

## PERENCO ECUADOR LTD. v. REPUBLIC OF ECUADOR

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**District Of Columbia District Court**

**Judge:** Jia M Cobb  
**Case #:** 1:19-cv-02943  
**Nature of Suit:** 890 Other Statutes - Other Statutory Actions  
**Cause:** 27:185 Enforcement of Arbitration Award  
**Case Filed:** Oct 01, 2019

[Docket](#)[Parties \(2\)](#)

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Last checked: **Sunday Mar 29, 2020 4:42 AM EDT**

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**Petitioner**

PERENCO ECUADOR LTD.

**Represented By**

Ada Fernandez Johnson  
*Debevoise & Plimpton LLP*  
[contact info](#)

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**Respondent**

REPUBLIC OF ECUADOR

**Represented By**

Alexandre de Gramont  
*Dechert LLP*  
[contact info](#)

Dennis H. Hranitzky  
*Dechert, LLP*  
[contact info](#)

Docket last updated: 10 hours ago

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**Tuesday, February 22, 2022**

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49  **respm** **Supplemental Memorandum** **Tue 02/22 9:53 PM**

REPLY re Order on Motion for Briefing Schedule,,,,,, Order on Motion for Hearing,,,,,, Order on Motion for Leave to File,,,,,, Set/Reset Deadlines,,,,, /Petitioners Reply Brief Regarding the November 8, 2021 Decision of the Ecuadorian National Court of Justice filed by PERENCO ECUADOR LTD..(Friedman, Mark) Modified on 2/23/2022 to correct docket event/text (zjf).

Att: 1  Exhibit A - Third Expert Report of Professor Carmen Simone Lasso

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## Tuesday, February 15, 2022

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48  **13 pgs** **respm** **Response to (non-motion) Document** **Tue 02/15 9:16 PM**

RESPONSE re47 Supplemental Memorandum,, Republic of Ecuador's Response regarding the November 8, 2021 Decision of the Ecuadorian National Court of Justice filed by REPUBLIC OF ECUADOR.(de Gramont, Alexandre)

Att: 1  Annex 1,

Att: 2  **44 pgs** Expert Report of Carlos Andres Coronel Endara,

Att: 3  Exhibit 1,

Att: 4  Exhibit 2,

Att: 5  Exhibit 3,

Att: 6  Exhibit 4,

Att: 7  Exhibit 5

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## Tuesday, January 25, 2022

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47  **respm** **Supplemental Memorandum** **Tue 01/25 8:36 PM**

SUPPLEMENTAL MEMORANDUM to re Order on Motion for Briefing Schedule,,,,,, Order on Motion for Hearing,,,,,, Order on Motion for Leave to File,,,,,, Set/Reset Deadlines,,,,, / Petitioner's Opening Brief Regarding the November 8, 2021 Decision of the Ecuadorian National Court of Justice filed by PERENCO ECUADOR LTD..(Friedman, Mark)

Att: 1  Addendum to Petitioner's Opening Brief,

Att: 2  **16 pgs** Supplemental Expert Report of Carmen Amalia Simone Lasso,

Att: 3  Exhibit 1 to Supplemental Expert Report,

Att: 4  Exhibit 2 to Supplemental Expert Report,

Att: 5  Exhibit 3 to Supplemental Expert Report

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## Tuesday, January 18, 2022

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order Order on Motion for Briefing Schedule Order on Motion for Hearing Order on Motion for Leave to File Set/Reset Deadlines

Tue 01/18 4:22 PM

MINUTE ORDER granting in part and denying in part<sup>46</sup> Joint Motion: The Court has reviewed the Parties' Joint Motion for Leave to Supplement the Record, for a Briefing Schedule, and for the Scheduling of Oral Argument. The Court ORDERS that the November 8, 2021 decision of the Tax Chamber of the Ecuadorian National Court of Justice attached to the Parties' Motion as Joint Exhibit 1 will form part of the record for Perenco's<sup>1</sup> Petition to Enforce Arbitral Award and Ecuador's<sup>20</sup> Cross Motion for Setoff. The Court further ORDERS that the Parties' request for a briefing schedule is granted, and that Perenco shall file its opening brief by January 25, 2022; that Ecuador shall file a responsive brief by February 15, 2022; and that Perenco shall file any reply brief by February 22, 2022. The Parties' briefs shall address only the November 8 decision and its significance for the pending Petition and Cross Motion; shall each be limited to ten pages; and may each attach a declaration and/or report by a witness and/or expert on Ecuadorian law. Finally, the Court DENIES the Parties' request to schedule oral argument as premature. If, after reviewing the briefing in this case, the Court determines that oral argument would aid it in the expeditious disposition of this case, the Court will schedule oral argument at that time. Signed by Judge Jia M. Cobb on January 18, 2022. (lcjmc2)

