

*INTERNATIONAL CENTRE FOR SETTLEMENT
OF INVESTMENT DISPUTES*

RIVERSIDE COFFEE, LLC

Claimant

v.

REPUBLIC OF NICARAGUA

Respondent

ICSID CASE NO. ARB/21/16

HEARING ON JURISDICTION AND MERITS

10 July 2024

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ARBITRAL TRIBUNAL

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09:05:21 1 PRESIDENT: Good morning, all. There are
2 a couple of housekeeping issues that the Tribunal wanted
3 to discuss first. There may be also housekeeping issues
4 on the part of the parties. We can come to those in a
09:05:38 5 moment.

6 First, we understand that counsel have
7 raised a query about the accounting of time, namely
8 whether the remaining time indicated in the report sent
9 by the secretary of the Tribunal last night includes the
09:05:56 10 time for the closing statements. It certainly and
11 obviously does because the total time, as indicated in
12 the table, is 29 hours, and that is the time allocated
13 to the parties in P011.

14 As you recall, I believe it was in
09:06:21 15 paragraph 17 of P011. The time allocated to the parties
16 at this hearing is 24 hours plus five hours, 24 hours
17 for the examination of witnesses and experts and
18 five hours for the opening and closing statements, three
19 for the opening, two hours for the closing statements.

09:06:49 20 So the remaining time, nine hours and 45
21 minutes for the Claimant and eight hours and nine
22 minutes for the Respondent as at the end of yesterday,
23 includes the two hours for each party allocated for the
24 closing statements.

09:07:09 25 So that's where we are. We are pretty

09:07:12 1 much on schedule. Thank you for the parties -- thanks
2 to the parties for cooperation. So this is proceeding
3 well. Any questions about that? It's clear. Okay.

4 Then we have received just this morning
09:07:37 5 the Respondent's comments on the Claimant's request to
6 introduce new evidence, so on that issue the record is
7 complete and the Tribunal will deliberate.

8 We just have one question to counsel for
9 the Claimant. In the request for leave in the last
09:08:04 10 paragraph, paragraph 13, there's a reference to the
11 documents that you request leave to produce. The media
12 articles -- the two media articles -- and then at the
13 end related investigative findings. Can you please
14 briefly explain what this means?

09:08:27 15 MR. APPLETON: Mr. President, there is a
16 witness that is before this Tribunal who is not
17 testifying, one of the witnesses before this Tribunal is
18 pictured -- they're on the front page of the article
19 that would be -- that is the subject of what we're
09:08:46 20 talking about. There's the Havana Times article and
21 then it discloses something else, a newspaper article
22 from earlier that talks about something. And the
23 picture, I've read the center which identifies the
24 ministry, the department, is of a witness in this case,
09:09:07 25 and so in order to identify that witness because it

09:09:10 1 doesn't have a byline, we would need to provide you with
2 some context to be able to say this is blank. There's
3 only three people or two people in that. It's very
4 prominent.

09:09:21 5 PRESIDENT: It's a submission by counsel?

6 MR. APPLETON: It could either be done by
7 way of a further piece of evidence, a declaration by,
8 for example, somebody who's here who can identify that
9 person, or potentially it could be by a picture from
10 another source. We're working on what that's going to
11 be now. Or it could be just a simple stipulation from
12 the other side because they know what their witness
13 looks like.

14 But either way, the further investigations
09:09:52 15 related to that, it's a very specific and limited item
16 but it would seem to be, we think, quite relevant if a
17 witness in this case is pictured engaged in official
18 acts at the site at a certain time doing certain things
19 that might be relevant and interesting. That's why --
09:10:10 20 that's why we had to do that. If the article had said
21 something, we would not have to do that.

22 PRESIDENT: Understood. But since the
23 Claimant is requesting leave to produce documents, the
24 documents should exist at the time when you're making
09:10:24 25 your request.

09:10:26 1 MR. APPLETON: So the documents would --
2 we have a choice of three different documents that we
3 could do. It would either be by way of a very brief
4 declaration. That would be one document that's
09:10:37 5 available. We're identifying somebody. So those are
6 our options. It would be a declaration or we also have
7 something from social media that would be used. We have
8 to decide if we think it's clear enough. That's why I
9 left it in that way.

09:10:54 10 PRESIDENT: Okay. Understood. Any
11 questions from my colleagues? Any comments by the
12 Respondent?

13 MS. GONZÁLEZ: Not at this time.

14 PRESIDENT: Okay. Very good. So that
09:11:05 15 issue is then under advisement having that
16 clarification.

17 Then we have also received from the
18 Respondent the Respondent's Reply to the Claimant's
19 Request to Strike the testimony of Mr. Ferrufino. We
09:11:26 20 did set the deadline yesterday for the Claimant to
21 respond. The secretary of the Tribunal will be, for the
22 record, circulating an email reminding the parties of
23 that deadline so that we have it organized. So it looks
24 like everything is in order on that front.

09:11:50 25 Any further comments or issues to be

09:11:52 1 raised by counsel?

2 MR. APPLETON: On this matter or
3 additional issues?

4 PRESIDENT: On this or any other
09:11:58 5 additional issues.

6 MR. APPLETON: Well, we do have -- we're
7 looking for some guidance.

8 So counsel, at the request of the
9 Tribunal, have had some communications dealing with the
09:12:09 10 matter of the post-hearing briefs. I invited the
11 Respondent to respond on some matters by 8:30 this
12 morning. I did not receive a response. So I'm not sure
13 what we're supposed to do.

14 We had an initial communication. It's
09:12:26 15 difficult to be able to deal with these, as you can
16 imagine, while we're engaged in the hearing, and so
17 we're trying to fit all of these things in. So I'm not
18 chiding counsel for the nonresponse other than it would
19 have been helpful to have done it by 8:30, which is what
09:12:44 20 I asked for, so we'd be efficient and ready to respond.

21 So my direction that I'm seeking is do you
22 want us to give you where we're at now, or would you
23 like to have us see if the parties can get any further
24 and come on this tomorrow? Because at this point we are
09:13:03 25 not close, and a new issue has been introduced that had

09:13:06 1 not been asked by the Tribunal and we're quite far apart
2 on that one and we're not entirely close on the first
3 one.

4 So it's a question of what would be your
09:13:17 5 preference in terms of how much you want in terms of
6 efforts of counsel. That's what I need to know.

7 PRESIDENT: Please keep discussing today,
8 tomorrow to see whether you can narrow down any
9 difference that exists. We don't want to discuss this
09:13:35 10 until at the end of the hearing on Friday. So this is
11 between the parties, and it may be more efficient to
12 speak viva voce by email, but we leave it for you.

13 MS. GONZÁLEZ: Mr. President, if I may
14 clarify? The issues that Mr. Appleton raised, I
09:13:55 15 received them at 7:05 a.m. this morning. He was
16 expecting me to discuss those issues by 8:30 a.m. I was
17 stuck in a traffic jam. We have the whole day to
18 continue these discussions, as you just mentioned, and
19 we can do that outside the courtroom.

09:14:21 20 MR. APPLETON: Ms. González omits that it
21 was a one-line clarification of what she meant by a
22 certain term. That was the extent of what I sought.

23 PRESIDENT: Let's not waste time on this
24 one. This is between counsel. If you can reach an
09:14:32 25 agreement, excellent. If not, we discuss on Friday.

09:14:36 1 MS. GONZÁLEZ: Yes. That is a very minor
2 point, and we can discuss during the break.

3 MR. APPLETON: And I encourage
4 Ms. González to please do that at her earliest
09:14:46 5 convenience.

6 MS. GONZÁLEZ: Yes, whenever the Tribunal
7 asks me to resolve. Thank you.

8 PRESIDENT: We will not discuss this
9 before the end of the hearing on Friday, so you have
09:14:50 10 time until then to try to reach an agreement.

11 MR. APPLETON: Thank you. We appreciate
12 your guidance on that matter.

13 PRESIDENT: Anything else?

14 MS. GONZÁLEZ: No.

09:15:00 15 PRESIDENT: Very good. Then we continue
16 with the witness.

17 Good morning, Mr. Sequeira.

18 MR. SEQUEIRA: Good morning.

19 PRESIDENT: I hope you had a nice and
09:15:12 20 peaceful evening. It looks like you did. Okay. So we
21 continue with the examination of Professor Sequeira, and
22 it will be Ms. Cardenas, I believe. Please.

23 **CONTINUED CROSS-EXAMINATION**

24 BY MS. CARDENAS:

09:15:36 25 Q. Mr. Sequeira, good morning.

09:15:40 1 A. Good morning.

2 Q. Yesterday we were discussing clause 144 of the
3 Code of Civil Procedure, and I'm going to begin this
4 morning with that clause once again.

09:16:03 5 Just to confirm, this article 144, which
6 is part Exhibit C-254, page 39 of the pdf, this clause,
7 article 144, only applies in cases of relative nullity,
8 correct?

9 A. Yes, the article speaks of relative nullity and
09:16:32 10 curing communication defects.

11 Q. And it does not apply to absolute nullity?

12 A. Correct. Absolute nullity has a different
13 procedure.

14 Q. Now, this article also stipulates in the first
09:16:47 15 paragraph that judicial resolutions only have effect
16 when notice is made in keeping with this code, correct?

17 A. Yes, that's the general rule. That's the first
18 part of the article.

19 Q. Thank you very much.

09:17:19 20 Now, we spoke quite a bit about the lack
21 of notice of the order issued in December 2021, and I'd
22 now like to speak a bit of 2024. You mentioned during
23 your opening arguments that INAGROSA had been notified.

24 If we could turn to page 5 of Exhibit R-199, this, I
09:17:52 25 understand, is the document where the Republic of

09:17:55 1 Nicaragua requests the update of the precautionary
2 measure, correct? And we see here, once again, that
3 reference is only made on this first page of the
4 document to Riverside Coffee, correct?

09:18:38 5 A. Yes.

6 Q. Okay. So now let's turn to page 7 of the pdf,
7 section 4. It is being asked that Riverside Coffee be
8 given notice and INAGROSA as well, correct?

9 A. Yes, that's what it says there.

09:19:30 10 Q. And do you see where it says under 2(IV)(2), it
11 says Riverside Coffee, LLC, but it spells coffee
12 C-O-F-F-E?

13 A. Yes, it says C-O-F-F-E.

14 Q. Would you agree with me that that is not the
09:19:51 15 complete name of Riverside Coffee?

16 A. I'd have to compare it with the Articles of
17 Incorporation or some such document so as to be able to
18 corroborate this.

19 Q. We could compare it with the first page of your
09:20:11 20 witness statement where you indicate that you are
21 presenting your report on behalf of Riverside Coffee,
22 LLC, which is spelled C-O-F-F-E-E, correct?

23 A. Yes, this arbitration proceeding.

24 Q. Now, let's now turn to page 8 of this document,
09:20:46 25 which I understand is the order updating the

09:20:49 1 precautionary measure -- that updates the precautionary
2 measure, and if we could look at paragraph 5, the order
3 indicates, "Notice shall be given of this order to the
4 company Riverside Coffee," and once again coffee is
09:21:20 5 spelled C-O-F-F-E, correct?

6 A. Yes, that's what the document says.

7 Q. And the address is given, particularly the
8 address identified for Barry Appleton in Toronto,
9 Ontario says "Wet Suit 602." Do you see that in the
09:21:55 10 third line of paragraph 5? Do you see where it says
11 "Wet Suit 602?" Do you know what a wet suit is?

12 A. No.

13 Q. I'm going to let you know that that is a
14 bathing suit. It's a wet suit for surfing. So you see
09:22:20 15 on the second line where the name Barry Appleton is
16 identified --

17 A. Yes.

18 Q. -- of Appleton & Associates? Now, do you see
19 how "Appleton" has been written A-P-P-E-L-T-O-N?

09:22:50 20 A. Yes.

21 Q. But rather the last name is shown as
22 A-P-P-L-E-T-O-N whereas the law firm's name spells his
23 last name A-P-P-E-L-T-O-N. Do you see that?

24 A. Yes.

09:23:10 25 Q. You have no knowledge that Riverside was

09:23:13 1 notified of this order, correct?

2 A. The order renewing a precautionary measure?
3 Correct?

4 Q. Correct.

09:23:21 5 A. Yes, I see addresses.

6 Q. Where? Well, let me clarify a bit. We'll talk
7 about INAGROSA, but in terms of Riverside, have you seen
8 any document confirming that, in effect, Riverside
9 received notice?

09:23:45 10 A. The document -- document of the notice? Is
11 that what we're talking about?

12 Q. I'm asking whether there is any document that
13 shows that Riverside was given notice of the updating of
14 the precautionary measure.

09:23:57 15 A. I understand that at that address, as indicated
16 there, at that address. I understand that at those
17 addresses.

18 Q. Have you seen any document -- have you seen any
19 document confirming that Riverside was notified?

09:24:18 20 A. The judicial certificate of notice.

21 Q. But have you seen that notice was actually
22 made?

23 A. I am aware of the letter rogatory and the
24 existence, but right now my recollection of it doesn't
09:24:41 25 come to mind.

09:24:44 1 Q. Do you have knowledge that the letter rogatory
2 was -- that notice was actually given in that
3 connection?

4 A. Yes, yesterday that was being discussed.

09:24:51 5 Q. What happened yesterday?

6 A. Yesterday that was being discussed. An image
7 was shown of that notice.

8 Q. Once again, I'm talking about INAGROSA and
9 Riverside as two distinct entities, and I'm asking you
09:25:05 10 whether you have knowledge that Riverside was notified.

11 A. No, I cannot affirm that.

12 Q. Okay. Now let's talk about INAGROSA, and let's
13 go to page 55 of the same document, which I understand
14 is the document you've just mentioned to me, but if you
09:25:33 15 could confirm that, please.

16 Now, this is -- I understand this is the
17 judicial certificate of notice that you just mentioned,
18 and if we scroll down to page 55, here it indicates that
19 notice has been given to Inversiones Agropecuarias SA,
09:26:03 20 correct?

21 A. Yes, that's what it says.

22 Q. And it says that, in 2024, in the month of
23 February, notice was given. That's the second line of
24 that paragraph, correct?

09:26:25 25 A. Yes.

09:26:27 1 Q. And it says notice was given, giving the
2 document to security guard Miguel Velasquez, right?

3 A. Yes, that's what it says.

4 Q. And Mr. Miguel Velasquez did not sign the
09:26:42 5 document, right?

6 A. Yes. That's what it says.

7 Q. It says "does not sign," correct?

8 A. "Does not sign," yes.

9 Q. Once again this document makes reference to --
09:26:51 10 Once again, this document makes reference
11 to notice to INAGROSA, not Riverside, correct?

12 A. Yes. Could you go up a bit just to see more?
13 Yes, it says Inversiones Agropecuarias.

14 Q. Now, do you know if an effort was made to give
09:27:25 15 notice to Mr. Rondón?

16 A. I don't have knowledge of that.

17 Q. Let's turn to article 308 of the Code of Civil
18 Procedure. That's Exhibit C-254. Page 92 of the pdf.
19 And do you see in the paragraph there where it says,
09:28:08 20 "when carrying out the precautionary measure" --

21 A. I'm sorry. It seems that you asked for 308.

22 Q. 380.

23 A. Okay.

24 Q. And this article stipulates that, "when
09:28:22 25 carrying out the precautionary measure, notice shall be

09:28:27 1 given to the person affected of that order providing
2 them a copy of the request brief so that they may oppose
3 it if they so wish."

4 Do you see that?

09:28:39 5 A. Yes.

6 Q. Now if we could turn to article 146 of the same
7 code -- and, again, this is Exhibit C-254 -- and, in
8 particular, this is the article that is entitled
9 "Practice of notice." And I'm going to refer you to
09:29:10 10 item 6 which indicates that, in the case of juridical
11 persons, notice shall be given to the representative
12 without a need to individually identify him or her,
13 correct?

14 A. Yes, that's what it says.

09:29:26 15 Q. And you've said that you don't have any
16 knowledge of what efforts were made to give notice to
17 Mr. Rondón, correct?

18 A. Yes. I haven't seen any such document.

19 Q. You haven't seen any document --

09:29:40 20 MS. CONOVER: Sorry for interrupting, but
21 you're not making any pauses between question and answer
22 which is making the translation difficult. If you could
23 please pause and wait a few seconds after the expert has
24 finished his answer before posing the next question.

09:29:56 25 MS. CARDENAS: Understood.

09:29:57 1 MS. CONOVER: Thank you.

2 Q. You've not seen any document showing that any
3 effort was made to give notice to Mr. Rondón, correct?

4 A. No.

09:30:13 5 Q. We have seen a number of documents, and
6 according to them, Nicaragua had understood that
7 Mr. Rondón was outside of Nicaragua. Is that correct?

8 A. Yes.

9 Q. That is what Nicaragua stated to the court when
09:30:29 10 it requested the precautionary measure in 2021, correct?

11 A. Yes.

12 Q. Do you know whether Nicaragua at any point in
13 time made any effort whatsoever to give notice to
14 Mr. Rondón outside of Nicaragua?

09:30:50 15 A. Well, I know that there is a letters rogatory
16 and then judicial assistance, international legal
17 assistance.

18 Q. But you do not know whether those notices were
19 updated or if they were actually given?

09:31:10 20 A. I don't have any evidence of that.

21 Q. Okay. When the precautionary measure was
22 requested, Nicaragua -- and I'm talking about 2021,
23 right -- Nicaragua told the court that the reason why
24 the precautionary measure was necessary was that

09:31:39 25 Riverside, acting through their lawyers, had indicated

09:31:46 1 that they were not going to travel to Nicaragua and they
2 were fearful to take possession of the farm.

3 I asked you yesterday whether you had seen
4 evidence showing that, and you said to me that there
09:32:05 5 were a number of communications when the farm is
6 offered.

7 I'm going to show you two pieces of
8 communication that I understand were exchanged before
9 Nicaragua asked for the precautionary measure in
09:32:23 10 November 2021.

11 The first communication is C-116. Do you
12 speak English, Mr. Sequeira?

13 A. Basic English, but I would like for this to be
14 translated, please.

09:32:53 15 Q. Very well. I'm going to ask you to look at the
16 last paragraph of your translation. If there are
17 problems with my translation, Nicaragua's counsel will
18 indicate so.

19 This is a communication sent from the
09:33:19 20 lawyers of Nicaragua to the lawyers of Riverside. In
21 the last paragraph, counsel for Nicaragua says:

22 "If your clients are in a position to
23 demonstrate their ownership of the property, Nicaragua
24 would be willing to meet with them and establish the
09:33:33 25 conditions for ensuring that the property is properly

09:33:37 1 and securely placed in their hands as promptly as
2 possible."

3 Do you see that?

4 A. I have heard what you read, you translated.

09:33:49 5 Okay, you're right, sir. Yes.

6 Q. Okay. Let us now look at C-118. What is the
7 date of this document, both the other letter and this
8 letter?

9 A. Both communications are dated September 9.

09:34:24 10 Both of them.

11 Q. Okay, very well. This is a letter that Barry
12 Appleton sent on that date, the same date, to counsel
13 for Nicaragua.

14 Mr. Appleton says halfway through the page
09:34:42 15 on this long paragraph, and I'm going to translate for
16 you.

17 "We are unaware that" --

18 A. Excuse me. Excuse me. What paragraph are you
19 reading? The second to last?

09:34:55 20 Q. You see (a) and (b) and then I'm reading the
21 paragraph right after (a) and (b).

22 A. Oh, okay.

23 Q. Mr. Appleton says there:

24 "We are unaware that there has ever been
09:35:15 25 an issue regarding the ownership of Hacienda Santa Fé

09:35:18 1 since the purchase of the property at public auction in
2 December 1997. Your client is the Government of the
3 Republic of Nicaragua which operates the land title
4 system in Nicaragua and would be the logical source of
09:35:42 5 the required information. Our client supplied C-042
6 (Public Auction Certificate) with the Notice of
7 Arbitration confirming the purchase of Hacienda Santa Fé
8 in 1997. What other documentation you could possibly
9 require? Accordingly, could you please explain why
09:36:11 10 there would be a need to further demonstrate the
11 property ownership in these circumstances, and the
12 process you propose in this regard?"

13 And then he says:

14 "Concerning the second condition, could
09:36:30 15 you please elaborate on your client's condition for
16 returning Hacienda Santa Fé and the basis for the
17 imposition of these conditions?"

18 Were you able to hear me all right?

19 A. Yes. Just give me one moment. I need to put
09:36:55 20 my thoughts in order.

21 Q. I see that you're still writing. My apologies.

22 A. Very well.

23 Q. In the passage I read to you, did you hear at
24 any time that Mr. Appleton told counsel for Nicaragua
09:37:27 25 that Riverside was not willing to take possession of the

09:37:30 1 property because they were afraid of traveling to
2 Nicaragua?

3 A. You have indicated two things, and I would like
4 to start by responding to the first matter you raised.

09:37:50 5 The explanation for this -- and I'm
6 thinking as a lawyer in the case to be able to provide a
7 legal analysis of the matter -- well, it says here that
8 documents were submitted showing the purchase of the
9 property in 1997. I understand that this is a letter of
09:38:14 10 2021.

11 If you look -- because of due diligence, a
12 lawyer should make sure that the individual that is
13 attributed title is indeed the acquirer of the property
14 because that does not mean that -- and during 1997 to
09:38:42 15 date, perhaps it was the subject of some registration
16 trafficking. So perhaps some documentation can be asked
17 of the person.

18 You read to me, I think, that they were
19 trying to -- perhaps it was the other letter. They
09:39:01 20 needed to make sure that they knew who they were going
21 to return the property to. So because of legal
22 formalities, this request is made. The documentation
23 allegedly said 1997 documentation, so we need to make
24 sure whether the title is still held by that person.

09:39:22 25 You also read something about a number of

09:39:26 1 conditions. I do not see that these are not subjective
2 or personal conditions. These are conditions that are
3 needed to formalize that kind of handover. That is what
4 I interpret from the information you've read to me.

09:39:46 5 Q. That was not my question. I appreciate that,
6 but that was not my question.

7 I asked you whether, in what I read to
8 you, Mr. Appleton told Nicaragua that the
9 representatives were not willing to take possession of
09:40:05 10 the property because they were scared to travel to
11 Nicaragua to do so.

