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13 \**Pro Hac Vice forthcoming*

14 *ATTORNEYS FOR PETITIONER*

15 **IN THE UNITED STATES DISTRICT COURT FOR THE**  
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 THE REPUBLIC OF NICARAGUA,

18 *Petitioner and Award Creditor,*  
19 v.

20 THE LOPEZ-GOYNE FAMILY  
21 TRUST, THE GOYNE FAMILY TRUST,  
22 THE BOCHNOWSKI FAMILY TRUST,  
23 THE BARISH FAMILY TRUST OF 2008,  
24 HILLS EXPLORATION CORPORATION,  
25 LG HAWAII OIL & GAS, INC., HAWAII  
26 DEVELOPMENT CORPORATION, MR.  
27 MICHAEL DAVID GOYNE, MS. EMILY  
28 LOPEZ GOYNE, MR. DAVID MICHAEL  
GOYNE, MS. ESTHER VALENTINA  
GOYNE, MR. JAMES JOHN  
BOCHNOWSKI, MS. JANET ANNE  
BOCHNOWSKI, MR. DAVID A. BARISH,  
MS. GALE RUTH FEUER BARISH, MR.  
JAMES DOUGLAS GOYNE, MR.  
RAYMOND GERALD BAILEY, MS.  
ANITA MEJARITO-BUZMAN ROSS, MS.  
ELSBETH IRENE FOSTER, MR. SCOTT  
STUART SHOGREEN, MS. ELOISA  
LOPEZ SHOWGREEN, MR. HAROLD  
ORRIS SHATTUCK, MS. DIANE  
ELIZABETH RADU AND MR. WALTER  
JOHN BILGER,

*Respondents and Award Debtors.*

Case No.: \_\_\_\_\_

DECLARATION OF MARCO MOLINA  
IN SUPPORT OF THE REPUBLIC OF  
NICARAGUA'S PETITION TO  
RECOGNIZE AND ENFORCE ICSID  
ARBITRAL AWARD

BAKER & HOSTETLER LLP  
ATTORNEYS AT LAW  
COSTA MESA, CA

1 I, MARCO MOLINA, hereby declare as follows:

2 1. I am a Partner based in Baker & Hostetler LLP's ("**Baker**") Orange County Office.  
3 I, along with my colleagues at Baker, acted as legal counsel for the Republic of Nicaragua in the  
4 underlying arbitration administered by the International Centre for Settlement of Investment  
5 Disputes ("**ICSID**"), styled as *The Lopez-Goyne Family Trust and Others v. The Republic of*  
6 *Nicaragua*, ICSID Case No. ARB/17/44 (the "**Arbitration**"). Specifically, Baker represented  
7 Nicaragua in responding to the Respondents' annulment proceeding, a proceeding which was later  
8 discontinued.

9 2. I respectfully submit this Declaration in support of my client's Petition to Recognize  
10 and Enforce an ICSID Arbitration Award. The facts set forth herein are based on my personal  
11 knowledge, unless otherwise indicated. If called as a witness, I could and would testify to the same  
12 as stated herein.

13 3. Attached as **Exhibit 1** is a certified copy of the final arbitral award ("**Award**")  
14 issued by the tribunal in the underlying Arbitration on March 1, 2023. This copy has been certified  
15 by the Secretary-General of ICSID, in accordance with the Article 54 of the Convention on the  
16 Settlement of Investment Disputes between States and Nationals of Other States, Mar. 18, 1965, 17  
17 U.S.T. 1270, 575 U.N.T.S. 159 ("**ICSID Convention**").

18 4. Attached as **Exhibit 2** is a true and correct copy of the ICSID Convention,  
19 Regulation and Rules.

20 5. Attached as **Exhibit 3** is a screenshot from the ICSID website showing case details  
21 from the underlying arbitration. As reflected therein, the case details were downloaded on May 20,  
22 2024 from <https://icsid.worldbank.org/cases/case-database/case-detail?CaseNo=ARB/17/44>.

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24 [Signature Page Follows]  
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1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

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4 Dated: May 22, 2024

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7 MARCO MOLINA  
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