## Friday, January 14, 2022

46  4 pgs motion Briefing Schedule Hearing Leave to File Document Fri 01/14 8:36 PM

Joint MOTION for Briefing Schedule , Joint MOTION for Hearing , Joint MOTION for Leave to File / Joint Motion for Leave to Supplement the Record, for a Briefing Schedule, and for the Scheduling of Oral Argument by PERENCO ECUADOR LTD..(Friedman, Mark)

Att: 1  30 pgs Exhibit 1 - November 8, 2021 Decision,

Att: 2  Text of Proposed Order

## Monday, January 10, 2022

45  notice Notice of Appearance Mon 01/10 4:55 PM

NOTICE of Appearance by Michael Losco on behalf of REPUBLIC OF ECUADOR (Losco, Michael)

## Wednesday, December 29, 2021

44  notice Notice of Withdrawal of Appearance Wed 12/29 9:40 PM

NOTICE OF WITHDRAWAL OF APPEARANCE as to REPUBLIC OF ECUADOR. (de Gramont, Alexandre)

## Thursday, December 02, 2021

43  notice Notice of Withdrawal of Appearance Thu 12/02 8:49 PM

NOTICE OF WITHDRAWAL OF APPEARANCE as to PERENCO ECUADOR LTD.. Attorney Ada Fernandez Johnson terminated. (Johnson, Ada)

## Monday, November 15, 2021

utility Case Assigned/Reassigned Mon 11/15 11:06 AM

Case directly reassigned to Judge Jia M. Cobb. Judge Ketanji Brown Jackson has been appointed to the D.C. Circuit and is no longer assigned to the case. (rj)

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**Monday, October 25, 2021**

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42



notice

Notice (Other)

Mon 10/25 5:09 PM

NOTICE of Filing English Translations by REPUBLIC OF ECUADOR re40 Reply to opposition to Motion,,,,(de Gramont, Alexandre)

- Att: 1 37 pgs Second Expert Report of Carlos Andres Coronel Endara on Ecuadorian Tax Law,
- Att: 2 Exhibit 2,
- Att: 3 Exhibit 3,
- Att: 4 Exhibit 4,
- Att: 5 Exhibit 5,
- Att: 6 Exhibit 6,
- Att: 7 Exhibit 7,
- Att: 8 Exhibit 8,
- Att: 9 Exhibit 9,
- Att: 10 Exhibit 10,
- Att: 11 Exhibit 11,
- Att: 12 Second Declaration of Andres Danilo Ordonez Cordova,
- Att: 13 Exhibit 1,
- Att: 14 Exhibit 2,
- Att: 15 Exhibit 3,
- Att: 16 Exhibit 4,
- Att: 17 Exhibit 5,
- Att: 18 Exhibit 6,
- Att: 19 Exhibit 7,
- Att: 20 Exhibit 8,
- Att: 21 Exhibit 9,
- Att: 22 Exhibit 10,
- Att: 23 Exhibit 11,
- Att: 24 Exhibit 12,
- Att: 25 Exhibit 13,
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- Att: 28 Exhibit 16,
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Att: 39  Exhibit 27,  
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Att: 42  Exhibit 30,  
Att: 43  Exhibit 31,  
Att: 44  Exhibit 32,  
Att: 45  Exhibit 33,  
Att: 46  Exhibit 34

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## Wednesday, October 20, 2021

utility
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Set/Reset Deadlines
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Wed 10/20 8:12 AM
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Set/Reset Deadlines: Respondent's English translations of the Exhibits to its40 Reply due by 10/25/2021. (zalh)

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## Tuesday, October 19, 2021