12 A. Not from what you read to me, no.

13 Q. I'm going to move on, and we're going to talk
14 about the MARENA resolution and this is included in your
09:40:58 15 report, in your expert report. We're going to look at
16 R-12, which is the resolution, article 4, page 4. Do
17 you see at paragraph 4 that they say that:

18 "The recognition of the private wildlife
19 reserve Hacienda Santa Fé will be subject to the terms
09:41:42 20 and conditions established in the administration
21 agreement of this private wildlife reserve and the
22 Management Plan and the Annual Operational Plans
23 approved by the Ministry of the Environment and Natural
24 Resources (MARENA) for monitoring and follow-up
09:42:01 25 purposes."

09:42:02 1 Do you see that?

2 A. Yes, I do see that.

3 Q. Let us now look at R-73, the last page, 2 of 2.
4 And this is a certificate dated February 9, 2023. Do
09:42:39 5 you see that? In the very last sentence here, "issued
6 in the City of Managua on February 9, 2023." Do you see
7 that?

8 A. Yes, I do see the date.

9 Q. If we scroll up, do you see in that paragraph
09:43:17 10 where it says -- in the recognition as a private
11 wildlife reserve, at 4 it says that:

12 "The recognition of the private wildlife
13 reserve will be subject to the terms and conditions
14 established in the administration agreement of the
09:43:41 15 private wildlife reserve and the General Management Plan
16 and Operational Plans -- yearly operational plans --
17 approved by MARENA for its monitoring and follow-up."

18 And then if you look at 5, it says that:

19 "The Administration Agreement should be
09:44:01 20 signed for the private wildlife reserve of Hacienda
21 Santa Fé by its legal representatives. Today, the
22 property owner of the reserve has not gone to MARENA and
23 processed the signature of the administration agreement
24 and the management plan under article 26 of Decree
09:44:27 25 01-2007, and these instruments will decide the

09:44:35 1 activities to be developed."

2 Do you see that?

3 A. Yes, that's correct.

09:45:07 4 Q. Now, we're going to go back to R-73, the
5 resolution, and this is the document that we have
6 identified as R-12. You see that at paragraph 6, it
7 indicates that:

09:45:58 8 "This Ministerial Resolution shall become
9 effective upon publication in the written press or any
10 newspaper of national circulation, notwithstanding its
11 subsequent publication in La Gaceta Official Gazette."

12 Do you see that?

13 A. I do.

09:46:17 14 Q. And you are not aware of any document that
15 shows that this MARENA resolution was published
16 anywhere?

17 A. No, I didn't see any evidence of that.

09:46:39 18 Q. I understand that in your report you say that
19 your opinion is that this resolution is valid. Is that
20 correct?

21 A. Yes. This is a valid resolution.

22 Q. But the fact that this is a valid resolution
23 doesn't mean that the resolution became effective. Is
24 that correct?

09:46:50 25 A. The resolution says that it will become

09:46:54 1 effective after its publication, but it is a valid
2 ministerial resolution. It's an administrative act that
3 is valid.

4 Q. Yesterday I asked you a few questions about the
09:47:13 5 university, UPOLI. You taught there and you were a
6 professor there. You have worked for the university,
7 and you said to me that UPOLI was a private university,
8 and it was then declared a public university later on.

9 Was UPOLI confiscated by the government?
09:47:38 10 Isn't that correct?

11 A. It was declared a public university.

12 Q. Via seizure, right? A confiscation?

13 A. Well, I do not share that term, seizure or
14 confiscation.

09:47:52 15 Q. But it was unilaterally declared public by the
16 government?

17 MS. GONZÁLEZ: We object to these
18 questions. These are outside the scope of the report of
19 Mr. Sequeira.

09:48:02 20 PRESIDENT: They don't seem to be relevant
21 to the case.

22 MR. APPLETON: Mr. President, the witness
23 has testified of his firsthand knowledge and employment
24 at that institution and you actually have evidence
09:48:12 25 before this Tribunal on this very issue in the expert

09:48:15 1 materials and it could very well be relevant in terms of
2 his relationship, which was not fully disclosed, and
3 that goes to his ability to give independent advice as
4 an expert.

09:48:28 5 All of these areas, I believe, are quite
6 appropriate for examination, especially given the
7 nondisclosure of the relationships.

8 PRESIDENT: I think you have already on
9 the record that it is -- that the university is now
09:48:39 10 State-owned. It doesn't matter whether it was
11 confiscated or not.

12 MR. APPLETON: Actually, it's on the
13 record that it was confiscated.

14 PRESIDENT: Then you don't need to ask.

09:48:51 15 MS. CARDENAS: Just, if I may, I don't
16 have a lot of questions here, but the reason I'm asking
17 the questions is, again, because the witness has
18 testified --

19 MR. APPLETON: We're getting Spanish on
09:49:21 20 the English again.

21 THE INTERPRETER: My apologies.

22 MR. APPLETON: Are we good? Because we'd
23 like to explain.

24 THE INTERPRETER: We're good.

09:49:31 25 MS. CARDENAS: That there was an order

09:49:32 1 issued that was never notified, that there was no proof,
2 as we've seen, of any sense of urgency prior to that
3 order being issued, that that order, notwithstanding not
4 having been served on Riverside, was then used to change
09:49:45 5 the notation on the title of Riverside by the public
6 registry. These are very much all rule of law issues
7 that I think go to the heart of the issues in this case
8 and go to the issues that the witness has already
9 testified about. And that is the reason for the
09:49:59 10 questions.

11 Q. Mr. Sequeira, we have also spoken yesterday
12 about the public registry of property. Was this under
13 the jurisdiction of the Supreme Court at any time? Is
14 that correct?

09:50:25 15 A. Yes.

16 Q. And today it is under the jurisdiction of the
17 Attorney General's office, correct?

18 A. Yes.

09:50:37 19 Q. And the Attorney General's office is part of
20 the executive branch in Nicaragua. Is that correct?

21 A. It represents the State.

22 Q. As a part of the executive branch of
23 government?

09:50:51 24 A. It represents the State according to the
25 organic law or law that rules the Attorney General's

09:50:54 1 office. That's what it does.

2 Q. Alba Luz Ramos, do you know who she is?

3 A. She is the Chief Justice of the Supreme Court
4 of Justice.

09:51:03 5 Q. And she was removed. Is that right?

6 MS. GONZÁLEZ: Again, that is not relevant
7 whether the president of the Supreme Court has been
8 removed or not. It's not relevant. He doesn't testify
9 about that in his expert report.

09:51:17 10 MS. CARDENAS: I don't -- again, I think
11 that these are issues of rule of law, and I think they
12 tie into how the courts behaved here 2021, 2024, and I
13 don't have more questions for the witness on this but I
14 would appreciate an answer on this question.

09:51:35 15 PRESIDENT: He's not testifying about
16 these issues. He's a legal expert. So you can make
17 submissions on these issues on the basis of the evidence
18 in the record. Please proceed.

19 MR. APPLETON: Mr. President, we all have
09:51:46 20 objections now so -- let me try to get into this and
21 then Ms. González will come in.

22 This witness is testifying specifically as
23 to whether or not there is an abuse of process with
24 respect to the judicial acts and the actions of the
09:52:03 25 Office of the Attorney General. That is exactly the

09:52:07 1 issues with respect to the protective order.

2 The protective order is mostly an issue
3 that deals with breaches caused by the conduct of the
4 Attorney General's department because there have been
09:52:21 5 then further issues because the courts did not engage in
6 due diligence and review and relied on that without
7 checking. So you have both the executive branch engaged
8 in issues and the judicial branch. But his evidence
9 goes to both.

09:52:34 10 The question here that's been posed by my
11 colleague goes to one of those issues. It is squarely
12 and entirely within the expertise and squarely and
13 entirely within his testimony that he's actually already
14 put into his witness statement which we would like to
09:52:48 15 challenge with respect to its credibility.

16 Furthermore, if you recall, the Tribunal's
17 already aware from the resignation letter of
18 Paul Reichler, their own former counsel, on that issue.
19 And there's material from expert Wolfe. But, in fact,
09:53:05 20 the fact that we have a letter from another lawyer who
21 had represented the State of Nicaragua on this issue
22 opposed entirely to the witness testimony, or
23 potentially, of this expert within materials within his
24 testimony would at least, at a minimum, be appropriate
09:53:23 25 for examination to put to the expert before this

09:53:27 1 Tribunal to answer that particular issue.

2 A. While we had not designed a large area for
3 review, we could have, and perhaps now will want to go
4 to those areas, but we were prepared to only ask the one
09:53:38 5 question. But that's why we're seeking the ability to
6 do that. And as you've ruled before, that witnesses
7 don't have to be confined within the scope of their
8 expert report, or within their witness report, but, in
9 fact, here there's testimony that is the heart and soul
09:53:58 10 of the abuse of process issues that he's been testifying
11 on. And it goes fundamentally if there's something
12 improper with how the judicial process works, that would
13 be relevant.

14 PRESIDENT: The question to which counsel
09:54:11 15 for the Respondent raised an objection to related to the
16 removal of the Chief Justice of the Supreme Court. This
17 is not an issue on which the expert is giving evidence,
18 so please move on.

19 MS. GONZÁLEZ: I'm sorry. Before that I
09:54:25 20 raised an objection. Ms. Cardenas, in response to your
21 comment regarding the university and whether the
22 university has been confiscated or not, she made a
23 statement and she said -- and I'm going to read:

24 "There was an order issued that was never
09:54:46 25 notified. There was no proof we've seen urgency prior

09:54:51 1 to that order being used. That order not having been
2 served on Riverside was then used to change the notation
3 on the title of Riverside by the public registry."

4 That has nothing to do with the
09:55:03 5 confiscation or not of the university and in any case
6 that is her testimony, not something that Mr. Byron
7 Sequeira raised in his expert report. That is her
8 opinion on that.

9 MS. CARDENAS: I did not --

09:55:16 10 PRESIDENT: Let's stop this now.

11 MS. CARDENAS: Understood.

12 PRESIDENT: Ms. Cardenas made that
13 statement. That statement is on the record. It's not a
14 question to the witness. Let's proceed with the next
09:55:27 15 question.

16 MS. CARDENAS: It was not a question to
17 the witness. Thank you, sir.

18 Q. Mr. Sequeira, I am going to show you the
19 statement by Mr. Luis Gutiérrez. This is CWS-10,
09:55:49 20 paragraph 187.

21 Do you see where in that paragraph
22 Mr. Gutiérrez identified that the expansion plan that
23 was initially proposed included 700 hectares of Hass
24 avocados?

09:56:13 25 A. Excuse me. There was an interruption. But I

09:56:17 1 couldn't hear the beginning of your statement, of your
2 question.

3 Q. Yes, okay. I'm going to repeat the question.

4 Mr. Luis Gutiérrez has testified at
09:56:32 5 paragraph 187 of his witness statement that the
6 expansion plan that was initially proposed discussed
7 700 hectares of Hass avocados, but INAGROSA'S management
8 decided that there were reasons to expand the operation
9 to additional adjacent lands. The expansion plan at the
09:56:52 10 time of the invasion of Hacienda Santa Fé was for
11 1,000 hectares. 1,000 hectares.

12 I note that the forest area was
13 approximately 140 hectares, so it actually had
14 1,084 hectares of available agricultural land available
09:57:16 15 at Hacienda Santa Fé that did not include the
16 100 hectares of forestland. Do you see that?

17 A. I do.

18 Q. Let us now look at your presentation. At
19 number 16 you cited article 356 of the Code of Civil
09:57:46 20 Procedure of Nicaragua related to the obligations of the
21 depository custodian, and you cited article 254 -- or
22 rather --

23 MR. APPLETON: There's something going on
24 with the translator. The translator is nowhere near the
09:58:13 25 microphone or walking back and forth.

09:58:15 1 PRESIDENT: I think the microphone is off.
2 Please turn it on.

3 THE INTERPRETER: This is the interpreter.
4 The microphone has been on at all times. I'm not sure
09:58:23 5 what's going on. And I'm sitting right in front of it.
6 I understand.

7 PRESIDENT: Please proceed.

8 Q. Mr. Sequeira, in your presentation yesterday
9 you cited article 356 of the Code of Civil Procedure.
09:58:49 10 This has been identified C-254, and in particular, you
11 cited a provision that says that the depository must,
12 amongst other things, keep the property in custody in
13 the same condition that it has gotten it from the
14 judicial authority. Do you remember that?

09:59:24 15 A. Yes.

16 Q. If the depository uses the property for any
17 other purpose, that would be incompatible with the
18 duties of a judicial depository?

19 A. Yes. When you are appointed a judicial
09:59:48 20 depository, you have an obligation to keep and care for
21 the property, and you cannot use it for anything else.
22 So a depository assumes that commitment.

23 In my presentation I said that there is no
24 transfer of title. What you have is an obligation for
10:00:11 25 the Republic of Nicaragua, in this case the judicial

10:00:15 1 depository, to care for the property received under
2 custody. The law obligates the depository to take care
3 of that piece of property, to preserve that piece of
4 property.

10:00:33 5 Q. What I understand from your statement is that
6 they have the obligation to take care of the lot but not
7 to use it?

8 A. Yes. Correct. Use is not assumed.

9 Q. And the interests being protected are those of
10 INAGROSA'S, correct?

10:00:48 11 A. If we follow the precautionary measures
12 procedure according to the documents, it will be to
13 protect Riverside's investment that was represented in
14 the investment right at Hacienda Santa Fé. So that is
10:01:09 15 the protection of an investment, that is Hacienda
16 Santa Fé. And based on the obligation of the judicial
17 depository, it is an obligation, an obligation acquired
18 by the Republic of Nicaragua but not the ownership of
19 the good.

10:01:29 20 Q. And in this case there was no -- any sort of
21 bond that was required from Nicaragua?

22 A. Yes. In the documents the applicant explained
23 that it was free of any bond, and that is what I
24 understood.

10:01:44 25 Q. But there was no request for that bond?

10:01:47

1 A. No.

2 Q. And the depository that was appointed went to
3 the Republic of Nicaragua, that is the party, the
4 opposing party in connection with Riverside, opposing to
10:02:01 5 Riverside in this arbitration, correct?

6 A. Correct. If you allow me to add a comment as
7 to some articles that may help us clarify this issue --

10:02:01

8 Q. I do not have additional questions to you
9 regarding this, and I know that you have already cited
10:02:24 10 some articles in your initial presentation.

11 Are you aware of any notification,
12 violation, fine, request or summons by any public
13 authority within the Nicaraguan government against
14 INAGROSA due to a violation of the law or any sort of
10:02:51 15 regulation?

16 A. No.

17 Q. Are you aware of any legal action against
18 INAGROSA by any public authority of Nicaragua?

19 A. No.

10:03:08

20 Q. Before concluding your expert report, were you
21 able to verify whether INAGROSA at any time had
22 received --

23 Do you know what the period is, what the
24 statute of limitations is in case of a property that has
10:03:50 25 arrears in the payment of the taxes?

10:03:53 1 A. That is tax law. That is not my area of
2 expertise.

3 Q. So you're not aware of that statute of
4 limitations?

10:03:59 5 A. No. That is tax law. As I mentioned, that is
6 not my area of expertise.

7 Q. Are you aware of the general limitations, not
8 specific, to a tax element but to the statute of
9 limitations in general?

10:04:24 10 MS. GONZÁLEZ: The witness already
11 testified that he's not an expert on taxes.

12 MR. APPLETON: Her question wasn't on
13 taxes. Her questions were on the general law, and so he
14 should be entitled to answer that question. Or is he
10:04:37 15 not competent to apply a question on the law of
16 Nicaragua? Which would be fine if he wants to --

17 PRESIDENT: The question was not on taxes,
18 so please proceed.

19 Q. Do you know of the statute of limitations in
10:04:55 20 general in Nicaragua?

21 A. So that is a different question. The statute
22 of limitations is regulated in the Civil Code, and we
23 talk about the period that has to do with properties.
24 So we're talking about whenever we are released of a
10:05:27 25 burden, those are the different types of statutes of

10:05:31 1 limitations, but I don't know in particular what you are
2 talking about.

3 Q. Just to confirm that there is no general
4 period, you were talking about adverse possession,
10:05:40 5 right. So my question is there are no general period?

6 A. Yes, there are some specific periods for the
7 statute of limitations.

8 Q. And what are they?

9 A. The Civil Code establishes several assumptions,
10:05:51 10 depending on whether they are actions or rights in
11 connection with the property title, and the Civil Code
12 gives us the different periods of the statute of
13 limitation.

14 MR. APPLETON: Give us a minute.

10:06:27 15 PRESIDENT: Excuse me, I didn't hear that.

16 Q. Let me refer you to the document that is R-228
17 that you have identified as a document that you reviewed
18 in your report or for your report. In particular, I am
19 going to refer to the first page.

10:07:27 20 Do you know who Dania Hernández is?

21 A. I understand that she's the consultant that
22 carried out the Rapid Environmental Study.

23 Q. In this report do you indicate somewhere where
24 you work or who she works with?

10:07:47 25 A. At this point in time I do not recall, but she

10:07:49 1 authored the Rapid Environmental Study.

2 Q. Yes. But my question is whether in this report
3 that you mentioned that you have analyzed for drafting
4 your own report, whether you mentioned who she worked
10:08:05 5 for.

6 A. No. I understand that there was an attachment
7 with the request by INAGROSA to be considered as a
8 private wildlife reserve. That was the x-ray of the
9 property so that, based on the requirements under the
10:08:24 10 protected areas regulation, we can get to obtaining the
11 recognition as a private wildlife reserve. This is
12 necessary for that declaration.

13 Q. Now, the report shows on the first page, on the
14 top of the document, American Bird Conservancy and
10:08:58 15 El Jaguar Lodge. Would it be possible that
16 Ms. Hernández was working for either of these entities?

17 A. I do not know. We need to ask Ms. Dania. But
18 the document attached is because it was attached to the
19 application. Therefore, that's the reason why this is
10:09:18 20 part of the administrative proceeding. It was used by
21 INAGROSA to present its application for a private
22 wildlife reserve. INAGROSA used this document.

23 Q. So nowhere in this document that you mentioned
24 that you reviewed we see any reference to this being
10:09:41 25 sent to INAGROSA?

10:09:45 1 A. No. No, but if this is attached to the
2 application, it's because INAGROSA is using the
3 document. And if they are using the document, it's
4 because they got it to present it to their favor.

10:09:57 5 Q. Do you know whether the document was final or
6 just a proposal?

7 A. The document says proposal, and it makes sense
8 because of the following. This is part of the
9 requirement followed by the law, so that if a person is
10:10:16 10 interested in having a declaration of private wildlife
11 reserve for their property, they need to present an
12 x-ray.

13 When I'm talking about an x-ray, this is a
14 general term to explain the contents of the document.
10:10:28 15 That would be a general description of the area. They
16 need to characterize the area, they need to describe the
17 area, all of the biodiversity in the area. And clearly,
18 there is a management plan that is attached so that we
19 can see that the applicant has a clear idea of what the
10:10:51 20 intent is when it is declared as a private wildlife
21 reserve. That's why whenever an administrative
22 resolution is handed down, it is indicated that after
23 that administrative resolution an agreement for
24 management will be entered and also the management plan
10:11:13 25 will be authorized.

10:11:14 1 Because throughout the administrative
2 proceeding, the interested party presented that
3 proposal. So this is part of the record, and for this
4 to be part of the record, INAGROSA used it.

10:11:26 5 Q. But would you agree with me -- the question is
6 that the first page of this document shows that this is
7 a proposal?

8 A. That's what it says.

9 Q. Do you agree with me that the Nicaraguan
10:11:57 10 constitution establishes that the legislative approval
11 of international instruments entered into by bodies or
12 organizations that are governed by international law
13 will be subject to the effects -- to the legal effects
14 within Nicaragua and beyond Nicaragua?

10:12:24 15 A. Yes. Any treaty that is entered into has to be
16 ratified by the assembly, and then after that state
17 enters into that, this is ratified by the assembly and
18 it follows the procedure that is established under the
19 organic law. So there is a procedure to be followed.

10:12:58 20 Q. I am going to show you the witness statement by
21 Melva Jo Winger that has been identified as CWS-8 at
22 paragraph 23. Can you review the -- were you able to
23 review the witness statement by Melva Jo Winger when you
24 drafted your report?

10:13:32 25 A. It doesn't ring a bell, but if you allow me to

10:13:35 1 look at the documents. No, it was not part of the
2 documents analyzed.

3 Q. I understand you're saying it was not one of
4 the documents reviewed, so not one of the documents that
10:14:08 5 you identified in your report as having reviewed, but
6 just to confirm, you did not review this?

7 A. No. I included here the documents that I
8 reviewed.

9 Q. Did you request to review documents beyond the
10:14:26 10 ones identified in your witness statement?

11 A. No, just the ones that we see there.

12 Q. I am going to refer you to paragraph 33 of the
13 statement by Melva Jo Winger.

14 MS. GONZÁLEZ: Objection. The expert has
10:14:46 15 mentioned that he has not reviewed that witness
16 statement. That is not part of his expert report.

17 PRESIDENT: Let's see whether he can
18 answer the question, but keep in mind that he's a legal
19 expert, not a witness of fact. So it should be a
10:15:03 20 question falling within his area of expertise.

21 Q. At paragraph 33, Ms. Melva Jo Winger indicated
22 that also, in the Counter-Memorial, Nicaragua --

23 A. Is that a translation, or are you paraphrasing?

24 Q. I am going to translate it for you.

10:15:45 25 "In the Counter-Memorial, Nicaragua

10:15:51 1 postulated that we would be subjected to governmental
2 denials of all discretionary permits necessary to
3 operate our business in Nicaragua. Thankfully,
4 according to legal expert Renaldy Gutiérrez, we did not
10:16:11 5 actually need the permits and authorizations that
6 Nicaragua has threatened would make our business illegal
7 and unworkable."

8 Have I read it correctly?

9 A. I don't know if you've read it correctly or
10:16:35 10 not.

11 Q. You're right. But did you hear what I said?

12 A. Yes, I heard it.

13 Q. And I am going to refer you to paragraph 30 of
14 the statement where Nicaragua -- or Ms. Melva Jo Winger
10:17:05 15 mentions that:

16 "Nicaragua has tried to exert crippling
17 financial pressure on our investments in Nicaragua.
18 Nicaragua froze our title in Hacienda Santa Fé. The
19 freeze effectively prevented us from raising funds on
10:17:27 20 that collateral to fund our arbitration ."

