

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHEVRON CORPORATION,

Plaintiff,

v.

STEVEN DONZIGER, et al.,

Defendants.

Case No. 11-CV-0691 (LAK)

**DEFENDANTS JAVIER PIAGUAJE PAYAGUAJE AND HUGO GERARDO
CAMACHO NARANJO RESPONSE IN OPPOSITION TO PLAINTIFF CHEVRON
CORPORATION'S MOTION TO COMPEL DEFENDANTS TO PRODUCE
DOCUMENTS (DKT 608)**

The Ecuadorian Defendants (“Defendants”) agreed to perform a reasonable and diligent search for and produce relevant documents and have done so, although objecting to overbroad, irrelevant, and improper requests.¹ Chevron’s Motion to Compel should be denied.²

Date limitation. Defendants never said they would not search for documents created before but only “Obtained After February 14, 2011.” Defendants contend that documents *created after* February 14, 2011 would not be relevant, just as Chevron did in March 2012 when it proposed using a standard time period of January 1, 2003 to February 14, 2011 for all discovery. Dkt. 415, at 6. Defendants agreed with February 14, 2011 as the standard terminal date. *Id.* at 6-7. Defendants objected that Chevron’s proposed period was too narrow because the *starting date* should begin well before January 1, 2003. Defendants also maintained that the relevant time period should be assessed for specific requests, offering to extend the period through June 30, 2011 as to proposed revisions to RFPs 51-52, as requested by Chevron. Mot. Ex. 9, at 2. February 14, 2011 is the date the Ecuadorian trial court issued its initial judgment, which is the alleged object of the supposed third-party fraud.³ Defendants object to the relevance of most documents created after that date because the sole claim against Defendants is this claim of third-party fraud in obtaining the judgment and because Chevron’s RICO claims do not extend the

¹ Chevron’s lawsuit is a sham based on invalid legal theories to avoid responsibility for its destruction, for profit, of the Amazonian rain forest, and so Defendants object to all discovery connected with this fake lawsuit. Chevron’s attempt to misuse these legal theories for an absurdly broad set of discovery requests should not be countenanced.

² Defendants Javier Piaguaje Payaguaje and Hugo Gerardo Camacho Naranjo join and incorporate herein the arguments made in Defendants Steven Donziger, the Law Offices of Steven R. Donziger, and Donziger & Associates, PLLC’s (collectively “Donziger”) Response to Chevron’s Motion to Compel.

³ To justify now trying to extend the time period, Chevron cites to its counsel’s recent self-serving letter alleging that a recent ruling by the presiding judge in Ecuador constitutes “ongoing collusion.” A judge’s ruling in favor of a party’s motion no more constitutes “collusion” than this Court’s ruling in favor of Chevron’s motion for temporary injunction in February 2011 reflects “collusion” between this Court and Chevron. Rule 26 does not authorize a party to take discovery based on its own self-serving letters to the Court, and the Court has sustained objections to requests related to enforcement, Ex. 1, Tr. 35:7, 36:3, 123:1, 135:8, which was the subject of the referenced order.

relevant time period to the present,⁴ as the allegations to which Chevron directs the Court demonstrate. Chevron cites to allegations about the selection process of the appellate panel—an “alleged lottery . . . conducted in secret and with no notice to the parties,” Dkt. 283 ¶ 327, and the Ecuadorian Plaintiffs’ enforcement efforts outside the United States, *id.* ¶¶ 331-36. These allegations were offered in support of Count 9, which the Second Circuit rejected as legally improper. Because the parties had no notice of the appellate selection procedure and there are no enforcement efforts in the United States, these allegations do not support discovery “through the present” in this case. Notably, Chevron fails to identify any allegations that would support discovery past February 14, 2011 on the issues it specifically lists, including ghostwriting, judgment allocation, or the Ecuadorian Plaintiffs’ travel. There are none.⁵ Defendants request a hearing—if necessary—to address the individual requests in Chevron’s 11-page Exhibit A.

The Court should sustain Defendants’ objections. As to the specific subject areas Chevron next addresses, Chevron ignores the Court’s rulings on similar objections, Defendants’ numerous agreements to produce documents, and Chevron’s own refusal to narrow overbroad requests.

Ghostwriting, Enforcement, and Funding. Defendants agreed to produce documents that show any advance knowledge—which would include drafting—of court decisions up to February 14, 2011. Ex. 2, RFPs 108-09⁶. Allegations after that date are not supported by Chevron’s complaint and are—like enforcement and funding—irrelevant.

Travel to U.S. The Defendants have agreed to produce documents concerning their travel to the United States and New York. RFPs 2-3. Travel by other persons, RFPs 4-5, is not relevant to

⁴ *Eastman Kodak Co. v. Camarata*, 238 F.R.D. 372 (W.D.N.Y. 2006), does not purport to establish the relevant time period for all RICO cases. The case involved specific allegations of money laundering, and the defendants’ counsel conceded that later transactions *involving the same funds* “may constitute further money laundering violations.” *Id.* at 376. The case is not a blank check authorizing Chevron’s overbroad and harassing discovery requests.

⁵ Chevron has not addressed Defendants’ overbreadth and relevance objections to RFPs 15, 29, 33, and 34.

⁶ The specific RFPs cited and Defendants’ objections thereto are found in Exhibit 2, Defendants’ Amended Responses and Objections.

personal jurisdiction, which requires evidence of “control over the activities of the purported agent,” *Chong v. Healthtronics, Inc.*, CV-06-1287 SJF MLO, 2007 WL 1836831 (E.D.N.Y. June 20, 2007), and the party’s participation as a “primary actor in the specific matter in question.” *In re Sumitomo Copper Litig.*, 120 F. Supp. 2d 328, 336 (S.D.N.Y. 2000). RFPs 4-5 are also overbroad because they are not limited to travel related to specific alleged acts or events and call for production of every document related to travel, like receipts, invoices, credit card bills, etc.

So-called Pressure Campaign. Chevron fallaciously argues that any effort to effectuate a settlement is part of an organized crime scheme. Hogwash. The argument turns every settlement conference into a meeting of crime bosses. Under Chevron’s reasoning, the meetings and public discourse among the United States Government, plaintiffs’ lawyers, and British Petroleum concerning settlement of the Deep-Water Horizon oil spill dispute were a RICO scheme. Nevertheless, Defendants agreed to produce any communications with securities analysts, Chevron shareholders, and government officials, RFP 130-131,137-139, rendering RFP 132 duplicative. Chevron’s remaining requests are overbroad, seeking documents on unspecified protests, *every document related to the entities responsible for such activities*, and communications between more than one hundred people⁷ and unspecified NGOs. RFP 133-34. When Defendants asked Chevron what protests, “activism,” or NGOs it was referring to or interested in, Chevron refused to provide any additional information. Chevron has the communications responsive to RFP 143 and has refused to provide further information about what other communications it seeks. RFP 142 is overbroad and seeks irrelevant documents related to *contemplated* communications; Chevron should already have any actual communications with its experts.

⁷ RFP 134 includes the overbroad “Lago Agrio Plaintiff Related Parties” term, which the Court observed, “seems a little onerous.” Ex. 3, Tr. 90:1.

Bribery Solicitation. Chevron agents attempted to bribe the Ecuadorian trial judge. Defendants agreed to produce any agreements and communications between the Defendants and the various persons allegedly involved in the attempt, RFPs 173-74, and *all documents* related to the key witnesses: Borja, Hansen, and Escobar, RFPs 170-172. Despite this, Chevron demands the use of the overbroad term “Lago Agrio Plaintiff Related Parties,” which is itself a combination of twelve defined terms covering more than one hundred people. Although Defendants object to the term, Chevron continues to ignore its “responsibility to frame discovery requests” to achieve the “just, speedy, and inexpensive determination of [this] action.” *Murray v. Geithner*, M8-85(LAK), 2010 WL 1257324, at *3 (S.D.N.Y. Mar. 25, 2010). Defendants offered solutions on several specific requests to avoid this term; Chevron offered none. Defendants do not have a duty to rewrite Chevron’s improper requests. *See id.*

Exhibit C. Chevron’s argument on the requests in Exhibit C to its motion is confusing, apparently asking for an order compelling production for these requests only “[i]n the event the Court grants relief on the Agency Motion with respect to the LAPs that it does not grant to Donziger.” Mot. at 4. First, Chevron is mistaken; the Ecuadorian Defendants advised Chevron that they *have* requested responsive documents from Defendants’ Ecuadorian counsel. Mot. Ex. 14. Ecuadorian counsel believes that requested documents cannot be produced due to constraints imposed by Ecuadorian law. In any event, many of the requests listed in Exhibit C—though not specifically addressed in the motion—are overbroad and irrelevant.⁸ Defendants already agreed to produce RFPs 51-52 up to Feb. 14, 2011, and to extend the date to June 30, 2011 for criminal investigations of Pallares and Reis Veiga. Mot. Exs. 3, 14. The Court already limited requests like RFP 102 to any *communications* with the Ecuadorian judges, specifically *regarding the*

⁸ RFPs 45, 47, 56-61, 63, 72, 83, 94, 103-04, and 114 use the overbroad “Lago Agrio Plaintiff Related Parties” term.

Lago Agrio litigation, Ex. 1, Tr. 97:17-19 & 113:5-7. In response to RFP 39, Defendants agreed to produce communications with Ecuadorian judges. The Court should deny Chevron's motion.

Dated: November 12, 2012
Houston, TX

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EXHIBIT 1

C9pdchemc

Conference

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

-----x

3 CHEVRON CORPORATION,

4 Plaintiff,

5 v.

11 Civ. 691 (LAK)

6 STEVEN DONZIGER, et al.,

7 Defendants.

8 -----x

September 25, 2012
11:20 a.m.

9
10 Before:

11 HON. LEWIS A. KAPLAN

12 District Judge

13 APPEARANCES

14 GIBSON DUNN & CRUTCHER

15 Attorneys for Plaintiff

16 BY: RANDY MASTRO

17 LAUREN ELLIOT

PETER SELEY

18 ANNE CHAMPION

BILL W. THOMSON

RICHARD MARK

19 GOMEZ LLC

20 Attorneys for Hugo Geraldo Cammacho and
Javier Piaguaje

21 BY: JULIO C. GOMEZ

- and -

22 SMYSER KAPLAN & VESELKA, LLP

23 BY: GARLAND "Land" D. MURPHY IV

24 LEADER & BERKON

Attorneys for Non-Party
Patton Boggs LLP

25 BY: JAMES K. LEADER

S. ALYSSA YOUNG

CORRECTED

C9pdchemc

Conference

1 THE COURT: This is true of every law school that
2 would have accepted anybody of Patton Boggs as a student.
3 Without that, they wouldn't be here.

4 MR. MASTRO: Your Honor, as an essential part of the
5 scheme, part the RICO scheme was to defraud -- to either get
6 co-conspirators or to defraud them into investing and thereby
7 be able to support the ability to try to extort Chevron not
8 only by continuing the Lago Agrio litigation but the
9 litigations around the country. And the common law fraud claim
10 that has been sustained was one of defrauding third parties to
11 the detriment of Chevron. If we are correct that the documents
12 will show Burford, maybe Kohn, others felt that they had been
13 defrauded at certain points into funding, that was integral to
14 the LAPs being able to continue their effort to extort Chevron.

15 THE COURT: Thank you.

16 I'm sustaining, for the time being anyway, the
17 objections to 9 and 10, save that Patton Boggs will produce
18 executed funding agreements.

19 11. Are you guys capable of agreeing as to whether
20 Andres Snaider is a lawyer or not?

21 MR. MASTRO: Your Honor, he apparently at times in his
22 life was a lawyer but we do not believe he is functioning as a
23 lawyer more recently and certainly not in the capacities in
24 which he participated in this case. In his more recent life he
25 hasn't been, to our understanding, practicing law.

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Conference

1 THE COURT: And why are you entitled to all documents
2 relating to him?

3 MR. MASTRO: He is a person who both participated in
4 helping them arrange funding and also served as a consultant --
5 as we understand it, a consultant to the LAPs on the foreign
6 enforcement or Invictus strategy.

7 THE COURT: Sustained.

8 MR. MASTRO: Your Honor, may I just ask one more
9 question?

10 THE COURT: Yes.

11 MR. MASTRO: In terms of the limited production on 9
12 and 10, I would strongly implore your Honor that if there are
13 exchanges with Burford that would reflect that Burford backed
14 out of the funding agreement because they felt they were
15 defrauded, that that would be highly relevant.

16 THE COURT: Nobody is stopping you from taking
17 Burford's deposition and let's see where that goes, if you
18 decide to do it.

19 MR. MASTRO: All right. We will, your Honor. We
20 will.

21 THE COURT: Number 12.

22 MS. YOUNG: Number 12. Nextant is, I believe, under
23 Snaider's company.

24 THE COURT: Is that right, Mr. --

25 MS. YOUNG: We have the same objection.

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Conference

1 THE COURT: -- Mr. Mastro?

2 MR. MASTRO: Nextant is his company.

3 THE COURT: Sustained.

4 13.

5 (Pause)

6 Anybody have anything to say?

7 MR. MASTRO: Well, your Honor, the relevance of the
8 documents, I think your Honor --

9 THE COURT: I'm fully appreciative of why you want to
10 see them.

11 MR. MASTRO: Right.

12 THE COURT: Which is not the same thing as relevance.

13 MR. MASTRO: I understand, your Honor.

14 But since at the heart of the conspiracy it was the
15 RICO defendants colluding with government officials to procure
16 a thumb on the scale of fraudulent judgment in Ecuador, the
17 communications with the government officials we believe are
18 highly relevant. We don't see how they could be privileged.
19 We don't see how there could be a sovereign immunity question.
20 And, you know, we therefore think that they should have to
21 produce those documents.

22 THE COURT: Ms. Young.

23 MR. MASTRO: To the extent they have a privilege
24 claim, they can put it on a categorical log.

25 THE COURT: I don't understand that point.

EXHIBIT 2

PART 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHEVRON CORPORATION,

Plaintiff,

CASE NO. 11 CV 0691 (LAK)

v.

STEVEN DONZIGER, ET AL,

Defendants.

**HUGO GERARDO CAMACHO NARANJO AND JAVIER PIAGUAJE PAYAGUAJE'S
JOINT AMENDED OBJECTIONS AND RESPONSES TO CHEVRON
CORPORATION'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

Defendants Hugo Gerardo Camacho Naranjo and Javier Piaguaje Payaguaje (“Respondents”),¹ by their undersigned attorneys, serve their Amended Objections and Responses to Plaintiff Chevron Corporation’s First Set of Requests for Production of Documents pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Rules 26.2 and 26.3 of the Local Rules for the United States District Court for the Southern District of New York, and the Parties’ March 7, 2012 Joint Report Concerning Scheduling and Discovery Matters (“the Joint Report”) (Dkt. 415), as directed by the Court’s Feb. 16, 2012 Order (Dkt. 389) regarding scheduling and discovery.

Respondents will follow the Parties’ agreed-upon discovery terms memorialized in the Joint Report, in particular with respect to the following matters: the timing of any privilege log production, the timing of any substantive responses, and the need to meet and confer with Chevron regarding scope, manner, and timing of production. In the Joint report, the Parties

¹ By responding to these Requests for Production, Respondents do not concede that the assertion of personal jurisdiction over them by this Court is lawful or proper, and specifically reserve their rights to continue to contest the lawfulness and propriety of this Court purporting to subject them to such jurisdiction.

agreed “with respect to timing of production of privilege logs, Local Civil Rule 26.2 will not apply, and the parties will provide privilege logs on a rolling basis consistent with their respective document productions as discussed above.” Dkt. 415 at 12. As for the timing of document productions, the Joint Report reflects that all Parties requested extensions of time to complete document production. *See id.* at 9, 11. Also, the Parties agreed to participate in further discussions regarding the scope and manner of production. *See id.* at 8. Finally, Respondents bring attention to and relies upon the Court’s June 25, 2012 Order regarding scheduling and discovery (Dkt. 494), which commenced the period for production of requested documents. *See* Dkt. 494 at 1. Accordingly, Respondents will treat the date of this Order, June 25, 2012, as the starting date for the calculation of document production deadlines for all preceding document requests.

GENERAL STATEMENT APPLICABLE TO ALL RESPONSES AND OBJECTIONS

Hugo Gerardo Camacho Naranjo and Javier Piaguaje Payaguaje (collectively, “Respondents”), a campesino and a canoe operator living in the remote Ecuadorian jungle, object to Chevron’s effort to define and characterize them in a way to make them responsible for production of all documents in the possession, custody, or control of other Ecuadorian inhabitants of the Napo Concession area who have participated in litigation against Chevron. Respondents produced documents in their possession, custody, and control in the so-called “Count 9” litigation. Respondents are individual litigants here and do not control other Ecuadorians involved in litigation with Chevron.

GENERAL OBJECTIONS

1. Respondent² objects to the “Definitions” accompanying the Requests because they purport to impose obligations in addition to, or different from, those required by the Federal Rules of Civil Procedure, the Local Rules of this Court, and/or any agreement memorialized in the Parties’ Joint Report.

2. Respondent objects that Respondent is not required to comply with the “Instructions” accompanying the Requests where they purport to impose obligations in addition to, or different from, those required by the Federal Rules of Civil Procedure, the Local Rules of this Court, and/or any agreement memorialized in the Parties’ Joint Report.

3. Respondent originally objected to Chevron’s “Definitions” because they were framed more broadly than permitted by the definitions set forth in Local Civil Rule 26.3. Chevron has now confirmed that the definitions set forth in the Local Rules control.

