

IN THE MATTER OF
AN ARBITRATION UNDER THE RULES OF THE
UNITED NATIONS COMMISSION ON INTERNATIONAL TRADE LAW

Alicia Grace; Ampex Retirement Master Trust; Apple Oaks Partners, LLC; Brentwood Associates Private Equity Profit Sharing Plan; Cambria Ventures, LLC; Carlos Williamson-Nasi; Carolyn Grace Baring; Diana Grace Beard; Floradale Partners, LLC; Frederick Grace; Frederick J. Warren; Frederick J. Warren IRA; Gary Olson; Genevieve T. Irwin; Genevieve T. Irwin 2002 Trust; Gerald L. Parsky; Gerald L. Parsky IRA; John N. Irwin III; José Antonio Cañedo-White; Nicholas Grace; Oliver Grace III; ON5 Investments, LLC; Rainbow Fund, L.P.; Robert M. Witt; Robert M. Witt IRA; Vista Pros, LLC; Virginia Grace

Claimants

v.

United Mexican States

Respondent

CLAIMANTS' TRANSPARENCY SCHEDULE ON MEXICO'S POST-HEARING
BRIEF

October 21, 2022

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CONTAINS CONFIDENTIAL INFORMATION

No.	1
Identification of redacted passages (Document, paragraph, page)	México’s Post-Hearing Brief, p. i, Section II.B. [REDACTED]
Reasons for requesting redaction	Information in this passage is subject to protective orders issued in two actions in U.S. federal courts seeking to obtain the Chapter 15 Discovery pursuant to 28 U.S.C. Section 1782 (the “Section 1782 Proceedings”), ¹ and has been designated Confidential and Highly Confidential pursuant to one of those protective orders (individually, the “Protective Order”). Therefore, the redactions are proper and comply with the Tribunal’s Procedural Orders Nos. 1 and 3.
Objections to the request for redaction	La Demandada no objeta las ediciones propuestas por las Demandantes.
Decision of the Tribunal	The Tribunal takes note that the Respondent does not object the redactions proposed by the Claimants.

No.	2
Identification of redacted passages (Document, paragraph, page)	México’s Post-Hearing Brief, p. 6, ¶ 18 & nn.14-15 [REDACTED]
Reasons for requesting redaction	Information in this passage is subject to a Protective Order and has been designated Confidential in the Section 1782 Proceedings. Therefore, the redactions are proper and comply with the Tribunal’s Procedural Orders Nos. 1 and 3.
Objections to the request for redaction	La Demandada no objeta las ediciones propuestas por las Demandantes.
Decision of the Tribunal	The Tribunal takes note that the Respondent does not object the redactions proposed by the Claimants.

¹ The actions are *In re Ex Parte Application of Frederick J. Warren for an Order to Obtain Discovery in Aid of Foreign Proceedings Pursuant to 28 U.S.C. § 1782*, No. 5:20-mc-00208, in the U.S. District Court for the Southern District of New York, and *In re Application of Frederick J. Warren for an Order to Obtain Discovery for Use in Foreign Proceedings Pursuant to 28 U.S.C. § 1782*, No. 4:20-mc-03517, in the U.S. District Court for the Southern District of Texas.

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No.	3
Identification of redacted passages (Document, paragraph, page)	México's Post-Hearing Brief, pp. 7-8, ¶¶ 22-23 
Reasons for requesting redaction	Information in this passage corresponds to language from the Interpol's October 7, 2020 decision cancelling the Red Notices against Messrs. Gil, Cañedo, Villegas, and Williamson (C-488), which expressly states that any information therein is not intended for public dissemination. Therefore, the redactions are proper and comply with the Tribunal's Procedural Orders Nos. 1 and 3.
Objections to the request for redaction	México no objeta las ediciones propuestas por las Demandantes bajo el principio de buena fe.
Decision of the Tribunal	The Tribunal takes note that the Respondent does not object the redactions proposed by the Claimants.