21 Did you hear that?

22 A. Yes, I did.

23 MS. CARDENAS: We have nothing else for
24 this witness.

10:18:08 25 PRESIDENT: You have no questions on these

10:18:09 1 two paragraphs?

2 MS. GONZÁLEZ: You read two paragraphs on
3 the statement by Melva Jo Winger, but you did not ask
4 any questions. What was the question?

10:18:51 5 Q. You have stated that the precautionary measure
6 and the preventive annotation did not -- or the
7 preliminary annotation did not have any impact on the
8 INAGROSA title in connection with Hacienda Santa Fé, and
9 I am asking you whether these assertions by Riverside in
10:19:20 10 this arbitration change your opinion as to the impact it
11 could have had -- that precautionary measure could have
12 had.

13 A. My appreciation as to the content of the report
14 do not change. As a matter of fact, after I heard your
10:19:41 15 reading, I considered that -- I understand that the lady
16 is a witness and I'm not sure whether she has knowledge
17 about Nicaraguan law, but article 102 of the registry
18 does not stop INAGROSA from continuing with the titling
19 of their property.

10:20:09 20 I do not see a direct impact because the
21 precautionary measure has been granted to Riverside to
22 protect an investment, and that investment became a
23 right as such.

24 So I see that from the legal standpoint
10:20:28 25 there is some sort of due diligence that is framed in

10:20:30 1 articles 44 of the constitution, 99 and 100 is in
2 connection with property protection. 99 and 100 are
3 related to the obligation that the State has to protect
4 private property and private investment.

10:20:49 5 Therefore, when the precautionary measure
6 is applied, if there is no transfer of the ownership,
7 rather obligations are being assigned to the State to
8 protect and preserve, I do not see any detriment to
9 Riverside because they're being guaranteed that their
10:21:11 10 property is going to be protected.

11 Q. As you mentioned yesterday, you never worked at
12 a bank, correct?

13 A. Correct.

14 Q. And you never worked in the finance area,
10:21:22 15 correct?

16 A. Correct.

17 MS. CARDENAS: Thank you very much.

18 PRESIDENT: Thank you, Ms. Cardenas. Are
19 you ready to do your redirect now, or should we break?

10:21:35 20 MS. GONZÁLEZ: Yes, we should go to the
21 break, please.

22 PRESIDENT: Okay. We have been going on
23 for one hour and 20 minutes. So let's break now for
24 15 minutes for our morning break until 10:35.

10:21:49 25 And, Professor Sequeira, the same reminder

10:21:52 1 as yesterday: please don't speak with anybody about your
2 testimony during the break. Thank you.

3 (Recess taken)

4 PRESIDENT: Okay. Let's proceed. We
10:42:49 5 understand Claimant has a housekeeping issue to raise.

6 MR. APPLETON: Do I have a housekeeping
7 issue to raise? Sorry, I thought actually,
8 Mr. President, you were going to raise the question
9 rather than me.

10:43:02 10 PRESIDENT: It's your issue, not mine.
11 May I encourage parties to communicate directly on these
12 kind of issues so that we don't need to spend valuable
13 hearing time?

14 MR. APPLETON: Mr. President, it deals
10:43:15 15 with the nature of the procedural order and the lack of
16 predictability on certain issues that's going to affect
17 both sides today. Today and tomorrow. So the
18 difficulty is is that the order requires us to guess
19 when certain things are going to be finished because we
10:43:32 20 don't know what the other side's going to do with
21 respect to the redirect.

22 PRESIDENT: I understand. That's why I
23 said please communicate between counsel. That's the
24 easy way to find out and know when to circulate the
10:43:43 25 slides.

10:43:44 1 MR. APPLETON: All right. I'll take your
2 position now, but we still need the information to be
3 able to facilitate what you would like, which is to have
4 timely circulation of demonstratives. So I still need
10:43:57 5 to ask that question.

6 PRESIDENT: For now, yes. But going
7 forward, please communicate directly between counsel so
8 that we don't need to waste the hearing time for these
9 issues. It can be handled during breaks. If you cannot
10:44:11 10 agree or if there's a disagreement, then you come to the
11 Tribunal.

12 MS. GONZÁLEZ: Mr. President, if I may.
13 We expect this redirect examination to last about
14 15 minutes, so we encourage Claimant to send the
10:44:26 15 PowerPoint presentation of Mr. Kotecha.

16 MR. APPLETON: And then the question is
17 will we need to switch legal teams over, or are you
18 ready to proceed? In other words, will we need another
19 break to switch to the damages from the legal team? I
10:44:43 20 just need to understand. Are we proceeding straight on?
21 No? We're good. Then fine, we can proceed on that
22 basis.

23 PRESIDENT: Okay. Let's proceed.
24 Ms. González.

10:44:54 25 MS. GONZÁLEZ: Thank you, Mr. President.

10:44:54

1

REDIRECT EXAMINATION

2

BY MS. GONZÁLEZ:

3

Q. Mr. Sequeira, good morning.

4

A. Good morning.

10:45:01

5

Q. I'm Analia González, attorney for the Republic

6

of Nicaragua. I'm going to ask you a series of

7

questions following up on the questions that were put to

8

you by Ms. Cardenas.

9

First of all, yesterday you were asked if

10:45:16

10

you had stated during your presentation that you

11

represent Nicaragua, and you indicated that you were

12

making reference to a quote. So I would like to ask if

13

we could please show up on the screen slide 5 of

14

Mr. Sequeira's presentation.

10:45:40

15

Now, do you see slide 5 of your

16

presentation up on the screen?

17

A. Yes, I do.

18

Q. If you could please explain what you were

19

referring to when you said that you were -- that it was

10:45:52

20

a quote when you were referring to representation of

21

Nicaragua.

22

A. On this slide, what I was showing, the lower

23

part -- well, you'll see there is some quoted text, and

24

then I put a paragraph there in those quotes. And then

10:46:13

25

at the bottom line there's a reference to where it comes

10:46:16 1 from. So those are not my words. It's what was
2 literally to be found in that document, C-253, request
3 for urgent provisional measure for appointment of a
4 judicial custodian. So that's a quote. Those aren't my
10:46:41 5 words. It's simply a quote, and that's why it's in
6 quotation marks and italics.

7 Q. Thank you, Mr. Sequeira. You were also asked
8 yesterday about the moment when you indicated in your
9 report that Riverside and INAGROSA came to learn of the
10:46:59 10 precautionary measure. The attorney said that you said
11 that date was November 2022.

12 I'd like to refer to paragraph 16.3 that
13 you were asked to read yesterday of your report. If we
14 could please put that up on the screen.

10:47:23 15 If you could please confirm, in your
16 opinion, what is the date when INAGROSA came to learn of
17 this precautionary measure.

18 A. Yes. In that paragraph, if you take note --
19 well, could I read it first to be in context? It says
10:47:43 20 16.3:

21 "This information is consistent with the
22 letter from Nicaraguan law firm Arias," and then there's
23 a footnote there, "which clearly explains the situations
24 where it evidently became aware of the implementation of
10:48:02 25 the provisional measure, indirectly, by means of a

10:48:06 1 Related Certificate issued by the Public Registry of
2 Jinotega on June 30th, received by Arias on July 13,
3 2022."

4 And then, once again, there is a footnote.
10:48:29 5 "Likewise, it became aware of the
6 existence of a provisional measure through Literal
7 Certificate that was received by Arias on November 1,
8 2022, with the complete file number."

9 What this paragraph means is that,
10:48:44 10 technically speaking, there were two moments, and the
11 idea is to situate the reader in time. The first moment
12 when the moving party came to learn of this was when the
13 law firm wrote and said that in the Related Certificate
14 there was a preventive annotation, and subsequently, in
10:49:17 15 November of 2022, they had requested a Literal
16 Certificate. So they're two different documents and two
17 different times.

18 So the objective of this paragraph was to
19 situate the reader in time so as to be able to
10:49:36 20 appreciate when the moving party came to learn of a
21 precautionary measure or provisional measure directly.
22 So when they asked for the Related Certificate, which
23 was July 13, 2022, and subsequently with the Literal
24 Certificate on November 11, 2022.

10:50:02 25 Q. Thank you. Also, yesterday you were shown a

10:50:05 1 document C-703.

2 MS. GONZÁLEZ: If we could bring that up,
3 please. C-703.

4 Q. I'm going to give you just a moment to read
10:50:24 5 this document, and I'm going to ask if you could explain
6 what is this document, and then I'll ask you another
7 question after that. But if you could please read it
8 and tell me what this document is.

9 A. Very well. I'll read it aloud because you've
10:50:45 10 asked me. Number of this matter --

11 Q. No, it's not necessary for you to read it.
12 Perhaps you could just read paragraphs 1 and 2 to
13 yourself and then explain what this document is.

14 A. Very well. Point 1, having concluded the
10:51:04 15 purpose of the request for precautionary measure
16 requested by the Office of the Attorney General,
17 Jinotega office, for a precautionary measure having to
18 do with the custodianship of a real property and
19 registry annotation of the order, it is ordered that the
10:51:23 20 actions be definitively archived. Against this
21 resolution there is no appeal as per article 401
22 paragraph 5 of the Code of Civil Procedure.

23 This is an order -- orders known as Autos
24 in the Nicaraguan legal system -- well, that is the name
10:51:38 25 given, Auto, to a communication issued by a judge. The

10:51:42 1 judge communicates with the parties through a document
2 of this sort, and these kinds of documents are known as
3 Autos, orders. In contrast with what's been projected
4 as well in this hearing, if you look at the certificates
10:51:54 5 of notice contained therein, this order is set forth in
6 the certificate of notice.

7 That is what this kind of order is. It's
8 a form of communication. And technically speaking, what
9 it's saying there is that, well, in practice, it is
10:52:15 10 interpreted that the file goes to the archive -- is in
11 archive -- not all of the files can be at the courts.

12 So let me put in it these terms. This is
13 not the only precautionary measure before that court,
14 and it's not the only file at the office of the clerk or
10:52:43 15 the judge. So the judge says we're going to send this
16 to archive. The judge has indicated that he considers
17 that the process in the matter has concluded, so
18 therefore we're going to send it to the archive. This
19 doesn't mean that a party subsequently cannot consult
10:53:03 20 that file.

21 For example, I can cite what was done by
22 the colleagues from the office of the lawyers for
23 Nicaragua when they said that they went to the judicial
24 office to get a copy of the file. So it was an archive
10:53:25 25 considered to be of a matter concluded, and this was

10:53:28 1 explained in the letter to the colleagues from
2 Nicaragua. So parties can go and get information. It's
3 not that the file is burned or anything of the sort.
4 Rather, it is kept. But it's no longer at the judicial
10:53:43 5 office. So it's always available for parties to
6 consult.

7 Q. Thank you. Now, when the lawyer read section 2
8 of this letter, she read up to where it says "no appeal
9 may be brought against this resolution." But then it
10:54:08 10 continues saying, "as per article 401, paragraph 5, of
11 the Code of Civil Procedure."

12 What does article 401, paragraph 5, of the
13 Code of Civil Procedure refer to? And let me know if I
14 should project it up on the screen or if you happen to
10:54:30 15 know.

16 A. Yes, please put it up on the screen.

17 Q. Okay. Let's go to RL-0001, please.

18 If you could -- well, I'm going to let you
19 read this. You can read it to yourself, not aloud, and
10:55:50 20 I'll then ask you to go to subparagraph 5 which is on
21 the next page.

22 If you could go to where it says "if the
23 person requesting the proceeding does not appear," this
24 is the section that the letter is referring to. And I'd
10:56:23 25 like to know if you could explain what it is referring

10:56:27 1 to where it says, "no appeal may be brought against this
2 decision." What decision is being referred to?

3 And for the record, this is article 401 of
4 the Code of Civil Procedure. It's in the chapter
10:56:54 5 regarding processing and hearings in the case of
6 preparatory measures. I'd ask if you could put this in
7 context and tell me in the resolution of 19 May what
8 does it mean where it says that "the action shall be
9 archived and no appeal may be brought against this
10:57:20 10 decision." What does that refer to?

11 A. The expression "no appeal may be brought" makes
12 reference to remedies such as a motion for appeal,
13 motion for reconsideration or motion for cassation. It
14 doesn't mean that the right to bring a motion for
10:57:44 15 nullity cannot be brought in case somebody feels that
16 due process has been violated. The expression "no
17 appeal may be brought" refers to the appeals that are
18 set out in the code to appeal, to reconsider the order,
19 depending on the type of judicial decision in question.

10:58:07 20 But where it says "no appeal may be
21 brought," it doesn't limit the right. It doesn't mean
22 the party can't do anything. Rather, one can always
23 bring a motion for annulment if someone believes that
24 there's been some violation, as has been discussed. It
10:58:27 25 has to do with the argument considered valid -- if it's

10:58:32 1 relative nullity or absolute nullity, that still is
2 available. But where it says "no appeal may be
3 brought," this refers to reconsideration appeal. Those
4 are the kinds of appeals covered there.

10:58:44 5 Q. And this with respect to this resolution that
6 says "to be archived."

7 A. Agreed.

8 Q. You were also asked about --

9 PRESIDENT: May I remind the parties, I
10:59:01 10 don't think we have an English translation of this
11 particular provision, so if that could be provided. I
12 forget now whether this is one of the additional
13 translations that we already discussed yesterday. If
14 yes, forget about what I said. If not, we would
10:59:20 15 appreciate a translation.

16 MS. GONZÁLEZ: We will. Thank you,
17 Mr. President.

18 Q. You were asked several questions with respect
19 to the types of measures that INAGROSA and Riverside
10:59:38 20 could have taken once they found out, whenever it might
21 be, once they found out about the precautionary measure.
22 It was also discussed in this hearing and the lawyer
23 asked you questions about absolute nullity and relative
24 nullity. What I'd like to ask you is is there some
11:00:00 25 period for filing a motion for absolute or relative

11:00:04 1 nullity? And please explain these.

2 A. Very well. Perhaps you'll remember when
3 article 415 was on the screen and 416 as well. You can
4 allege at any time that there is an act that is null and
11:00:29 5 void. This is what the provisions of the Civil Code of
6 Procedure state.

7 Now, in connection with the voidability of
8 an act, it has to be shown in the first appearance
9 before the court. I think, to be clear, we need to talk
11:00:53 10 about the first appearance before the court, right? How
11 long do I have to do that? The law allows us my full
12 lifetime to do it? No.

13 Article 131 of the Code of Civil Procedure
14 provides that, if there is no set period or a set date,
11:01:25 15 one must understand that this needs to be done within
16 24 hours. If we use the provision as a reference
17 because it says simply what is the first appearance,
18 right, and there is no term for that, so one is to
19 understand that that term is 24 hours.

11:01:46 20 What happens if, taking into account these
21 two references, I do not act within 24 hours? We have a
22 principle of procedural validation of the act and then
23 article 44 applies, and we read it, the last part of
24 article 144. If the party -- although it may have
11:02:08 25 gained knowledge of the voidability of the act and it

11:02:10 1 doesn't say anything about it, the act is understood as
2 valid, and it has all legal effects. This is what the
3 provision says.

4 That is the difference between an act that
11:02:21 5 is voidable and an act that is null and void. And
6 that's what I can explain about that.

7 Q. INAGROSA, did it have any remedies at its
8 disposal to claim about the lack of notice once the file
9 had been closed out or archived?

11:02:52 10 A. Yes, of course. That possibility has always
11 been open to it. This possibility also depends on the
12 interpretation of the attorney that seeks to indicate
13 that there was a violation of the law.

14 What I think is that a lawyer can attack
11:03:21 15 the communication, and that is why I am connected to
16 article 144, which is the voidable act, relative
17 nullity. But they're saying, okay, this creates a
18 defenseless situation for me. Okay, fine. But you can
19 still appeal because you have the possibility of
11:03:45 20 deciding this under absolute nullity. So you have the
21 possibility as well.

22 If you think that your right was violated,
23 your right to defense was violated, or if you think that
24 a procedural rule was violated or a communication was
11:04:05 25 not provided to you, well, you have remedies, and it

11:04:10 1 depends on how the attorney examines the case.

2 I think that this was an act of
3 communication. Article 144 talks about acts of
4 communication and also how to cure any defects related
11:04:25 5 to acts of communication.

6 Q. A number of remedies were mentioned yesterday,
7 and a number of terms were also indicated yesterday.
8 Ms. Cardenas said the fact that Riverside was not
9 notified resulted in the fact that Riverside did not
11:04:45 10 have an opportunity to challenge and the period of time
11 of three days never ran.

12 What did you mean by that three-day period
13 of time, and what kind of remedy are we referring to in
14 that case in connection with that three-day period?

11:05:05 15 A. The three-day period makes reference to the
16 possibility that a party has to challenge the
17 application of the measure. You can call this a
18 challenge or an opposition, procedurally speaking. When
19 a notice is given, the party has three days to challenge
11:05:26 20 that measure in the case of precautionary measures that
21 are urgent in nature.

22 If we're talking about other remedies,
23 then you have nullity of course, as we spoke before.

24 Q. Okay. According to you, the three days refer
11:05:44 25 to the fact that the notice was given, correct?

11:05:49 1 A. Correct.

2 Q. What happens if the notice was not given? Was
3 there any remedy that the party has?

4 A. Yes, the remedy of nullity.

11:05:59 5 Q. This morning you were asked a question -- or
6 rather you were shown a notice to INAGROSA that was

7 given in connection with the renewal of the

8 precautionary measure in 2024. Ms. Cardenas showed you
9 a page, and she had you read who the notice had been

11:06:24 10 given to, and it said "no signature."

11 What happens when somebody refuses the
12 notice or refuses to sign? Is the notice deemed invalid
13 in that case?

14 A. Oftentimes that situation arises. Article 149
11:06:52 15 of the Code of Civil Procedure, you have the possibility
16 of providing notice via a certificate. And there are a
17 number of rules in that article, and it says that if the
18 notifying officer comes to the venue and the party

19 refuses to receive the certificate of notice, then the
11:07:27 20 notifying officer writes that out, and if the person is
21 not home, the notice may be given to a family member or
22 an assistant or somebody that provides a service to that
23 person. I understand that in this case it was a
24 security guard. So the notifying officer could do that.

11:07:52 25 The security guard said -- and this

11:07:55 1 happens a lot in practice, because oftentimes not
2 everyone is a lawyer, right? So a person sees a
3 judicial notice and the person is a little afraid,
4 especially if the notice is not addressed to them. And
11:08:07 5 the person may say, okay, I am a security guard, I work
6 here, and he just wrote "I am the security guard." He
7 didn't sign. And that is permitted.

8 Article 149 provides how the notifying
9 officer should act.

11:08:25 10 Q. Thank you, sir. You were also asked about the
11 bond related to the precautionary measure, and you said
12 that no bond should have been required. You made
13 reference to a number of articles, and I wanted to ask
14 you why is it that in this case no bond should have been
11:08:53 15 required or should be required of the State? Can you
16 explain?

17 A. Yes. This is very important when we examine
18 interpretations. Because in law, definitions are
19 dangerous. That is a maxim. If you cannot identify
11:09:14 20 certain names or adjectives, you cannot reach your
21 conclusion.

22 What's my point? Okay. The article that
23 provides that a bond is to be requested mentions that
24 the State is exempted from presenting bonds in
11:09:35 25 connection with charges, taxes or services and there is

11:09:44 1 no other qualification.

2 So we have to look at the act. In this
3 case we have a precautionary measure. The depository is
4 Nicaragua. Nicaragua has the obligation to provide that
11:09:57 5 service, to provide custody of the property. So from
6 that viewpoint, that term is not defined in the Code of
7 Civil Procedure.

8 So I'm saying that Nicaragua is exempt
9 from that obligation.

11:10:15 10 Q. Also you were asked about the notice to
11 Riverside in 2024 in connection with the renewal of the
12 precautionary measure. In your experience as a litigant
13 in Nicaragua, how long does it take for a letters
14 rogatory when it's sent abroad? How long does it take?

11:10:39 15 A. Well, these are bureaucratic proceedings
16 because they entail internal communications amongst the
17 different branches of the government. It has to be
18 issued by the Supreme Court of Justice. That
19 information needs to come out of the court of Jinotega,
11:11:00 20 then get to the Supreme Court of Justice. Then it has
21 to go to the Ministry of Foreign Affairs. The Ministry
22 of Foreign Affairs has to communicate with its
23 counterpart in the country where the letters rogatory is
24 going to be sent, and the receiving country is going to
11:11:20 25 apply its own rules. There's also, of course, the issue

11:11:26 1 of due diligence in the framework of international legal
2 assistance.

3 Q. Thank you.

4 In connection with administrative law and
11:11:37 5 the penalties in connection with administrative law,
6 what should the government do to determine where a
7 penalty is to be applied?

8 A. Well, there has to be a triggering event that
9 creates the penalty.

11:11:56 10 Q. So what steps should the State take or the
11 government take to determine if a penalty is to be
12 applied?

13 A. First, it has to gain knowledge of that event,
14 verify that that event has taken place. But if the
11:12:08 15 State does not know about the event, no penalty can be
16 applied because the government, the State, does not know
17 about that event so it cannot apply the penalty.

18 If the party has not come to the given
19 institution and provide notice of the event, the
11:12:29 20 government is not going to say, okay, I have gained
21 knowledge of this because of intuition. No. What needs
22 to happen is that some requirements have not been
23 fulfilled.

24 MS. GONZÁLEZ: Thank you, sir. I have no
11:12:50 25 further questions. Thank you.

11:12:53 1 PRESIDENT: Thank you very much. Any
2 questions from my colleagues? There are no questions
3 from the Tribunal.

4 Thank you very much, Professor. Thank you
11:13:07 5 for your time. You are released.

6 MR. SEQUEIRA: Thank you.

7 PRESIDENT: I suggest we continue
8 immediately with the expert. Is he available,
9 Mr. Kotecha?

10 I asked counsel whether the expert is
11 available.

12 MR. APPLETON: He's here.

13 PRESIDENT: Let's have a very brief
14 technical break to get the witness in place, but let's
11:13:53 15 not leave the room.

16 *(Brief Recess)*

17 MR VIMAL KOTECHA

18 PRESIDENT: Let's resume. Good morning,
19 Mr. Kotecha.

11:23:28 20 MR. KOTECHA: Good morning.

21 PRESIDENT: First question is that's the
22 way you pronounce your name?

23 MR. KOTECHA: Yes, it is.

24 PRESIDENT: So we understand you'll be
11:23:35 25 dealing with some confidential information, so we need

11:23:40 1 to make sure that we suspend the live stream for those
2 periods. Mr. Appleton?