4. Respondent objects to the Requests because they seek documents, materials, and/or information irrelevant to the extant and active claims, counterclaims, or defenses of the present action.

5. Respondent objects to Chevron’s definition of “AGREEMENTS” because it is overly broad and exceedingly vague and is therefore incomprehensible and lacks any discernible parameters.

6. Respondent objects to Chevron’s definition of “BURFORD” because it is overly broad and exceedingly vague and is therefore incomprehensible and lacks any discernible parameters.

² Because each of Chevron’s 181 Requests for Production are identical as to both Hugo Gerardo Camacho Naranjo and Javier Piaguaje Payaguaje, and because both defendants present identical responses, all objections, responses, and comments by “Respondent” are asserted equally and simultaneously by each of the Respondents.

7. Respondent objects to Chevron's definition of the commonly-used word "THREATS" because Chevron unnecessarily seeks to replace the ordinary definition of a word that carries a widely-understood meaning and is not a specialized term of art.

8. Respondent objects to Chevron's definition of the commonly-used word "WORK" because Chevron unnecessarily seeks to replace the ordinary definition of a word that carries a widely-understood meaning and is not a specialized term of art.

9. Respondent objects to Chevron's definition of the commonly-used word "PREPARATION" because Chevron unnecessarily seeks to replace the ordinary definition of a word that carries a widely-understood meaning and is not a specialized term of art.

10. Respondent objects to Chevron's definition of the commonly-used word "PROVIDE" or "PROVIDED" because Chevron unnecessarily seeks to replace the ordinary definition of a word that carries a widely-understood meaning and is not a specialized term of art.

11. Respondent objects to the term "RELATED WEB SITES" because it is excessively broad and overly expansive by encompassing approximately 75 internet websites ranging from various websites controlled by Chevron to independent media outlets (such as CBS News and Huffington Post, and SFGate.com) to social media outlets such as Twitter and Facebook. Purporting to impose upon Respondent an obligation to produce all documents related to such "RELATED WEB SITES" would create an unduly burdensome obligation.

12. Respondent objects to the term "POST-CABRERA CLEANSING CONSULTANTS" because it is an inflammatory and argumentative definition intended to suggest wrongdoing.

13. Respondent objects to the term “PURPORTED CABRERA TEAM” because it appears to serve as an inflammatory and argumentative term and definition by suggesting that there was no actual team assisting Richard Cabrera.

14. Respondent objects to the term “CO-CONSPIRATORS” because it is an inflammatory and pejorative term intended to presumptively cast aspersions upon certain persons, or groups thereof, by referencing them as such. Respondent further objects to the term because it may be construed in an overly broad manner to include any other persons or entities that Chevron may at any time consider as “those acting in concert with the RICO DEFENDANTS.”

15. Respondent objects to the term “UNFILED LAGO AGRIO PLAINTIFFS’ WORK PRODUCT” because the term itself as well as the proposed definition argumentatively presume that certain documents were not filed in the litigation.

16. Respondent objects to the Requests because they presume Respondent has any access to a personal computer or internet resources.

17. Respondent objects to the Requests, Definitions, and Instructions because they call for the production of documents that are protected under and/or beyond the scope of Fed. R. Civ. P. 26.

18. Respondent objects to the Requests, Definitions, and Instructions because it appears their true purpose is not to obtain discovery relevant to the captioned litigation, but rather, is to harass, intimidate, and deplete the resources of Defendants, including Respondent, and others.

19. Respondent objects to the introductory “Definitions” accompanying the Requests because they purport to enlarge, expand or alter in any way a plain meaning and scope of any

specific Request, and such enlargement, expansions or alterations render the Request vague, ambiguous, unintelligible, unduly broad and/or uncertain.

20. Respondent objects to the Requests, Definitions, and Instructions because they seek to subject Respondent to undue burden and expense.

21. Respondent objects to all Definitions, Instructions, and Requests where they call for the production of “originals” of any document.

22. Respondent objects to all Definitions, Instructions, and Requests asking for the identification of information not currently in the possession, custody, or control of Respondent, or which refers to persons, entities, or events not known to it, on the grounds that such Definitions, Instructions, or Requests seek to require more of Respondent than any other obligation by law; which subjects Respondent to unreasonable and undue annoyance, pressure, burden, and expense; or would seek to impose upon Respondent an obligation to investigate or to discover information or materials from third-party resources that are equally accessible to Chevron.

23. Respondent objects to the Requests, Definitions, and Instructions because they seek information protected by the attorney-client privilege, the work-product immunity doctrine, the joint defense privilege, the common interest privilege, or any other applicable privilege, and Respondent generally objects to the production by Respondent of any documents protected by any such privilege or doctrine. Any production by Respondent, inadvertent or otherwise, of privileged and/or immune information by Respondent shall not be deemed to be a waiver by Respondent of the attorney-client privilege, work-product immunity doctrine, the joint defense privilege, the common interest privilege, or any other applicable privilege. Respondent is willing to meet and confer with Chevron regarding the privilege implications of the Requests, but

Respondent will not produce privileged or otherwise protected documents or information in response to the Requests. For the privileged documents that exist and are in Respondent's possession, custody, or control, Respondent will withhold from production any documents belonging to the following categories:

- (i) The work product of or other protected trial preparation materials in connection with the Lago Agrio Litigation, the *Aguinda* Litigation, the *Jota* Litigation, the *Salazar* action, this action, the pending judgment recognition actions abroad, or any other legal action or proceeding in which the Lago Agrio Plaintiffs have filed pleadings or otherwise appeared or in which they have a legal interest, including, but not limited to the 1782 Actions, the ROE Litigation, and the BIT Arbitration;
- (ii) Attorney-client communications between or among the Lago Agrio Plaintiffs and their legal agents or representatives and any counsel representing or working on behalf of the Lago Agrio Plaintiffs in Ecuador, the United States, Canada, Brazil, or any other country.
- (iii) The litigation-related correspondence, work product and trial preparation materials of any other attorneys, expert consultants or advisors, litigation support service providers, or public relations or media consultants representing and/or working on behalf of the Lago Agrio Plaintiffs regarding the Lago Agrio Litigation, the *Aguinda* Litigation, the *Jota* Litigation, the *Salazar* action, this action, the pending judgment recognition actions in Ontario, Canada and Brasilia, Brazil, or any other legal action or proceeding in which the Lago Agrio Plaintiffs have filed pleadings or otherwise appeared or in which they have a legal interest, including, but not limited to, the 1782 Actions, the ROE Litigation and the BIT Arbitration;
- (iv) Respondent's attorney-client communications with his own counsel in any of the aforementioned actions in which Respondent is a plaintiff, defendant, or an interested party;
- (v) Any common-interest communications between Respondent's counsel and any other counsel *representing* any other party in any legal actions or proceedings to which Respondent is a party or an interested party, including the 1782 Actions, the ROE Litigation, the *Salazar* action, the BIT Arbitration, and this action; and
- (vi) Any common-interest communications with any person or entity providing litigation funding or support on behalf of the Lago Agrio Plaintiffs in connection with the Lago *Agrio* Litigation, the *Aguinda* Litigation, the *Jota* Litigation, the *Salazar* action, this action, the pending judgment recognition actions in Ontario, Canada and Brasilia, Brazil, or any other legal action or proceeding in which the Lago Agrio Plaintiffs have filed pleadings or otherwise appeared or in which they

have a legal interest, including, but not limited to, the 1782 Actions, the ROE Litigation and the BIT Arbitration.

Respondent's assertion of any privilege or immunity shall not be construed as an admission of possession, custody, or control of any protected materials. The persons and entities with whom Respondent or Respondent's attorneys or agents may have had communications during the relevant time period over which he intends to claim privilege include, but are not necessarily limited to, the persons and entities identified in the Supplemental Appendix to Privilege Logs by Non-Parties Andrew Woods and Laura J. Garr, submitted to the Court and provided to Chevron in the *Chevron Corp. v. Salazar*, No. 11-Civ-03718 (LAK), action on July 15, 2011. Many of these individuals and entities are expressly included within Chevron's definitions of "DEFENDANTS' agents, attorneys, and representations," "AGUINDA PLAINTIFFS," "AMAZON DEFENSE FRONT," "AMAZON WATCH," "ASSEMBLY OF THE AFFECTED," "BURFORD," "CO-CONSPIRATORS," "DONZIGER & ASSOCIATES," "ELAW," "LAGO AGRIO PLAINTIFF ACTIVISTS," "LAGO AGRIO PLAINTIFF CONSULTANTS," "LAGO AGRIO PLAINTIFF LAW FIRMS," "LAGO AGRIO PLAINTIFFS," "LAGO AGRIO PLAINTIFF PUBLIC RELATIONS CONSULTANTS," and "UHL & ASSOCIATES."

24. The Requests seek documents in connection with an action filed in the District Court for the Southern District of New York. Underlying that action, however, is a suit filed in 2003 against Chevron in the Superior Court of Nueva Loja in Lago Agrio, Ecuador (the "Lago Agrio Litigation"). On this basis, Respondent objects to the Requests because they seek information protected or immune from discovery, or otherwise considered privileged by the Constitution of the Republic of Ecuador, the statutory and decisional law of the Republic of Ecuador, or any Orders issued under the authority of the courts of the Republic of Ecuador,

generally. Any production, inadvertent or otherwise, of privileged and/or immune information under the constitution, laws, or judicial orders of the Republic of Ecuador shall not be deemed to be a waiver by Defendants or Respondent of the attorney-client privilege, work-product immunity doctrine, or any other applicable privilege or protection, including but not limited to the common-interest privilege.

25. Respondent objects that many of the documents that would be responsive to these Requests are already within the possession, custody, or control of Chevron due to the finding of waiver of privilege by any court that ultimately may be determined to have been improvidently granted by the same court or another court upon direct appeal or other collateral ruling, and Respondent hereby reserves his right to pursue measures to re-assert any heretofore deemed-waived privilege over such documents at the time of any such ruling.

26. Respondent objects to all Requests seeking the production of documents that are already within the possession, custody, or control of Chevron due to 28 U.S.C. § 1782 applications filed by Chevron to seek discovery for now-inactive foreign criminal proceedings, and Respondent hereby reserves his right to assert or reassert his objections to the use or disclosure of any such 1782 discovery.

27. Respondent objects to all Requests seeking the production of any personal or sensitive information, confidential information, or documents which contain any such information, except as provided under the Local Rules of this Court and any protective Order entered in this case.

28. Respondent objects to all Requests seeking information relating to persons or entities other than Respondent where such information is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence.

29. Respondent objects to all Requests requiring Respondent to disclose any information received from or sent to a third party under a non-disclosure agreement, or the content of any part of an agreement between Respondent and a third party which by its terms may not be disclosed by Respondent.

30. Respondent objects to the Requests, Definitions, and Instructions as being overbroad and unduly burdensome because they seek information and/or not reasonably calculated to lead to the discovery of admissible evidence.

31. Respondent objects to the Requests, Definitions, and Instructions that necessarily call for a legal conclusion or legal analysis.

32. Respondent submits that all documents responsive to the Requests should only be produced subject to any Protective Order entered in this matter, should a Protective Order be entered.

33. By responding to the specific Requests herein and/or stating that a diligent search will be undertaken for documents responsive to any specific Request, Respondent is neither conceding the accuracy of the premise of the Request nor conceding that any responsive documents exist or are within Respondent's possession, custody, or control.

OBJECTIONS TO INSTRUCTIONS

1. Respondent objects to the relevant time period stated in Instruction 18 because it seeks discovery past February 14, 2011, the date the Provincial Court of Justice of Sucumbios entered its judgment against Chevron. Since Chevron's Amended Complaint only describes and concerns events leading up to February 14, 2011, documents and information post-dating that date are irrelevant to Chevron's allegations and claims. In this particular respect, Respondent is in agreement with Chevron's statement in the Joint Report requesting that discovery not cover materials past that date. *See* Joint Report at 6. As a result, Chevron's requests for documents

after February 14, 2011, are not calculated to lead to the discovery of admissible evidence and would also pose an undue burden and expense on Respondent, especially considering that the documents sought in many Requests would include privileged material relating to current, ongoing litigation.

2. Respondent objects to Instruction 11 because it deviates from or purports to impose requirements other than or in addition to those required by the Federal Rules of Civil Procedure and the Local Civil Rules for the Southern District of New York. The demand for an identification of any documents no longer in Respondents' possession, custody, or control is inappropriate for requests for production, which do not require a party to create documents. Respondent will not comply with the instruction.

3. Respondent objects to Instruction 8 because it seeks to impose an obligation regarding the timing of Privilege Log that differs from the Parties' previously-submitted agreement regarding Privilege Logs. *See* Joint Report at 12 (memorializing Parties' agreement that Local Civil Rule 26.2 will not apply with respect to timing of production of privilege logs and that the parties will provide privilege logs on a rolling basis consistent with their respective document productions).

4. Respondent objects to Instruction 8 because it asks that Respondent provide more information than necessary or required for Chevron to assess the validity of the privilege asserted.

5. Respondent further objects to Instruction 8 because it seeks as its purpose the disclosure of the identities of interlocutors that would reveal the existence or absence of certain communications that would provide insight into the existence or absence of strategy in specific areas. To cure this, Respondent reserves the right to identify certain interlocutors on any

privilege log with the alias “John Doe” or “Jane Doe,” where appropriate, pending a ruling of the Court on the obligation to reveal their identities.

6. Respondent objects to Instruction 13 because it seeks to impose an unduly burdensome obligation upon Respondent to filter documents already produced in the course of the 1782 Actions or “CHEVRON LITIGATIONS” or to match trace documents already produced, whether by Respondent or by other parties, to specific Requests.

7. Respondent objects to Instruction 17 because it calls for information or documents that pre-date the undersigned attorneys’ involvement or are not among the documents within the possession, custody, or control of Respondent’s current attorneys or are held by Respondent’s former attorneys and are not accessible to Respondent’s undersigned attorneys.

8. Respondent objects to Instruction 1 because it seeks to impose an unduly burdensome and overly-broad understanding of the scope of materials “subject to the custody and control of” Respondent by improperly expanding the scope of possession, custody, and control to include other persons who are either separately named parties in the litigation or persons who are not parties to the litigation. Respondent reserves the right to produce documents in his possession, custody, or control as a party of the litigation, using the definition for “Parties” as defined in Local Rule 26.3(c)(5).

9. Respondent objects to Instruction 3 because it calls for the “author(s) of all handwritten notes” to be identified. Such a demand is inappropriate for requests for production, which do not require a party to create documents. Respondent will therefore disregard that portion of the instruction.

OBJECTIONS TO SPECIFIC CATEGORIES OF DOCUMENTS REQUESTED

1. All DOCUMENTS RELATED TO any payment, compensation, revenue, or any other thing of value any LAGO AGRIO PLAINTIFF has received, contracted to receive, or has

been promised RELATED TO any LAGO AGRIO PLAINTIFF's involvement in, or WORK CONCERNING, the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

2. All DOCUMENTS RELATED TO any travel by any LAGO AGRIO PLAINTIFF to the United States RELATED TO CHEVRON or the CHEVRON LITIGATIONS, including but not limited to that LAGO AGRIO PLAINTIFF's passports, itineraries, credit card bills, receipts, invoices, expense reports, notes, sketches, diaries, calendars, trip logs, photographs and video recordings.

RESPONSE:

Respondents repeat and incorporate by reference the GENERAL OBJECTIONS in full as if set forth herein. Respondents object that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondents object to this Request because it presumes that Respondents

have ever traveled to the geographic area(s) mentioned in this Request. Respondents object to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs. Respondents object because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondents object that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondents further object because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search only as to documents created on or before February 14, 2011, concerning travel by Respondents and produce any responsive, non-privileged documents located as a result of such search.

3. All DOCUMENTS RELATED TO any travel by any LAGO AGRIO PLAINTIFF to New York RELATED TO CHEVRON or the CHEVRON LITIGATIONS, including but not limited to that LAGO AGRIO PLAINTIFF's itineraries, credit card bills, receipts, invoices, expense reports, notes, sketches, diaries, calendars, trip logs, photographs and video recordings.

RESPONSE:

Respondents repeat and incorporate by reference the GENERAL OBJECTIONS in full as if set forth herein. Respondents object that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondents object to this Request because it presumes that Respondents have ever traveled to the geographic area(s) mentioned in this Request. Respondents object to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs. Respondents object because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondents object that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondents further object because the Request calls for disclosure of materials protected by one or more privileges for which the

right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search only as to documents created on or before February 14, 2011, concerning travel by Respondents and produce any responsive, non-privileged documents located as a result of such search.

