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September 16, 2011

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VIA ECF

Ms. Catherine O'Hagan Wolfe
Clerk of Court
U.S. Court of Appeals for the Second Circuit
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *Chevron Corp. v. Donziger, et al.*, Nos. 11-1150-cv-(L), 11-1264-cv(CON), 11-2259-op(CON)

Dear Judges Pooler, Wesley, and Lynch:

At oral argument of the above-captioned matter this morning, the Court asked if the Ecuadorian Plaintiffs would stipulate not to engage in pre-judgment attachment or enforcement of Chevron Corporation's assets anywhere in the world prior to the entry of a ruling on the *de novo* appeal currently pending before the Ecuadorian intermediate court, the Provincial Court of Sucumbíos. While we represent only Messrs. Hugo Gerardo Camacho Naranjo and Javier Piaguaje Payaguaje in the current appeal, we have communicated with Pablo Fajardo Mendoza, lead counsel for the all of the Ecuadorian Plaintiffs in the Lago Agrio litigation to determine his willingness to so stipulate. Mr. Fajardo holds the power of attorney to act on behalf of the Ecuadorian Plaintiffs in connection with the Lago Agro litigation and this litigation. As advised by Mr. Fajardo, I can report that the Ecuadorian Plaintiffs will stipulate not to commence pre-judgment attachment or enforcement proceedings anywhere in the world prior to entry of a ruling by the Provincial Court of Sucumbíos on the *de novo* appeal currently pending before that court in Ecuador.



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I trust that this representation adequately responds to the Court's request. If the Court has any questions, we will be happy to respond immediately. We appreciate the Court's consideration in this regard.

Sincerely,
s/ James E. Tyrrell, Jr.
James E. Tyrrell, Jr.

cc: All counsel of record (via ECF)