3 MR. APPLETON: I think it would be helpful
4 before we swear the witness in that we address some of
11:23:50 5 the technical issues so we're very clear.

6 Mr. Kotecha's report, his two reports,
7 they both have been designated as protected information,
8 and the parties have agreed on the protected information
9 in the joint bundle. And you'll see that indicated --
11:24:05 10 because you had a procedural order that dealt with it,
11 you had us indicate by agreement in red.

12 There are 94 confidential documents that
13 have been attached plus these two reports. I believe
14 they are CER-1 and CER-4, but I might have it wrong.
11:24:25 15 I'm often corrected by my colleagues. But I believe
16 those are the correct numbers.

17 So the entirety of those -- so they've
18 been designated for some time. The entirety of them are
19 protected. So our suggestion is that the best way to
11:24:41 20 proceed is to actually protect -- in order to not have
21 protected information released is to basically move into
22 closed session, and we would anticipate that the
23 entirety of the session would be closed session, unless
24 we find that there's something that is outside it, but I
11:25:01 25 think that's very unlikely.

11:25:05 1 So, I mean, I could stand with the red,
2 but I think I'd like to start that in this way, so that
3 would be our intention based on the materials as they've
4 been done and the terms of the CAFTA which deal with the
11:25:19 5 protection of protected information, and this, in
6 particular, is confidential business information, and
7 also with respect to the orders that you've made,
8 including your provisions on that, are in Procedural
9 Order No. 3 in addition to the terms that are in
11:25:33 10 Procedural Order 1, and I believe there's a reference to
11 it in Procedural Order 11. If you'd like, I can give
12 you a reference to all of those orders. I happen to
13 have them handy if that would assist you. But if not,
14 you can trust me that you've covered this in multiple
11:25:47 15 orders and in multiple ways, plus in additional
16 procedural discussions along the process.

17 PRESIDENT: Any comments from the
18 Respondent on this?

19 MS. GONZÁLEZ: No comments. Thank you.

11:26:02 20 PRESIDENT: So we move on to a closed
21 session from now. If the entire report -- reports,
22 rather, are confidential, then the entire examination of
23 Mr. Kotecha will be confidential or closed. Let's
24 proceed on that basis.

11:26:25 25 Again, Mr. Kotecha, welcome.

11:26:28

1

MR. KOTECHA: Thank you, sir.

2

MS. CONOVER: The session has been closed.

3

VIMAL KOTECHA,

4

PRESIDENT: You have been called as an

11:26:32

5

expert witness to this proceeding, so in that capacity

6

you need to make a declaration of an expert witness.

7

You should have the text of the declaration, and I would

8

now ask you to make that declaration for the record,

9

please.

11:26:47

10

MR. KOTECHA: I solemnly declare upon my

11

honor and conscience that my statement will be in

12

accordance with my sincere belief.

13

PRESIDENT: Thank you very much.

14

So you'll be making a presentation of up

11:27:05

15

to 40 minutes instead of a direct examination. Again,

16

just to remind you of the rules, the 30 minutes cover

17

the summary of your evidence, and then the remaining

18

ten minutes are for you to comment on any new evidence

19

that has been submitted in this arbitration since your

11:27:28

20

last report.

21

Please proceed.

22

PRESENTATION

23

MR. KOTECHA: Good morning and thank you

24

for allowing me to attend. By way of background, I

11:27:51

25

thought I would start off with telling you a little bit

11:27:52 1 about myself. I am a chartered professional accountant,
2 I am a chartered business valuator. That is a
3 designation that specializes in valuation, litigation
4 and finance. I'm also certified in financial forensics.

11:28:06 5 Over the course of the last 24 years, I've
6 been retained by claimants, or plaintiffs as we call it
7 in my jurisdiction, and respondents and defendants.

8 I've served a term on the CICB, so the Canadian
9 Institute of Chartered Business Valuators, board of
11:28:27 10 directors. I was elected to that position by my
11 colleagues. And that is the governing board of the
12 valuation profession in Canada. There are members of
13 that designation around the world.

14 As part of the board, I was part of the
11:28:41 15 accreditation committee, and that is a committee that
16 oversees the exam process that qualifies new CBVs.

17 I've provided expert reports in domestic
18 litigation and also in international arbitration related
19 to valuation and loss of profits. I've been qualified
11:28:59 20 as an expert, again, in valuation/litigation matters.
21 I've also been appointed by the courts as a valuation
22 expert on a binding decision. As part of my experience
23 over the last 24 years, I've also had experience in
24 raising financing and M&A activity.

11:29:23 25 I'd like to start off with some

11:29:26 1 corrections to my first report. There were a number of
2 instances where I used the word "Riverside" as opposed
3 to "INAGROSA." So I'm correcting that as of today.

4 Table A6.1 should have read in the
11:29:43 5 paragraph 1992, not 2012.

6 In the scope of review, I missed citing
7 certain exhibits, and I am correcting that today.

8 There are some corrections to report
9 No. 2. Paragraph 2.6, page 6, line 2, to read "do not
11:30:10 10 include," missing the "not."

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 Paragraph 8.3 should read "44.75," not
11:30:26 15 "44.54."

16 In chart No. 6 on page 65, I did not
17 update the table to reflect the revised pricing. The
18 revised pricing was in the model, however.

19 And the last change is it should read
11:30:46 20 "post-interest," not "pre-interest."

21 As you know, this matter relates to the
22 quantification of the economic loss resulting from the
23 wrongful acts or the alleged wrongful acts against
24 INAGROSA and specifically by the Republic of Nicaragua.

11:31:09 25 The purpose of the quantification of

11:31:11 1 damages is to put Riverside back in the same position
2 that it would have been but for the wrongful acts taken.

3 In order to quantify the economic loss to
4 Riverside, I have been guided by the concept of fair
11:31:26 5 market value. While fair market value, I understand, is
6 not stated in the CAFTA, the common definition that I've
7 used over the course of 24 years, and has been accepted
8 by various courts, is the following:

9 "The highest price, expressed in terms of
11:31:46 10 cash equivalents, at which property would change hands
11 between a hypothetical willing and able buyer and a
12 hypothetical willing and able seller, acting at arm's
13 length in an open and unrestricted market, when neither
14 is under compulsion to buy or sell and when both have
11:32:05 15 reasonable knowledge of the relevant facts."

16 Now, I'm not going to spend that much time
17 on the next couple of slides because they're rather
18 legal matters, and I've been advised by clients that
19 this is the appropriate standards. But what I will
11:32:30 20 comment on is I calculated the fair market value under
21 expropriation, and also I calculated fair market value
22 under the other measures of breach, being fair and
23 equitable treatment, full protection and services, most
24 favored nation and national treatment. And having done
11:32:56 25 that, I've done it on the same date, being June 16,

11:33:01 1 2018.

2 I have assumed, based on guidance from
3 counsel, that any composite act is also to be valued on
4 June 16, 2018.

11:33:25 5 I was asked by counsel to mention
6 restitution. In my opinion, restitution is not possible
7 in this matter because you cannot put the Claimant back
8 in the same position that it would have been but for the
9 wrongful acts. As an example, the forest and the trees.

11:33:49 10 My understanding is those trees were well
11 over 100 years old. You can never replace those trees,
12 at least in our lifetime. And for that reason alone, I
13 don't believe restitution is possible.

14 Fair market value. There are three
11:34:18 15 general approaches to fair market value. There's an
16 income approach. An income approach can be further
17 defined in either as a discounted cash flow or DCF
18 approach or capitalized cash flow, CCF, approach.

19 The difference being, in a CCF approach
11:34:40 20 it's usually used when there's a history of operations
21 in the business, and that business has reached a period
22 of maturation. In other words, there is very little
23 difference expected between the historical financial
24 performance and the future financial performance.

11:34:59 25 A DCF approach is very different. A DCF

11:35:03 1 approach will be used where there isn't much historical
2 performance to go on or to rely on, or the past is very
3 different from the future. And that's the ideal
4 situation and when a DCF approach would be used. As an
11:35:25 5 example, if you have a startup company, there's very
6 little historical performance, but yet, you can try to
7 forecast what the revenues and the costs may be in the
8 future.

9 A market approach. A market approach
11:35:43 10 determines the value of the subject company using
11 publicly available information. This can be somewhat
12 challenging, but it does provide a benchmark or a
13 guidance to test some of the other approaches that can
14 be used.

11:36:00 15 The third approach is an asset-based
16 approach or an adjusted asset-based approach. This
17 approach is used when the underlying asset values
18 constitute the primary value of the entity. In other
19 words, there's likely no cash flows to value in the
11:36:23 20 future.

21 The concept of value is forward-looking.
22 Value is often defined as being the present value of
23 future cash flows, and the best way to determine fair
24 market value is to use multiple approaches. I use, in
11:36:50 25 the first instance, a discounted cash flow approach. I

11:36:55 1 then tested that approach with a market approach.

2 As an alternative, should the Tribunal
3 decide that is not the appropriate approach to do, I
4 also included in my reports an adjusted asset-based
11:37:12 5 approach based on the value of the lands. In my
6 opinion, the following approaches are not acceptable
7 under fair market value:

8 A historical cost approach. A historical
9 cost approach is dependent on when you bought the asset.
11:37:31 10 That could go back 20, 30, 40, 50 years ago. It is not
11 reflective of the value today. As an example, I bought
12 my house 20 years ago. The price I paid for my house
13 then is not reflective of what it is worth today. And
14 if I were to sell that house today, I would then have to
11:37:54 15 buy another house in today's market.

16 A differential approach -- and this is the
17 approach used by Mr. Hart -- it does not compensate for
18 the lost business opportunity and assumes that the land
19 has been returned in the exact same condition as at the
11:38:11 20 date of the wrongful act.

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PRESIDENT: Mr. Kotecha, you are now at 30 minutes for the first part of your presentation, so you should wrap up this part and move to your comments on Mr. Hart's second report.

MR. KOTECHA: Okay. Shall I finish this --

PRESIDENT: Finish this in the next minute or two.

MR. MULLINS: You're up to slide 30. You need to finish. I know there was time for questioning, but you need to finish this slide before the next ten.

PRESIDENT: That's what I understand, that the commentary part starts from slide 30?

MR. KOTECHA: What slide are we on?

MR. MULLINS: We're on 25.

MR. KOTECHA: I'll go quite quickly.

PRESIDENT: Just finish this in the next three or four slides and move on.

MR. MULLINS: Slide 29 is the switch-over.

MR. KOTECHA: I won't go line by line.

You can read this on your own time, so I won't go line

12:01:50

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by line, but I will highlight the different assumptions

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that I made.

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PRESIDENT: Thank you very much,

9

Mr. Kotecha.

12:08:04

10

Let's break for lunch now before the cross for one hour until ten past 1, and Mr. Kotecha, you know the rules. You cannot discuss your evidence with anybody during the break.

14

12:08:30

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We understand there's a request for a longer lunch break. An hour and a half. Any objections on the part of the Respondent?

17

MS. GONZÁLEZ: No, no objection.

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12:08:45

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01:43:08

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(Recess taken)

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PRESIDENT: We go back on record.

3

MS. CONOVER: Yes. The session is opened.

4

PRESIDENT: So the Tribunal has considered

02:22:54

5

carefully the parties' positions on whether the closing

6

arguments should be held on Friday as planned and/or

7

whether they should be replaced by post-hearing

8

submissions.

9

We have considered all the options that we

02:23:22

10

have discussed carefully, all four options, and after

11

careful consideration, the Tribunal has decided that the

12

closing session, closing argument, will be canceled and

13

will be replaced by post-hearing submissions, written

14

post-hearing submissions, and we invite the parties to

02:23:47

15

do the following:

16

First of all, agree on the scope and the

17

length of the post-hearing submissions. We encourage

18

the parties to be concise and effective. Of course,

19

even if the oral closing arguments are canceled, you can

02:24:13

20

say whatever you planned to say during your oral closing

21

in the post-hearing submissions, so the post-hearing

22

submissions are instead of the oral closing argument.

23

And the focus of the post-hearing submissions should be

24

on the evidence that has been given, that has unfolded

02:24:40

25

over the last two weeks. State your case in light of

02:24:44 1 the evidence that is now on the record.

2 And we also invite the parties -- apart
3 from trying to agree on the page limit -- agree on
4 deadlines. We would invite the parties to try to agree
02:25:07 5 on the earliest possible deadline for the post-hearing
6 submissions so that these issues are still fresh in your
7 minds and in our minds.

8 And the third request would be that you
9 also confer and try to agree on whether one round is
02:25:31 10 sufficient or whether you want to have brief rebuttals.

11 And the next item is then the final
12 session, which we planned to do at the end of the
13 closing argument on Friday to discuss issues such as the
14 post-hearing submissions as well as cost submissions.

02:26:06 15 So we would invite parties also to try to agree on cost
16 submissions, including deadlines, one or two rounds.

17 And the question then becomes, given that
18 we are beginning to run behind on the examination of the
19 experts, quantum experts, whether we should have this
02:26:36 20 discussion on housekeeping issues at the end of the day
21 on Thursday or whether Friday morning would be an
22 option. We understand it may not be an option for
23 Mr. Appleton. You only need to say no, and we will have
24 the final session at the end of the hearing tomorrow
02:26:53 25 evening.

02:26:54 1 MR. APPLETON: I think we should try for
2 Thursday for now, and we'll do the best we can.

3 PRESIDENT: Sorry, I didn't hear you.

4 MR. APPLETON: I'm sorry. We'll try for
02:27:04 5 Thursday for now, and we'll do the best we can.

6 PRESIDENT: Let's aim for Thursday
7 evening, tomorrow evening, for the final session where
8 we discuss the remaining issues. In the meantime, if
9 counsel could try to agree on these outstanding items
02:27:21 10 that I just listed.

11 So that's where we are. If there's
12 nothing else, I suggest we proceed with the examination.

13 MR. APPLETON: One brief question that
14 could help the parties because the parties have already
02:27:35 15 been in discussion on all these issues, including the
16 cost submissions as well.

17 At this point, just as a general
18 indication, has the Tribunal thought about how many
19 questions it might be putting?

02:27:49 20 PRESIDENT: From us, we have likely four
21 or five issues. So it won't be a long list. The focus
22 will be on issues we believe are either important or
23 issues that have not been, in our view, fully briefed.

24 But, of course, in the post-hearing
02:28:07 25 submissions you should state your case fully, in light

02:28:12 1 of the evidence we have now on the record, and at the
2 same time address the questions for the Tribunal.

3 MS. GONZÁLEZ: When can we expect to
4 receive those questions, Mr. President?

02:28:26 5 PRESIDENT: We will send them. We can
6 send them tomorrow evening. Maybe we can distribute
7 them at the end of the day tomorrow. There is no rush
8 now with them because they will not be discussed at oral
9 closing, so they should be addressed in your
02:28:44 10 post-hearing submissions.

11 MS. GONZÁLEZ: Okay. Thank you,
12 Mr. President.

13 PRESIDENT: But we should be able to share
14 them with you tomorrow evening at the latest.

02:28:52 15 MR. APPLETON: Thank you very much.

16 PRESIDENT: Okay. Then let's continue
17 with Mr. Kotecha.

18 Welcome back, Mr. Kotecha.

19 MR. KOTECHA: Thank you, sir.

02:31:26 20 PRESIDENT: We will continue with the
21 cross-examination. We understand it will be Mr. Molina.
22 Please go ahead.

23 MR. MOLINA: Thank you, Mr. President.
24
25

02:31:39

1

CROSS-EXAMINATION

2

BY MR. MOLINA:

3

Q. Hello, Mr. Kotecha.

4

A. Good afternoon, sir.

02:31:46

5

Q. My name is Marco Molina.

6

A. Nice to meet you, sir.

7

Q. Nice to meet you too. Thank you. I was going

8

to ask if you could move closer to the microphone. When

9

you gave your presentation, I was having a hard time. I

02:32:00

10

think you can move it closer to you if that's feasible.

11

You're obviously testifying in English, yes?

12

A. Yes.

13

Q. Do you speak Spanish?

14

A. I do not.

02:32:06

15

Q. Do you read Spanish?

16

A. I do not.

17

Q. I may have missed you, but I think this is the

18

first day I'm seeing you here. Have you been following

19

the hearing as it's been going forward?

02:32:17

20

A. I've been reading some of the transcripts.

21

Q. Have you also been watching the video feed

22

that's available online?

23

A. I have not.

24

Q. You submitted a CV with your expert reports,

02:32:30

25

correct?

02:32:31 1 A. I did.

2 Q. Just for the record, when I say CV, I'm
3 referring to curriculum vitae.

4 A. Yes.

02:32:39 5 Q. And in that document, you represent that you've
6 prepared expert reports in international commercial
7 arbitration matters, yes?

8 A. Yes, I have.

9 Q. And how many times have you prepared expert
02:32:53 10 reports in those types of matters?

11 A. So specifically in?

12 Q. International commercial arbitrations.

13 A. So international commercial arbitrations, in
14 that context I've signed two and co-signed one.

02:33:12 15 Q. And when was the last time that you submitted
16 one?

17 A. I believe it was 2019.

18 Q. And I'm only asking -- by the way, just for the
19 record, I didn't see any listing in your report so

02:33:26 20 that's why I'm asking. I just want to make sure. I
21 know your testimony is that you did prepare, and I just
22 want to understand a little more. So I hope you indulge
23 me.

24 With international investment

02:33:36 25 arbitrations, the same question. How many times have

02:33:38 1 you submitted an expert report in an international
2 investment arbitration?

3 A. So I probably misunderstood your question. So
4 when you said international commercial arbitration, I
02:33:52 5 would have included that within. So in total, between
6 total investment commercial arbitration and investment
7 treaty, that would have been the combined number that I
8 gave you.

9 Q. And just for the record, the combined number is
02:34:13 10 what again?

11 A. It was two signed, one co-signed.

12 Q. And with the 2019 one that you mentioned, was
13 that an investment arbitration matter?

14 A. It was an investment treaty arbitration matter.

02:34:28 15 Q. At ICSID?

16 A. I believe it was ICSID.

17 Q. And in those -- for those arbitrations that --
18 the investment arbitrations that you've participated in,
19 which side did you represent, the investor or the
02:34:48 20 respondent?

21 A. It was the claimant on that side.

22 Q. Each time?

23 A. Yes.

24 Q. And how many times have you represented --
02:35:03 25 sorry. How many times have you testified?

02:35:07 1 A. In total?

2 Q. No, no. Sorry. Let me finish my question.

3 How many times have you testified --

4 Sorry, let me start that over.

02:35:20 5 How many times have you submitted a report

6 on behalf of a party that's also represented by Appleton

7 and Associates, like the one here?

8 A. This would be No.2.

9 Q. And what was the other time?

02:35:36 10 A. The other one that we talked about, the other

11 ICSID case that we talked about.

12 Q. Just for the record, what's the name of that

13 case?

14 A. *Gabourel and Honduras*. Gabourel.

02:35:56 15 Q. And were you the testifying expert in that

16 case?

17 A. I didn't have to testify.

18 Q. And just for that one, you wrote it yourself,

19 that report that you submitted for that case?

02:36:07 20 A. I had a team help me.

21 Q. Sorry. You mentioned earlier you co-signed. I

22 should have asked. Did you co-sign that one, or were

23 you the only signatory on that report?

24 A. I was the only signatory on that report.

02:36:21 25 Q. Thank you. And same question, how many times

02:36:24 1 have you submitted an expert report for a party that's
2 being represented by Reed Smith in an arbitration?

3 A. Never.

4 Q. In those cases where you submitted an expert
02:36:49 5 report in an investment arbitration, did you happen to
6 present a discounted cash flow model as part of those
7 reports?

8 A. So you're speaking specifically of the two?

9 Q. Of the two investment arbitrations that you've
02:37:07 10 discussed.

11 A. The other one was not a DCF calculation.

12 Q. When you say the other one, you mean the 2019
13 one?

14 A. Yes.

02:37:16 15 Q. Other than that one, you have not presented --
16 other than that 2019 arbitration and this one, I just
17 want to understand, have you submitted an expert report
18 presenting a discounted cash flow method?

19 A. Oh, yes. Of course. I thought you were
02:37:31 20 specifically confining it within that investment treaty.
21 No, no --

22 Q. I am asking about investment treaty. I'm
23 saying other than the 2019 one and this one, is there
24 another investment case where you've presented a
02:37:43 25 discounted cash flow method?

02:37:45 1 A. Sorry. Ask your question again, please.

2 Q. The question is the one that I've asked. I'll
3 ask one more time.

4 Other than the 2019 case and this one,
02:37:53 5 have you presented another expert report in an
6 investment arbitration where you've put forward a
7 discounted cash flow method?

8 A. No.

9 Q. Now I'm going to ask you the question about
02:38:07 10 testifying. We've covered that you submitted expert
11 reports. Have you testified -- other than this case,
12 have you testified as an expert in quantum in an
13 investment arbitration case?

14 A. Not specifically in investment arbitration
02:38:21 15 case.

16 Q. You mentioned earlier today when you gave your
17 presentation that you have experience in raising
18 financing. Do you remember that?

19 A. Yes.

02:38:40 20 Q. So you would know from that experience what
21 investors generally look for when deciding to invest in
22 a company. Is that fair to say?

23 A. Generally, Yes.

24 Q. And if you go to slide 22 of your presentation
02:38:55 25 from today -- let me know when you're ready.

02:39:28

1 A. Yes.

2 Q. So in that slide, when you were presenting it,
3 you mentioned that investors do not look at historical
4 value when making an investment decision, right?

02:39:39

5 A. Correct.

6 Q. And you mentioned they look at rate of --
7 sorry, return on investment as one factor when deciding
8 to invest in a company, correct?

02:39:55

9 A. I think what I said was they look at the return
10 of their investment, and they look at the horizon over
11 which that investment is going to occur.

12 Q. What would have been the return on investment
13 in INAGROSA as of June 16, 2018, according to your
14 model?

02:40:13

15 A. So according to the model, I specifically -- I
16 did not do the calculation at the time. I did it after
17 the submission of my second report. [REDACTED]

18 [REDACTED]

19 [REDACTED]

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23 [REDACTED]

02:40:54

24 Q. And when is that -- when do you -- what's the
25 date and time that you've calculated that to?

02:40:58 1 A. So it would have started in June of 2018 and
2 gone to, I believe it was, 2026.