4. All DOCUMENTS RELATED TO any travel by any of the non-US resident RICO DEFENDANTS or non-US resident CO-CONSPIRATORS to the United States RELATED TO CHEVRON or the CHEVRON LITIGATIONS, including but not limited to passports, itineraries, credit card bills, receipts, invoices, expense reports, notes, sketches, diaries, calendars, trip logs, photographs and video recordings.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the "RICO DEFENDANTS" and/or the so-called "CO-CONSPIRATORS." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

5. All DOCUMENTS RELATED TO any travel by any of the non-US resident RICO DEFENDANTS or non-US resident CO-CONSPIRATORS to New York RELATED TO

CHEVRON or the CHEVRON LITIGATIONS, including but not limited to passports, itineraries, credit card bills, receipts, invoices, expense reports, notes, sketches, diaries, calendars, trip logs, photographs and video recordings.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the "RICO DEFENDANTS" and/or the so-called "CO-CONSPIRATORS." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

6. All DOCUMENTS RELATED TO any travel by any of the non-Ecuador resident RICO DEFENDANTS or non-Ecuador resident CO-CONSPIRATORS to Ecuador RELATED TO CHEVRON or the CHEVRON LITIGATIONS, including but not limited to passports, itineraries, credit card bills, receipts, invoices, expense reports, notes, sketches, diaries, calendars, trip logs, photographs and video recordings.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects to this Request as overly broad because it

incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the "RICO DEFENDANTS" and/or the so-called "CO-CONSPIRATORS." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

7. All DOCUMENTS RELATED TO any travel by any of the LAGO AGRIO PLAINTIFFS, any of the RICO DEFENDANTS or any of the CO-CONSPIRATORS to Brazil, Canada, Colombia, Panama or Venezuela RELATED TO CHEVRON or the CHEVRON LITIGATIONS, including but not limited to passports, itineraries, credit card bills, receipts, invoices, expense reports, notes, sketches, diaries, calendars, trip logs, photographs and video recordings.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request because it presumes that Respondent has ever traveled to the geographic area(s) mentioned in this Request. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the "RICO DEFENDANTS" and/or the so-called "CO-CONSPIRATORS." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or

any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

8. All DOCUMENTS RELATED TO any video recordings RELATED TO the CHEVRON LITIGATIONS, including but not limited to the recordings themselves.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly burdensome, as it could entail any documents in existence about any video recordings related to the litigations. This action and all related litigation comprise a high-profile set of actions for which reports, videos, and newscasts around the world could conceivably pertain to this Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

9. All DOCUMENTS RELATED TO any LAGO AGRIO PLAINTIFF RELATED PARTIES' involvement in drafting, lobbying for, supporting, or enactment of the EMA or any

other Ecuadorian law or constitutional amendment RELATED TO the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because it inquires about, and ostensibly seeks to exert a chilling effect upon, activities constituting free-speech, free association, and free expression of political views on matters of public concern, as well as petitioning the government, all of which are activities that are universally enshrined as inviolate pillars of liberty and democracy, and were these actions undertaken in the United States, would be protected by the First Amendment and doctrines and principles related thereto. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

10. All DOCUMENTS RELATED TO any LAGO AGRIO PLAINTIFF RELATED PARTIES' involvement in the planning, drafting, finalization, translation, and submission of the LAGO AGRIO COMPLAINT on behalf of the LAGO AGRIO PLAINTIFFS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this

Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

11. All DOCUMENTS RELATED TO any and all claims alleged in the complaint filed on behalf of the AGUINDA PLAINTIFFS in the AGUINDA LITIGATION.

RESPONSE:

*****Chevron has withdrawn this request.*****

12. All DOCUMENTS RELATED TO the signing of the LAGO AGRIO COMPLAINT in the LAGO AGRIO LITIGATION, soliciting individuals to participate in the LAGO AGRIO LITIGATION or gathering the signatures of the LAGO AGRIO PLAINTIFFS on the LAGO AGRIO COMPLAINT, any actual or possible forgery of any signatures of the LAGO AGRIO PLAINTIFFS on the LAGO AGRIO COMPLAINT, and the identities of the LAGO AGRIO PLAINTIFFS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent further objects to the Request because it casts aspersions on proper, legal activities related to the filing of a meritorious, and ultimately successful, lawsuit and because it presumes any fraudulent activity in connection thereof. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession,

custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for documents related to the Lago Agrio Litigation that bear the signatures of the Lago Agrio Plaintiffs and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

13. All DOCUMENTS RELATED TO the hiring or retention of counsel for the LAGO AGRIO LITIGATION.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-

distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for any executed engagement letters and powers of attorney that bear the signatures of the Lago Agrio Plaintiffs and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

14. All DOCUMENTS RELATED TO the authority of Steven Donziger to act on behalf of the LAGO AGRIO PLAINTIFFS in the United States or Ecuador.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for any executed engagement letters and powers of attorney that bear the signatures of the Lago Agrio Plaintiffs and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

15. All DOCUMENTS RELATED TO the authority of PATTON BOGGS to act on behalf of the LAGO AGRIO PLAINTIFFS in the United States, Ecuador or Canada.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

16. All DOCUMENTS RELATED TO any power of attorney granted by any LAGO AGRIO PLAINTIFF to anyone, including but not limited to, Pablo Fajardo Mendoza, Luis Yanza, Julio Prieto Mendéz, Juan Pablo Sáenz or Ermel Chávez, related to the LAGO AGRIO LITIGATION.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-

Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for any executed engagement letters and powers of attorney that bear the signatures of the Lago Agrio Plaintiffs and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

17. All DOCUMENTS RELATED TO any personal injury claims alleged by the AGUINDA PLAINTIFFS, or any PERSONS on behalf of the AGUINDA PLAINTIFFS, in connection with the AGUINDA LITIGATION.

RESPONSE:

*****Chevron has withdrawn this request.*****

18. All DOCUMENTS RELATED TO any personal injury claims alleged by the LAGO AGRIO PLAINTIFFS, or any PERSONS on behalf of the LAGO AGRIO PLAINTIFFS, in connection with the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of

any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

19. All DOCUMENTS RELATED TO any property damage claims alleged by the AGUINDA PLAINTIFFS, or any PERSONS on behalf of the AGUINDA PLAINTIFFS, in connection with the AGUINDA LITIGATION.

RESPONSE:

*****Chevron has withdrawn this request.*****

20. All DOCUMENTS RELATED TO any property damage claims alleged by the LAGO AGRIO PLAINTIFFS, or any PERSONS on behalf of the LAGO AGRIO PLAINTIFFS, in connection with the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from

disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

21. All DOCUMENTS RELATED TO any AGUINDA PLAINTIFF not pursuing any claim asserted in the AGUINDA LITIGATION in the LAGO AGRIO LITIGATION.

RESPONSE:

*****Chevron has withdrawn this request.*****

22. All DOCUMENTS RELATED TO the decision that the LAGO AGRIO PLAINTIFFS not pursue personal injury or property damage claims in the LAGO AGRIO LITIGATION.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent also objects to the Request because it assumes facts not in evidence. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is

not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

23. If YOU contend that any of the LAGO AGRIO PLAINTIFFS currently live or previously lived in the FORMER CONCESSION AREA, all DOCUMENTS in support of that contention.

RESPONSE:

*****Chevron has withdrawn this request.*****

24. If YOU contend that any of the AGUINDA PLAINTIFFS currently live or previously lived in the FORMER CONCESSION AREA, all DOCUMENTS in support of that contention.

RESPONSE:

*****Chevron has withdrawn this request.*****

25. All DOCUMENTS RELATED TO the withdrawal or resignation of any lawyer or law firm that provided legal counsel to the LAGO AGRIO PLAINTIFFS in connection with the CHEVRON LITIGATIONS, including but not limited to KOHN SWIFT & GRAF; Constantine Canon LLP; Brownstein Hyatt Farber Schreck LLP; Recht Kornfield PC Horowitz Forbes LLP; and Wheeler Trigg O'Donnell LLP.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as

overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

26. All COMMUNICATIONS between any LAGO AGRIO PLAINTIFF and Steven Donziger.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action. In particular, Respondent objects because Chevron has previously obtained most if not all existing documents pertaining to this Request through Chevron's 1782 actions, rendering this Request as duplicative and harassing.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

27. All AGREEMENTS RELATED TO the funding of the LAGO AGRIO LITIGATION or the CRIMINAL CASES.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for executed funding agreements not already produced or in Chevron's possession and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

28. All DOCUMENTS RELATED TO any PERSON, excluding any counsel of record, who financially supported or invested in, was asked to financially support or invest in, or who offered to financially support or invest in the LAGO AGRIO LITIGATION or the CRIMINAL CASES, including but not limited to BURFORD; Christopher Bogart; Selvyn Seidel; Russell DeLeon; Orin Kramer; Torvia Limited; H5; Elliott Management; Nugent Investments Limited; Calunius; Credit Suisse; IMF Australia; Juridica; Ironshore; Integro Group;

Ambridge Partners; AON; KOHN SWIFT & GRAF; Joseph Kohn; Oil Watch; AMAZON WATCH; RAINFOREST ACTION NETWORK; New Orleans Group; Satee GMBH; 88 Capital LLC; Jonaks Limited; Equitable Outcomes; David Sherman; Glen Krevlin; Michael Donziger; Russell O. Wiese; Calumnia Capital; Douglas Ellenoff; Eric Saltzman; and John Weintraub.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

29. All DOCUMENTS CONCERNING the funding of the LAGO AGRIO LITIGATION that are COMMUNICATIONS with, or mention, PATTON BOGGS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure

EXHIBIT 2

PART 2

by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

30. All DOCUMENTS RELATED TO any savings accounts, checking accounts, money market accounts, brokerage accounts, certificates of deposit or any other credit or debit accounts, whether open or closed, from which any monies were paid to CABRERA, any member of the PURPORTED CABRERA TEAM, COURT EXPERTS, or any ROE government officials, agencies, employees, representatives, contractors, judges, judicial staff or any other PERSON or entity acting, or purporting to act, on the ROE's behalf.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents

responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

31. All DOCUMENTS RELATED TO BANCO PICHINCHA account number 39324298-00 (referred to as the “secret account” in DONZ-HDD-0124585), held by or in the name of Frente de Defensa de la Amazonia a/k/a Amazon Defense Front or Amazon Defense Coalition.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

32. All DOCUMENTS RELATED TO BANCO PICHINCHA account number 32564450-04, held by or in the name of Selva Viva Selviva Cia. Ltda. a/k/a Selva Viva or Selva Viva Cia. Ltda.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

33. All DOCUMENTS RELATED TO Andres Snaider.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents

responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

34. All DOCUMENTS RELATED TO NEXTANT.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

35. All DOCUMENTS RELATED TO funding by KOHN SWIFT & GRAF (including Joseph Kohn) of the CHEVRON LITIGATIONS, including but not limited to DOCUMENTS reflecting KOHN SWIFT & GRAF deposits into savings, checking, money market, brokerage or any other credit or debit accounts and DOCUMENTS REFLECTING KOHN SWIFT & GRAF payments or compensation for any services and expenses RELATING TO the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

36. All DOCUMENTS that set forth an accounting of the expenditures for the CHEVRON LITIGATIONS including but not limited to any accountings prepared by SELVA VIVA.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for

disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

37. All DOCUMENTS RELATED TO the CHEVRON LITIGATIONS associated with savings, checking, money market, brokerage or any other credit or debit accounts belonging to Steven Donziger, operated by Steven Donziger, controlled by Steven Donziger, or for which Steven Donziger is a signatory, that were used in RELATION TO any of the CHEVRON LITIGATIONS, including but not limited to:

- a. Chase Bank Account Number 000000742190218;
- b. Chase Bank Account Number 000000828422758;
- c. Chase Bank Account Number 000151112225365;
- d. Chase Bank Account Number 000002745715678;
- e. Chase Bank Account Number 239-0048161-65;
- f. Chase Bank Account Number 239-0047601-65;
- g. Chase Bank Account Number 151-0291052-65;
- h. Chase IOLA Trust Account #00000074218922;
- i. Chase Bank Account Number 455001782965;
- j. Chase Bank Account Number 773420989;
- k. Synovus Bank Account Number 001-001-056-4; and
- h.[sic] Citi Smith Barney Account Number 71G 26750.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure

by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

38. All DOCUMENTS RELATED TO COMMUNICATIONS with, interference with, guidance to, instruction to, or pressure on the LAGO AGRIO COURT by the ROE REGARDING CHEVRON or the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. The Request assumes facts not in evidence—in particular, the Request improperly presumes “interference with,” “instruction to,” or “pressure on” the Lago Agrio Court. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

39. All DOCUMENTS RELATED TO meetings or COMMUNICATIONS between any PERSON on the one hand, and the ROE, on the other hand, REGARDING CHEVRON or the CHEVRON LITIGATIONS, including but not limited to meetings or COMMUNICATIONS with President Rafael Correa and his staff, all government ministries (including the Ministry of Environment), all executive branch agencies, prosecutors, legislators, judicial bodies, and judges.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

40. All DOCUMENTS RELATED TO COMMUNICATIONS with Pereina [sic] Correa.

RESPONSE:

Respondent repeats and incorporates by reference his **GENERAL OBJECTIONS** in full as if set forth herein. This Request assumes facts not in evidence: Respondent objects to this Request because it presumes any communication or relationship with Pierina Correa. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including **CHEVRON**, may have previously produced or received documents responsive to this Request in the course of the **CHEVRON LITIGATIONS** or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for documents related to Chevron or the Chevron Litigations and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

41. All DOCUMENTS RELATED TO the writing, drafting, creation, editing, advance knowledge of, or revision by any of the LAGO AGRIO PLAINTIFF RELATED PARTIES of any official communication, order, statement, ruling, report, judgment, sentencia, escrito, providencia, edict, or other writing issued by the ROE.

RESPONSE:

Respondent repeats and incorporates by reference his **GENERAL OBJECTIONS** in full as if set forth herein. This Request assumes facts not in evidence: Respondent objects to this Request because it is premised on the incorrect assumption of inappropriate collaboration between the Lago Agrio Plaintiffs and the Republic of Ecuador. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents

and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will interpret this request as follows:

All DOCUMENTS RELATED TO the writing, drafting, creation, editing, advance knowledge of, or revision of any official communication, order, statement, ruling, report, judgment, sentencia, escrito, providencia, edict, or other writing issued by the ROE related to CHEVRON or the CHEVRON LITIGATIONS.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

42. All DOCUMENTS RELATED TO payments, expenses, invoices, receipts, or bills for goods or services RELATED TO the LAGO AGRIO LITIGATION, and made or rendered to or by the ROE or counsel for the ROE including Winston & Strawn LLP.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent further objects to this Request because it assumes facts not in evidence—that any payments, bills, or related items were made or rendered to or by the ROE or its counsel. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request.

Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

43. All DOCUMENTS RELATED TO any AGREEMENTS between the LAGO AGRIO PLAINTIFFS or any of the LAGO AGRIO PLAINTIFF RELATED PARTIES, on the one hand, and ROE or PETROECUADOR, on the other hand, including but not limited to: (1) AGREEMENTS between THE FRONT and the Ministry of Environment of Ecuador or any other agency or program that is part of or supported by the ROE RELATING TO relocation or housing of certain residents of the FORMER CONCESSION AREA or other areas allegedly affected by petroleum production operations (“Proyecto de Reparación Ambiental y Social” or “PRAS Fund”); (2) AGREEMENTS RELATED TO the Special Account for Economic Reactivation (“Cuenta Especial de la Reactivación Productiva y Social, del Desarrollo Científico-Tecnológico y de la Estabilización Fiscal” or the “CEREPS Fund”); and (3) AGREEMENTS REGARDING any potential claims, lawsuits, or other forms of legal action against the ROE or PETROECUADOR, including, but not limited to the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for documents related to agreements (as normally defined and understood) between the Lago Agrio Plaintiffs and ROE or PetroEcuador related to Chevron or the Chevron Litigations and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

44. All DOCUMENTS RELATED TO the transfer, or exchange of funds, services, information, technology, software, of any kind whatsoever, including but not limited to DOCUMENTS RELATED TO the Special Account for Economic Reactivation ("Cuenta Especial de la Reactivación Productiva y Social, del Desarrollo Científico-Tecnológico y de la Estabilización Fiscal" or the "CEREPS Fund"), between the ROE or PETROECUADOR, on the one hand, and any of the LAGO AGRIO PLAINTIFF RELATED PARTIES, on the other hand.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will interpret this request as follows:

ALL DOCUMENTS RELATED TO the transfer, or exchange of funds, services, information, technology, software, of any kind whatsoever, including but not limited to DOCUMENTS RELATED TO the Special Account for Economic Reactivation ("Cuenta Especial de la Reactivación Productiva y Social, del Desarrollo Científico-Tecnológico y de la Estabilización Fiscal" or the "CEREPS Fund"), between the ROE or PETROECUADOR, on the one hand, and any of the LAGO AGRIO PLAINTIFFS, on the other hand, related to Chevron, the Chevron Litigations,

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

45. All DOCUMENTS RELATED TO PETROECUADOR's relationship to the LAGO AGRIO LITIGATION, including but not limited to: (1) PETROECUADOR's activities in the FORMER CONCESSION AREA including but not limited to any remediation, oil exploration and production activities conducted by PETROECUADOR in the FORMER CONCESSION AREA; (2) any COMMUNICATIONS between PETROECUADOR, on the one hand, and any of the LAGO AGRIO PLAINTIFF RELATED PARTIES, on the other hand, RELATED TO CHEVRON or the CHEVRON LITIGATIONS; (3) PETROECUADOR's release from liability RELATED TO its activities in the FORMER CONCESSION AREA; and (4) any assistance, whether monetary or material, provided by PETROECUADOR to any of the LAGO AGRIO PLAINTIFF RELATED PARTIES in connection with the LAGO AGRIO LITIGATION.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Petroecuador. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

46. All DOCUMENTS RELATED TO any planned, contemplated or ongoing remediation, waste cleanup, provision of any services relating to health and/or human services, cultural restoration or environmental restoration in the FORMER CONCESSION AREA, including but not limited to remediation by PETROECUADOR or PEPDA.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Petroecuador. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

47. All DOCUMENTS RELATED TO attempts by any of the LAGO AGRIO PLAINTIFF RELATED PARTIES to halt, delay, or influence PETROECUADOR's ongoing

activities in the FORMER CONCESSION AREA, including but not limited to any remediation activities conducted by PETROECUADOR or PEPDA in the FORMER CONCESSION AREA.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as argumentative. In particular, the Request assumes facts not in evidence in that it improperly assumes that any efforts to halt or delay have occurred. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Petroecuador. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

48. If YOU contend that any party to the TEXPET REMEDIATION AND RELEASE failed to perform under the TEXPET REMEDIATION AND RELEASE, all DOCUMENTS that support YOUR contention.

