

Barnert, Christopher

From: Kovár, Jeffrey D
Sent: Tuesday, September 10, 2013 8:31 AM
To: Barnert, Christopher
Subject: FW: Discovery in Chevron-Ecuador RICO case

RELEASED IN FULL

From: Teel, Wynne M
Sent: Sunday, February 03, 2013 12:48 PM
To: Whitaker, Kevin M
Cc: Kovar, Jeffrey D; Bischoff, James L
Subject: RE: Discovery in Chevron-Ecuador RICO case

Kevin,
Thank you for copying me. I have forwarded this to Jeff Kovar and Jay Bischoff, as they are following and advising due to WHA's interest.
Best,
Wynne

From: Whitaker, Kevin M
Sent: Friday, February 01, 2013 1:28 PM
To: Henshaw, Simon; Brown, Jennifer M; Laidlaw, Philip G; Namm, Adam E (Quito); Zuniga-Brown, Timothy P (Quito); Mozdierz, William J (Quito); Feeley, John D; Allison, Robert S; Teel, Wynne M
Subject: Discovery in Chevron-Ecuador RICO case

Bill Irwin of Chevron called. Chevron has a private cause of action RICO case against Ecuador, alleging a criminal conspiracy in the \$40 bn judgment against Chevron over the oil pits in northern Ecuador.

As part of mutual discovery, Chevron has had to turn over something like 200k ppgs of technical documentation. Ecuador's attorneys have also subpoenaed Chevron's government affairs documentation related to the case. This will show a broad Chevron effort to tell its story to various stakeholders, including the media, the Hill, and the executive, including State. To the extent we've written Irwin or he has memorialized our conversations, those documents presumably will be turned over to Ecuador's attorneys. He says the whole haul for govt affairs documentation is about 27k ppgs.

REVIEW AUTHORITY: Alan Flanigan, Senior Reviewer

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