3 Q. Now I'm going to go through some other factors
4 that I just want to ask you, and in your expert opinion
02:41:14 5 I would like to know if you think those factors would be
6 considered to be relevant by an investor when looking to
7 invest in a company. Is that fair?

8 A. Yes.

9 Q. So what about the precedent? In other words,
02:41:32 10 wouldn't it be important from an investor's perspective,
11 in your view, that the business plan that's being
12 presented to them has been achieved, if not by that
13 company, by another company in that industry, in that
14 sector? Isn't that something that they would look to as
02:41:53 15 being important?

16 A. I'm sure any investor would conduct their due
17 diligence and do industry analysis to find a comparable
18 company to the extent that they could.

19 Q. And if there is no comparable company in that
02:42:09 20 region that's achieved what the business plan suggests
21 should be achieved, an investor would be -- would view
22 that unfavorably. Is that fair to say?

23 A. Or opportunistically, right? It could go
24 either way.

02:42:24 25 Q. What about permitting? So if a company is

02:42:32 1 pitching a project and soliciting investment for a
2 business strategy, would an investor be interested,
3 would it consider important to know before investing if
4 the permitting is in place to be able to execute on that
02:42:48 5 strategy, yes or no?

6 A. In place or on their way to be placed in, yes.

7 Q. Let's start with in place. Would they consider
8 that to be a relevant factor before committing to invest
9 in that company, yes or no?

02:43:02 10 A. I think it depends on the nature of the
11 company.

12 Q. What if it's an agricultural company?

13 A. All permits may not be in place at that
14 particular time.

02:43:13 15 MR. MULLINS: If I could just ask counsel
16 to let the witness finish. I know you didn't mean to.

17 MR. MOLINA: That was my fault. I jumped
18 in.

19 MR. MULLINS: I know. Just so the
02:43:22 20 record's clear. Thank you.

21 Q. I interrupted you. I'm sorry, Mr. Kotecha.

22 A. Sorry. I lost my train of thought. I think it
23 would certainly be important to consider whether they
24 were in place or about to be in place or what was the
02:43:40 25 plan if they were specifically necessary for that

02:43:45 1 particular business.

2 Q. So what if -- I'm just giving you a
3 hypothetical. What if you have an agricultural company
4 that's trying to exploit natural resources and the
02:44:01 5 business plan says we're going to be doing -- we're
6 going to be working the land, we're going to be using
7 all this water, and we're going to be exporting to all
8 these different countries, we're going to be
9 specifically exporting perishable goods that have to go
02:44:16 10 through certain protocols and permitting.

11 Would it be important, from your
12 perspective -- from an investor's perspective, sorry,
13 would it be important to understand if all that
14 permitting is in place to be able to execute on the
02:44:29 15 strategy that I just summarized?

16 A. And I think I've already answered your
17 question. Whether in place or about to be in place or
18 plans to put it in place.

19 Q. So let's talk about the plans. What plans
02:44:46 20 would you expect the investor to want to see to feel
21 comfortable that, even though the permitting is not in
22 place, that it will be put in place?

23 A. I think certainly a discussion with the company
24 that you're talking about and what permits would be
02:45:02 25 needed, what is the action plan, how long it would take.

02:45:11 1 Q. Would it also be important in this realm to
2 have feasibility studies that tee up some of these
3 permitting issues and give exactly the schedules and
4 information that you just provided?

02:45:23 5 A. I think it depends what you mean exactly by a
6 feasibility study. There were certainly business plans
7 in place, and one may consider that to be a feasibility
8 study, which did discuss those things.

02:45:44 9 Q. You're an expert in business valuation, and
10 you've testified in this sector before, in the
11 investment arbitration world. So you understand
12 feasibility study is an industry term that's separate
13 from a business plan. You understand that?

14 A. I think they can be one and the same.

02:46:04 15 Q. So a business plan is typically drafted, put
16 together by representatives of that business. Is that
17 fair to say?

18 A. Or a consultant or somebody from outside of the
19 business.

02:46:18 20 Q. Right. Or someone hired by the company who's
21 working with the management to try to develop the
22 business. Fair?

23 A. I've also seen business plans prepared by
24 analysts, for example, who are not associated with the
02:46:33 25 company.

02:46:34 1 Q. And we'll get to -- by the way, we'll get to
2 some of the cases that you've compared this case to, but
3 just to get ahead a little bit on that, let's take
4 Crystallex, for instance. You're familiar with the
02:46:51 5 *Crystallex v Venezuela* case, yes?

6 A. I've read it.

7 Q. You cite it in your second report extensively,
8 fair?

9 A. I've cited it, yes.

02:47:02 10 Q. You use it, in particular, as a comparison.
11 You say this case is similar in certain respects to the
12 case that was before the investment Tribunal in
13 *Crystallex v Venezuela*, yes?

14 A. In certain respects. They talk about some of
02:47:20 15 the same ideologies that we talk about.

16 Q. There, when they talk about feasibility
17 studies, for instance, they're not talking about
18 business plans, are they?

19 A. Well, I don't know what sort of feasibility
02:47:34 20 studies they're particularly referring to.

21 Q. Well, you're familiar with that it's a mining
22 case, yes?

23 A. Yes.

24 Q. And the investment there was in gold, yes?

02:47:42 25 A. Yes.

02:47:43 1 Q. So I know you said you cite to the opinion.
2 You're generally familiar, I'm sure, that this project
3 had extensive studies containing reports and analyses
4 from third parties who are experts in the field of
02:47:58 5 mining. You're familiar with that?

6 A. Yes.

7 Q. Right. And so that is different than a plan
8 drafted by a member of a company, correct?

9 A. Well, again, they may achieve the same
02:48:15 10 objective, so I appreciate your comment that in the
11 other matter they had technical expertise. I think
12 that's what you're referring to is the technical
13 expertise.

14 Here in our case, we had people that also
02:48:35 15 had some technical expertise. Maybe not at the same
16 level as the experts in the other case, but certainly
17 they did have knowledge about what they were doing.
18 They did have knowledge about the farming operations.

19 Again, I appreciate they may not have the
02:48:53 20 same knowledge as the experts that you're citing in the
21 other case.

22 Q. And, again, just going back -- and we'll get to
23 those cases later today. But going back to the
24 questions that I started asking a few minutes ago, from
02:49:09 25 an investor's perspective, isn't it preferable to have

02:49:12 1 experts who have a lot of experience in a field being
2 part of a case, of a business, rather than individuals
3 who only have limited expertise in that field?

4 A. I think either way, the investor would be doing
02:49:29 5 their own due diligence.

6 Q. That's not my question. I'm not asking if the
7 investor would do a due diligence.

8 You said a few minutes ago you're familiar
9 with what an investor would be interested in when
02:49:40 10 vetting a business. My question is simply isn't it fair
11 to say, Mr. Kotecha, that an investor would want a
12 business that has experts with significant experience
13 rather than individuals with limited experience? That's
14 my question.

02:49:56 15 A. Well, again, I'm -- your language of
16 significance versus limited, I think, can be somewhat
17 debatable. I think it's helpful to have people who have
18 experience.

19 Q. Thank you.

02:50:12 20 We'll get back to all this. I just wanted
21 to react to that slide. Again, we'll come back to this.

22 Let's talk quickly about your reports. So
23 you submitted two expert reports, yes?

24 A. Yes, I did.

02:50:29 25 Q. And just for the record, you're presenting

02:50:33 1 those reports as an expert in quantum, yes?

2 A. Correct.

3 Q. You're not a fact witness, correct?

4 A. Correct.

02:50:41 5 Q. You're not a legal expert, correct?

6 A. Correct.

7 Q. Many of the facts that you put into your
8 model -- and when I say the model, just for the record,

9 I'm referring to your discounted cash flow model. You

02:50:53 10 understand?

11 A. I understand.

12 Q. So many of the facts that you put into the
13 model were provided to you by Riverside, INAGROSA or
14 their lawyers. Is that fair to say?

02:51:03 15 A. I think initially, because of the lack of
16 information or the lack of information that was
17 available because obviously it was destroyed, they had
18 to provide me with some guidance and some information as
19 to what they thought the situation would have been at
02:51:24 20 the time.

21 Q. You're an independent expert, correct?

22 A. Correct.

23 Q. And you're objective in your analysis, correct?

24 A. Correct.

02:51:35 25 Q. So the information that you received from

02:51:37 1 Riverside, INAGROSA or their lawyers, if it didn't sound
2 reasonable to you or you thought you needed additional
3 information, you would have said so to them, correct?

4 A. I would have said so to them, but of course
02:51:52 5 because of the situation that happened, there was
6 limited information that they had.

7 Q. And we'll get to that. We'll get to that
8 situation.

9 And if you learned of additional
02:52:04 10 information after submitting your analysis that in some
11 way changed your analysis, you would go back and change
12 your model to reflect that new information. Is that
13 true?

14 A. That's what I did.

02:52:18 15 Q. Because the whole point is to give this
16 Tribunal sitting here a damages model that is as
17 reliable as possible. Is that fair to say?

18 A. I appreciate your language to say "as reliable
19 as possible" because there is no certainty. There is no
02:52:39 20 certainty in business. There is no certainty in
21 execution. And so is it reasonable? That was the
22 standard that I applied.

23 Q. Great. So as you mentioned, you did go back in
24 your second report and you did make some tweaks to your
02:52:58 25 model. True?

02:52:59

1

A. Yes.

2

Q. So you covered these in your presentation. I

3

just want to -- for the record, I just want to go

4

through them very quickly. Okay?

02:53:08

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A. Okay.

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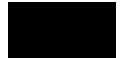
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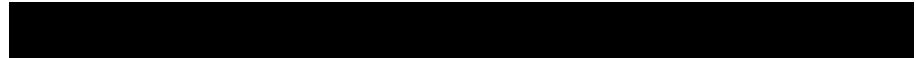


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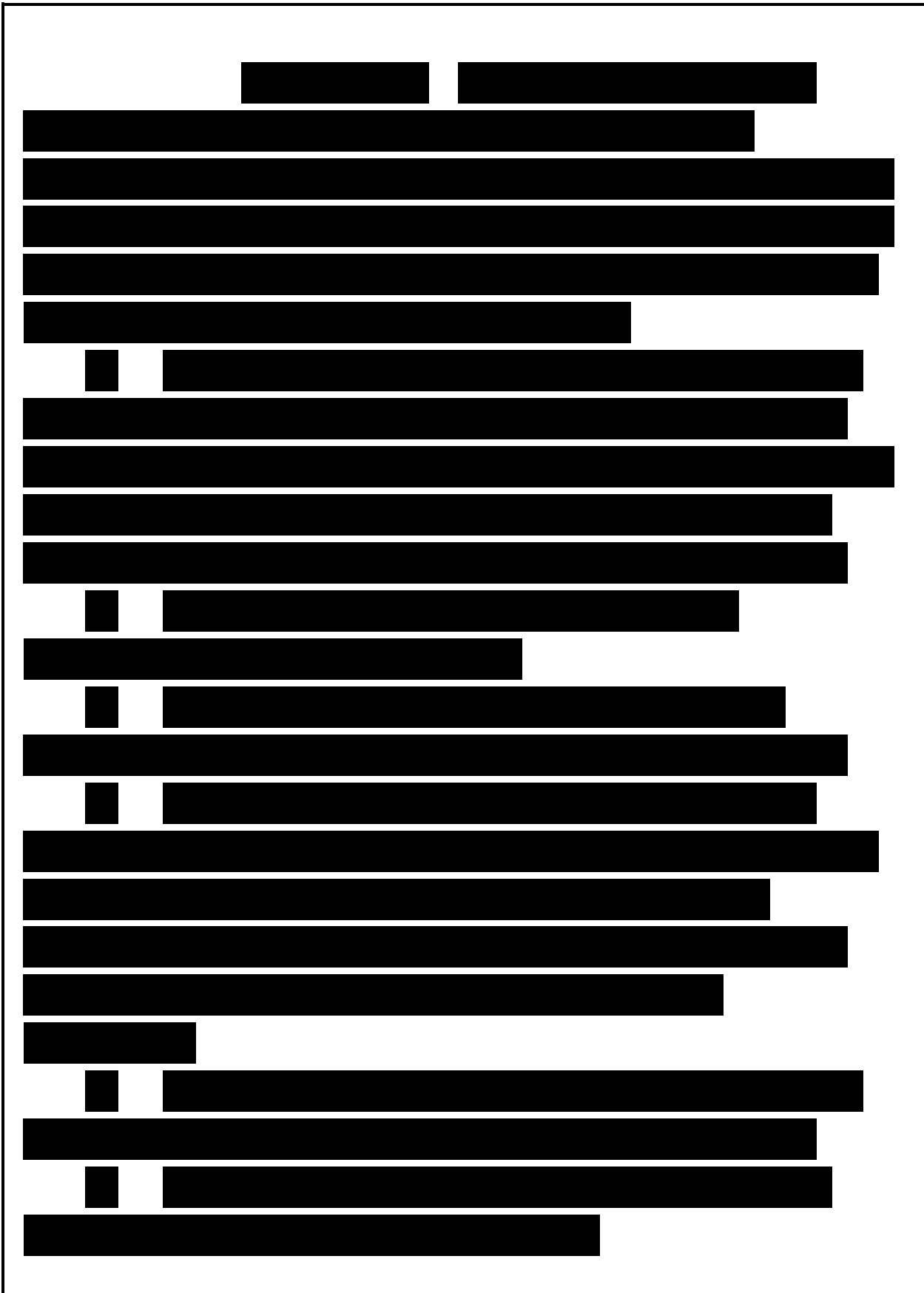
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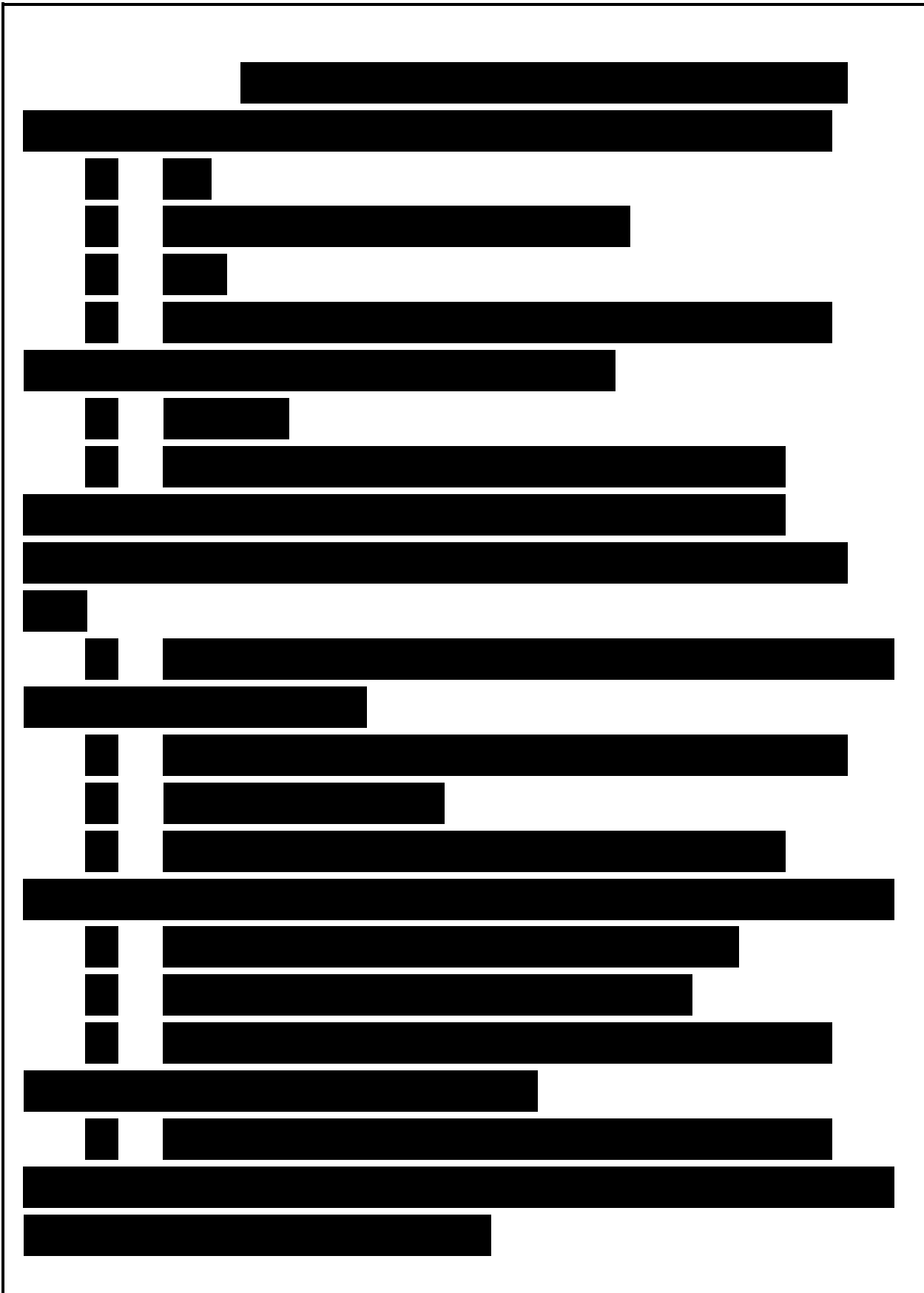
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03:22:35

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[REDACTED]

[REDACTED]

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A. Correct.

14

Q. I looked through both of your reports very

03:22:46

15

closely.

[REDACTED]

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A. I remember that change, yes.

21

Q. And you called it --

[REDACTED]

22

[REDACTED]

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[REDACTED]

24

A. I don't remember.

03:23:25

25

Q. If you go to your second report in

03:23:27

1 paragraph 8.3, I think that's where it is and -- just
2 for the record.

03:23:44

3 But my question to you, Mr. Kotecha, is
4 other than that instruction, did counsel provide you
5 with any other instructions as to certain facts that you
6 considered in preparing your models?

03:24:39

7 [REDACTED]
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11 [REDACTED]

12 So my question to you is is there another
13 one?

03:24:53

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03:25:29

19 Q. Thank you for clarifying that. I wanted to
20 make sure I understood that.

21 Now, if you look on the screen, you also
22 have A12.3, right? [REDACTED]

03:25:49

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A. That's what it says.

16

Q. So just for the record and just so I

17

understand, there's certain information that you

18

received that you did independently verify, yes?

19

A. Yes.

03:26:52

20

Q. And then for all the other information, you

21

used your professional judgment to determine whether it

22

was reasonable to rely on that information without

23

separately and independently verifying it, fair?

24

A. I think that's what that line says.

03:27:17

25

Q. So what I'm going to do now, Mr. Kotecha, is

03:27:20 1 I'm going to go through various information that you've
2 relied upon in your models, and what I'm going to want
3 to understand is if you've independently verified that
4 information. Is that fair?

03:27:39 5 A. Fair.

6 MR. MOLINA: Ricky, do you mind putting up
7 C-55, please?

8 Q. So, Mr. Kotecha, if you look at the screen, it
9 won't be in front of you because I think you've only
03:28:00 10 been given your expert reports, but up on the screen
11 you're being shown what has been designated as
12 Exhibit C-55. Do you see it?

13 A. I do.

14 Q. It is a letter addressed to you from Riverside
03:28:13 15 Coffee and dated September 12, 2022. Do you see it?

16 A. I do.

17 Q. You're obviously familiar with this letter?

18 A. I am.

19 Q. It is a letter that was signed at the bottom --
03:28:27 20 if you go to the signature at the last page,
21 Mr. Ricky -- it's a letter signed by Carlos Rondón?

22 A. Yes.

23 Q. And he signs off as president and chief
24 operating officer of INAGROSA, yes?

03:28:42 25 A. Yes.

03:28:43 1 Q. And you've explained in your second report that
2 this letter essentially -- and I'm going to call it --
3 this is my word -- is an amalgamation of information
4 that you and Riverside and INAGROSA had essentially
03:29:04 5 discussed in the months leading up to your first expert
6 report being submitted in this case.

7 Is that fair?

8 A. In the absence of information that was not
9 available to me, this was the best way to communicate
03:29:25 10 such information.

11 Q. Right. So just to confirm, this is a complete
12 sort of summary of the information that was being
13 discussed with you and that related to your report that
14 you submitted soon after this letter, yes?

03:29:43 15 A. I think it's certainly a summary. Is it a
16 100 percent complete summary? I don't know.

17 Q. It's a nine-page letter, yes?

18 A. I only see the first page.

19 Q. Sure. We can go to the end just to confirm for
03:29:58 20 the record.

21 A. It says page 9 at the top, yes.

22 Q. So why don't we just start jumping through it.
23 We're going to have this up for a few minutes. I'm
24 going to jump through it and ask you questions. Okay?
03:30:15 25 Why don't we go to paragraphs 8 and 9 on page 3.

03:30:19 1 MR. MOLINA: You don't have to highlight
2 anything on this one. Thank you.

3 Q. Mr. Kotecha, I'm showing you page 3 and
4 specifically paragraphs 8 and 9. And these paragraphs
03:30:31 5 fall under a header called "management and staff
6 compensation," right?

7 A. Yes.

8 Q. So these two paragraphs, essentially what
9 they're showing you is a representation from INAGROSA
03:30:44 10 that it had these people serving as its management and
11 staff as of June 2018. Is that fair?

12 A. Yes.

13 Q. And then at the bottom on page 9 it talks
14 about -- it ascribes compensation figures that
03:31:05 15 corresponded to those people at that time, yes?

16 A. Correct.

17 Q. So I'm going to be asking you these questions
18 that's going to get a little repetitive, so bear with
19 me.

03:31:19 20 Did you independently verify this
21 information, yes or no?

22 A. Which information specifically are you asking
23 about?

24 Q. Well, let's focus on the compensation. The
03:31:28 25 figures here, the numbers that are ascribed to these

03:31:31 1 people, did you independently verify that?

2 A. So my understanding is that this is the
3 compensation that would have been prepared if they had
4 the ability to continue. And since they did not have
03:31:46 5 the ability to continue, I would not have been able to
6 verify any of them or maybe even some of them.

7 Q. Just so I understand what you said, this
8 compensation that -- it was your understanding at the
9 time that this compensation was not the compensation
03:32:03 10 that corresponded to them as of June 2018?