41



respm
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Reply to opposition to motion
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Tue 10/19 11:05 AM
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REPLY to opposition to motion re38 MOTION for Leave to File Excess Pages for Reply In Support of Cross-Motion for Setoff and to File Supporting Documents filed by REPUBLIC OF ECUADOR. (de Gramont, Alexandre)

order
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Order on Motion for Leave to File Excess Pages
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Tue 10/19 5:33 PM
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MINUTE ORDER (paperless) GRANTING respondent's38 Motion for Leave to File Excess Pages in its Reply in Support of Cross-Motion for Setoff and to File Supporting Documents, upon consideration of petitioner's39 Response in opposition to the Motion for Leave to File Excess Pages, and DIRECTING respondent to file English translations of the Exhibits to its40 Reply by October 25, 2021. Signed by Chief Judge Beryl A. Howell on October 19, 2021. (lcbah4)

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## Monday, October 18, 2021

40



30+ pgs
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respm
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Reply to opposition to motion
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Mon 10/18 10:32 PM
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REPLY to opposition to motion re20 Cross MOTION for Setoff re1 Petition to Confirm Arbitration Award,, filed by REPUBLIC OF ECUADOR.(de Gramont, Alexandre)

Att: 1  Exhibit A,

Att: 2 

35 pgs
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 Declaration of Carlos Andres Coronel Endara,

Att: 3  Exhibit 1,

- Att: 4  Exhibit 2,
- Att: 5  Exhibit 3,
- Att: 6  Exhibit 4,
- Att: 7  Exhibit 5,
- Att: 8  Exhibit 6,
- Att: 9  Exhibit 7,
- Att: 10  Exhibit 8,
- Att: 11  Exhibit 9,
- Att: 12  Exhibit 10,
- Att: 13  Exhibit 11,
- Att: 14  33 pgs Declaration of Andres Danilo Ordonez Cordova,
- Att: 15  Exhibit 1,
- Att: 16  Exhibit 2,
- Att: 17  Exhibit 3,
- Att: 18  Exhibit 4,
- Att: 19  Exhibit 5,
- Att: 20  Exhibit 6,
- Att: 21  Exhibit 7,
- Att: 22  Exhibit 8,
- Att: 23  Exhibit 9,
- Att: 24  Exhibit 10,
- Att: 25  Exhibit 11,
- Att: 26  Exhibit 12,
- Att: 27  Exhibit 13,
- Att: 28  Exhibit 14,
- Att: 29  Exhibit 15,
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- Att: 32  Exhibit 18,
- Att: 33  Exhibit 19,
- Att: 34  Exhibit 20,
- Att: 35  Exhibit 21,
- Att: 36  Exhibit 22,
- Att: 37  Exhibit 23,
- Att: 38  Exhibit 24,
- Att: 39  Exhibit 25,

Att: 40  Exhibit 26,  
Att: 41  Exhibit 27,  
Att: 42  Exhibit 28,  
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Att: 44  Exhibit 30,  
Att: 45  Exhibit 31,  
Att: 46  Exhibit 32,  
Att: 47  Exhibit 33,  
Att: 48  Exhibit 34

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39  **respn** **Response to motion** **Mon 10/18 6:41 PM**

RESPONSE re38 MOTION for Leave to File Excess Pages for Reply In Support of Cross-Motion for Setoff and to File Supporting Documents By Petitioner in Opposition to Respondents Motion for Leave to File Excess Pages for Reply in Support of Cross-Motion for Setoff and to File Supporting Documents filed by PERENCO ECUADOR LTD..(Friedman, Mark)

Att: 1  Text of Proposed Order

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38  **motion** **File Excess Pages** **Mon 10/18 12:58 PM**

MOTION for Leave to File Excess Pages for Reply In Support of Cross-Motion for Setoff and to File Supporting Documents by REPUBLIC OF ECUADOR.(de Gramont, Alexandre)

Att: 1  Text of Proposed Order

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## Friday, October 08, 2021

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37  **respn** **Reply to opposition to motion** **Fri 10/08 9:38 AM**

REPLY to opposition to motion re34 MOTION for Extension of Time to File Reply In Support of Cross-Motion for Setoff filed by REPUBLIC OF ECUADOR. (de Gramont, Alexandre)

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**order** **Order on Motion for Extension of Time to File** **Fri 10/08 5:51 PM**

