

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED MEXICAN STATES,

Petitioner,

v.

LION MEXICO CONSOLIDATED, L.P.,

Respondent.

Civil Action No. 1:21-cv-03185 (TFH)

MOTION TO INTERVENE

Hector Cardenas respectfully moves this Court for an order granting him leave to intervene as a Petitioner in this action as of right pursuant to Rule 24(a)(2) or, alternatively, permissively pursuant to Rule 24(b)(1)(B). This motion is accompanied by a Memorandum of Law in support thereof, and a Declaration by Mr. Cardenas.

Mr. Cardenas has an interest in the subject of this action, and the Court's disposition of the case may substantially impair or impede his ability to protect that interest, which is currently not adequately represented by either Lion Mexico Consolidated L.P. ("Lion") or by the United Mexican States ("Mexico"). Mr. Cardenas' participation in this action will also aid the Court in its decision on Mexico's Petition to Vacate Arbitral Award.

Counsel for Mr. Cardenas has conferred with counsel for both Parties. Petitioner Mexico does not oppose this motion. Respondent Lion opposes this motion.

A proposed Order is attached to this Motion.

WHEREFORE, Mr. Cardenas respectfully requests that the Court grant his leave to participate as intervenor-Petitioner in this case.

Dated: August 22, 2022
Washington, D.C.

Respectfully submitted,

By: /s/ Luis A. Parada
Luis A. Parada [Bar # 469886]
Csaba M. Rusznak [Bar # 1030310]
SOVEREIGN ARBITRATION
ADVISORS
1050 Connecticut Ave, NW
Suite 66255
Washington, DC 20035
Telephone: 703-298-5522
lparada@sovereignarbitration.us
crusznak@sovereignarbitration.us

Counsel for Hector Cardenas