11 A. Well, that's what it says, June 2018.
12 Remember --

13 Q. That's my question.

14 A. But, remember, the invasion happened mid June.

03:32:17 15 Q. I'm fully aware. Let me ask it differently.
16 Maybe we're talking past one another.

17 Is your understanding -- let's pick out
18 Mr. Russ Welty under 9(a).

19 MR. MOLINA: Ricky, you don't have to zoom
03:32:31 20 in -- I think -- unless the witness needs -- or the
21 expert needs to zoom in.

22 Q. Do you see under 9(a) it says "Russ Welty,
23 \$150,000?"

24 A. I see that.

03:32:42 25 Q. So at least the way this letter reads, as of

03:32:46 1 June 2018, this is the compensation that corresponded to
2 Mr. Welty. Do you agree with that?

3 A. That's not the way I read it.

4 Q. So how do you read this particular input?

03:33:02 5 A. Well, it says "the management and staff were
6 entitled to the following compensation."

7 Q. As of June 2018, right?

8 A. My understanding is that Mr. Welty had not
9 received any compensation as of June 2018.

03:33:22 10 Q. So when it says "was entitled" -- but my
11 question is did you independently verify that figure?

12 A. You can't independently verify a figure when my
13 understanding was he was not paid up until that date,
14 and he would have been entitled to that compensation
03:33:45 15 going forward.

16 Q. All I'm asking -- I'm really not trying to be
17 difficult. It's a very specific figure, 150,000.

18 Is there any document that you saw from
19 the relevant period that showed that he would have been
03:34:03 20 entitled to \$150,000 in salary? That's my question.

21 A. I haven't seen anything like a tax receipt, if
22 that's what you're asking, or anything to that degree
23 because my understanding, that \$150,000 was not paid.
24 He was entitled to be paid.

03:34:26 25 Q. And just to confirm, did you talk to Mr. Welty

03:34:29 1 to confirm that this number that Mr. Rondón cited in
2 this letter was accurate, yes or no?

3 A. Was -- I didn't catch the end. I apologize.

4 Q. That's okay.

03:34:40 5 Did you talk to Mr. Welty to just confirm
6 that this compensation figure is accurate?

7 A. I did not.

8 Q. Okay. Thanks. Now we're going to jump -- I am
9 going to go a little faster. If you go to the next

03:34:55 10 page, there's another paragraph 9. I think it's a
11 typographical error as I think it should be 10.

12 Do you see now here on page 4 under the
13 header "Avocado production at Hacienda Santa Fé" there's
14 a paragraph 9?

03:35:06 15 A. I do see that, yes.

16 Q. And this is talking about the planting of
17 trees, and specifically it said that there had been
18 16,000 avocado trees planted, yes?

19 A. 16. 16,000.

03:35:23 20 Q. That's what I said.

21 A. I'm sorry. I thought you said 60,000. My
22 apologies.

23 Q. It's okay. 16,000. 1-6.

24 A. That's what it said, "Our original Hass avocado
03:35:39 25 orchard had 16,000."

03:35:41 1 Q. And you since -- we just looked at in your
2 second expert report you were instructed to revise that
3 upwards to 17,900, right?

4 A. Well, no. What it says is our original Hass
03:36:02 5 avocado orchard had 16,000 avocado trees as of
6 January 2014.

7 Q. Right. My question is in your second report --
8 remember a few minutes ago we looked at the instructions
9 in 8.3?

03:36:14 10 A. Yes.

11 Q. This was one of the instructions, right, to
12 revise this figure upwards to 17,900 trees, correct?

13 A. No. The 17,900 trees was not -- was as of
14 2018, I believe. So that was the change in the planting
03:36:34 15 schedule.

16 Q. Thanks for clarifying.

17 So my question is the same question as
18 before. Did you do anything to independently verify
19 that by June 2018 INAGROSA had planted 17,900 avocado
03:36:49 20 trees at Hacienda Santa Fé, yes or no?

21 A. So obviously I was not there. I could not
22 independently verify and go there and do it. There were
23 witness statements that confirmed that that was the
24 amount that was there.

03:37:07 25 Q. Right. And again, I'm not trying to do a

03:37:10 1 gotcha game. We just covered a few minutes ago that you
2 said to me that sometimes you did independently verify
3 information that was given to you and sometimes you did
4 not. All I'm trying to do is go through this letter and
03:37:23 5 confirm whether a certain input is in one category or
6 the other.

7 So I think your answer is you did not
8 independently verify 17,900 trees had been planted at
9 Hacienda Santa Fé as of the valuation date, correct?

03:37:37 10 A. It was supported by other witness statements.

11 Q. Witness statements provided by Riverside, yes?

12 A. By Mr. Gutiérrez in particular.

13 Q. All right. Let's keep going.

14 A. Sorry, I'm not sure if I'm saying that right,
03:37:53 15 so I apologize.

16 Q. I think it's close enough.

17 Actually, before we move on from this
18 input, another question I'm going to be asking you,
19 Mr. Kotecha, is to the extent this Tribunal finds that
03:38:09 20 that testimony that you just cited is wrong or at least
21 that there's not enough evidence to support it, that
22 would have an effect on your projections in your model,
23 correct?

24 A. What specifically are you saying? The planting
03:38:28 25 schedule or the amount or both or what?

03:38:31 1 Q. Let me back -- let me break this down.

2 You in your model, as you know, use this
3 figure of the 17,900 trees planted as of the valuation
4 date figure to support your assumption that the
03:38:49 5 expansion that Riverside alleges INAGROSA would have
6 done was reasonable.

7 Is that fair?

8 A. Again, that 17.9 is a moment in time.

9 Q. But you cite it in your reports, and you put it
03:39:03 10 into your model, correct?

11 A. Yes.

12 Q. So you thought it was relevant to include and
13 to support the projections that you published, yes?

14 A. Because my understanding is that's what they
03:39:15 15 had at the time.

16 Q. And my question is simply if that number is not
17 found by this Tribunal to be a valid number or an
18 objective number, would that change your projections,
19 yes or no?

03:39:34 20 A. It would certainly change that number, yes.

21 Q. We're going to keep moving. Go to
22 paragraph 10.

23 There's a reference here to a 20 kg of
24 avocado fruit per tree in 2017. Do you see that?

03:39:52 25 A. I do.

03:39:54 1 Q. So you understand that Riverside alleges that
2 in 2017 its plantation had the first harvest, yes?

3 A. In 2017, correct.

4 Q. And Riverside alleges that INAGROSA'S first
03:40:13 5 harvest in 2017 was successful. And specifically they
6 ascribe a quantity per tree of 20 kilos of avocado
7 fruit. You remember that?

8 A. Well, that's what this says is "we harvested
9 over 20 kg of fruit per tree."

03:40:33 10 Q. And you use that allegation in your models as
11 support for the assumption that the ensuing harvest
12 could get an average of 39 kg per tree, yes?

13 A. Sorry, say that again, please.

14 Q. I'm saying in your reports you cite to this
03:40:58 15 20 kg figure to support your conclusion that INAGROSA
16 would have been able, at a later harvest, to average
17 39 kg of Hass avocado fruit per tree. True?

18 A. No. No. The 39 kg per tree came from the
19 expert report of Dr. Duarte, and the reason I used that
03:41:27 20 was in an effort to assist the Tribunal in reducing the
21 gap between management's representation where they
22 said -- and I'm not going to use your word "allegation"
23 because I don't think that's a very good word -- their
24 representation where they said 20 kg of avocado per tree
03:41:47 25 in 2017 and then 50 kg thereafter.

03:41:55 1 Q. Same question I've asked before. Did you do
2 anything to independently verify that 20 kg figure in
3 this paragraph, yes or no?

03:42:07 4 A. Well, again, in my first report I did look at a
5 study that verified that the 50 kg is reasonable, and
6 therefore, if 50 kg would be reasonable, then I would
7 assess that 20 kg would also be somewhat reasonable.

8 MS. GREENWOOD: Counsel, just a question
9 for the witness, if I may.

03:42:27 10 Mr. Kotecha, the application of the
11 kilograms per tree, that is applied to a tree figure of
12 17,900 in your report. Is that right?

13 MR. KOTECHA: The kilograms per tree is
14 applied to the trees that are producing fruit over that
03:42:58 15 period of time, so the 17.9 as of 2018 included trees
16 that were just planted that would not have produced
17 fruit in that year.

18 MS. GREENWOOD: Understood. And that's
19 the staggered part, trees coming on stream point that I
03:43:19 20 asked you about in your presentation. But your primary
21 assumption was that there were 17,900 trees at the
22 beginning, at the relevant date, and that was your base
23 assumption and then they came on stream later. Is that
24 correct?

03:43:43 25 MR. KOTECHA: Correct, in the but-for

03:43:44 1 model, yes, the starting number was 17,900.

2 MS. GREENWOOD: Thank you. That clarifies
3 that for me. Counsel, do proceed.

4 Q. You mentioned -- you said there was an article
03:43:56 5 that, in your words, confirmed the 50 kg figure, or at
6 least you said it was possible.

7 Are you referring to -- you see in the
8 bottom of this page there's a footnote 2 that makes a
9 reference to a document that's been assigned Exhibit
03:44:12 10 No. C-138?

11 A. Can I just double check my report to make sure
12 that's the same one?

13 Q. Yeah, of course.

14 It might be easier to -- I just got a note
03:45:09 15 that you actually cite to this in slide 26 of your
16 presentation.

17 A. I'm just confirming --

18 Q. Sure. Take your time.

19 A. Yes, I can confirm it's the same one.

03:45:42 20 Q. Did you read that article?

21 A. I did.

22 Q. You would agree with me then it has absolutely
23 no mention of Hacienda Santa Fé, correct?

24 A. It does not specifically mention Hacienda
03:45:55 25 Santa Fé.

03:45:56 1 Q. It's not an article that analyzes avocado
2 plantations in Nicaragua, correct?

3 A. Correct.

4 Q. The figure that comes -- if you've read the
03:46:06 5 article, which you say you have, you understand that the
6 number that you're citing there, it is not even in a
7 study of an actual avocado plantation, it was a
8 hypothetical one. True?

9 A. Well, again, whether it is a hypothetical one
03:46:24 10 that is support of that in a but-for world, which is
11 also hypothetical, that that amount was somewhat
12 reasonable.

13 Q. I just want to confirm that it's a hypothetical
14 plantation that this article is referring to. Yes?

03:46:37 15 A. I would have to read it again to make sure.

16 Q. And just to confirm, you said also a few
17 minutes ago that the 39-kilogram per tree figure that
18 you've now included in your updated model came from
19 Dr. Duarte's expert report, yes?

03:47:00 20 A. It did.

21 Q. And Dr. Duarte, when he noted that figure, he
22 was not talking about what he expected the avocado
23 plantation at Hacienda Santa Fé to produce. You
24 understand that, right?

03:47:13 25 A. Correct. He was not explicitly speaking about

03:47:17 1 Hacienda Santa Fé.

2 Q. He was talking about an avocado plantation in
3 Peru, yes?

4 A. He listed a number of different comparisons,
03:47:25 5 yes.

6 MR. MOLINA: I want to move to the next
7 page, Mr. Ricky.

8 Q. So there's a section that starts on this page
9 that's called "Plans for expansion." Do you see that
03:47:42 10 section III on page 5?

11 A. I do.

12 Q. And so, again, we started covering this earlier
13 on that -- just, again, for the record very quickly, you
14 understand that the plantation only included
03:48:01 15 44.75 hectares of planted trees, at least according to
16 Riverside, as of June 16, 2018, yes?

17 A. 44.75, yes.

18 Q. Right. And so the expansion that's being
19 referenced here is two-fold, right? The first expansion
03:48:24 20 would have been for 200 additional hectares by 2019,
21 yes?

22 A. Are you saying that's -- are you asking me to
23 read that in here?

24 Q. No, I'm just asking -- we've covered this
03:48:45 25 already. I'm going to ask you a couple questions about

03:48:47 1 the expansion. I was going back for a few minutes where
2 we talked about the two different expansions that you
3 identify in your model. Okay?

4 A. Okay.

03:48:56 5 Q. So the first one is an extra 200 hectares to
6 the existing 44.75-hectare plantation?

7 A. Yes.

8 Q. So roughly -- and again, very loose, basic
9 math -- roughly between 400 and 500 percent increase in
03:49:12 10 size of the plantation, yes?

11 A. Why don't we just say 200 hectares? I think
12 that's easier to understand.

13 Q. And so the question I have for you is -- and I
14 think you've already answered this, but just for the
03:49:27 15 record, you did not independently verify that that
16 200-hectare expansion was feasible, correct?

17 A. When you say feasible, they certainly had the
18 land to do it, and so in here I can see it says our next
19 sampling would be of approximately 200 hectares.

03:49:53 20 Q. You would agree with me there's no feasibility
21 or technical study from the relevant period that
22 confirms that this expansion was possible, yes?

23 A. I'm not aware of any technical or feasible
24 study that would suggest that this expansion is
03:50:12 25 possible, nor would I expect something of that sort.

03:50:17 1 Q. I haven't asked if you expect it, but your
2 lawyers can ask you that if they think it's relevant.

3 My next question is have you seen any soil
4 samples from the relevant period that suggests that the
03:50:29 5 soil where this plantation would have been expanded was
6 similar to the soil in the existing plantation, yes or
7 no?

8 A. I have not seen a soil sample.

9 Q. If I put up a map of Hacienda Santa Fé, would
03:50:47 10 you be able to point me to the area where this
11 200-hectare plot of land would have been located, yes or
12 no?

13 A. I don't think I'd be able to do that without
14 assistance of the people that expected the expansion.

03:51:05 15 Q. Did you ask them in preparing your expert
16 reports: hey, where exactly would this 200-hectare plot
17 be?

18 A. No.

19 Q. Similar questions for the extra -- the second
03:51:18 20 expansion. So just for the record, when I mention a
21 second expansion, I'm referring to the roughly
22 760-hectare expansion that would have occurred sometime
23 after 2019 and that would have brought the area of the
24 plantation up to 1,000 hectares. Do you understand
03:51:36 25 that?

03:51:38

1 A. Yes.

2 Q. So same questions. Did you independently
3 verify that INAGROSA would have had -- it would have
4 been feasible for INAGROSA to achieve that 1,000-hectare
03:51:53 5 expansion, yes or no?

6 A. Again, same answer with respect to the 200.

7 Q. And same answers as to my other questions about
8 the first expansion? No soil samples?

9 A. I'm not aware.

03:52:07

10 Q. No feasibility or technical studies?

11 A. Again, I wouldn't expect any at the time.

12 Q. Can we go to paragraph 22 of this letter,
13 please?

14 So in paragraph 22, this is on page 6 of
03:52:30 15 C-55, there's a reference here to "transportation,
16 shipment and logistics services." Do you see that?

17 A. I do.

18 Q. I just have a general question here. Were you
19 able to independently verify that as of June 16, 2018
03:52:55 20 INAGROSA had the facilities and equipment necessary to
21 process, box, and ship Hass avocados from its plantation
22 to their intended destination? Yes or no?

23 A. My understanding is, as of June 16, 2018, after
24 they had already gone through their initial harvest and
03:53:22 25 were expecting another harvest, that they would have the

03:53:27 1 infrastructure to do so.

2 Q. So you -- just to break that down -- so you
3 think that as of June 16, 2018 they would have had, for
4 instance, the boxes and the containers necessary to
03:53:39 5 store these avocados after they were picked, yes?

6 A. Maybe not necessarily on that specific date,
7 but they would certainly need it when the time that the
8 harvest had come.

9 Q. And that harvest would have started in July of
03:53:54 10 that year, of 2018?

11 A. I believe it was supposed to be July, end of
12 July.

13 Q. And same question for the -- you understand
14 that these avocados need to be cooled once they're
03:54:04 15 picked to delay the aging process, right?

16 A. I understand.

17 Q. So the same question. Was it your
18 understanding that INAGROSA had the facilities and
19 equipment at Hacienda Santa Fé to cool the avocados
03:54:17 20 after they had been picked?

21 A. Again, if they did not have it as of
22 June 18th -- sorry, 16th, my apologies -- that they
23 would have had it at the time that they needed it for
24 the harvest.

03:54:31 25 Q. And then my last question in this line of

03:54:33 1 questioning is was it your understanding that as of the
2 valuation date, INAGROSA had a business plan as to what
3 they would do once they picked the avocados, yes or no?

4 A. The business plan was very clear as to sell
03:54:51 5 those avocados.

6 Q. To Costa Rica?

7 A. For 2018.

8 Q. Have you seen the emails that Riverside's
9 produced from July 2018 from Mr. Gutiérrez to Mr. Rondón
03:55:06 10 about the 2018 harvest?

11 A. Perhaps you can remind me.

12 Q. Sure. I'm going to have Mr. Ricky put up on
13 the screen -- let's see if he can do it.

14 MR. MOLINA: I'm going to challenge you.
03:55:21 15 C-431 and C-432, only the English versions since
16 Mr. Kotecha said he does not read Spanish.

17 A. My apologies.

18 Q. All right, Mr. Kotecha. These are emails that
19 were produced by Riverside. The one on the left on your
03:55:58 20 screen has been designated as Exhibit C-431, and the one
21 on the right has been designated as C-432. And these
22 are email chains that are dated late July 2018.

23 My question is have you seen these
24 documents before?

03:56:16 25 A. Yes, I believe I have.

03:56:18 1 Q. So you see that starting on the left there's an
2 email from Mr. Gutiérrez to Mr. Rondón, dated July 29,
3 2018 that identifies that the avocados are starting to
4 get dark and that they're being spread out in the
03:56:36 5 warehouse but they're not in contact with the ground
6 because Mr. Gutiérrez placed a black plastic underneath
7 them.

8 Do you see that?

9 A. I do see that.

03:56:56 10 Q. And at the bottom of that email he mentions
11 that, "Remember, I don't have anything to send it in
12 like plastic crates or cardboard boxes." Do you see
13 that?

14 A. I do see that, and if I recall directly,
03:57:11 15 Mr. Gutiérrez addressed that issue and he had sent this
16 email at his home address where he did not have the
17 boxes at his home address.

18 Q. So were you shown these documents before you
19 submitted your second report?

03:57:31 20 A. I don't recall.

21 Q. Did you ask for documents from Riverside and
22 its lawyers about what happened to the 2018 harvest that
23 took place at Hacienda Santa Fé, yes or no?

24 A. Well, again, remember, our date is June 16,
03:57:49 25 2018, and so anything that happened after that date,

03:57:53 1 again, would not be considered in the but-for model
2 as -- would not be considered as at June 16.

3 Q. So you said a few minutes ago that your
4 understanding was that INAGROSA did have the facilities
03:58:07 5 and equipment in place or that if it didn't, it would
6 have gotten them in place in time for the harvest. Do
7 you remember that?

8 A. I do remember that.

9 Q. Same question I've been asking you. Were you
03:58:18 10 able to independently verify that representation, yes or
11 no?

12 A. Again, I'm not sure how I verified that
13 representation. That is my assumption. How do I verify
14 my own assumption that in the upcoming harvest that they
03:58:42 15 would need that material, and if they did not have it,
16 they would get it.

17 Q. Let me ask it differently.

18 Other than testimony from Riverside's
19 witnesses or representations from its lawyers, have you
03:58:55 20 seen any evidence that suggests that INAGROSA had the
21 facilities and equipment at Hacienda Santa Fé as of the
22 valuation date to store, process and ship Hass avocados
23 from that plantation, yes or no?

24 A. Again, it's going to be the same answer.

03:59:18 25 Q. Is the answer yes or no? I really need a yes

03:59:21 1 or no.

2 A. Unfortunately --

3 Q. Is it yes or no?

4 A. -- it is not a yes or no answer.

03:59:26 5 Q. The question is other than testimony and
6 representations, was there objective evidence? Yes or
7 no? I really just need a yes or no.

8 A. Again, my assumption is going to be that if
9 they did not have it at the time, that they would have.

03:59:41 10 Q. I understand --

11 A. And for anything that happens after June 16th,
12 it is a guess.

13 Q. Mr. Kotecha, I'm being very patient. I really
14 am.

03:59:51 15 PRESIDENT: I think he answered the
16 question.

17 MR. MOLINA: Moving on.

18 PRESIDENT: Look at the transcript. He
19 answered the question.

04:00:00 20 MR. MOLINA: Moving on --

21 PRESIDENT: We are now at hour and a half
22 since we started, so this would be a good time to break.
23 I didn't want to intervene because you indicated you
24 only had a few questions to complete your line of
04:00:23 25 questioning. Have you now completed your line of

04:00:26 1 questioning over --

2 MR. MOLINA: We can take a break. I will
3 need more on this line of questioning.

4 PRESIDENT: Okay. Let's break now anyway.

04:00:34 5 It's been a long round. We break for 15 minutes until
6 quarter past 4.

7 *(Recess taken).*

8 PRESIDENT: Okay. Let's go on.

9 Mr. Molina?

04:19:46 10 MR. MOLINA: Thank you, Mr. President.

11 Mr. Ricky, do you mind putting C-55 back
12 on the screen? C-55.

13 Q. Mr. Kotecha, I'm going to try to move forward,
14 this along because it's already getting later in the
04:20:06 15 day. So this is a document that we showed you a few
16 minutes ago. This is C-55, the letter to you from
17 Riverside. If you go to paragraph 42, which is on the
18 last page.

19 So, Mr. Kotecha, this paragraph says that
04:20:31 20 "INAGROSA determined that it did not require third-party
21 capital investment because of the ongoing commitment and
22 financial resources available from the company and the
23 members of this LLC."

24 Do you see that?

04:20:56 25 A. I do see that.

04:20:59 1 Q. And you essentially accept this representation
2 in your report. You note that it's your opinion that
3 INAGROSA had sufficient financial backing from Riverside
4 to conduct the expansion and operations that it
04:21:21 5 allegedly planned to conduct as of the valuation date,
6 correct?

7 A. What was the start of your question, if you
8 don't mind?

9 Q. Just saying that you've accepted this
04:21:33 10 representation that was made to you by Mr. Rondón on
11 paragraph 42, the one that's highlighted, right? You
12 don't disagree with it?

13 A. I do not disagree with it.

14 Q. Right. I'm trying to understand that in your
04:21:46 15 reports you specifically say that it's your opinion that
16 Riverside had the financial -- sorry, that INAGROSA had
17 the financial backing necessary to conduct the
18 expansions that we discussed a few minutes ago, correct?

19 A. Yes.

04:22:03 20 Q. Just to be clear, you're aware that Riverside
21 made its last loan to INAGROSA in 2014, correct?