MINUTE ORDER (paperless) GRANTING IN PART AND DENYING IN PART respondent's34 Motion for Extension of Time to File Reply, upon consideration of respondent's34 Motion, petitioner's36 Memorandum in Opposition to Petitioner's Motion for Extension of Time, and respondent's37 Reply in Support of Motion for Extension of Time. Respondent is DIRECTED to file by October 18, 2021, its Reply in Support of its Cross-Motion for Setoff. Signed by Chief Judge Beryl A. Howell on October 8, 2021. (lcbah4)

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**utility** **Set/Reset Deadlines** **Tue 10/12 8:07 AM**

Set/Reset Deadlines: Respondent's Reply to Cross Motion due by 10/18/2021. (zacr)

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## Thursday, October 07, 2021

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36  7 pgs **respm** **Memorandum in opposition to motion** **Thu 10/07 10:39 PM**

Corrected Memorandum in opposition to re34 MOTION for Extension of Time to File Reply In Support of Cross-Motion for Setoff / Petitioner's Corrected Opposition to Respondent's Motion and Memorandum to Enlarge Time to File Reply in Support of Cross-Motion for Setoff filed by PERENCO ECUADOR LTD.. (Friedman, Mark)

Att: 1  Text of Proposed Order

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35  7 pgs **respm** **Memorandum in opposition to motion** **Thu 10/07 5:38 PM**

Memorandum in opposition to re34 MOTION for Extension of Time to File Reply In Support of Cross-Motion for Setoff filed by PERENCO ECUADOR LTD..(Friedman, Mark)

Att: 1  Text of Proposed Order

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### Wednesday, October 06, 2021

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34  **motion** **Extension of Time to File Document** **Wed 10/06 6:03 PM**

MOTION for Extension of Time to File Reply In Support of Cross-Motion for Setoff by REPUBLIC OF ECUADOR.(de Gramont, Alexandre)

Att: 1  Text of Proposed Order

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### Tuesday, September 21, 2021

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33  79 pgs **misc** **Declaration** **Tue 09/21 12:52 AM**

DECLARATION / Expert Report of Carmen Simone Lasso in Support of Perenco's Consolidated Response to the Republic of Ecuador's Partial Opposition to Petition to Enforce Arbitral Award and Cross-Motion for Setoff by PERENCO ECUADOR LTD. re29 Reply to Document, filed by PERENCO ECUADOR LTD.,30 Memorandum in Opposition, filed by PERENCO ECUADOR LTD..(Friedman, Mark)

Att: 1  Exhibit 1,

Att: 2  Exhibit 2,

Att: 3  Exhibit 3,

Att: 4  Exhibit 4,

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Att: 52  Exhibit 52,  
Att: 53  Exhibit 53,  
Att: 54  Exhibit 54,  
Att: 55  Exhibit 55,  
Att: 56  Exhibit 56

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## Monday, September 20, 2021

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32  42 pgs misc Declaration Mon 09/20 11:43 PM

DECLARATION of Emmanuel Colombel in Support of Perenco's Consolidated Response to the Republic of Ecuador's Partial Opposition to Petition to Enforce Arbitral Award and Cross-Motion for Setoff by PERENCO ECUADOR LTD. re29 Reply to Document, filed by PERENCO ECUADOR LTD.,30 Memorandum in Opposition, filed by PERENCO ECUADOR LTD..(Friedman, Mark)

Att: 1  Exhibit 1,  
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  - Att: 51  Exhibit 51,
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  - Att: 55  Exhibit 55,
  - Att: 56  Exhibit 56,
  - Att: 57  Exhibit 57
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31  misc Declaration Mon 09/20 11:05 PM

DECLARATION of Mark W. Friedman in Support of Perenco's Consolidated Response to the Republic of Ecuador's Partial Opposition to Petition to Enforce Arbitral Award and Cross-Motion for Setoff by PERENCO ECUADOR LTD. re29 Reply to Document, filed by PERENCO ECUADOR LTD.,30 Memorandum in Opposition, filed by PERENCO ECUADOR LTD..(Friedman, Mark)

- Att: 1  Exhibit 1 - Stay Hearing Transcript Excerpts,  
 Att: 2  Exhibit 2 - Martnez Statement,  
 Att: 3  Exhibit 3 - Payment Undertaking,  
 Att: 4  Exhibit 4 - Official Letter No. 203R from Dr. Salvador,  
 Att: 5  Exhibit 5 - July 2021 Ecuador Press Release