RESPONSE:

*****Chevron has withdrawn this request.*****

49. IF YOU contend that any party committed fraud associated with the TEXPET REMEDIATION AND RELEASE, all DOCUMENTS that support YOUR contention.

RESPONSE:

*****Chevron has withdrawn this request.*****

50. All DOCUMENTS RELATED TO any compensation received by any of the LAGO AGRIO PLAINTIFFS from TEXPET in satisfaction of claims made by any of the LAGO AGRIO PLAINTIFFS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent also objects that this Request assumes facts not in evidence—in particular, the Request improperly assumes that any of the LAGO AGRIO PLAINTIFFS received any compensation from TEXPET. Respondent further objects that the Request is improper and seeks information that would be equally available to Plaintiff, if such information existed. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for documents related to compensation received by Respondents in satisfaction of any claims by Respondents against Chevron and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

51. All DOCUMENTS RELATED TO the CRIMINAL CASES and any purported basis for the CRIMINAL CASES, including documents provided to the Ecuadorian Attorney General in support of criminal prosecutions.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent also objects to this Request as overly broad and expansive because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Ecuadorian Attorney General. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search. Respondents will also conduct a reasonable search for documents related to Rodrigo Pérez Pallares or Ricardo Reis Veiga and produce any responsive, non-privileged documents created on or before June 30, 2011, that are located as a result of such search.

52. All DOCUMENTS RELATED TO Rodrigo Pérez Pallares or Ricardo Reis Veiga.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before June 30, 2011, that are located as a result of such search.

53. All DOCUMENTS RELATED TO Dr. Charles Calmbacher including but not limited to:

- a. all DOCUMENTS RELATED TO the PREPARATION or filing of any DOCUMENT purportedly submitted to the LAGO AGRIO COURT by Dr. Charles Calmbacher or in the name of Dr. Charles Calmbacher;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party.

Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action. In particular, Respondent objects because Chevron has previously obtained most if not all existing documents pertaining to this Request through Chevron's 1782 actions, rendering this Request as duplicative and harassing.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

- b. all DOCUMENTS RELATED TO any payments to Dr. Charles Calmbacher in connection with the LAGO AGRIO LITIGATION; and

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action. In particular, Respondent objects because Chevron has previously obtained most if not all existing documents pertaining to this Request through Chevron's 1782 actions, rendering this Request as duplicative and harassing.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

- c. all DOCUMENTS RELATED TO COMMUNICATIONS with Dr. Charles Calmbacher RELATING TO his May 29, 2010 deposition.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action. In particular, Respondent objects because Chevron has previously obtained most if not all existing documents pertaining to this Request through Chevron's 1782 actions, rendering this Request as duplicative and harassing.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

54. All DOCUMENTS RELATED TO Edison Camino Castro, including any payments to Mr. Castro.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of

documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

55. All DOCUMENTS RELATED TO David Lloyd Russell, including any payments to Mr. Russell.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

56. All DOCUMENTS including COMMUNICATIONS among any of the LAGO AGRIO PLAINTIFF RELATED PARTIES RELATED TO the PREPARATION of the SAMPLING AND ANALYSIS PLAN.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

57. All DOCUMENTS including COMMUNICATIONS among any of the LAGO AGRIO PLAINTIFF RELATED PARTIES RELATED TO the implementation of the SAMPLING AND ANALYSIS PLAN.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from

disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

58. All DOCUMENTS RELATED TO CESAQ-PUCE's work on behalf of the LAGO AGRIO PLAINTIFF RELATED PARTIES; test results reported by CESAQ-PUCE to the LAGO AGRIO PLAINTIFF RELATED PARTIES; COMMUNICATIONS with CESAQ-PUCE; and the decision to hire a laboratory other than CESAQ-PUCE to conduct analysis for the LAGO AGRIO PLAINTIFF RELATED PARTIES.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as argumentative. Respondent also objects that the Request assumes facts not in evidence. In particular, the Request makes improper factual assumptions about decisions concerning hiring laboratories. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for

disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

59. All DOCUMENTS RELATED TO HAVOC including (1) the hiring of HAVOC by the LAGO AGRIO PLAINTIFF RELATED PARTIES, (2) inspections of or visits to HAVOC by the LAGO AGRIO PLAINTIFF RELATED PARTIES, (3) payments to HAVOC by the LAGO AGRIO PLAINTIFF RELATED PARTIES, (4) HAVOC's WORK on behalf of the LAGO AGRIO PLAINTIFF RELATED PARTIES, (5) HAVOC's equipment including any equipment or testing materials provided by the LAGO AGRIO PLAINTIFF RELATED PARTIES, (6) HAVOC's accreditation or lack thereof, (7) the preparation and use of HAVOC data, (8) HAVOC's quality assurance and/or quality control procedures and documentation, (9) the chain of custody documentation for HAVOC samples, (10) test results reported by HAVOC to any of the LAGO AGRIO PLAINTIFF RELATED PARTIES, and (11) HAVOC ownership or other financial interest in HAVOC by any of the LAGO AGRIO PLAINTIFF RELATED PARTIES.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of "HAVOC." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or

EXHIBIT 2

PART 3

limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

60. All DOCUMENTS RELATED TO the preventing, impairing, protesting and/or canceling of any judicial inspections RELATED TO HAVOC, including but not limited to all DOCUMENTS RELATED TO ex parte COMMUNICATIONS between the LAGO AGRIO PLAINTIFF RELATED PARTIES and Judge German Gonzalez del Pozo CONCERNING any judicial inspection of HAVOC's laboratory.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. The Request also assumes facts not in evidence. In particular, the Request assumes that judicial inspections were prevented, impaired and/or cancelled due to actions by Respondent or any of the so-called RELATED PARTIES. The Request also assumes that any improper ex parte contact occurred. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of "HAVOC." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have

previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

61. All DOCUMENTS RELATED TO the WORK conducted by the SELVA VIVA LABORATORY on behalf of the LAGO AGRIO PLAINTIFF RELATED PARTIES and SELVA VIVA LABORATORY test results used in connection with the LAGO AGRIO LITIGATION.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Selva Viva or its related persons or entities. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

62. All DOCUMENTS RELATED TO the SELVA VIVA LABORATORY's accreditation or lack thereof.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks

documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Selva Viva or its related persons or entities. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

63. All DOCUMENTS RELATED TO any COMMUNICATIONS between the LAGO AGRIO PLAINTIFF RELATED PARTIES and the COURT EXPERTS, including but not limited to all AGREEMENTS with, payments or benefits conferred or to be conferred upon, the COURT EXPERTS, whether before, during, or after the COURT EXPERT's appointment by the LAGO AGRIO COURT.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent

individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

64. If YOU contend that CHEVRON had any ex parte COMMUNICATIONS with the COURT EXPERTS, then all DOCUMENTS RELATED TO that contention.

RESPONSE:

*****Chevron has withdrawn this request.*****

65. If YOU contend that CHEVRON entered into any AGREEMENTS with, made any payments to, or conferred any benefits on the COURT EXPERTS, excluding those publicly disclosed, all DOCUMENTS supporting that contention.

RESPONSE:

*****Chevron has withdrawn this request.*****

66. All DOCUMENTS RELATED TO any COMMUNICATIONS between the LAGO AGRIO PLAINTIFF RELATED PARTIES on the one hand, and Miguel San Sebastian or Anna-Karin Hurtig, on the other hand.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks

documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to Chevron's impermissibly broad and overly expansive definition of "YOU" and "YOUR" because it greatly exceeds the permissible scope of any pronoun meant to refer to a party, as defined in Local Civil Rule 26.3(c)(5) and violates its prohibition that "[n]o discovery request shall use broader definitions or rules of construction than those set forth in paragraphs (c) and (d)." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for communications or documents discussing communications with Miguel San Sebastian or Anna-Karin Hurtig and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

67. All DOCUMENTS RELATED TO Miguel San Sebastian including (1) Miguel San Sebastian's employment with the LAGO AGRIO PLAINTIFF RELATED PARTIES or the FDA, and any payments, funding, or other compensation made by the LAGO AGRIO PLAINTIFF RELATED PARTIES or the FDA to or for the benefit of Miguel San Sebastian; (2) the participation or involvement of the LAGO AGRIO PLAINTIFF RELATED PARTIES or the FDA in any WORK by Miguel San Sebastian; and (3) any WORK by Miguel San Sebastian, including but not limited to the writing, drafting, creating, editing, or revising of any DOCUMENT or draft DOCUMENT submitted to the LAGO AGRIO COURT or submitted to any journal or other scientific publication.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to Chevron's impermissibly broad and overly expansive definition of "YOU" and "YOUR" because it greatly exceeds the permissible scope of any pronoun meant to refer to a party, as defined in Local Civil Rule 26.3(c)(5) and violates its prohibition that "[n]o discovery request shall use broader definitions or rules of construction than those set forth in paragraphs (c) and (d)." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

68. All DOCUMENTS RELATED TO Fernando Reyes.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or

others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search that are related to Chevron or the Chevron Litigations.

69. All DOCUMENTS RELATED TO Gustavo Pinto.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search that are related to Chevron or the Chevron Litigations.

70. All DOCUMENTS RELATED TO Julio Gonzalez.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the

constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search that are related to Chevron or the Chevron Litigations.

71. All DOCUMENTS RELATED TO the Colegio de Ingenieros en Geologia, Minas, Petr leos y Ambiente.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

72. All DOCUMENTS RELATED TO any attempts by any of the LAGO AGRIO PLAINTIFF RELATED PARTIES, whether successful or not, to cancel, terminate, close, end, avoid, abandon or waive any judicial inspection or the judicial inspection process.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects to the Request because it implies or presumes improper interference with the judicial inspection process. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

73. If YOU contend that drinking water in the FORMER CONCESSION AREA is contaminated as a result of poor sanitation conditions, all DOCUMENTS that support YOUR contention that were not submitted on the record in the LAGO AGRIO LITIGATION.

RESPONSE:

*****Chevron has withdrawn this request.*****

74. If YOU contend that drinking water in the FORMER CONCESSION AREA is contaminated as a result of any action by TEXPET, all DOCUMENTS that support YOUR contention that were not submitted on the record in the LAGO AGRIO LITIGATION.

RESPONSE:

*****Chevron has withdrawn this request.*****

75. If YOU contend that streams, rivers, or other surface water in the FORMER CONCESSION AREA are contaminated as a result of any action by TEXPET, all DOCUMENTS that support YOUR contention that were not submitted on the record in the LAGO AGRIO LITIGATION.

RESPONSE:

*****Chevron has withdrawn this request.*****

76. If YOU contend that any individual's cancer in the FORMER CONCESSION AREA was caused by any action by TEXPET, all DOCUMENTS that support YOUR contention that were not submitted on the record in the LAGO AGRIO LITIGATION.

RESPONSE:

*****Chevron has withdrawn this request.*****

77. If YOU contend that any medical doctor has diagnosed any individual in the FORMER CONCESSION AREA with any illness caused by any action by TEXPET, all DOCUMENTS that support YOUR contention that were not submitted on the record in the LAGO AGRIO LITIGATION.

RESPONSE:

*****Chevron has withdrawn this request.*****

78. If YOU contend that the groundwater in the FORMER CONCESSION AREA is contaminated by an action by TEXPET, all DOCUMENTS that support YOUR contention that were not submitted on the record in the LAGO AGRIO LITIGATION.

RESPONSE:

*****Chevron has withdrawn this request.*****

79. If YOU contend that soil in the FORMER CONCESSION AREA is contaminated by any action by TEXPET and poses a significant risk to human health or the environment, all

DOCUMENTS that support YOUR contention that were not submitted on the record in the LAGO AGRIO LITIGATION.

RESPONSE:

*****Chevron has withdrawn this request.*****

80. All DOCUMENTS that were not submitted on the record in the LAGO AGRIO LITIGATION that are RELATED TO the following claims made by the LAGO AGRIO PLAINTIFF RELATED PARTIES:

- a. produced water is toxic waste (*e.g.*, TEXPET “dumped 18 billion gallons of toxic waste into the rainforest”³);
- b. TEXPET “abandoned more than 1,000 toxic waste pits;”⁴
- c. TEXPET pits are “filled with carcinogens;”⁵
- d. “Chevron destroyed over 1,700 square miles of once pristine rain forest with petrochemicals and seepage;”⁶
- e. CHEVRON “poisoned generations of people;”⁷
- f. drinking water in the area is contaminated with petroleum-related compounds (*e.g.*, “We can no longer drink the water in our villages and towns because the water is contaminated”⁸);

³ Press Release, *Plaintiffs’ Lawyer Asks California Governor to Urge Chevron to Clean Up Its Rainforest Mess*, Apr. 19, 2007, Amazon Watch, <http://chevrontoxico.com/news-and-multimedia/2007/0419-plaintiffs-lawyer-asks-california-governor-to-urge-chevron.html>.

⁴ Press Release, *Plaintiffs’ Lawyer Asks California Governor to Urge Chevron to Clean Up Its Rainforest Mess*, Apr. 19, 2007, Amazon Watch, <http://chevrontoxico.com/news-and-multimedia/2007/0419-plaintiffs-lawyer-asks-california-governor-to-urge-chevron.html>.

⁵ Press Release, *Plaintiffs’ Lawyer Asks California Governor to Urge Chevron to Clean Up Its Rainforest Mess*, Apr. 19, 2007, Amazon Watch, <http://chevrontoxico.com/news-and-multimedia/2007/0419-plaintiffs-lawyer-asks-california-governor-to-urge-chevron.html>.

⁶ Press Release, *Plaintiffs’ Lawyer Asks California Governor to Urge Chevron to Clean Up Its Rainforest Mess*, Apr. 19, 2007, Amazon Watch, <http://chevrontoxico.com/news-and-multimedia/2007/0419-plaintiffs-lawyer-asks-california-governor-to-urge-chevron.html>.

⁷ Press Release, *Plaintiffs’ Lawyer Asks California Governor to Urge Chevron to Clean Up Its Rainforest Mess*, Apr. 19, 2007, Amazon Watch, <http://chevrontoxico.com/news-and-multimedia/2007/0419-plaintiffs-lawyer-asks-california-governor-to-urge-chevron.html>.

- g. TEXPET operations “caused more than 1,400 deaths from cancer;”⁹
- h. “In this area of Ecuador the water, soil, and air on which thousands of people depend for almost every aspect of their daily sustenance is for the most part poisoned;”¹⁰
- i. Total Petroleum Hydrocarbons are life-threatening toxins (e.g., “One soil sample at a Chevron well-site inspected by the Ecuadorian court, for example, contains life-threatening toxins that exceed maximum amounts permitted by U.S. law by 3,250 times”¹¹);
- j. petroleum-related compounds have leached from pits into rivers and streams (e.g., “Chevron used unlined waste pits in Ecuador and the toxins leached [sic] into rivers and streams that local populations still depend on for drinking, bathing, watering their crops and nourishing their animals.”¹²);
- k. “[T]he pollution has cost hundreds of people their lives, contributing to the extinction of one indigenous group and the endangerment of two others;”¹³
- l. “Contamination of soil, groundwater, and surface streams has caused local indigenous and campesino people to suffer a wave of mouth, stomach and uterine cancer, birth defects, and spontaneous miscarriages,”¹⁴ and

⁸ Press Release, *Plaintiffs’ Lawyer Asks California Governor to Urge Chevron to Clean Up Its Rainforest Mess*, Apr. 19, 2007, Amazon Watch, <http://chevrontoxico.com/news-and-multimedia/2007/0419-plaintiffs-lawyer-asks-california-governor-to-urge-chevron.html>.

⁹ Press Release, *Chevron Blasted Before U.S. Congress for Violating Human Rights in Ecuador’s Amazon Rainforest*, Amazon Defense Coalition, Apr. 30, 2009, <http://chevrontoxico.com/news-and-multimedia/2009/0430-chevron-blasted-before-u.s.-congress-for-violating-human-rights-in-ecuador-e2-80-99s-amazon-rainforest.html>.

¹⁰ Press Release, *Chevron Blasted Before U.S. Congress for Violating Human Rights in Ecuador’s Amazon Rainforest*, Amazon Defense Coalition, Apr. 30, 2009, <http://chevrontoxico.com/news-and-multimedia/2009/0430-chevron-blasted-before-u.s.-congress-for-violating-human-rights-in-ecuador-e2-80-99s-amazon-rainforest.html>.

¹¹ Press Release, *September 2006 Report: New Results Suggest Chevron Faces Mounting Liability*, Amazon Watch, Sept. 13, 2006, <http://chevrontoxico.com/news-and-multimedia/2006/0913-september-2006-report.html>.

¹² Press Release, *September 2006 Report: New Results Suggest Chevron Faces Mounting Liability*, Amazon Watch, Sept. 13, 2006, <http://chevrontoxico.com/news-and-multimedia/2006/0913-september-2006-report.html>.

¹³ Press Release, *September 2006 Report: New Results Suggest Chevron Faces Mounting Liability*, Amazon Watch, Sept. 13, 2006, <http://chevrontoxico.com/news-and-multimedia/2006/0913-september-2006-report.html>.

¹⁴ *About the Campaign*, CHEVRONTOXICO.COM, <http://chevrontoxico.com/about/>.