22 A. Correct. I think it was in December of 2014
23 for over \$600,000 US, yes.

24 Q. And from December 2014 through the valuation
04:22:24 25 date, there's no transfer of money, whether by loan or

04:22:29 1 otherwise, from Riverside to INAGROSA, correct?

2 A. That is correct, because my understanding is it
3 wasn't needed.

4 Q. Right. So you specifically cite to this pledge
04:22:42 5 or this resolution that from 2016 where Riverside
6 declared that it would pledge up to \$16 million to
7 finance the avocado business at INAGROSA, correct?

8 A. Is that something you're going to put up for
9 me?

04:23:03 10 Q. No. I'm just saying, sitting here today, when
11 you say that you believe that Riverside would
12 financially back INAGROSA, that's based on this
13 \$16 million pledge that you've written about, correct?

14 A. With respect to that formal resolution.

04:23:40 15 Q. Yes.

16 A. Yes.

17 Q. Right. So, again, you've not -- other than the
18 document itself, you've not seen any evidence of
19 Riverside moving money or liquidating assets to be ready
04:24:01 20 to pay INAGROSA up to \$16 million, correct?

21 A. While I have not seen Riverside liquidating any
22 assets or transferring any funds from 2014 onwards, I am
23 aware that the family behind Riverside was of good means
24 and would be able to financially support INAGROSA as and
04:24:30 25 when and if needed.

04:24:33 1 Q. Sitting here today, do you know if there's any
2 document that you've seen in this record that shows the
3 exact holdings that the Wingers had as of the valuation
4 date personally? Like their personal holdings.

04:24:49 5 A. I have not seen a personal net worth statement
6 or balance sheet or anything like that of any members of
7 the Winger family.

8 Q. If you look at paragraph 43, there is a
9 reference here to:

04:25:03 10 "No government approvals were required for
11 the physical expansion of INAGROSA'S business operations
12 to continue. As a result, the forecast in the business
13 plan was not subject to third-party approval."

14 Do you see that?

04:25:20 15 A. I do see that.

16 Q. Do you agree with that representation?

17 A. Again, government approvals is not something
18 that I'm a specialist in anywhere in the world, not even
19 Nicaragua.

04:25:39 20 Q. Let me ask it differently --

21 A. And so it is not in my wheelhouse to say
22 whether I have accepted that representation or not. I
23 know there is a legal expert, another Mr. Gutiérrez, who
24 opined that, in fact, no government approvals were
04:25:58 25 required.

04:26:00 1 Q. You've testified already that you have
2 experience serving as a quantum expert in other cases,
3 yes?

4 A. Yes.

04:26:10 5 Q. From that experience, do you have any memory of
6 a business, an operational business, that did not
7 require any permits to operate, yes or no?

8 A. That one particular case, that other case that
9 we've referred to did not require any government permits
10 to operate.

11 Q. Which case?

12 A. The other case that we had talked about.

13 Q. Crystallex?

14 A. No. The other case that I had signed and you
04:26:42 15 had asked me about.

16 Q. And what was that case about?

17 A. It was about land value.

18 Q. Was there any sort of business that was taking
19 place on that land?

04:26:52 20 A. No.

21 Q. Sitting here today, have you seen -- can you
22 name one permit that INAGROSA had as of the valuation
23 date?

24 A. Again, if they required permits, then I'm going
04:27:11 25 to assume, because it's outside of my expertise, that

04:27:16 1 they would have gone -- they had it or they would have
2 gotten it. And my overall assumption with respect to
3 government permits is that I'm going to rely on the
4 expertise of Renaldy Gutiérrez, who opined the same.

04:27:33 5 Furthermore, my assumption has to be with
6 respect to quantum that the government will not be
7 prohibitive and restrictive in their approvals of
8 government certificates and whatnot and would actually
9 be helpful, particularly with the transition from coffee
04:27:57 10 to avocado.

11 Q. Thank you.

12 One last question on this. To the extent
13 this Tribunal finds that permits were required by --
14 that INAGROSA was required to obtain certain permits to
04:28:11 15 be able to execute the expansion that it contemplated as
16 of the valuation date, that would've negatively affected
17 the projections in your models, yes?

18 A. I don't think so, but in fairness, I'm going to
19 ask you to repeat that question.

04:28:31 20 Q. I'm just saying right now you said you're
21 assuming there were no permits that were necessary
22 because that's what the Riverside's legal expert has
23 said and you've stated as much in your report.

24 A. No. No. That's not what I said. What I said
04:28:48 25 was to the extent that permits are necessary, that they

04:28:51 1 would, in fact, get the permits as they were necessary,
2 I'm going to leave it to the legal expert to opine on
3 which permits were necessary and whether or not they
4 were prohibitive or not to get.

04:29:04 5 Q. Right. So then my question is in the event
6 that this Tribunal finds that certain permits, like, for
7 instance, the ability to export to the United States,
8 were not reasonably -- or could not be assumed as of the
9 valuation date and were necessary, that would negatively
04:29:25 10 affect your projections, yes?

11 A. It may. But in the alternative, what other
12 markets do they have to go to?

13 MR. MOLINA: Thank you, Mr. Ricky. You
14 can put down the letter.

04:29:40 15 Q. I'm just going to try to move this along.
16 You mentioned in your testimony today that
17 INAGROSA had a dearth of documents related to its
18 operations when you were preparing your first expert
19 report. True?

04:30:03 20 A. A "dearth" of documents? I don't think I ever
21 used that word.

22 Q. Sorry, that's my word. They didn't have
23 business records at the time -- the business records --
24 there were many business records missing at the time
04:30:19 25 when you were preparing your first expert report,

04:30:21 1 correct?

2 A. So in the preparation of the first expert
3 report, I was advised that many of the documentation was
4 destroyed at the time and that, you're right, there was
04:30:35 5 a lack of information that was available at the time.

6 Q. Thank you. That's what I'm referring to.

7 So all I want to understand is when you
8 were represented -- when this representation was made to
9 you, what steps did you take to confirm whether or not
04:30:50 10 that information was accurate?

11 A. Again, I need a little bit more clarity from
12 you, sir. Confirm what information was accurate?

13 Q. Sure.

14 A. The information that, in fact, the financial
04:31:08 15 records and everything else was destroyed?

16 Q. So let's --

17 A. Are you referring to that information, because
18 I want to be -- I want to be respectful of your
19 question?

04:31:16 20 Q. Yeah, so let's pick one at a time.

21 So you're aware that Riverside alleges
22 that INAGROSA's email was hacked and, therefore, its
23 emails had been -- had become unrecoverable, right?

24 A. I did read that, yes.

04:31:33 25 Q. And you were told this when you were preparing

04:31:35 1 your first expert report, yes?

2 A. Yes.

3 Q. So my question is did you follow up to confirm
4 that the email account was indeed hacked?

04:31:51 5 A. I did not engage with a forensic expert or an
6 electronic expert to verify whether that email was
7 hacked. That is outside of my level of expertise. But
8 I do understand that one was engaged to do so.

9 Q. Did you review any conclusions or reports from
04:32:12 10 that individual that was engaged?

11 A. I did not.

12 Q. Is it fair to assume that you just took the
13 representations about the missing, stolen or destroyed
14 documents at face value without doing any additional
04:32:29 15 inquiry, yes?

16 A. I did not do any follow-up inquiry with respect
17 to the statement that the financial records were
18 destroyed.

19 Q. And so then when you wrote your second expert
04:32:45 20 report a year later, in 2023, by that point Riverside
21 says that INAGROSA found documents that had been
22 mislabeled and were sitting in a warehouse in Managua.

23 My question is did it surprise you to
24 learn that there were, in fact, documents under the
04:33:10 25 control and possession of INAGROSA the whole time?

04:33:14

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A. Based on the information I had received while preparing my first report, which as you've accurately described, no financial information was available because it was destroyed, then, yes, I was surprised to

04:33:28

5

hear that more documents were found.

6

Q. Did you reach out to the bookkeepers that were maintaining those newly found documents and ask if they had any more?

8

9

A. I did not.

04:33:52

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[REDACTED]

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[REDACTED]

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[REDACTED]

Q. And you said in your presentation that you bought a house about 20 years ago, right?

A. I did.

Q. And it's since appreciated in value, yes?

A. It has.

Q. So if you were to sell that house today, one would expect that purchase price to be higher than the price that you purchased that property 20 years ago?

A. Correct.

Q. I'm not going to ask you to tell me how much your house is worth, but just roughly, how much do you think it's appreciated in value in terms of percentage?

A. Again, I think that's asking me about my house, which is outside of Toronto, which is not a 1200-acre -- hectare property. It is not very comparable.

Q. I'm only saying it because you raised it during your presentation several times. So I can move on if you don't want to answer that. Let me ask you a different question.

Do you know what the percentage would be [REDACTED]

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[REDACTED]

[REDACTED]

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Q. Thank you. One more document.

12

MR. MOLINA: Mr. Ricky, can we put up

13

Credibility 5?

14

MS. GREENWOOD: Sorry, I'm struggling for

04:45:37

15

the reference.

16

MR. MOLINA: This is an exhibit that's

17

been marked in this record as, I think, Credibility 5.

18

I think I have that right. Yeah, the reference is

19

C-R-E-D, as in David, dash 5, I think is the official

04:46:02

20

designation of this exhibit in the record.

21

MS. GREENWOOD: Thank you.

22

MR. MOLINA: No problem.

23

Q. Mr. Kotecha, I'm showing you standards from the

24

CBV Institute. Are you familiar with these?

04:46:19

25

A. I am.

04:46:20 1 Q. Why don't you explain what the CBV Institute
2 is?

3 A. I think I explained that in my opening. The
4 CBV designation is the Chartered Business Valuator
04:46:36 5 designation. The CBV Institute grants members that
6 designation and oversees the profession.

7 Q. Right. And you also testified earlier that you
8 actually sat on the board of this institute, yes?

9 A. I did.

04:46:51 10 Q. So you're very familiar with these standards,
11 yes?

12 A. I am.

13 Q. In fact, you say in both of your reports that
14 you believe your analyses comply with these standards,
04:47:02 15 correct?

16 A. Correct.

17 Q. If we go to the second page, what is under
18 Subsection 4E, which is towards the top of that page,
19 this standard says that:

04:47:19 20 "When access to essential information is
21 denied by the client or some other party or is otherwise
22 unavailable to the expert, any conclusion expressed by
23 the expert in the expert report shall be qualified and
24 the limitations on the scope of work clearly set out in
04:47:39 25 the expert report."

04:47:41 1 Do you see that?

2 A. I do.

3 Q. So we covered a little bit earlier that when
4 you were compiling your first expert report, that there
04:47:50 5 was a lack of access to information for a variety of
6 reasons that we've already covered, but you never put in
7 that report a qualification to that effect in writing,
8 correct?

9 A. Because it wasn't necessary. If we read this
04:48:10 10 paragraph -- and let's read it together:

11 "When access to essential information is
12 denied by the client."

13 In other words, what this means is when
14 you've asked for information and they've said I had the
04:48:26 15 information but you're not getting the information, then
16 it is appropriate to put in a scope limitation in your
17 report.

18 That was not the case here. They did not
19 deny me information. The information was not there to
04:48:42 20 begin with, so they could not deny the information.

21 Q. I hate to be a textualist, but it comes with
22 the legal profession, because if you look past that
23 clause of "denied by the client or some other party,"
24 there is a word "or." Then it follows "is otherwise
04:49:03 25 unavailable to the expert."

04:49:05 1 So you understand, as we read this
2 together, that this clause applies either in the event
3 that the information is denied by the client or is
4 otherwise unavailable to the expert. In this case,
04:49:18 5 that's you.

6 So my question is in this case when the
7 information wasn't there because it had been stolen,
8 destroyed or lost, it was otherwise unavailable to you,
9 yes?

04:49:36 10 A. And I did say that in my report, and I think
11 you're reading it as a lawyer, not from a practical
12 perspective. But even upon your reading as a lawyer --
13 and I respect your reading of it as a lawyer -- I did
14 say in my report that I did not have access to that
04:49:55 15 financial information.

16 Q. You said that in your first expert report?

17 A. I believe so.

18 Q. You put a qualification on your conclusion
19 saying: hey, these may be wrong because I have not had
04:50:06 20 access to certain information?

21 A. I did not feel the need to put a qualification
22 on that conclusion.

23 Q. If you look at the bottom, 5E, there's a
24 standard here. I'll let you read it because it carries
04:50:23 25 on to the next page. So maybe Ricky can do the thing he

04:50:29 1 does where he -- there you go.

2 Let me know when you're ready,
3 Mr. Kotecha.

4 A. Okay.

04:51:15 5 Q. We've covered before during today's questions
6 that you're not a Hass avocado expert, right?

7 A. I am not.

8 Q. And Riverside did not produce a Hass avocado
9 expert, correct?

04:51:28 10 A. Not to my knowledge, no.

11 Q. And you've said that you've relied exclusively
12 on testimony from fact witnesses about the Hass avocado
13 plantation when preparing your models, correct?

14 A. No. And I also considered the Respondent's
04:51:47 15 avocado expert as well.

16 Q. Right. But, of course, you know that the
17 Respondent's Hass avocado expert, his conclusions are
18 that the avocado project that INAGROSA supposedly was
19 carrying out was infeasible, right?

04:52:03 20 A. I understand his work product within his
21 document, and I also understand his conclusion.

22 Q. My only question on this paragraph is did you
23 ever ask Riverside that it would be great if you could
24 get a specialist to opine on the allegations from
04:52:23 25 Riverside's fact witnesses about the Hass avocado

04:52:25 1 plantation, yes or no?

2 A. Again, it's not for me to ask, nor did I think
3 it was necessary to do so because, as I've said and as I
4 illustrated in my opening, I was independently able -- I
04:52:40 5 was able to independently verify many of the assumptions
6 that were provided to me.

7 Q. So let's look at F, which is on the last page,
8 page 3. So it says:

9 "The expert shall determine the necessity
04:52:56 10 of obtaining client representations in writing and, if
11 possible, management representations from management or
12 other representatives of the underlying business."

13 Then it says that this representation
14 should provide that management has reviewed a draft copy
04:53:19 15 of the report and that management "does not have any
16 information or knowledge which would reasonably be
17 expected to affect materially the conclusions noted in
18 the expert report." Do you see that?

19 A. I do see that.

04:53:35 20 Q. So, again, my question is simply did you obtain
21 this letter from management?

22 A. I had a representation letter from management.

23 Q. Is that the one we were looking at earlier,
24 C-55?

04:53:47 25 A. Correct.

04:53:47 1 Q. Right. But that letter pre-dates your expert
2 report and only feeds you information that you then
3 later used in your expert report. This paragraph is
4 talking about something different, isn't it?

04:54:03 5 A. This paragraph -- and I've prepared management
6 rep letters over the last 24 years. The management rep
7 letter says, the ones that I've prepared, in a very
8 simple format, based on the information that you've
9 given me, is there anything that I've left out or missed
04:54:26 10 that I should consider?

11 In other words, usually the management rep
12 letter comes at the end, but in this case it came at the
13 beginning and it served the same purpose.

04:54:46 14 Q. Did Riverside ever tell you in writing that it
15 did not have any information or knowledge which would
16 reasonably be expected to affect materially the
17 conclusions in your first expert report?

18 A. Say that again, please.

19 Q. You see (ii) under F?

04:55:05 20 A. Yes.

21 Q. I just want to know if Riverside -- before you
22 published your first report with this arbitration,
23 before you sent it in, did Riverside make this
24 representation to you in writing?

04:55:14 25 A. No.

04:55:21 1 MR. MOLINA: I pass the witness. Thank
2 you.

3 PRESIDENT: Thank you. Redirect?
4 Mr. Mullins?

04:55:28 5 MR. MULLINS: Yes.

6 **REDIRECT EXAMINATION**

7 BY MR. MULLINS:

8 Q. Good afternoon, Mr. Kotecha. How are you?

9 A. Good afternoon. Good. How are you?

04:55:49 10 Q. I'm going to follow up, but you know when a
11 lawyer says they only have a few questions...

12 I don't think it will be that long, but
13 let me go forward.

14 First, you were asked about your
04:56:05 15 background and testimony regarding arbitrations,
16 international arbitrations. But on slide 1, if you have
17 that in front of you -- we can pull that up maybe. You
18 have it in front of you. Let's get moving.

19 You say you were retained by
04:56:36 20 claimant/plaintiffs and respondents/defendants, and you
21 said in your jurisdiction that's what we call people
22 that sue. Can you give us a little bit more of your
23 experience? When you say -- sorry, retained by
24 plaintiffs and defendants, what does that mean?

04:56:50 25 A. So in my practice I make it a point, where

04:56:58 1 possible, to not only be retained by one side or the
2 other. I think it's important from an independence
3 perspective to ensure that whenever you're on a matter,
4 that you look at it from both sides, because ultimately
04:57:13 5 it's not the client that you're serving, it's the trier
6 of fact.

7 Q. And counsel asked you about your arbitration
8 experience. Have you had experience testifying in court
9 cases?

04:57:26 10 A. I do. So I would say I've testified in the
11 Ontario Superior Court. I've also testified in
12 arbitrations in Ontario. Just so you can understand the
13 difference, in the Ontario Superior Court, there's a
14 qualification process before you are able to testify,
04:57:53 15 unlike here. And what that means is the other side can
16 challenge your qualifications. It's a much more
17 rigorous process, I've found, than here.

18 Q. Have you been qualified to testify in an
19 Ontario court?

04:58:11 20 A. I have.

21 Q. Have you ever been disqualified?

22 A. I have not.

23 Q. In court cases, can you give us how many
24 opinions you have given relating to valuation of DCF
04:58:26 25 models in court cases?

04:58:29 1 A. The DCF model is an acceptable model, and I've
2 done that a number of times, both -- I've constructed
3 DCF models, and I've criticized DCF models as well. As
4 a guess --

04:58:49 5 Q. Go ahead.

6 A. -- how many times over the course of a 24-year
7 career so far, I'd have to say it's at least 50. At
8 least.

9 Q. And you've testified in court as well, sir?

04:59:01 10 A. Yes.

11 Q. If we can -- let me ask you. You were asked
12 about your assumption on the --

13 PRESIDENT: Apologies. Can I just clarify
14 that? You said that you have testified at least 50
04:59:43 15 times before courts in Canada or over 50 times in cases
16 involving the DCF method?

17 MR. KOTECHA: No, no. I've prepared
18 reports 50 times.

19 PRESIDENT: Understood. Thank you.

04:59:59 20 Q. Just to follow up on the Tribunal's question,
21 how much of the percentage of your work has been DCF
22 models?

23 A. Mr. Mullins, that's a tough question to answer.

24 Q. I'm not supposed to be doing that.

05:00:17 25 A. Exactly.

05:00:19

1

I would say every valuation assignment --

2

every assignment I do is a valuation or a loss of

3

profits assignment. They are all forward-looking. So

4

whether it's a DCF approach, a market approach or a

05:00:34

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capitalized cash flow approach, every single one of

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those approaches -- every single one of the reports I

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would do would encompass those approaches. At least

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one.

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Q. I just wanted to make sure that was clear.

6

And I hate to jump back around again, but you were asked questions about the CBV. Again, what does that stand for?

7

8

9

05:05:56

10

A. CBV means Chartered Business Valuator. That's a designation that I have.

11

12

Q. Are you familiar with the guidelines you saw today?

13

A. Yes, I am.

14

05:06:06

15

Q. And, again, how are you so familiar with those guidelines?

16

A. So, first of all, I've been a chartered business valuator for the last 24 years. When I wrote my exam, they test you on the guidelines and the standards and the effects. I'm proud to say I did quite well. I was second in the country. I was then elected by my peers to sit on the board of that institution, and while on the board of that institution, while I mentioned one committee, I was on a number of committees. One of those committees was the standards committee.

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05:06:25

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05:06:40 1 So I am very familiar with the standards.
2 I'm very familiar with the practical aspects of those
3 standards and so I am comfortable, 100 percent
4 comfortable, that I abide by all of my regulatory body
05:06:58 5 standards.

6 Q. Does that include these reports that you've
7 submitted here today?

8 A. Yes.

9 Q. Part of the standards of being a CBV valuator,
05:07:11 10 is it required to independently verify every single
11 assumption that you make in making a DCF evaluation?

12 A. Again, the DC valuation, it is determined upon
13 the inputs that you use in the model, without a doubt.
14 To the extent that you can verify that information with
05:07:38 15 reasonable certainty, yes, you should without a doubt.

16 But, again, the standard is not absolute
17 certainty. So, for example, if I go ask ten farmers
18 what their yield is, I'm sure I'm going to get ten
19 different answers. It doesn't mean that one is right
05:07:57 20 and one is wrong. There's a range. And so within that
21 range, what is the reasonable range?

22 And that's what I attempted to do in the
23 second report is there was some feedback on the yields
24 that management had represented were too high even
05:08:18 25 though they were independently verified by a different

05:08:21

1 source. So then I adjusted, and I adjusted in the hopes
2 that it would help the Tribunal better understand the
3 differences between the two approaches.

05:08:39

4 My approach, I've made an attempt at least
5 to do a DCF based on the inputs that were provided to
6 me, and I'm fairly comfortable that I did the homework
7 necessary to assess the reasonability of those inputs.
8 The Respondent expert didn't even try.

05:09:00

9 Q. When you do -- as a chartered business
10 valuator, when you do your valuation models, is it
11 appropriate to rely on testimony and representations of
12 other experts or testimony from witnesses as to what the
13 facts are to ascertain your valuation?

05:09:26

14 A. It is essential. I cannot be an expert in
15 everything and anything. I'm a quantum expert, and in
16 that role I have to rely upon facts that are outside my
17 purview. It just makes sense.

05:10:13

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In addition to that, I recall in reading,

13

I think it was, Mrs. Rondón's statement that the family

14

and the father was a very successful businessperson and

05:19:51

15

had many financial interests. And so, again, that

16

provided me with some comfort that the financial issue

17

was not an issue at all.

18

Q. And finally, this is just for my ego. You

19

mentioned the Honduras case. Do you remember me being

05:20:15

20

involved at all?

21

A. I think we may have talked once, maybe.

22

Q. Okay. Well, just so -- I was working at Reed

23

Smith when we worked on the Honduras case. So the

24

record is clear, I just wanted to put it on the record.

05:20:34

25

Just for my own ego.