30  53 pgs respm Memorandum in opposition to motion Mon 09/20 10:45 PM

Memorandum in opposition to re20 Cross MOTION for Setoff re1 Petition to Confirm Arbitration Award,, / Perenco's Consolidated Response to the Republic of Ecuador's Partial Opposition to Petition to Enforce Arbitral Award and Cross-Motion for Setoff filed by PERENCO ECUADOR LTD..(Friedman, Mark)

- Att: 1  Text of Proposed Order

29  53 pgs respm Reply to (non-motion) Document Mon 09/20 10:40 PM

REPLY re1 Petition to Confirm Arbitration Award,, / Perenco's Consolidated Response to the Republic of Ecuador's Partial Opposition to Petition to Enforce Arbitral Award and Cross-Motion for Setoff filed by PERENCO ECUADOR LTD..(Friedman, Mark)

- Att: 1  Text of Proposed Order

## Wednesday, August 25, 2021

utility Set/Reset Deadlines Wed 08/25 12:55 PM

Set/Reset Deadlines: Cross Motion for Setoff by 9/20/2021. Response to Cross Motion due by 10/11/2021. Response to Enforce Arbitral Award by 9/20/2021 Reply due by 10/11/2021. (zgdf)

## Friday, August 20, 2021

order Order on Motion for Extension of Time to File Fri 08/20 7:00 PM

MINUTE ORDER (paperless) GRANTING the parties'28 Joint Motion to Modify Schedule and ISSUING the following SCHEDULING ORDER: (1) petitioner shall file, by September 20, 2021, its response to respondent's20 Partial Opposition to Enforce Arbitral Award and Cross-Motion for Setoff, and (2) respondent shall file, by October 11, 2021, its reply in support of its20 Partial Opposition to Enforce Arbitral Award and Cross-Motion for Setoff. Signed by Chief Judge Beryl A. Howell on August 20, 2021. (lcbah4)

## Thursday, August 19, 2021

28  motion Extension of Time to File Document Thu 08/19 8:09 PM

Joint MOTION for Extension of Time to File / Joint Motion to Modify Schedule by PERENCO ECUADOR LTD.. (Friedman, Mark)

- Att: 1  Text of Proposed Order

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**Tuesday, August 17, 2021**

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 **order** **Order on Motion for Extension of Time to File Response/Reply** **Tue 08/17 4:27 PM**

MINUTE ORDER (paperless) GRANTING nunc pro tunc petitioner's27 Unopposed Motion for an Extension of Time and DIRECTING petitioner to file, by August 23, 2021, its response to respondent's20 Partial Opposition to Enforce Arbitral Award and Cross-Motion for Setoff. Signed by Chief Judge Beryl A. Howell on August 17, 2021. (lcbah4)

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**Monday, August 16, 2021**

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**27**  **motion** **Extension of Time to File Response/Reply** **Mon 08/16 10:34 PM**

MOTION for Extension of Time to File Response/Reply / Petitioner's Unopposed Motion for an Extension of Time to Reply to Respondent's Partial Opposition to Petition to Enforce Arbitral Award and Cross-Motion for Setoff by PERENCO ECUADOR LTD..(Friedman, Mark)

Att: 1  Exhibit A - Proposed Order

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**Thursday, August 12, 2021**

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**order** **Order on Motion for Leave to Appear Pro Hac Vice** **Thu 08/12 9:56 AM**

MINUTE ORDER (paperless) GRANTING respondent's25 Motion for Admission Pro Hac Vice of Michael Anthony Losco. Mr. Losco may enter an appearance pro hac vice for the purpose of representing respondent in this action. Counsel should register for e-filing via PACER and file a notice of appearance pursuant to LCvR 83.6(a). Click for instructions . Signed by Chief Judge Beryl A. Howell on August 12, 2021. (lcbah4)

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**order** **Order on Motion for Leave to Appear Pro Hac Vice** **Thu 08/12 9:59 AM**

MINUTE ORDER (paperless) GRANTING respondent's26 Motion for Admission Pro Hac Vice of Tamar Sarjveladze. Ms. Sarjveladze may enter an appearance pro hac vice for the purpose of representing respondent in this action. Counsel should register for e-filing via PACER and file a notice of appearance pursuant to LCvR 83.6(a). Click for instructions . Signed by Chief Judge Beryl A. Howell on August 12, 2021. (lcbah4)

