Igor Yuryevich Fedorov, born 04.04.1965;  
Vsevolod Vladimirovich Cherepanov, born 25.11.1966,

**1,271,329,548 roubles 28 kopecks, on a joint and several basis, in favour of Gazprom.**