- m. “[E]xperts have called the damage the worst oil related contamination on the planet.”¹⁵

RESPONSE:

*****Chevron has withdrawn this request and all of its subparts.*****

81. All DOCUMENTS that were not submitted on the record in the LAGO AGRIO LITIGATION identifying all the “experts” who have allegedly “called the damage the worst oil related contamination on the planet,” determinations rendered by these “experts,” and the basis for their determinations. *See* About the Campaign: Affected Communities Fight for Justice, ChevronToxico.com, <http://chevrontoxico.com/about/rainforest-chernobyl/affected-communities-fight-for-justice.html>.

RESPONSE:

*****Chevron has withdrawn this request.*****

82. All DOCUMENTS RELATED TO the consideration of, or planning, pressure, or advocacy for, the appointment of a global assessment expert and/or order requiring a global expert report or peritaje global RELATED TO the LAGO AGRIO LITIGATION.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. In particular, Respondent objects to this Request because it suggests impropriety or illegality surrounding the appointment of the global assessment expert. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client

¹⁵ *About the Campaign: Affected Communities Fight for Justice*, ChevronToxico.com, <http://chevrontoxico.com/about/rainforest-chernobyl/affected-communities-fight-for-justice.html>.

privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

83. All DOCUMENTS RELATED TO any THREATS, attacks, crimes of violence, surveillance, or thefts targeted at, affecting, or attempted upon any LAGO AGRIO PLAINTIFF RELATED PARTIES, LAGO AGRIO PLAINTIFF LAW FIRMS, CABRERA, any member of the PURPORTED CABRERA TEAM, or CHEVRON, including all DOCUMENTS RELATED TO actions taken in response to such THREATS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the

right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

84. All DOCUMENTS RELATED TO CABRERA or the PURPORTED CABRERA TEAM, including but not limited to:

- a. all DOCUMENTS RELATED TO the selection and appointment of CABRERA as an expert in the LAGO AGRIO LITIGATION;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

- b. all DOCUMENTS RELATED TO the inclusion of any PERSON in Annex V of the CABRERA REPORT;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

- c. all COMMUNICATIONS with CABRERA or any member of the PURPORTED CABRERA TEAM;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the

common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

- d. all DOCUMENTS RELATED TO meetings with CABRERA or any member of the PURPORTED CABRERA TEAM;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

- e. all DOCUMENTS RELATED TO the planning, drafting, writing, revision, finalization, translation, and submission of THE CABRERA REPORTS, including but not limited to Annex H-1 of the CABRERA REPORT;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

- f. all DOCUMENTS RELATED TO the Cabrera WORKPLAN;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure

by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

- g. all DOCUMENTS RELATED TO the planning, drafting, writing, revision, finalization, translation, and submission of any and all filings submitted in the LAGO AGRIO LITIGATION purportedly by or in the name of CABRERA;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

- h. all DOCUMENTS RELATED TO payments or compensation to CABRERA or any member of the PURPORTED CABRERA TEAM, including but not limited to payments made through the bank account referred to as the "secret account" in DONZ-HDD-0124585;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

- i. all DOCUMENTS RELATED TO WORK by any of the LAGO AGRIO PLAINTIFF CONSULTANTS appearing in whole or in part in THE CABRERA REPORTS or any DOCUMENT filed in the LAGO AGRIO LITIGATION by CABRERA;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

- j. all DOCUMENTS RELATED TO revisions, edits, modifications or changes made by any and all lawyers to THE CABRERA REPORTS, including but not limited to changes made by or at the direction of any LAGO AGRIO PLAINTIFF RELATED PARTY who is or purports to be a lawyer;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES."

Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request, which is duplicative of subpart (g).

- k. all DOCUMENTS RELATED TO CABRERA's independence or lack thereof or claims or statements made by any PERSON or entity relating to CABRERA's independence or lack thereof;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to the Request as overbroad, expansive, and burdensome, as it requests documents made "by any person", generally and without limitation. Respondent objects to this Request as argumentative. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously

produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

- l. all DOCUMENTS RELATED TO any claims that any member of the PURPORTED CABRERA TEAM acted independent of the LAGO AGRIO PLAINTIFF RELATED PARTIES;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as argumentative. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

- m. all DOCUMENTS RELATED TO the independence or lack of independence of any member of the PURPORTED CABRERA TEAM;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks

documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as argumentative. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

- n. all DOCUMENTS RELATED TO public comments on the CABRERA REPORT;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to the Request as overly broad, expansive, and burdensome as it seeks any public comment on the Cabrera Report, without limitation. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects to this Request as argumentative. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-

distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

- o. all COMMUNICATIONS with the ROE RELATED TO CABRERA or THE CABRERA REPORTS;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as argumentative. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

- p. all COMMUNICATIONS RELATED TO CABRERA or the CABRERA REPORT with any PERSON who financially supported or invested in, was

EXHIBIT 2

PART 4

asked to financially support or invest in, or offered to financially support or invest in the LAGO AGRIO LITIGATION;

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

- q. all DOCUMENTS RELATED TO samples taken for THE CABRERA REPORTS; and

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are

protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

- r. all DOCUMENTS RELATED TO CABRERA's scheduled deposition, including but not limited to COMMUNICATIONS among any of the LAGO AGRIO PLAINTIFF RELATED PARTIES REGARDING pressuring the LAGO AGRIO COURT to prevent the deposition.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that the Request assumes facts not in evidence—in particular, it implies improper or illegal behavior on the part of the “Lago Agrio Plaintiff Related Parties” to influence or prevent the deposition of Richard Cabrera. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called “RELATED PARTIES.” Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Richard Cabrera or members of his team. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial

orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

85. If YOU contend that CABRERA drafted, edited, reviewed or PREPARED any part of THE CABRERA REPORTS prior to their being filed with the LAGO AGRIO COURT, all DOCUMENTS that support YOUR contention.

RESPONSE:

*****Chevron has withdrawn this request.*****

86. All DOCUMENTS RELATED TO STRATUS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search and that relate to Chevron or the Chevron Litigations.

87. All DOCUMENTS RELATED TO E-TECH.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search and that relate to Chevron or the Chevron Litigations.

88. All DOCUMENTS RELATED TO William Powers.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure

by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search and that relate to Chevron or the Chevron Litigations.

89. All DOCUMENTS RELATED TO UHL & ASSOCIATES.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search and that relate to Chevron or the Chevron Litigations.

90. All DOCUMENTS RELATED TO Juan Cristóbal Villao Yépez.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search and that relate to Chevron or the Chevron Litigations.

91. All DOCUMENTS RELATED TO the HIDDEN PITS REPORT including but not limited to all DOCUMENTS that identify the PERSONS who contributed to the HIDDEN PITS REPORT and the date(s) of the contributions made by each PERSON.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United

States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

92. All DOCUMENTS RELATED TO the SELVA VIVA DATABASES, including but not limited to all unique versions of the SELVA VIVA DATABASES and the distribution of copies of the SELVA VIVA DATABASES and any output or reports therefrom.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Selva Viva or its related persons or entities. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

93. All DOCUMENTS RELATED TO the work of SELVA VIVA RELATED TO the CHEVRON LITIGATIONS, including but not limited to any WORK RELATED TO the SELVA VIVA DATABASES or THE CABRERA REPORTS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Selva Viva or its related persons or entities. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

94. All DOCUMENTS RELATED TO the identification or recruitment by any LAGO AGRIO PLAINTIFF RELATED PARTY of any person other than CABRERA to potentially serve as the global expert and any COMMUNICATIONS with such person, including Fernando Reyes.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent

individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

95. All DOCUMENTS RELATED TO the POST-CABRERA CLEANSING CONSULTANTS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as argumentative. Specifically, Respondent objects to the Request because it improperly suggests “cleansing” of wrongdoing. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for documents related to the specific entities named in the definition of POST-CABRERA CLEANSING CONSULTANTS and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search that are related to Chevron or the Chevron Litigations.

96. All DOCUMENTS RELATED TO the POST-CABRERA CLEANSING CONSULTANTS that are COMMUNICATIONS with, or mention, PATTON BOGGS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as argumentative. Specifically, Respondent objects to the Request because it improperly suggests “cleansing” of wrongdoing. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request because it is duplicative of Request No. 95.

97. All DOCUMENTS RELATED TO COMMUNICATIONS between the LAGO AGRIO PLAINTIFFS or LAGO AGRIO PLAINTIFF RELATED PARTIES, or any other representative, agent, or advocate for the LAGO AGRIO PLAINTIFFS, on the one hand, and any judge, official, or employee of the LAGO AGRIO COURT, on the other hand, RELATED TO the reports submitted by the POST-CABRERA CLEANSING CONSULTANTS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as argumentative. Specifically, Respondent objects to the Request because it improperly suggests “cleansing” of wrongdoing. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called “RELATED PARTIES.” Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will interpret this request as follows:

ALL DOCUMENTS RELATED TO COMMUNICATIONS with any judge, official, or employee of the LAGO AGRIO COURT RELATED TO the reports submitted by the POST-CABRERA CLEANSING CONSULTANTS.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

98. ALL DOCUMENTS RELATED TO the writing, drafting, creation, editing, or revision of any DOCUMENT or draft DOCUMENT or other writing filed with the LAGO AGRIO COURT under the signature of, in the name of, or purported to be authored by, any of the POST-CABRERA CLEANSING CONSULTANTS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as argumentative. Specifically, Respondent objects to the Request because it improperly suggests “cleansing” of wrongdoing. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

99. All DOCUMENTS RELATED TO the POST-CABRERA CLEANSING CONSULTANTS’ independence or lack thereof or claims or statements made by any PERSON or entity RELATED TO the POST-CABRERA CLEANSING CONSULTANTS’ independence or lack thereof.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as argumentative. Specifically, Respondent objects to the Request because it improperly suggests “cleansing” of wrongdoing. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals,

entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will interpret this request as follows:

All DOCUMENTS RELATED TO claims or statements made by the Lago Agrio Plaintiffs RELATED TO the independence from CABRERA or lack thereof of the specific entities named in the definition of POST-CABRERA CLEANSING CONSULTANTS.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

100. All DOCUMENTS RELATED TO the drafting, editing, researching, creating, or revising of the CULTURAL DAMAGES REPORT.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the

right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

101. All DOCUMENTS RELATED TO any COMMUNICATIONS between the LAGO AGRIO PLAINTIFFS or any of the LAGO AGRIO PLAINTIFF RELATED PARTIES, or any other representative, agent, or advocate for the LAGO AGRIO PLAINTIFFS, on the one hand, and any judge, official, or employee of the LAGO AGRIO COURT, or any judge, official, or employee of any other court in the ROE, on the other hand, RELATED TO the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including

CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will interpret this request as follows:

ALL DOCUMENTS RELATED TO any COMMUNICATIONS with any judge, official, or employee of the LAGO AGRIO COURT, or any judge, official, or employee of the Lago Agrio Court, or any judge, official or employee of any other court in the ROE RELATED TO THE CHEVRON LITIGATIONS.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

102. All DOCUMENTS RELATED TO Judge Alberto Guerra Bastidas; Judge Efrain Novillo Guzmán; Judge Germán Yáñez Ricardo Ruiz; Judge Juan Evangelista Núñez Sanabria; Judge Leonardo Ordóñez Pina; and Judge Nicolás Augusto Zambrano Lozada in both their judicial and nonjudicial capacities.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

103. All DOCUMENTS provided by any LAGO AGRIO PLAINTIFF RELATED PARTY for use in any way by the author(s) of the LAGO AGRIO JUDGMENT, but not contained in the RECORD.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that the Request assumes facts not in evidence—in particular, the Request presumes an unknown or alternate authorship of the Lago Agrio Judgment. Respondent further objects to the Request because it presumes that Judge Zambrano, the author of the Judgment, relied on materials provided by a “Lago Agrio Plaintiff Related Party” that were not contained in the RECORD. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called “RELATED PARTIES.” Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

104. All DOCUMENTS sufficient to identify any DOCUMENTS provided to, filed with, or otherwise transmitted to the LAGO AGRIO COURT, including any judge on that court, by or on behalf of the LAGO AGRIO PLAINTIFFS, or by any of the LAGO AGRIO PLAINTIFF RELATED PARTIES, in connection with the LAGO AGRIO LITIGATION that are not contained in the RECORD.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that the Request assumes facts not in evidence with regards to documents allegedly transmitted to the court not contained in the record. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

105. All DOCUMENTS RELATED TO the "evidence against Chevron" that YOU contend was presented to "Ecuadorian trial and appellate courts [which] demonstrated that Chevron/Texaco (hereinafter 'Chevron') (a) recklessly adopted sub-standard operational practices in Ecuador to cut production costs to the bare minimum, creating what experts believe could be the largest and most damaging oil related disaster of all time; (b) flagrantly violated multiple Ecuadorian laws, its own contractual obligations, and oil industry standards in effect at the time; and thereby (c) caused massive environmental damage to an area the size of Rhode Island that for decades to come will create myriad health risks for thousands of rainforest inhabitants unless there is a comprehensive clean up" and the "independent third-party sources" for such "evidence." See Defendants Steven Donziger, the Law Offices of Steven R. Donziger,

and Donziger & Associates, PLLS., Javier Piaguaje Payaguaje, and Hugo Gerardo Camacho Naranjo's Opposition to Chevron Corporation's Renewed Motion for an Order of Attachment and Other Relief at 24 n.20.

RESPONSE:

*****Chevron has withdrawn this request.*****

106. All DOCUMENTS FILED with the LAGO AGRIO COURT by the LAGO AGRIO PLAINTIFFS or LAGO AGRIO PLAINTIFF RELATED PARTIES regarding the CALIFORNIA ASBESTOS CAUSATION TEST.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action. In particular, Respondent objects that the Request seeks documents that are already in Plaintiff's possession and/or contained in the Ecuadorian court record.

Respondents will interpret this request as follows:

All DOCUMENTS FILED with the LAGO AGRIO COURT
regarding the CALIFORNIA ASBESTOS CAUSATION
TEST.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-

privileged documents created on or before February 14, 2011, that are located as a result of such search.

107. All DOCUMENTS FILED with the LAGO AGRIO COURT by the LAGO AGRIO PLAINTIFFS or LAGO AGRIO PLAINTIFF RELATED PARTIES REGARDING the PURPORTED AUSTRALIAN MOST PROBABLE CAUSE TEST.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action. In particular, Respondent objects that the Request seeks documents that are already in Plaintiff's possession and/or contained in the Ecuadorian court record.

Respondents will interpret this request as follows:

**All DOCUMENTS FILED with the LAGO AGRIO COURT
REGARDING the PURPORTED AUSTRALIAN MOST
PROBABLE CAUSE TEST.**

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

108. All DOCUMENTS and COMMUNICATIONS of the LAGO AGRIO PLAINTIFF RELATED PARTIES RELATED TO the proposing, writing, drafting, creation, editing, advance knowledge, or revision of any order, statement, ruling, report, or other writing

RELATED TO the LAGO AGRIO LITIGATION and issued by the LAGO AGRIO COURT or the LAGO AGRIO APPELLATE PANEL, including but not limited to the LAGO AGRIO JUDGMENT, the LAGO AGRIO APPELLATE DECISION, the LAGO AGRIO APPELLATE CLARIFICATION ORDER, the February 17, 2012 Order of the LAGO AGRIO APPELLATE PANEL, and the March 1, 2012 Order of the LAGO AGRIO APPELLATE PANEL, including any commenting or advising as to the content of the same.

RESPONSE:

Respondent repeats and incorporates by reference his **GENERAL OBJECTIONS** in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent also objects that the Request assumes facts not in evidence—in particular, the Request could be understood as a wide-ranging and unfounded set of allegations insinuating collaboration between the “Lago Agrio Plaintiff Related Parties” and Ecuadorian courts. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called “**RELATED PARTIES**.” Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including **CHEVRON**, may have previously produced or received documents responsive to this Request in the course of the **CHEVRON LITIGATIONS** or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for any documents regarding advance knowledge of any action taken or decision made by the Lago Agrio Court and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

109. All **DOCUMENTS** and **COMMUNICATIONS** of the **ROE RELATED TO** the proposed, writing, drafting, creation, editing, advance knowledge, or revision of any order,

statement, ruling, report, or other writing RELATED TO the LAGO AGRIO LITIGATION and issued by the LAGO AGRIO COURT or the LAGO AGRIO APPELLATE PANEL, including but not limited to the LAGO AGRIO JUDGMENT, the LAGO AGRIO APPELLATE DECISION, the LAGO AGRIO APPELLATE CLARIFICATION ORDER, the February 17, 2012 Order of the LAGO AGRIO APPELLATE PANEL, and the March 1, 2012 Order of the LAGO AGRIO APPELLATE PANEL, including any commenting or advising as to the content of the same.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent also objects to this Request because it could be understood as a wide-ranging and unfounded set of allegations insinuating improper collaboration between branches of the Ecuadorian government. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

110. If YOU contend that any of the UNFILED LAGO AGRIO PLAINTIFFS' WORK PRODUCT is in the RECORD, all DOCUMENTS that support YOUR contention.