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**Tuesday, August 10, 2021**

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**26**  **motion** **Appear Pro Hac Vice** **Tue 08/10 4:05 PM**

MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Tamar Sarjveladze, Filing fee \$ 100, receipt number ADCDC-8659099. Fee Status: Fee Paid. by REPUBLIC OF ECUADOR.(de Gramont, Alexandre)

Att: 1  Declaration of Tamar Sarjveladze,  
Att: 2  Exhibit A. Good Standing Certificate,  
Att: 3  Text of Proposed Order

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**25**  **motion** **Appear Pro Hac Vice** **Tue 08/10 3:59 PM**

MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Michael Anthony Losco, Filing fee \$ 100, receipt number ADCDC-8659052. Fee Status: Fee Paid. by REPUBLIC OF ECUADOR.(de Gramont, Alexandre)

Att: 1  Declaration of Michael Anthony Losco,  
Att: 2  Exhibit A. Good Standing Certificate,

Att: 3  Text of Proposed Order

23



77 pgs

misc

Errata

Tue 08/10 1:57 AM

ERRATA attaching exhibits to the Declaration of Andres Danilo Ordonez by REPUBLIC OF ECUADOR re19 Answer to Complaint filed by REPUBLIC OF ECUADOR.(de Gramont, Alexandre)

Att: 1  Exhibit 1,

Att: 2  Exhibit 2,

Att: 3  Exhibit 3,

Att: 4  Exhibit 4,

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Att: 46  Exhibit 46,  
Att: 47  Exhibit 47,  
Att: 48  Exhibit 48,  
Att: 49  Exhibit 49

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**22**

64 pgs

misc

Errata

Tue 08/10 1:37 AM

ERRATA attaching exhibits to the Declaration of Carlos Coronel by REPUBLIC OF ECUADOR re19 Answer to Complaint filed by REPUBLIC OF ECUADOR.(de Gramont, Alexandre)

Att: 1  Exhibit 1,  
Att: 2  Exhibit 2,  
Att: 3  Exhibit 3,  
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Att: 50  Exhibit 50,  
Att: 51  Exhibit 51,  
Att: 52  Exhibit 52,

Att: 53  Exhibit 53,

Att: 54  Exhibit 54

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21  2 pgs misc Errata Tue 08/10 1:16 AM

ENTERED IN ERROR.....ERRATA attaching exhibits to the Declaration of Alexandre de Gramont by REPUBLIC OF ECUADOR re19 Answer to Complaint filed by REPUBLIC OF ECUADOR.(de Gramont, Alexandre) Modified on 8/10/2021 (zjf).

Att: 1  5 pgs Exhibit 1,

Att: 2  16 pgs Exhibit 2,

Att: 3  Exhibit 3

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notice Notice of Corrected Docket Entry Tue 08/10 11:32 AM

NOTICE OF CORRECTED DOCKET ENTRY: Document No. re19 Answer to Complaint, was entered in error and counsel was instructed to refile said pleading with correct titled document. (zjf)

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notice Notice of Corrected Docket Entry Tue 08/10 11:34 AM

NOTICE OF CORRECTED DOCKET ENTRY: Document No. re21 Errata, was entered in error and counsel was instructed to refile said pleading along with their Answer. (zjf)

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## Monday, August 09, 2021

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24  respm Response to (non-motion) Document Tue 08/10 12:28 PM

RESPONSE re1 Petition to Confirm Arbitration Award,, filed by REPUBLIC OF ECUADOR.(de Gramont, Alexandre) Modified on 8/10/2021 to correct filing date (zjf).

Att: 1  2 pgs Declaration of Alexandre de Gramont,

Att: 2  Exhibit 1,

Att: 3  Exhibit 2,

Att: 4  Exhibit 3,

Att: 5  Declaration of Carlos Coronal,

Att: 6  Declaration of Andres Danilo Ordonez

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20  6 pgs motion Miscellaneous Relief Mon 08/09 11:52 PM

Cross MOTION for Setoff re1 Petition to Confirm Arbitration Award,, by REPUBLIC OF ECUADOR.(de Gramont, Alexandre)

Att: 1  Memorandum in Support,

Att: 2  Text of Proposed Order

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19  34 pgs answer Answer to Complaint Mon 08/09 11:47 PM

ENTERED IN ERROR.....ANSWER to Complaint by REPUBLIC OF ECUADOR.(de Gramont, Alexandre) Modified on 8/10/2021 (zjf).

