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November 21, 2019

## VIA EMAIL

Ms. Celeste Estefania Salinas Quero Legal Counsel International Centre for the Settlement of Investment Disputes 1818 H Street, N.W. MSN J2-200 Washington, D.C. 20433

Re: <u>UNCITRAL Arbitration</u>: *Alicia Grace et al. v. United Mexican States* 

Dear Ms. Salinas Quero:

We write to inform the Tribunal that Claimants have discovered two inadvertent errors in their Statement of Claim filed on October 7, 2019. Those errors regard the citizenship status of Mr. Carlos Williamson-Nasi ("Mr. Williamson"), one of the individual Claimants in the above captioned proceeding. Claimants hereby provide correct information and amend their Statement of Claim pursuant to Article 20 of the UNCITRAL Rules.

In paragraph 332 of the Statement of Claim, Claimants stated that "Mr. Williamson obtained his U.S. citizenship by naturalization in 2014." However, Mr. Williamson actually became a U.S. citizen by naturalization in 1989. We attach a copy of Mr. Williamson's U.S. naturalization certificate to this letter as Exhibit C-233. In addition, in the past week, it has come to the attention of Claimants' counsel that in addition to his Colombian and U.S. citizenships, Mr. Williamson also holds Mexican citizenship. Mr. Williamson obtained his Mexican citizenship by naturalization on November 19, 2002. We attach a copy of Mr. Williamson's Mexican naturalization certificate to this letter as Exhibit C-234. Although this information was not included in the Statement of Claim, Mr. Williamson's Mexican nationality is immaterial to his ability to pursue this claim under the NAFTA, as already argued in paragraphs 336-342.

By this letter Claimants seek to correct the above-referenced errors contained in their Statement of Claim. Claimants also submit new factual exhibits numbered **C-233** and **C-234** in support of the corrected information and in accordance with Section 18.5 of Procedural Order No. 1.

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Sincerely,

Juan P. Morillo David M. Orta Philippe Pinsolle

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Counsel for the Claimants

cc: Members of the Tribunal

Mr. Orlando Pérez Gárate

Ms. Cindy Rayo Zapata

Mr. Alan Bonfiglio

Ms. Blanca Martinez

Mr. Francisco Pacheco