RESPONSE:

*****Chevron has withdrawn this request.*****

111. All DOCUMENTS RELATED TO the drafting, use and distribution of the UNFILED LAGO AGRIO PLAINTIFFS' WORK PRODUCT.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for documents concerning the distribution of the Fusion Memo, the Moodie Memo, the Selva Viva Record Summary, the Selva Viva Databases, the Trust Email, the Katia Foch Gomez Memo, and the Draft Alegato and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

112. All DOCUMENTS RELATED TO the MOODIE MEMO including copies of all English and Spanish translations of the MOODIE MEMO.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other

privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for documents concerning the distribution of the Moodie Memo and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

113. All DOCUMENTS RELATED TO payments of any kind made or given by any person or entity to any official, employee, representative or agent of the LAGO AGRIO COURT, including but not limited to compensation, bonuses, bribes, awards, honorariums, or gifts or exchanges of money, goods or services, regardless of form and regardless of whether such payments were ever actually offered or delivered.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have

previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

114. All DOCUMENTS RELATED TO the writing, drafting, editing, advance knowledge of, or revision of the LAGO AGRIO JUDGMENT by any of the LAGO AGRIO PLAINTIFF RELATED PARTIES that are COMMUNICATIONS with, or mention, PATTON BOGGS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent also objects that the Request assumes facts not in evidence—in particular, the Request presumes inappropriate collaboration between the “Lago Agrio Plaintiff Related Parties”, Patton Boggs, and the Lago Agrio Court. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called “RELATED PARTIES.” Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

115. All DOCUMENTS RELATED TO the writing, drafting, creating, advance knowledge, or revision of the ELAW AMICUS BRIEF.

RESPONSE:

Respondent repeats and incorporates by reference his **GENERAL OBJECTIONS** in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

116. All DOCUMENTS RELATED TO the writing, drafting, creating, editing, advance knowledge or revision of Amicus Curiae Brief; 2006.7.21 CL 1070 fojas 116436-41 in connection with the LAGO AGRIO LITIGATION.

RESPONSE:

Respondent repeats and incorporates by reference his **GENERAL OBJECTIONS** in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of

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documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

117. All DOCUMENTS RELATED TO the CITED HEALTH REPORTS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

118. All DOCUMENTS RELATED TO the allocation or distribution of, division of, interest in, or responsibility for any proceeds, revenue, award, penalty, cost or expense RELATED TO the LAGO AGRIO LITIGATION, including DOCUMENTS RELATED TO any PERSON who has any interest in or shares in any distribution of any proceeds RELATED TO the LAGO AGRIO JUDGMENT.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

119. All DOCUMENTS RELATED TO Steven Donziger's allocation or distribution of any of the proceeds RELATED TO the LAGO AGRIO JUDGMENT including all COMMUNICATIONS RELATED TO the same.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the "RICO DEFENDANTS" and/or the so-called "CO-CONSPIRATORS." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United

States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

120. All DOCUMENTS RELATED TO the release, disposal, sale, transfer or gift whether through contract or otherwise of any interest in any of the proceeds from the LAGO AGRIO JUDGMENT to any individual or entity by any of the LAGO AGRIO PLAINTIFFS, any of the RICO DEFENDANTS or any of the CO-CONSPIRATORS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the "RICO DEFENDANTS" and/or the so-called "CO-CONSPIRATORS." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

121. All DOCUMENTS CONCERNING the concept of, necessity or desirability of, or the creation of any trust, account, or legal entity created or to be created for the purposes of holding, managing or administering any of the proceeds of the LAGO AGRIO LITIGATION, including but not limited to all DOCUMENTS CONCERNING the JUDGMENT TRUST discussed in the LAGO AGRIO JUDGMENT, and all COMMUNICATIONS with the LAGO AGRIO COURT CONCERNING the JUDGMENT TRUST.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

122. All DOCUMENTS RELATED TO COMMUNICATIONS with foreign governments in connection with any attempt to enforce the LAGO AGRIO JUDGMENT.

RESPONSE:

Respondent repeats and incorporates by reference his **GENERAL OBJECTIONS** in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request or Chevron's modified request:

All **COMMUNICATIONS** with foreign governments in connection with any attempt to enforce the **LAGO AGRIO JUDGMENT**.

123. All **DOCUMENTS RELATED TO** the constitution or makeup of the **LAGO AGRIO APPELLATE COURT** or **LAGO AGRIO APPELLATE PANEL** in connection with the **LAGO AGRIO LITIGATION**, including but not limited to the nomination, appointment, removal, dismissal, or recusal of Judge Wilfrido Enrique Erazo Araujo, Judge Luis Alberto Legña Zambrano, Judge Juan Carlos Encarnación Sanchez, Judge Cruz María Ávila Delgado, Judge Marco Antonio Yaguache Mora, Judge Milton David Rafael Toral Zevallos, and Judge Alejandro Kleber Orellana Pineda, including any "sorteos" (lotteries) and **COMMUNICATIONS** between the **LAGO AGRIO PLAINTIFF RELATED PARTIES** and the **ROE REGARDING** the same.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as argumentative. The Request also assumes facts not in evidence, for example, alleged communications between the so-called RELATED PARTIES and the ROE regarding the LAGO AGRIO APPELLATE proceedings. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

124. All DOCUMENTS RELATED TO any COMMUNICATIONS between the LAGO AGRIO PLAINTIFFS or LAGO AGRIO PLAINTIFF RELATED PARTIES, or any other representative, agent, or advocate for the LAGO AGRIO PLAINTIFFS, on the one hand, and any judge, official, or employee of the LAGO AGRIO APPELLATE COURT or LAGO AGRIO APPELLATE PANEL, or any judge, official, or employee of any other court in the ROE, on the other hand, RELATED TO the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his **GENERAL OBJECTIONS** in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as argumentative. The Request also assumes facts not in evidence, for example, alleged communications between the so-called **RELATED PARTIES** and the ROE regarding the **LAGO AGRIO APPELLATE** proceedings. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "**RELATED PARTIES**." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including **CHEVRON**, may have previously produced or received documents responsive to this Request in the course of the **CHEVRON LITIGATIONS** or the present action.

Respondents will not produce documents responsive to this request.

125. All DOCUMENTS RELATED TO Judge Milton David Toral Cevallos, Judge Luis Alberto Legña Zambrano, Judge Alejandro Kleber Orellana Pineda, Judge Juan Carlos Encarnación Sanchez, Judge Cruz María Ávila Delgado, Judge Wilfrido Enrique Erazo Araujo or Judge Marco Antonio Yaguache Mora in both their judicial and nonjudicial capacities.

RESPONSE:

Respondent repeats and incorporates by reference his **GENERAL OBJECTIONS** in full as if set forth herein. Respondent objects that this Request is overly broad and seeks

documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

126. All DOCUMENTS outside of the RECORD and provided by the LAGO AGRIO PLAINTIFF RELATED PARTIES which were used in any way by the LAGO AGRIO APPELLATE COURT or LAGO AGRIO APPELLATE PANEL.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects that the Request assumes facts not in evidence, namely, collaboration between the "Lago Agrio Plaintiff Related Parties" and the Lago Agrio Courts. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject

of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof.

Respondents will not produce documents responsive to this request.

127. All DOCUMENTS sufficient to identify any DOCUMENTS provided to, filed with, or otherwise transmitted to the LAGO AGRIO APPELLATE COURT or LAGO AGRIO APPELLATE PANEL by or on behalf of the LAGO AGRIO PLAINTIFFS, or by any of the LAGO AGRIO PLAINTIFF RELATED PARTIES in connection with the LAGO AGRIO LITIGATION that are not incorporated into the RECORD.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that the Request assumes facts not in evidence, namely, collaboration between the “Lago Agrio Plaintiff Related Parties” and the Lago Agrio Courts. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called “RELATED PARTIES.” Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

128. All DOCUMENTS RELATED TO the DRAFT SECOND INSTANCE SENTENCIA including COMMUNICATIONS with the ROE and/or counsel for the ROE

including Winston & Strawn LLP RELATED TO the DRAFT SECOND INSTANCE SENTENCIA.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of the Republic of Ecuador, or its divisions, ministries, agencies, individual officers, or civil servants. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

129. All DOCUMENTS RELATED TO the actual or potential involvement of PATTON BOGGS in the PREPARATION of any brief, motion, or pleading in connection with the LAGO AGRIO LITIGATION or the appeal of the LAGO AGRIO JUDGMENT.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client

privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

130. All DOCUMENTS RELATED TO COMMUNICATIONS and/or meetings with CHEVRON officers, Board of Directors, shareholders or institutional investors REGARDING CHEVRON or the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

131. ALL DOCUMENTS RELATED TO COMMUNICATIONS with stock market analysts, energy industry analysts, energy industry journalists, or other media professionals RELATED TO CABRERA, alleged remediation costs or remediation damages in the Oriente attributable to Chevron, the extent of alleged environmental harms in the Oriente attributable to Chevron, any alleged fraud in connection with the TEXPET REMEDIATION AND RELEASE, the supposed independence of the LAGO AGRIO PLAINTIFFs from the Ecuadorian Government, the supposed independence or integrity of the Ecuadorian judiciary in adjudicating the CHEVRON LITIGATIONS, the LAGO AGRIO JUDGMENT, the LAGO AGRIO APPELLATE DECISIONS, the LAGO AGRIO APPELLATE CLARIFICATION ORDER, enforcement of the LAGO AGRIO JUDGMENT and attachment of CHEVRON's assets.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for communications with stock market analysts, energy industry analysts, energy industry journalists, or other media professionals and produce any

responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search that are related to Chevron or the Chevron Litigations.

132. All DOCUMENTS RELATED TO the WORK of Graham Erion in connection with CHEVRON or the CHEVRON LITIGATIONS including but not limited to his memorandum REGARDING a securities strategy directed against CHEVRON and all COMMUNICATIONS RELATED TO this memorandum and strategy.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

133. All DOCUMENTS RELATED TO any protests, rallies, marches, demonstrations, grassroots events, and other forms of activism (as well as all DOCUMENTS RELATED TO the entities which have organized, promoted, financed or otherwise furthered these activities) in connection with CHEVRON or the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request because it inquires about, and ostensibly seeks to exert a chilling effect upon, activities constituting free-speech, free association, and free expression of political views on matters of public concern, as well as petitioning the government, all of which are activities that are universally enshrined as inviolate pillars of liberty and democracy, and were these actions undertaken in the United States, would be protected by the First Amendment and doctrines and principles related thereto. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

134. All DOCUMENTS RELATED TO any COMMUNICATIONS between any of the LAGO AGRIO PLAINTIFF RELATED PARTIES, on the one hand, and any non-governmental organization (“NGO”) or its employees, on the other hand, REGARDING CHEVRON or the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called “RELATED PARTIES.” Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this

Request because it inquires about, and ostensibly seeks to exert a chilling effect upon, activities constituting free-speech, free association, and free expression of political views on matters of public concern, as well as petitioning the government, all of which are activities that are universally enshrined as inviolate pillars of liberty and democracy, and were these actions undertaken in the United States, would be protected by the First Amendment and doctrines and principles related thereto. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

135. All DOCUMENTS RELATED TO Joseph Berlinger, Michael Bonfiglio, @Radical Media or any PERSONS employed by them or working at their direction, CONCERNING the CHEVRON LITIGATIONS or the film *Crude: The Real Price of Oil*.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or

others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action. In particular, Respondent objects because Chevron has previously obtained most if not all existing documents pertaining to this Request through Chevron's 1782 actions, rendering this Request as duplicative and harassing.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

136. All DOCUMENTS RELATED TO Duncan MacLean, Lou Dematteis or Kelly Hearn CONCERNING the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

137. All DOCUMENTS RELATED TO any COMMUNICATIONS by any of the LAGO AGRIO PLAINTIFF RELATED PARTIES with any State Attorney General's Office or its employees REGARDING CHEVRON.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request because it inquires about, and ostensibly seeks to exert a chilling effect upon, activities constituting free-speech, free association, and free expression of political views on matters of public concern, as well as petitioning the government, all of which are activities that are universally enshrined as inviolate pillars of liberty and democracy, and were these actions undertaken in the United States, would be protected by the First Amendment and doctrines and principles related thereto. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will interpret this request as follows:

ALL DOCUMENTS RELATED TO any COMMUNICATIONS
with any State Attorney General's Office or its employees
REGARDING CHEVRON.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

138. All DOCUMENTS RELATED TO any COMMUNICATIONS by any of the
LAGO AGRIO PLAINTIFF RELATED PARTIES with any current or former elected or

appointed government official of the government of the United States or any state, territory, or possession thereof including any city or town, related to CABRERA, alleged remediation costs or remediation damages in the Oriente attributable to Chevron, the extent of alleged environmental harms in the Oriente attributable to Chevron, any alleged fraud in connection with the TEXPET REMEDIATION AND RELEASE, the supposed independence of the LAGO AGRIO PLAINTIFFs from the Ecuadorian Government, and the supposed independence or integrity of the Ecuadorian judiciary in adjudicating the CHEVRON LITIGATIONS. This includes but is not limited to any COMMUNICATIONS with the President, any ambassador, governor, attorney general, mayor, legislator, controller, or comptroller.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request because it inquires about, and ostensibly seeks to exert a chilling effect upon, activities constituting free-speech, free association, and free expression of political views on matters of public concern, as well as petitioning the government, all of which are activities that are universally enshrined as inviolate pillars of liberty and democracy, and were these actions undertaken in the United States, would be protected by the First Amendment and doctrines and principles related thereto. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or

others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will interpret this request as follows:

ALL DOCUMENTS RELATED TO any COMMUNICATIONS with any current or former elected or appointed government official of the government of the United States or any state, territory, or possession thereof including any city or town, related to CABRERA, alleged remediation costs or remediation damages in the Oriente attributable to Chevron, the extent of alleged environmental harms in the Oriente attributable to Chevron, any alleged fraud in connection with the TEXPET REMEDIATION AND RELEASE, the alleged independence of the LAGO AGRIO PLAINTIFFs from the Ecuadorian Government, and the alleged independence or integrity of the Ecuadorian judiciary in adjudicating the CHEVRON LITIGATIONS. This includes but is not limited to any COMMUNICATIONS with the President, any ambassador, governor, attorney general, mayor, legislator, controller, or comptroller.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

139. All DOCUMENTS RELATED TO any COMMUNICATION by any of the LAGO AGRIO PLAINTIFF RELATED PARTIES with any State's Office of the Comptroller or its employees including the Office of the New York State Comptroller, and the California State Controller's Office REGARDING CHEVRON.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other

Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request because it inquires about, and ostensibly seeks to exert a chilling effect upon, activities constituting free-speech, free association, and free expression of political views on matters of public concern, as well as petitioning the government, all of which are activities that are universally enshrined as inviolate pillars of liberty and democracy, and were these actions undertaken in the United States, would be protected by the First Amendment and doctrines and principles related thereto. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will interpret this request as follows:

ALL DOCUMENTS RELATED TO any COMMUNICATION with any State's Office of the Comptroller or its employees including the Office of the New York State Comptroller, and the California State Controller's Office REGARDING CHEVRON.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

140. **ALL DOCUMENTS RELATED TO any COMMUNICATIONS with Joshua Rizack by any of the LAGO AGRIO PLAINTIFF RELATED PARTIES.**

RESPONSE:

Respondent repeats and incorporates by reference his **GENERAL OBJECTIONS** in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request as overly

broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will interpret this request as follows:

All DOCUMENTS RELATED TO any COMMUNICATIONS
with Joshua Rizack RELATED to CHEVRON or the
CHEVRON LITIGATIONS.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

141. All DOCUMENTS RELATED TO the creation, development, or management of
"You Break It, You Fix It."

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination

or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

142. All DOCUMENTS RELATED TO contemplated and actual COMMUNICATIONS with CHEVRON EXPERT WITNESSES.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. In particular, the Request is overbroad and irrelevant because it calls for documents regarding “contemplated” communications. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

143. All DOCUMENTS RELATED TO any submission of letters, requests, complaints, or petitions on behalf of any of the LAGO AGRIO PLAINTIFF RELATED PARTIES to any international agency, including the International Commission of Jurists; the Inter-American Commission on Human Rights; the Organization of American States; Hina Jilani; or the United Nations and sub-agencies, commissions, and committees thereof.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request because it inquires about, and ostensibly seeks to exert a chilling effect upon, activities constituting free-speech, free association, and free expression of political views on matters of public concern, as well as petitioning the government, all of which are activities that are universally enshrined as inviolate pillars of liberty and democracy, and were these actions undertaken in the United States, would be protected by the First Amendment and doctrines and principles related thereto. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

144. All DOCUMENTS RELATED TO the factual support for the statements and assertions in the video entitled "Chevron's Amazon Chernobyl: How Chevron Poisoned Ecuador's Rainforest," available for viewing as of April 24, 2012 at <http://www.chevrontoxico.com>.

RESPONSE:

Chevron has withdrawn this request.

145. All DOCUMENTS RELATED TO any statement or testimony prepared or given to any committee within the United States Congress RELATED TO CHEVRON or the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as vague and overbroad, given that the Request as written could refer to any number of events "related to" or mentioning Chevron, including, by way of example, 2010 U.S. Congressional hearings regarding BP Gulf of Mexico spill. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects to this Request because it inquires about, and ostensibly seeks to exert a chilling effect upon, activities constituting free-speech, free association, and free expression of political views on matters of public concern, as well as petitioning the government, all of which are activities that are universally enshrined as inviolate pillars of liberty and democracy, and were these actions undertaken in the United States, would be protected by the First Amendment and doctrines and principles related thereto. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for testimony given to any committee within the United States Congress and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search that are related to Chevron or the Chevron Litigations.