Att: 1  Declaration Alexandre de Gramont,

Att: 2  Declaration Carlos Coronal,

Att: 3  Declaration Andres Danilo Ordonez

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**Thursday, July 29, 2021**

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**utility** **Set/Reset Deadlines** **Thu 07/29 10:16 AM**

Set/Reset Deadlines: Response due by 8/9/2021. (zgdf)

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**Wednesday, July 28, 2021**

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**order** **Order on Motion to Lift Stay Order on Motion for Extension of Time to** **Wed 07/28 4:43 PM**

MINUTE ORDER (paperless) GRANTING petitioner's16 Unopposed Motion to Lift Stay, LIFTING the STAY of this matter, GRANTING respondent's18 Unopposed Motion for Extension of Time, construed as a motion to set a briefing schedule since the alleged deadline referenced in respondent's motion was set by stipulation rather than by order of the Court, see Appendix to5 General Order and Guidelines, Para. 5(f), and further DIRECTING respondent to respond to the1 Petition to Enforce Arbitral Award by August 9, 2021. Signed by Chief Judge Beryl A. Howell on July 28, 2021. (lcbah4)

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**Tuesday, July 27, 2021**

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18  **6 pgs** **motion** **Extension of Time to** **Tue 07/27 7:53 PM**

Unopposed MOTION for Extension of Time to Respond to the Petition to Enforce Arbitral Award by REPUBLIC OF ECUADOR.(de Gramont, Alexandre)

Att: 1  Text of Proposed Order

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17  **3 pgs** **misc** **Status Report** **Tue 07/27 7:30 PM**

Joint STATUS REPORT / Supplemental Joint Status Report by PERENCO ECUADOR LTD.. (Friedman, Mark)

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16  **motion** **Lift Stay** **Tue 07/27 6:06 PM**

MOTION to Lift Stay by PERENCO ECUADOR LTD..(Friedman, Mark)

Att: 1  Exhibit Proposed Order

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**Monday, June 28, 2021**

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**notice** **Notice (Other)** **Mon 06/28 3:51 PM**

Judge Ketanji Brown Jackson has been elevated to serve on the U.S. Court of Appeals for the D.C. Circuit. She is therefore no longer assigned to this case, and this matter has been reassigned to the Calendar Committee, which will oversee it until it is assigned to another district judge. Any questions should be directed to Judge Jackson's former deputy clerk, Gwendolyn Franklin, at 202-354-3145 or gwen\_franklin@dcd.uscourts.gov. (rj)

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**Monday, June 21, 2021**

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15  **4 pgs** **misc** **Status Report** **Tue 06/22 12:09 AM**

Joint STATUS REPORT by PERENCO ECUADOR LTD..(Friedman, Mark)

Att: 1  Exhibit A - Certified Decision on Annulment,

Att: 2  Exhibit B - Certified ICSID Award,

Att: 3  Exhibit C - Annulment Committee's Procedural Order No. 2

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**Monday, March 22, 2021**

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- 14  2 pgs misc Status Report Mon 03/22 5:28 PM  
Joint STATUS REPORT by PERENCO ECUADOR LTD.. (Friedman, Mark)

### Monday, December 21, 2020

- 13  2 pgs misc Status Report Mon 12/21 6:10 PM  
Joint STATUS REPORT by PERENCO ECUADOR LTD.. (Friedman, Mark)

### Monday, September 21, 2020

- 12  3 pgs misc Status Report Mon 09/21 7:06 PM  
Joint STATUS REPORT by PERENCO ECUADOR LTD.. (Friedman, Mark)

### Tuesday, June 23, 2020

- 11  misc Status Report Tue 06/23 9:10 PM  
Joint STATUS REPORT by PERENCO ECUADOR LTD..(Friedman, Mark)

Att: 1  4 pgs Exhibit A - Procedural Order No. 2

### Wednesday, June 17, 2020

- 10  notice Notice of Appearance Wed 06/17 10:55 AM  
NOTICE of Appearance by Mark W Friedman on behalf of PERENCO ECUADOR LTD. (Friedman, Mark)