146. All DOCUMENTS RELATED TO the drafting of material REGARDING the Latin American Law Institute, a/k/a the Center for Multinational Civil Justice, RELATED TO CHEVRON or the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

147. All DOCUMENTS RELATED TO the AMAZON DEFENSE FRONT, including but not limited to all DOCUMENTS RELATED TO the formation, structure, and management of the AMAZON DEFENSE FRONT, WORK RELATED TO the CHEVRON LITIGATIONS, any payments made by the AMAZON DEFENSE FRONT to any PERSON or entity providing any WORK or assistance RELATED TO the CHEVRON LITIGATIONS, and payments made to the AMAZON DEFENSE FRONT by any PERSON or entity for any WORK or assistance RELATED TO the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege,

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and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

148. All DOCUMENTS RELATED TO AMAZON WATCH, including but not limited to all DOCUMENTS RELATED TO the formation, structure, and management of AMAZON WATCH, WORK RELATED TO the CHEVRON LITIGATIONS, any payments made by AMAZON WATCH to any PERSON or entity providing any WORK or assistance RELATED TO the CHEVRON LITIGATIONS, and any payments made to AMAZON WATCH by any PERSON or entity for any WORK or assistance RELATED TO the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or

others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

149. ALL DOCUMENTS RELATED TO the RAINFOREST ACTION NETWORK, including but not limited to all DOCUMENTS RELATED TO the formation, structure, and management of the RAINFOREST ACTION NETWORK, WORK RELATED TO the CHEVRON LITIGATIONS, any payments made by the RAINFOREST ACTION NETWORK to any PERSON or entity providing any WORK or assistance RELATED TO the CHEVRON LITIGATIONS, and any payments made to the RAINFOREST ACTION NETWORK by any PERSON or entity for any WORK or assistance RELATED TO the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

150. All DOCUMENTS RELATED TO the WORK of Ermel Chávez RELATED TO the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

151. All DOCUMENTS RELATED TO the WORK of Donald Moncayo RELATED TO the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the

production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

152. All DOCUMENTS RELATED TO the ASSEMBLY OF THE AFFECTED, including but not limited to any DOCUMENTS RELATED TO the formation, structure, and management of the ASSEMBLY OF THE AFFECTED, WORK RELATED TO the CHEVRON LITIGATIONS, any payments made by the ASSEMBLY OF THE AFFECTED to any PERSON or entity providing any WORK or assistance RELATED TO the CHEVRON LITIGATIONS, and any payments made to the ASSEMBLY OF THE AFFECTED by any PERSON or entity for any WORK or assistance RELATED TO the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

153. All DOCUMENTS RELATED TO SELVA VIVA including but not limited to DOCUMENTS RELATED TO the solicitation and/or receipt of funding in connection with CHEVRON or the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of Selva Viva or its related persons or entities. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

154. All DOCUMENTS RELATED TO the identity or opinion of any person called an "expert" whether by name or reference whose opinion is contained or referenced in any press release issued by the FDA and/or AMAZON WATCH or any pleading, motion, or other document filed in the United States or Ecuador by any LAGO AGRIO PLAINTIFF RELATED PARTY REGARDING TEXPET's operations or practices in Ecuador.

RESPONSE:

*****Chevron has withdrawn this request.*****

155. All DOCUMENTS RELATED TO any fee arrangement between PATTON BOGGS and the LAGO AGRIO PLAINTIFFS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

156. All DOCUMENTS RELATED TO the scope of PATTON BOGGS's representation of the LAGO AGRIO PLAINTIFFS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents, materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-

Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

157. All DOCUMENTS RELATED TO any attempt or plan to enforce the LAGO AGRIO JUDGMENT or attach CHEVRON's assets anywhere in the world, including but not limited to COMMUNICATIONS with current or former government officials, analyses of CHEVRON'S assets, analyses of legal systems, and the retention of agents for the purpose of obtaining an interest in any CHEVRON asset.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the

right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request or Chevron's modified request:

All DOCUMENTS related to: (A) the writing of the INVICTUS MEMO, including drafts and COMMUNICATIONS regarding those drafts; and (B) COMMUNICATIONS with third parties that specifically refer to the INVICTUS MEMO, or which were accompanied by the INVICTUS MEMO.

158. All DOCUMENTS RELATED TO any attempt or plan for the LAGO AGRIO PLAINTIFF RELATED PARTIES to enforce the LAGO AGRIO JUDGMENT or attach CHEVRON's assets anywhere in the world that are COMMUNICATIONS with, or mention, PATTON BOGGS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received

documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

159. All DOCUMENTS RELATED TO COMMUNICATIONS with the MEDIA REGARDING any attempt or plan for the LAGO AGRIO PLAINTIFF RELATED PARTIES to enforce the LAGO AGRIO JUDGMENT or attach CHEVRON's assets anywhere in the world.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

160. All DOCUMENTS RELATED TO the seizure, attachment, obstruction, or prevention of movement of any property of CHEVRON.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request because it seeks documents,

materials, and/or information irrelevant to the extant claims, counterclaims, or defenses of the present action. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will not produce documents responsive to this request.

161. All DOCUMENTS RELATED TO COMMUNICATIONS among the LAGO AGRIO PLAINTIFF RELATED PARTIES REGARDING any plan on the part of any LAGO AGRIO PLAINTIFF RELATED PARTIES, COURT EXPERTS, or other deponents, to avoid providing responsive answers to questioning during depositions conducted in the CHEVRON LITIGATIONS, including but not limited to the 1782 ACTIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as argumentative. Respondent objects that the Request assumes facts not in evidence, in particular, that there was any plan to avoid responsive answers to deposition questions. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for documents responsive to modified requests (a)-(e) and (g)-(h) and

produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

162. All DOCUMENTS RELATED TO any tampering or influencing of any witness's testimony in any of the CHEVRON LITIGATIONS whether made or contemplated, including the discouragement of witnesses from appearing for their depositions.

RESPONSE:

*****Chevron has replaced this request with modified request number 161.*****

163. All DOCUMENTS RELATED TO any THREATS made by any of the LAGO AGRIO PLAINTIFF RELATED PARTIES to any individual who has testified, or been deposed during the LAGO AGRIO LITIGATION or the 1782 ACTIONS.

RESPONSE:

*****Chevron has replaced this request with modified request number 161.*****

164. All DOCUMENTS RELATED TO COMMUNICATIONS between and among the LAGO AGRIO PLAINTIFF RELATED PARTIES, whether or not including any third party, REGARDING efforts to delay CHEVRON's discovery efforts in any of the CHEVRON LITIGATIONS.

RESPONSE:

*****Chevron has replaced this request with modified request number 161.*****

165. All DOCUMENTS RELATED TO YOUR affirmative defenses and counterclaims asserted by YOU in response to the COMPLAINT.

RESPONSE:

*****Chevron has withdrawn this request.*****

166. All DOCUMENTS YOU intend to rely upon or introduce at trial of this matter.

RESPONSE:

*****Chevron has withdrawn this request.*****

167. All DOCUMENTS that support YOUR assertion that “Chevron threatened the Ecuadorian trial court judge with imprisonment if he did not rule in the company’s favor, ... orchestrated an illegal scheme to entrap the Ecuadorian judge, had improper ex parte contacts with Ecuadorian judges despite its sworn interrogatory answers to the contrary” or otherwise acted improperly toward the LAGO AGRIO COURT or other Ecuadorian judges. *See* Defendants Steven Donziger, the Law Offices of Steven R. Donziger, and Donziger & Associates, PLLS., Javier Piaguaje Payaguaje, and Hugo Gerardo Camacho Naranjo’s Opposition to Chevron Corporation’s Renewed Motion for an Order of Attachment and Other Relief at 30 (citations omitted).

RESPONSE:

*****Chevron has withdrawn this request.*****

168. All DOCUMENTS that support YOUR assertion that “Chevron deceived the Ecuadorian Court by arranging for inspection results that could not show contamination” through, among other things, “direct[ing] its experts to limit their testing to areas earlier determined to be ‘clean’ and ma[king] false representations to the Ecuadorian court about its testing protocol.” *See* Defendants Steven Donziger, the Law Offices of Steven R. Donziger, and Donziger & Associates, PLLS., Javier Piaguaje Payaguaje, and Hugo Gerardo Camacho Naranjo’s Opposition to Chevron Corporation’s Renewed Motion for an Order of Attachment and Other Relief at 30 (citations omitted).

RESPONSE:

*****Chevron has withdrawn this request.*****

169. All DOCUMENTS that support YOUR assertion that “Chevron used its ties to the Ecuadorian military to improperly postpone a judicial inspection site inspection that had drawn the interest of the public and international media.” *See* Defendants Steven Donziger, the Law Offices of Steven R. Donziger, and Donziger & Associates, PLLS., Javier Piaguaje Payaguaje, and Hugo Gerardo Camacho Naranjo’s Opposition to Chevron Corporation’s Renewed Motion for an Order of Attachment and Other Relief at 30 (citations omitted).

RESPONSE:

*****Chevron has withdrawn this request.*****

170. All DOCUMENTS RELATED TO Diego Borja.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called “RELATED PARTIES.” Respondent objects to this Request as overly broad because it incorrectly presumes Respondent’s possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

171. All DOCUMENTS RELATED TO Santiago Escobar.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

172. All DOCUMENTS RELATED TO Wayne Hansen.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that

the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

173. All DOCUMENTS RELATED TO AGREEMENTS, if any, between any of the LAGO AGRIO PLAINTIFF RELATED PARTIES, on the one hand, and Diego Borja, Juan Evangelista Núñez Sanabria, Carlos Patricio Garcia Ortega, Aulogelio Servio Tulio Ávila Cartagena, Rafael Juan Pablo Almeida Norat, Juan Pablo Novoa Velasco, Ruben Dario Miranda Martinez, Santiago Ernesto Escobar Escobar, Hartmut Bock, Juan Carlos Maldonado, or Pablo Villamar, on the other hand.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for agreements between the Lago Agrio Plaintiffs and the named individuals or discussions of such agreements and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

174. ALL DOCUMENTS RELATED TO COMMUNICATIONS between any of the LAGO AGRIO PLAINTIFF RELATED PARTIES on the one hand, and Diego Borja, Juan Evangelista Núñez Sanabria, Carlos Patricio Garcia Ortega, Aulogelio Servio Tulio Ávila Cartagena, Rafael Juan Pablo Almeida Norat, Juan Pablo Novoa Velasco, Ruben Dario Miranda Martinez, Santiago Ernesto Escobar Escobar, Hartmut Bock, Juan Carlos Maldonado, or Pablo Villamar (including their agents and any other person or entity acting on their behalf or for their benefit), on the other hand.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent also objects that the Request assumes facts not in evidence, namely, alleged communications between the mentioned parties. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search for communications between the Lago Agrio Plaintiffs and the named

individuals and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

175. If YOU contend that CHEVRON engaged in any ex parte COMMUNICATIONS with the LAGO AGRIO COURT including all judges, judicial officials, court employees or judicial bodies REGARDING the LAGO AGRIO LITIGATION, then all DOCUMENTS that support such a contention.

RESPONSE:

*****Chevron has withdrawn this request.*****

176. All DOCUMENTS and COMMUNICATIONS among the LAGO AGRIO PLAINTIFF RELATED PARTIES REGARDING the judicial inspection of the Guanta Station conducted on March 26, 2009.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will interpret this request as follows:

All DOCUMENTS and COMMUNICATIONS REGARDING the judicial inspection of the Guanta Station conducted on March 26, 2009.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

177. ALL DOCUMENTS RELATED TO any COMMUNICATION by any of the LAGO AGRIO PLAINTIFF RELATED PARTIES with any United States Government Agency or its employees including the Securities and Exchange Commission, the Department of Justice, and the Office of the United States Trade Representative RELATED TO CABRERA, alleged remediation costs or remediation damages in the Oriente attributable to Chevron, the extent of alleged environmental harms in the Oriente attributable to Chevron, any alleged fraud in connection with the TEXPET REMEDIATION AND RELEASE, the supposed independence of the LAPs from the Ecuadorian Government, the supposed independence or integrity of the Ecuadorian judiciary in adjudicating the CHEVRON LITIGATIONS, the LAGO AGRIO JUDGMENT, the LAGO AGRIO APPELLATE DECISION, the LAGO AGRIO APPELLATE CLARIFICATION ORDER, enforcement of the LAGO AGRIO JUDGMENT and attachment of CHEVRON's assets.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request because it inquires about, and ostensibly seeks to exert a chilling effect upon, activities constituting free-speech, free association, and free expression of political views on matters of public concern, as well as petitioning the government, all of which are activities that are universally enshrined as inviolate pillars of liberty and democracy, and were these actions undertaken in the United States, would be protected by the First Amendment and doctrines and principles related thereto. Respondent objects to this Request as argumentative. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or

limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof. Respondent objects to this Request because that Respondent or others, including CHEVRON, may have previously produced or received documents responsive to this Request in the course of the CHEVRON LITIGATIONS or the present action.

Respondents will interpret this request as follows:

All DOCUMENTS RELATED TO any COMMUNICATION with any United States Government Agency or its employees including the Securities and Exchange Commission, the Department of Justice, and the Office of the United States Trade Representative RELATED TO CHEVRON or the CHEVRON LITIGATIONS.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

178. All DOCUMENTS RELATED TO the WORK of Karen Hinton on behalf of any of the LAGO AGRIO PLAINTIFF RELATED PARTIES RELATING in any way to the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the other Lago Agrio Plaintiffs or their so-called "RELATED PARTIES." Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any

tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof.

Respondents will interpret this request as follows:

ALL DOCUMENTS RELATED TO the WORK of Karen Hinton RELATING in any way to the CHEVRON LITIGATIONS.

Subject to and without waiver of the foregoing objections, Respondents will conduct a reasonable search in response to this modified request and produce any responsive, non-privileged documents created on or before February 14, 2011, that are located as a result of such search.

179. All DOCUMENTS RELATED TO the lobbying WORK performed by Ben Barnes and the Ben Barnes Group, Christopher Lehane, Kerry Kennedy, Karen Hinton, Steven Donziger or anyone from PATTON BOGGS RELATED TO the CHEVRON LITIGATIONS.

RESPONSE:

Respondent repeats and incorporates by reference his GENERAL OBJECTIONS in full as if set forth herein. Respondent objects that this Request is overly broad and seeks documents or information irrelevant to the extant claims, counter-claims, or defenses of the present action. Respondent objects to this Request because it inquires about, and ostensibly seeks to exert a chilling effect upon, activities constituting free-speech, free association, and free expression of political views on matters of public concern, as well as petitioning the government, all of which are activities that are universally enshrined as inviolate pillars of liberty and democracy, and were these actions undertaken in the United States, would be protected by the First Amendment and doctrines and principles related thereto. Respondent objects to this Request as overly broad because it incorrectly presumes Respondent's possession, custody, control, or knowledge of any documents within the possession, custody, or control of any of the non-Respondent individuals, entities, or sources mentioned in the Request. Respondent objects because this Request calls for the production of documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, the common-interest privilege, and/or any other privilege, immunity, confidentiality, or limitation on discovery pursuant to the constitutions, laws, or judicial orders of any tribunal of either the United States or the Republic of Ecuador. Respondent objects that the Request may seek the production of documents and materials that may be the subject of a non-disclosure or confidentiality agreement with a third party. Respondent further objects because the Request calls for disclosure of materials protected by one or more privileges for which the right of waiver is

not held by Respondent but by another, legally-distinct individual, entity, or combination or grouping thereof.

Respondents will not produce documents responsive to this request.

180. All DOCUMENTS RELATED TO the contents of the INVICTUS MEMO including any DOCUMENTS that are COMMUNICATIONS with, or mention, PATTON BOGGS.

RESPONSE:

*****Chevron has withdrawn this request in favor of modified request number 157.*****

181. All DOCUMENTS RELATED TO any attempt or plan for the LAGO AGRIO PLAINTIFF RELATED PARTIES to enforce the LAGO AGRIO JUDGMENT or attach CHEVRON's assets anywhere in the world that are COMMUNICATIONS with, or mention, PATTON BOGGS.

RESPONSE:

*****Chevron has withdrawn this request in favor of modified request number 157.*****

DATED: November 12, 2012
Houston, Texas

Respectfully submitted,

SMYSER KAPLAN & VESELKA, L.L.P.

By: /s/ Craig Smyser
Craig Smyser (*pro hac vice*)
Larry R. Veselka (*pro hac vice*)
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ATTORNEYS FOR DEFENDANTS
JAVIER PIAGUAJE PAYAGUAJE
and HUGO GERARDO CAMACHO
NARANJO

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2012, I caused the foregoing Javier Piaguaje Payaguaje's Objections and Responses to Plaintiff Chevron Corporation's First Set of Requests for Production of Documents to be served upon the following via email and US Mail.

Christopher Joralemon
Randy M. Mastro
GIBSON, DUNN & CRUTCHER, LLP
200 Park Avenue
New York, NY 10166-0193

/s/ Craig Smyser
Craig Smyser

EXHIBIT 3

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C9RAACHE1 Argument
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

CHEVRON CORPORATION,

Plaintiff,

v.

11 Civ. 691 (LAK)

STEVEN DONZIGER, et al.,

Defendants.

-----x

September 27, 2012
2:15 p.m.

Before:

HON. LEWIS A. KAPLAN

District Judge

APPEARANCES

GIBSON DUNN & CRUTCHER
Attorneys for Plaintiff

BY: RANDY MASTRO
LAUREN ELLIOT
PETER SELEY
ANNE CHAMPION
BILL W. THOMSON
RICHARD MARK

LEADER & BERKON
Attorneys for Non-Party
Patton Boggs LLP

BY: JAMES K. LEADER
S. ALYSSA YOUNG

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C9RAACHE1 Argument
APPEARANCES CONTINUED

- also present -

PATTON BOGGS LLP
Non-Party Respondent
BY: ERIC WESTENBERGER
EDWARD YENNOCK
JONATHAN PECK

THE COURT: Good afternoon, folks.
(Case called)

MR. MASTRO: Randy Mastro, for plaintiff Chevron with
Gibson, Dunn & Crutcher. My colleagues Lauren Elliot, Pete

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C9RAACHE1

Argument

responses and objections. So which page is that? It may not actually be quoted. I don't think I have the full subpoena. Does somebody have a copy of that?

(Pause)

MR. MASTRO: Your Honor, I am happy to hand one up to the Court.

THE COURT: All right. Someone has taken care of that.

(Pause)

MS. YOUNG: Paragraph 61, I believe on page 24.

THE COURT: What I have is now the subpoena. Where should I look in the subpoena?

MS. YOUNG: Page 13, paragraph 48.

(Pause)

THE COURT: So in order to comply with this as I modified in thus far what you are going to have to do is do searches which contain for documents containing something about the Lago Agrio court, something to pick up that piece and you are going to have to seek that in conjunction with any of the 40 some odd Lago Agrio plaintiffs and/or in conjunction with any of the people included in paragraph 48, right?

MS. YOUNG: Correct. Each of the groups of people in number 48 also include and sometimes a dozen or more individuals.

THE COURT: Yes, I do understand that.

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C9RAACHE1

Argument

Mr. Mastro, seems a little onerous, don't you think?

MR. MASTRO: Well, your Honor, one of things that goes to the heart of the conspiracy here is the ways in which the court and court personnel were improperly influenced. And they know exactly who has worked for them. Patton Boggs is part of the team, so we're simply asking for people they know themselves have worked for them in addition to their clients. So while there are a lot of people who have worked for them, we're simply trying to get at those been communicating with the court or court personnel. And they know exactly who they are, so they have said this burden by us not identifying who we think has worked for them.

THE COURT: I am trying to deal with this in very practical terms. I know that. And if they said to you, okay, here are the documents involving communications, assuming there were any, between anybody on their side and anybody who worked for the court you would say, well, how do I know that's the universe, right?

MR. MASTRO: That's true, your Honor.

THE COURT: And so you've tried to ask a question here that describes the universe. The practical effect of which is to say to them, okay, and I'll be guilty of hyperbole myself just to illustrate the point, take the New York City telephone directory and do a computer search on every name in it to see if it comes with up the name of anybody who worked for the Lago

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C9RAACHE1

Argument

Agrio court, right? I mean that is the practical effect of the
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12 guidance -- that will allow us --

13 THE COURT: Believe me, I am not going to if I can
14 avoid it, sit down and talk about search terms.

15 All right. At least for purposes of this question,
16 this Request 26, the definition of Lago Agrio related parties
17 is limited to the RICO defendants, co-conspirators, the front,
18 the assembly of the effected, the Lago Agrio plaintiff law
19 firms, the Lago Agrio plaintiff consultants, Lago Agrio
20 plaintiff lobbyists and Lago Agrio plaintiff's public relations
21 consultants. As modified, the objection is overruled or the
22 objection is overruled to the request as modified.

23 whoever lent me the subpoena, it's right here. You
24 are welcome to take it now or I may need to again, whatever you
25 like.

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C9RAACHE1 Argument

1 Number 27?

2 MS. YOUNG: Number 27 seeks all documents related to
3 various judges. Now, we just talked about Request 26 which
4 would encompass communications with court or court officials
5 which would presumably include all of these judges.

6 THE COURT: This is duplicative, isn't it now,
7 Mr. Mastro?

8 MR. MASTRO: It would be duplicative, your Honor, if
9 the responding to communications with them in their judicial or
10 nonjudicial capacities which I assume in response to 26 they
11 would have to do.

12 THE COURT: Okay. So, it's sustained on the ground
13 that it's duplicative.

14 28?

15 MS. YOUNG: Your Honor, Patton Boggs seeks --

16 MR. MASTRO: Your Honor, I am sorry. Just one -- my
17 colleague's pointing something out to me. This is not just
18 about communications with them. It also has to do with
19 documents relating to them. So it does actually cover whatever
20 deliberations they had about attempting to communicate with
21 them or maybe ghostwriting something for them. It didn't
22 involve a direct communication with those judges. So my
23 colleagues have clarified for me that the request actually
24 reaches potentially that different segment of documents, ones
25 that are relating to these judges, not necessarily

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C9RAACHE1 Argument
communicating directly with them.

2 MS. YOUNG: Again, the request is not tailored at all
3 to Chevron's allegations in this lawsuit. For example, Patton
4 Boggs has done a search of its top 20 custodians using the
5 judges' names. It gets 10,600 relating to Zambron. It's also
6 almost ten thousand relating to Nunez. Judge Nunez was a judge
7 that presided over the Ecuadorian trial proceedings for some
8 period of time. He was secretly recorded with pen camera by
9 individuals with connections to him. And we have reason to
10 believe or Patton Boggs has uncovered that Chevron had
11 substantial ties with these individuals and, actually, set up
12 the encounter. So those are documents, potentially, ten
13 thousand of them that really don't have to do with Chevron's
14 allegations at all. But Patton Boggs would be required to sift
15 through all of that information just to respond to this request
16 that's not tailored to anything.

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THE COURT: Going back to 27. I am going to modify it to insert after the phrase "all documents related to", the phrase "communications actual or proposed".

MR. MASTRO: Thank you, your Honor.

THE COURT: And as modified, the objection is overruled.

Okay. 28?

MS. YOUNG: Your Honor, Patton Boggs proposes a date limitation on this particular request which is the day of SOUTHERN DISTRICT REPORTERS, P.C.

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C9RAACHE1

Argument

judgment, February 14, 2011. I just want to be clear that Patton Boggs had represented in filings before this Court that it had no knowledge that any official document prepared by the Court or any official was ever written, drafted or revised by anyone other than the Court. However, Patton Boggs has, certainly, discussed, analyzed and responded to Chevron's allegations of that type. So we'd like to avoid having to review analog all of Patton Boggs's work relating to its analysis of the allegations versus any actual evidence of the allegations. And I think a date limitation would cover that.

MR. MASTRO: May I?

THE COURT: Yes.

MR. MASTRO: Your Honor, this really does, this request and the ones that will follow really go to the heart of what's been the critical issue in the case proving the ghostwriting of the judgment and, potentially, ghostwriting of subsequent modifications, clarifications, appellate decision. And your Honor has already reviewed just some of the evidence in this regard and encouraged us to find more evidence of exactly what ghostwrote.

THE COURT: Well, that's not the right way to put it do you think, Mr. Mastro?

MR. MASTRO: I don't mean, your Honor -- that we have to find more evidence of this, your Honor, is what I am saying.

THE COURT: Just like any litigant who wants to win SOUTHERN DISTRICT REPORTERS, P.C.

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C9RAACHE1

Argument

his case has to find evidence to support it.

MR. MASTRO: Exactly, your Honor. So that's all I meant to say, your Honor, was that the burden is on us to, actually, tie the ghostwriting to the plaintiffs. And at this point, your Honor, we are seeking to do exactly that.

Now, your Honor, on this particular point it is not only -- so we had proposed no date limitation for the obvious reason that there was -- we believed that there will be evidence about ghostwriting by the plaintiff's team and those working with the plaintiff's team leading up to the judgment being entered. We believe there will be evidence about ghostwriting, working with the trial court and the appellate court. And we also believe that there will be probative evidence as we think this is crime fraud about how Patton Boggs and others communicated about the evidence of ghostwriting that was emerging.

For example, your Honor, Patton Boggs made a representation to the Second Circuit about the trust issue and an e-mail that Pablo Fajardo had written quoting a case on trust. And, of course, they wanted to create a trust to move the proceeds offshore.

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proceedings, the modifying language your Honor used on No. 27 relating to the trial court judges, we will propose that that be done on this request, as well, to narrow it.

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C9RLCHE2

Argument

THE COURT: Well, and another thought has just occurred to me with respect to both this and 27. What we did on 27 was all documents related to communications, actual or proposed, with these various judges.

Should there not be a limitation to relating to the Lago Agrio litigation?

MR. MASTRO: Absolutely, your Honor, and that's what I understood your Honor to be saying on 27. So we are fine with that on both 27 and 34.

MS. YOUNG: I want to be clear that this would exclude routine filings with the court, that could be a communication with the court.

THE COURT: If you can come back and show me how you could do a search that would automatically and objectively exclude those without excluding anything else, I'm all ears. But if you're telling me that you're going to do the search anyway, you're going to kick up both kinds of documents, but what you want to do is not have to produce a subset of what you've already searched for and incurred the expense of looking for, it's a different matter, at least I think it is.

So which are you telling me?

MS. YOUNG: We'll try to propose a way to exclude court filings while getting at the documents related to these particular judges.

THE COURT: All right. I'll be happy to listen to
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C9RLCHE2

Argument

that. Otherwise, as modified, objection overruled.

Thirty-five.

MR. MASTRO: Your Honor, this is what I was referring to earlier, the notion of a trust. It turned out to be integral to the scheme and the creation of a trust to move it offshore.

THE COURT: How?

MR. MASTRO: Your Honor, it's in Invictus and it's in the internal exchanges.

THE COURT: But how is it applicable? The scheme is to get money out of Chevron allegedly improperly.

MR. MASTRO: Yes, your Honor.

THE COURT: That all the people you suspect of perpetrating the alleged scheme hope to get rich by it is a given.

Now, the mechanism of how they move the money around, I have a little more trouble with the relevance of that here.

MR. MASTRO: Because, your Honor, I think it goes to, and if this were a criminal case -- and these are overlapping civil concepts -- it goes to consciousness of guilt and how they divide up the spoils, your Honor. A conception of Patton Boggs in particular that supposedly representing the indigenous people in Ecuador, we should set up a trust to get the money out of Ecuador so that we -- their words, your Honor -- we can divide up the money outside of Ecuadorian law where we can do

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MR. MASTRO: Yes, your Honor. We believe, your Honor, we believe that seeking to enforce a judgment that a party or a lawyer knows or should know was procured by fraud is itself an act of fraud. The Hazel Atlas case in the Supreme Court we think basically stands for this proposition. That's where a law firm ginned up the expert report or independent report that was used to support a judgment, then sought to enforce the judgment; and the judgment was vacated on that basis.

Here we have Patton Boggs orchestrating the enforcement strategy around the world of a judgment that they know or should have known, must have known was procured by fraud.

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C9RLCHE2

Argument

The reason I say that is they come on to the case at a time when parties are talking about the fraud that occurred there, they orchestrate trying to get the piece of paper as a judgment anyway knowing that, and they are involved in the process of drafting the final brief, the alegato, where they take out of that internal work product on a fusion theory, that's the only way Chevron could be held liable for Texaco's actions, this theory they try to convince the court should go. But they actually took that memo out of what they submitted, they drafted for the court. And then, and then that work product nevertheless shows up sometimes 90, a hundred words at a time verbatim in the final judgment.

Patton Boggs must realize that there was some kind of transmission of the LAPs' private internal communications, including the fusion memo and the Fajardo email, that got into the court's hands that show up verbatim in the judgment because they edited things out to not give the court or make part of the official record that nevertheless show up almost word for word, including that fusion memo.

So, your Honor, when they go around the world enforcing -- and Invictus says it all. Invictus says they're going to seek to enforce to effectuate the extortion. So it goes not because they think they'll necessarily succeed. So those enforcement efforts, we think, your Honor, go to the heart of the extortion and fraud claims.

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C9RLCHE2

Argument

THE COURT: Objection sustained.

Forty.

MR. MASTRO: Your Honor, if you'd like to hear --

THE COURT: Let me hear from the other side.

MR. MASTRO: Certainly, your Honor.

MS. YOUNG: Thank you, your Honor.

Request No. 40 seeks documents relating to communications with government, various government officials. To the extent that plaintiff related parties include Patton Boggs, I just want to make it clear on the record that Patton Boggs is asserting a sovereign immunity objection to this.

THE COURT: Sovereign immunity objection.

MS. YOUNG: Perhaps --

THE COURT: Patton Boggs is now a state under the Foreign Sovereign Immunities Act?

MS. YOUNG: On behalf of its client, which is the Embassy of Ecuador, I want to go into this in a little more detail than I did yesterday. Patton Boggs represents the

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19 embassy.

20 THE COURT: Yesterday what you said is that you
21 withdrew the objection because now that you understood that it
22 was an unrelated representation and there wouldn't be any
23 documents that are related to the Lago Agrio litigation
24 relating to this independent representation, you had no
25 problem.

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C9RLCHE2

Argument

1 MS. YOUNG: Your Honor, the reason I want to clarify
2 is because I had subsequent discussions with my client, and I
3 now have a better understanding of the representation and what
4 it involved and how it may relate to Chevron.

5 Patton Boggs has advised the ambassador of Ecuador on
6 the renewal of what's called the Andean Trade Preference Act.
7 It's basically a free trade arrangement with Ecuador that gets
8 renewed every so often.

9 what I didn't know yesterday that I know today is that
10 Chevron has repeatedly opposed the renewal of that treaty, and
11 Chevron itself has communicated with the U.S. government and
12 potentially other governments in opposition to that renewal.

13 To the extent that Patton Boggs has represented the
14 embassy in connection with the renewal of that legislation, it
15 may have had communication with U.S. officials or other
16 officials relating to Chevron because Chevron has opposed it.

17 I'm sorry I wasn't aware of that yesterday, but now
18 that I'm aware of the full scope of Patton Boggs'
19 representation, I want to make it clear on the record that the
20 ambassador of Ecuador has requested us to assert foreign
21 sovereign immunity over this request and request 13.

22 THE COURT: Now, what in the Foreign Sovereign
23 Immunities Act says that a person in the United States, lawyer
24 or otherwise, has sovereign immunity to resist the process of
25 the United States courts?

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C9RLCHE2

Argument

1 MS. YOUNG: It's the Republic of Ecuador that has the
2 immunity, your Honor.

3 THE COURT: Yeah, but nobody is asking for anything
4 from them.

5 MS. YOUNG: No, but the subpoena is asking arguably
6 for documents that belong to the Republic of Ecuador that are
7 related to the representation that Patton Boggs has done.

8 THE COURT: Are you asking for any documents that
9 belong to the Republic of Ecuador, Mr. Mastro?

10 MR. MASTRO: I don't believe we're asking for
11 documents that belong to the Republic of Ecuador, your Honor.

12 THE COURT: Okay. So that's that, right?

13 MS. YOUNG: No, your Honor. They're seeking documents
14 that Patton Boggs has that relate to Chevron that also relate
15 to Patton Boggs' representation. If Patton Boggs created work
16 product in the course of that representation, it belongs to the
17 Republic of Ecuador.

18 THE COURT: So we are talking about documents that
19 belong to the Republic of Ecuador.

20 MS. YOUNG: That's what I'm saying.

21 THE COURT: And he's not asking for them, right?

22 MR. MASTRO: I'm not asking for the Republic of
23 Ecuador's documents. To the extent they've got documents that

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15 agreed to limit the request to "all drafts of and source
 16 material used in connection with the drafting of the Invictus
 17 memo and all documents that mention the Invictus memo itself."
 18 THE COURT: I see.
 19 MR. MASTRO: We're trying to get exactly what that was
 20 about, what the mental state was there, and whether it shows
 21 basically an extortion scheme.
 22 THE COURT: Well, as limited, what about it,
 23 Mr. Leader? I understood your first point. You were all the
 24 way home until I read what they limited it to.
 25 MR. LEADER: Well, the drafts and the source materials
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C9RLCHE2

Argument

1 go into what essentially is a treatise on international
 2 enforcement. We shouldn't have to provide that to them. And I
 3 dare say to obtain that information won't add anything to their
 4 case, will be highly burdensome and, frankly, I don't know that
 5 we can actually reconstruct that. They have the memo, they can
 6 make every use that Chevron has talked about by having that
 7 memo.
 8 THE COURT: Objection sustained.
 9 I don't mean to cut you off, but Judge Rifkind told me
 10 a long time ago that when a judge goes your way, it's time to
 11 sit down.
 12 MR. LEADER: I learned that lesson as well, your
 13 Honor, and I'm sitting.
 14 THE COURT: No. 55. So, Ms. Young, 55, 56, and 57 and
 15 58, you're saying those are all too burdensome because you
 16 don't have any such documents. Right?
 17 MS. YOUNG: We don't have any such documents, your
 18 Honor, as drafted.
 19 THE COURT: Okay. So objection is overruled as to all
 20 of them. And if in fact you don't have them, you have no
 21 problem. And if in fact you do, you have a different kind of
 22 problem.
 23 I didn't mean to suggest that you do, only that it
 24 would be a different kind of a problem if you did.
 25 Mr. Mastro.
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C9RLCHE2

Argument

1 MR. MASTRO: Your Honor, very briefly because --
 2 THE COURT: I thought we were done almost.
 3 MR. MASTRO: We're almost done. And we're going to
 4 meet on that series of ten requests that your Honor asked us to
 5 meet about that go to the pressure campaign.
 6 I just wanted to put on the record that as we told the
 7 other side we would do, for request No. 54, about NGOs in the
 8 pressure campaign, we agreed to give them a definition. The
 9 definition we've given for NGOs comes from the USAID's website.
 10 THE COURT: Talk to them.
 11 MR. MASTRO: I understand.
 12 THE COURT: I don't need to hear this.
 13 MR. MASTRO: No problem, your Honor, and then we'll
 14 work the rest out.
 15 THE COURT: Everything is above my pay grade now.
 16 MR. MASTRO: No problem, your Honor. Thank you very
 17 much, your Honor, for all your time.
 18 THE COURT: We're not quite done, but, Mr. Leader.
 19 MR. LEADER: Your Honor, I would just like to also put