### Thursday, March 26, 2020

- 9  notice Notice of Substitution of Counsel Thu 03/26 2:49 PM  
NOTICE OF SUBSTITUTION OF COUNSEL by Alexandre de Gramont on behalf of REPUBLIC OF ECUADOR  
Substituting for attorney Dennis H. Hranitzky (de Gramont, Alexandre)

### Wednesday, March 25, 2020

- 8  misc Status Report Wed 03/25 10:51 PM  
Joint STATUS REPORT by PERENCO ECUADOR LTD..(Johnson, Ada)

Att: 1  Exhibit A - Stay Decision

### Thursday, December 26, 2019

order Order on Motion for Issuance of Letters Rogatory Set/Reset Deadlines Thu 12/26 6:57 PM

MINUTE ORDER construing the parties'7 Stipulation as a motion to stay and, so construed, GRANTING the motion. (See Appendix to5 General Order and Guidelines, Para. 5(f).) It is hereby ORDERED that this matter is STAYED until further Order of this Court. It is FURTHER ORDERED that, notwithstanding this stay, on or before 3/25/2020, and every 90 days thereafter, the parties shall file a joint status report updating this Court on the proceedings before the Tribunal. It is FURTHER ORDERED that, in light of the parties'7 Stipulation, the4 Motion for Issuance of Letters Rogatory is DENIED as moot. Signed by Judge Ketanji Brown Jackson on 12/26/2019. (jag)

utility Case Stayed Fri 12/27 12:07 PM

Case Stayed (zjch)

## Monday, December 09, 2019

7  misc Stipulation Mon 12/09 3:30 PM  
STIPULATION and Proposed Order by REPUBLIC OF ECUADOR. (Hranitzky, Dennis)

6  notice Notice of Appearance Mon 12/09 3:26 PM  
NOTICE of Appearance by Dennis H. Hranitzky on behalf of REPUBLIC OF ECUADOR (Hranitzky, Dennis)

## Thursday, October 10, 2019

5  order .Order Thu 10/10 4:27 PM  
GENERAL ORDER AND GUIDELINES FOR CIVIL CASES BEFORE JUDGE KETANJI BROWN JACKSON. The Court will hold the parties and counsel responsible for following these directives, and parties and counsel should pay particular attention to the Court's instructions for briefing motions and filing exhibits. Failure to adhere to this Order may, when appropriate, result the imposition of sanctions and/or sua sponte denial of non-conforming motions. Signed by Judge Ketanji Brown Jackson on 10/10/2019. (jag)

## Thursday, October 03, 2019

4  motion Letters Rogatory Thu 10/03 11:54 PM  
MOTION for Issuance of Letters Rogatory by PERENCO ECUADOR LTD.(Johnson, Ada)

Att: 1  Exhibit A USM-272 Form,

Att: 2  Exhibit B Spanish Translations,

Att: 3  Exhibit C Proposed Order

3  service Electronic Summons Issued Thu 10/03 3:17 PM  
SUMMONS (1) Issued Electronically as to REPUBLIC OF ECUADOR.(zrdj)

Att: 1  Notice and Consent

utility Case Assigned/Reassigned Thu 10/03 3:13 PM

Case Assigned to Judge Ketanji Brown Jackson. (zrdj)

## Tuesday, October 01, 2019

2  notice LCvR 26.1 Certificate of Disclosure - Corporate Affiliations/Financial Interests Tue 10/01 2:31 PM  
LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by PERENCO ECUADOR LTD. (Johnson, Ada)

1  cmp Petition to Confirm Arbitration Award Tue 10/01 2:21 PM  
PETITION TO CONFIRM ARBITRATION AWARD against REPUBLIC OF ECUADOR ( Filing fee \$ 400 receipt number 0090-6410210) filed by PERENCO ECUADOR LTD..(Johnson, Ada)

Att: 1  Declaration of Ada Fernandez Johnson in Support of Petition to Enforce Arbitral Award,

Att: 2  Exhibit A - Certified ICSID Award,

- Att: 3  Exhibit B - ICSID Decision on Remaining Issues of Jurisdiction and on Liability,
- Att: 4  Exhibit C - ICSID Interim Decision on the Environmental Counterclaim,
- Att: 5  Exhibit D - ICSID Convention,
- Att: 6  Exhibit E - France-Ecuador Bilateral Investment Treaty,
- Att: 7  Text of Proposed Order,
- Att: 8  Civil Cover Sheet,
- Att: 9  Summons

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