05:20:37

1 A. My apologies.

2 Q. It's okay. I have one of those faces people
3 forget.

05:20:49

4 PRESIDENT: Unfortunately, it's a closed
5 session.

6 MR. MULLINS: I know. I lost my day in
7 the light. That was the line for the day,
8 Mr. President.

05:21:03

9 On that, I have to thank Mr. Kotecha for
10 his time and thank you. I have no further questions.

11 PRESIDENT: Thank you very much.

12 MS. GREENWOOD: No additional questions,
13 thank you.

14 QUESTIONS BY THE TRIBUNAL

05:21:15

15 PRESIDENT: I may have a couple of
16 questions for you about your first report.

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[REDACTED]

[REDACTED]

05:27:46 1 PRESIDENT: So that concludes your
2 examination, Mr. Kotecha.

3 MR. KOTECHA: Thank you. Thank you,
4 Mr. Molina.

05:27:55 5 MR. MOLINA: Thank you, Mr. Kotecha.

6 PRESIDENT: You are a free man.

7 We are now ahead of time. So the question
8 is whether we should start today -- given what we
9 discussed earlier today, whether we should start with

05:28:16 10 Mr. Hart. I think much depends on whether the
11 Claimant's estimate of three hours for the
12 cross-examination of Mr. Hart still stands.

13 MR. MOLINA: Mr. President, if I may,
14 sorry to interrupt. We had -- you might recall a couple
05:28:36 15 of days ago Mr. Appleton and I chatted during one of the
16 sessions and agreed to ensure that Credibility would
17 start on Thursday morning, assuming we were able to get
18 through Mr. Kotecha today.

19 So I think that given that we are -- that
05:28:58 20 they're the only remaining witness, that that should not
21 be an issue, and so I wanted to remind you that we had
22 already come up with that agreement.

23 PRESIDENT: Yes, I remember that
24 discussion, but the only reason I'm raising it is
05:29:13 25 because of the change of circumstances for the reasons

05:29:15 1 discussed earlier today. But if, Mr. Mullins, if you
2 will be doing the cross-examination, can confirm that
3 the three hours is still a reasonably accurate
4 assessment?

05:29:31 5 MR. MULLINS: At this point I think at
6 this point it's probably right. It could go longer, but
7 certainly he will be done tomorrow for sure. He'll have
8 his opening.

9 PRESIDENT: Okay.

05:29:40 10 MR. MULLINS: There is a procedural issue
11 on that because you mentioned Mr. Hart and I had the
12 same confusion.

13 MS. CONOVER: Counsel, I'm sorry. Before
14 we proceed, can we move on to open session, or do we
05:29:49 15 stay as a closed session?

16 PRESIDENT: Now we can move to open
17 session, yes. Thank you for reminding us.

18 MS. CONOVER: The session has been opened.
19 Thank you.

05:29:59 20 PRESIDENT: So as to the timetable,
21 Mr. Mullins?

22 MR. MULLINS: Yes, sorry. We had two
23 issues. First on this, I found out at lunch that
24 apparently Respondent purports to have Mr. Hart and
05:30:17 25 Mr. Kratovil -- I don't know if I pronounce that

05:30:21 1 correctly -- both testify. They had been listed, I
2 recognize that. I understood that that meant in case
3 somebody -- something happened, that somebody got caught
4 in an emergency, that either one of them would be able
05:30:33 5 to testify.

6 It turns out that's not true, that they
7 want both of them to testify. I originally was told
8 that the way it would work is that I would be told right
9 before the presentation what expert would be talking on
05:30:49 10 what topic, and I said, well, I'd like to know what that
11 is. I think this is highly inappropriate and I object,
12 but at least I need to know who's going to talk on what.

13 After I talked to counsel again, I then
14 learned that, no, that Mr. Hart would be the quarterback
05:31:04 15 and then if there's a question to him that he can't
16 answer, he would turn to the co-author.

17 To be honest, I think it's completely
18 unusual and inappropriate. Our witness was able to
19 answer the questions that the panel had. He had his
05:31:23 20 whole staff behind him. Mr. Hart's got plenty of
21 experience, and I really think it hurts our ability to
22 make an effective cross-examination if I'm now basically
23 being double-teamed by two experts.

24 So at this point I raise it now because I
05:31:40 25 didn't want to raise it in the morning in case the

05:31:42 1 Tribunal wants to make a ruling on this issue. But I do
2 object to the procedure which I just found out today.

3 PRESIDENT: Respondent?

4 MR. MOLINA: Yes, please. First,
05:31:54 5 correction. I think Mr. Mullins said that what I'd
6 communicated was that if Mr. Hart couldn't answer it he
7 would -- that's not what I'd communicated to
8 Mr. Mullins.

9 What I said to him was that the procedure
05:32:10 10 that we were anticipating which has taken place in
11 numerous arbitrations would be that Mr. Hart would
12 essentially field the question and if he decided to
13 delegate it to Mr. Kratovil, he could. Or he could take
14 it himself. It has nothing to do about whether he can
05:32:29 15 answer it or not.

16 Going back to now the substance of the
17 objection, both experts have signed both reports. Both
18 experts were discussed with the parties and the Tribunal
19 during the pre-hearing call as being on the calendar.

05:32:48 20 I've never represented, nor I don't think could the
21 inference be made, that it was one or the other. That
22 would not be -- that's never been something we said.

23 Again, my understanding is this has
24 happened several, several times that I'm aware of in
05:33:07 25 other cases. So I disagree with Mr. Mullins'

05:33:11 1 characterization of it being highly inappropriate. It's
2 actually somewhat ordinary.

3 So that being said, the plan is, unless
4 there's some instruction from the Tribunal, for both of
05:33:24 5 them to testify and Mr. Hart to field the questions and
6 either answer it himself or delegate and, to be very
7 clear, there's no tag-teaming. By that, I mean in no
8 world are both experts going to answer the same
9 question. It would only be one expert that would answer
05:33:47 10 each question. Thank you.

11 PRESIDENT: Just to confirm, as I recall
12 from the two reports, both experts are, so to speak,
13 jointly and severally liable for the report, for the two
14 reports. There is no division of labor in terms of
05:34:09 15 subject matter.

16 MR. MOLINA: That's right, because the
17 understanding was they would have the procedure that I
18 suggested. So the answer is yes.

19 PRESIDENT: The Tribunal will withdraw and
05:34:22 20 will deliberate.

21 (The Tribunal withdrew)

22 PRESIDENT: Okay. So here's where we are.

23 We understand that both Mr. Hart and
24 Mr. Kratovil are equally qualified to answer any
05:45:59 25 question that counsel for the Claimant puts to them.

05:46:04 1 There's no division of labor in terms of substance.

2 If that's the case, it's fair for the
3 Claimant's counsel to be able to choose which expert to
4 put the question to. So you can choose whether you
05:46:15 5 address your question to Mr. Hart or Mr. Kratovil.

6 If the Respondent is not happy with this
7 approach, then you can designate one of the two experts
8 as the expert who will deal with all the questions. So
9 we give you an option.

05:46:37 10 This is not an easy or obvious decision.

11 There is practice that goes both ways, but the
12 Tribunal's sense is that it's a bit unfair to give the
13 experts an option to choose which one will answer. The
14 option should be for the Claimant to choose if both
05:47:01 15 experts are equally qualified to answer the question.

16 But we allow the Respondent to take a view
17 on whether they want to proceed on this basis or whether
18 they designate Mr. Hart or Mr. Kratovil alone as the
19 expert who will deal with these questions. Because
05:47:16 20 either one, we understand, can deal with all the
21 questions.

22 MR. MOLINA: Could I suggest something
23 that's potentially a little bit different?

24 While you withdrew, I spoke to the
05:47:31 25 experts. They suggested that if it was easier for them

05:47:35 1 to be designated such that there was parts of their
2 reports -- a certain portion of the reports went to one
3 and the other portions went to the other?

4 PRESIDENT: That is certainly a
05:47:46 5 possibility. If that is their approach, there is
6 nothing wrong with that.

7 MR. MOLINA: So let me just confirm with
8 them which parts, and then I can pose it to Claimant's
9 counsel, and that way they will have advance --

05:48:03 10 PRESIDENT: They are your experts, so you
11 can designate which one will cover which issues. Do you
12 need a break?

13 MR. MOLINA: I think what they told me --
14 I wrote it down, but I just wanted to confirm because
05:48:18 15 once I say it, I don't know if it can be unsaid.

16 In their second report, so their updated
17 report, they pointed to Mr. Hart can go from section 1
18 through section 4.1, and then Mr. Kratovil can handle
19 questions related to the subject matter covered by
05:48:41 20 section 4.2 onward, and obviously to the extent there's
21 a question about either's experience, those would be
22 handled by the relevant expert.

23 PRESIDENT: Is this agreeable to the
24 Claimant?

05:48:58 25 MR. MULLINS: If I could check the reports

05:49:00 1 so I understand exactly what this means practically.

2 MR. MOLINA: I just got confirmation that
3 this break-down is the same in either report.

4 Apparently they put the section headers -- they're
05:49:47 5 consistent.

6 PRESIDENT: The structure is the same.

7 MR. MOLINA: Yes.

8 MR. MULLINS: I think I understand it, and
9 it is -- we will just proceed that way. I guess there
05:49:59 10 may be some overlap, but I'll do the best I can. I
11 think I generally have an understanding how that breaks
12 out.

13 PRESIDENT: Okay. Very good. On that
14 basis, we have an understanding on how we will proceed
05:50:12 15 tomorrow.

16 So we call it a day.

17 MR. APPLETON: We still have a second
18 procedural issue. Mr. Mullins will know there are two
19 issues. But it's a relatively simple one.

05:50:26 20 PRESIDENT: Can you speak a bit closer?

21 MR. APPLETON: Yes, I'm sorry, I'm a
22 little quieter today than usual.

23 If you recall, I wasn't able to address
24 procedural issues on the lunch break for other reasons.

05:50:43 25 I had something I wanted to bring to your attention. It

05:50:46 1 was in relation to a procedural matter we had talked
2 about this morning, and I wanted to give you a brief
3 update on that and then of course other matters took me
4 away.

05:50:57 5 This morning you had asked specifically --
6 I believe it was you, Mr. President -- about the nature
7 of the information that would be related to the
8 investigation, and I could actually tell you with great
9 specificity now of exactly what that is to the extent

05:51:13 10 that you're interested. I can tell you the following,
11 that there is a social media post, there's a video that
12 comes from that social media post and that there is some
13 form of a declaration, all dealing with the identity of
14 the person who is in the article who's a government
05:51:38 15 official. And so that's sort of how to tie that
16 together.

17 And then, if you recall, there's the
18 article from the Havana Times and then the subsequent
19 article they referred to. So those are the pieces.

05:51:54 20 PRESIDENT: Understood. That's helpful.
21 Thank you.

22 Anything further?

23 MR. APPLETON: I don't believe so. I'm
24 delighted that we can reconvene tomorrow morning.

05:52:05 25 PRESIDENT: Anything on the Respondent's

05:52:06

1 side?

2

MS. GONZÁLEZ: Nothing from us. Thank

3

you.

4

PRESIDENT: Very good. Thank you very

05:52:11

5

much. That brings us to the end, then, today. We'll

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resume again tomorrow morning at 9:00. Thank you very

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much.

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(Hearing adjourned at 5:52 p.m.)

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<p>MR. APPLETON: [34] 1737/15 1738/6 1739/1 1740/2 1740/6 1741/20 1742/3 1742/11 1758/22 1759/12 1759/19 1759/22 1761/19 1765/23 1769/12 1770/14 1778/6 1778/14 1779/1 1779/16 1795/12 1796/3 1821/20 1821/25 1822/4 1822/10 1823/16 1826/1 1826/4 1826/13 1827/15 1938/17 1938/21 1939/23 MR. KOTECHA: [35] 1795/20 1795/23 1798/1 1798/10 1798/23 1809/15 1809/20 1810/1 1810/10 1811/2 1811/8 1817/9 1817/18 1817/20 1817/24 1827/19 1877/13 1877/25 1914/17 1921/25 1927/9 1927/14 1927/17 1927/21 1927/24 1928/5 1928/13 1928/17 1928/19 1928/22 1929/12 1929/15 1929/20 1930/8 1931/3 MR. MOLINA: [33] 1821/23 1827/23 1836/17 1863/10 1863/19 1863/25 1867/6 1869/1 1870/19 1880/6 1885/14 1888/17 1888/20 1889/2 1889/10 1895/13 1901/23 1902/25 1905/12 1905/16 1905/22 1912/1 1929/3 1930/25 1931/5 1931/13 1934/4 1935/16 1936/22 1937/7 1937/13 1938/2 1938/7 MR. MULLINS: [19] 1817/13 1817/19 1817/23 1836/15 1836/19 1853/17 1853/21 1912/5 1926/6 1929/6 1929/10 1930/12</p>	<p>1930/17 1930/20 1932/5 1932/10 1932/22 1937/25 1938/8 MR. SEQUEIRA: [2] 1742/18 1795/6 MS. CARDENAS: [9] 1749/25 1759/15 1759/25 1761/10 1764/9 1764/11 1764/16 1775/23 1777/17 MS. CONOVER: [7] 1749/20 1750/1 1798/2 1824/3 1856/1 1932/13 1932/18 MS. GONZÁLEZ: [22] 1739/13 1741/13 1742/1 1742/6 1742/14 1758/17 1761/6 1763/19 1769/10 1774/14 1776/2 1777/20 1779/12 1779/25 1783/2 1787/16 1794/24 1797/19 1821/17 1827/3 1827/11 1940/2 MS. GREENWOOD: [18] 1805/20 1805/25 1806/7 1809/6 1809/18 1809/21 1810/3 1810/21 1811/6 1863/21 1877/8 1877/18 1878/2 1905/14 1905/21 1921/15 1922/10 1926/12 PRESIDENT: [111] 1735/22 1738/5 1738/22 1739/10 1739/14 1740/4 1741/7 1741/23 1742/8 1742/13 1742/15 1742/19 1758/20 1759/8 1759/14 1761/15 1763/14 1764/10 1764/12 1766/1 1766/7 1769/17 1770/15 1774/17 1775/25 1777/18 1777/22 1778/4 1778/10 1778/22 1779/6 1779/23 1787/9 1795/1 1795/7 1795/13 1795/18 1795/21 1795/24 1797/17 1797/20 1798/4 1798/13 1817/5 1817/11 1817/16 1817/21 1821/8 1821/18</p>	<p>1822/3 1822/5 1823/4 1823/22 1824/2 1824/4 1826/3 1826/6 1826/20 1827/5 1827/13 1827/16 1827/20 1888/15 1888/18 1888/21 1889/4 1889/8 1912/3 1914/13 1914/19 1926/4 1926/11 1926/15 1927/12 1927/15 1927/19 1927/22 1927/25 1928/10 1928/14 1928/18 1928/20 1928/24 1929/5 1929/7 1929/13 1929/17 1930/6 1930/9 1930/16 1930/18 1930/22 1931/1 1931/6 1931/23 1932/9 1932/16 1932/20 1934/3 1935/11 1935/19 1935/22 1937/4 1937/10 1937/23 1938/6 1938/13 1938/20 1939/20 1939/25 1940/4 THE INTERPRETER: [3] 1759/21 1759/24 1766/3 <hr/> \$ \$150,000 [3] 1870/23 1871/20 1871/23 \$16 [3] 1891/6 1891/13 1891/20 \$16 million [3] 1891/6 1891/13 1891/20 \$600,000 [1] 1890/23 <hr/> 0 0001 [1] 1785/17 01-2007 [1] 1756/25 042 [1] 1753/5 <hr/> 1 1,000 hectares [3] 1765/11 1765/11 1882/24 1,000-hectare [1] 1883/4 1,084 hectares [1] 1765/14 1-6 [1] 1872/23 10 [5] 1731/15 1734/23 1764/19 1872/11 1875/22</p>	<p>100 [3] 1777/1 1777/2 1802/11 100 hectares [1] 1765/16 100 percent [2] 1868/16 1919/3 102 [1] 1776/17 10:35 [1] 1777/24 11 [2] 1782/24 1797/11 116 [1] 1751/11 118 [1] 1752/6 12 [3] 1755/16 1757/6 1867/15 1200-acre [1] 1900/15 13 [3] 1737/10 1782/2 1782/23 131 [1] 1788/13 138 [1] 1878/10 140 hectares [1] 1765/13 144 [6] 1743/2 1743/5 1743/7 1788/24 1789/16 1790/3 146 [1] 1749/6 149 [2] 1791/14 1792/8 15 [1] 1889/5 15 minutes [2] 1777/24 1779/14 150,000 [1] 1871/17 16 [12] 1731/11 1765/19 1801/25 1802/4 1834/13 1872/19 1880/16 1883/19 1883/23 1884/3 1884/10 1884/3 1886/24 1887/2 16,000 [5] 1872/18 1872/19 1872/23 1872/25 1873/5 16.3 [2] 1781/12 1781/20 16th [2] 1884/22 1888/11 17 [1] 1736/15 17,900 [9] 1873/3 1873/12 1873/13 1873/19 1874/8 1875/3 1877/12 1877/21 1878/1 17.9 [2] 1875/8 1877/15 187 [2] 1764/20 1765/5 18th [1] 1884/22 19 [1] 1786/7 199 [1] 1743/24 1992 [1] 1800/5 1997 [5] 1753/2 1753/8 1754/9</p>	<p>1754/14 1754/23 <hr/> 2 2.6 [1] 1800/9 20 [8] 1777/23 1804/10 1875/23 1876/6 1876/9 1876/24 1877/2 1877/7 20 kg [1] 1876/15 20 years [3] 1804/12 1900/3 1900/9 200 [2] 1880/20 1883/6 200 hectares [3] 1881/5 1881/11 1881/19 200-hectare [3] 1881/16 1882/11 1882/16 2007 [1] 1756/25 2012 [1] 1800/5 2014 [5] 1873/6 1890/21 1890/22 1890/24 1891/22 2016 [1] 1891/5 2017 [5] 1875/24 1876/2 1876/3 1876/5 1876/25 2018 [25] 1802/1 1802/4 1834/13 1835/1 1869/11 1870/10 1870/11 1871/1 1871/7 1871/9 1873/14 1873/19 1877/15 1880/16 1883/19 1883/23 1884/3 1884/10 1885/7 1885/9 1885/10 1885/22 1886/3 1886/22 1886/25 2019 [8] 1829/17 1830/12 1832/12 1832/16 1832/23 1833/4 1880/20 1882/23 2021 [6] 1743/21 1750/10 1750/22 1751/10 1754/10 1761/12 2022 [7] 1781/11 1782/3 1782/8 1782/15 1782/23 1782/24 1867/15 2023 [3] 1756/4 1756/6 1897/20 2024 [7] 1731/15 1735/1 1743/22 1747/22 1761/12 1791/8 1793/11 2026 [1] 1835/2 22 [3] 1833/24</p>
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<p>apparently [2] 1932/24 1938/4</p> <p>appeal [12] 1783/21 1785/8 1786/1 1786/9 1786/11 1786/12 1786/17 1786/18 1786/20 1787/2 1787/3 1789/19</p> <p>appeals [2] 1786/17 1787/4</p> <p>appear [1] 1785/23</p> <p>appearance [3] 1788/8 1788/10 1788/17</p> <p>APPLETON [16] 1733/5 1733/6 1741/14 1745/8 1745/15 1745/18 1745/19 1752/12</p>
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[8] 1752/14 1752/23 1753/24 1755/8 1796/2 1825/23 1831/6 1931/15</p> <p>applicant [2] 1767/22 1772/19</p> <p>application [5] 1771/19 1771/21 1772/2 1790/17 1877/10</p> <p>applied [7] 1777/6 1794/7 1794/12 1794/16 1843/22 1877/11 1877/14</p> <p>applies [3] 1743/7 1788/23 1908/2</p> <p>apply [4] 1743/11 1769/15 1793/25 1794/17</p> <p>appointed [3] 1766/19 1768/2 1799/21</p> <p>appointment [1] 1781/3</p> <p>appreciate [8] 1742/11 1755/5 1761/14 1782/20 1787/15 1840/10 1840/19 1843/18</p> <p>appreciated [2] 1900/5 1900/13</p> <p>appreciation [1] 1776/13</p> <p>approach [29] 1802/16 1802/16 1802/18 1802/18 1802/19 1802/25 1803/1 1803/4 1803/9 1803/9 1803/15 1803/16 1803/16 1803/17 1803/25 1804/1 1804/1 1804/3 1804/5 1804/8 1804/9 1804/16 1804/17 1915/4 1915/4 1915/5 1920/4 1936/7 1937/5</p> <p>approaches [7] 1802/15 1803/13 1803/24 1804/6 1915/6 1915/7 1920/3</p> <p>appropriate [6] 1759/6 1762/24 1801/19 1804/3 1907/16 1920/11</p> <p>approval [2] 1773/10 1892/13</p> <p>approvals [4] 1892/10 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1796/12 1796/14 1796/16 1796/18 1797/8 1797/9 1797/22 1798/18 1799/12 1800/8 1802/14 1804/6 1817/5</p>	<p>1817/18 1824/19 1824/22 1825/6 1825/18 1826/11 1826/22 1838/24 1839/18 1840/4 1869/22 1869/25 1874/24 1877/14 1878/7 1880/22 1880/22 1885/18 1885/22 1885/22 1886/3 1888/21 1894/25 1896/17 1905/24 1909/17 1912/8 1912/9 1913/14 1915/3 1918/11 1918/14 1920/13 1920/16 1931/6 1931/7 1931/19 1935/8 1935/12 1935/22 1935/24 1936/15 1937/10 1938/18 1939/19</p> <p>area [12] 1763/2 1765/12 1769/1 1769/6 1772/15 1772/16 1772/17 1772/17 1774/20 1777/14 1882/10 1882/23</p> <p>areas [3] 1759/5 1763/4 1771/10</p> <p>aren't [1] 1781/4</p> <p>argument [4] 1786/25 1824/12 1824/22 1825/13</p> <p>arguments [3] 1743/23 1824/6 1824/19</p> <p>Arias [3] 1781/22 1782/2 1782/7</p> <p>arises [1] 1791/14</p> <p>arm's [1] 1801/12</p> <p>around [2] 1799/13 1918/6</p> <p>arrears [1] 1768/25</p> <p>article [41] 1737/18 1737/20 1737/21 1738/20 1743/5 1743/7 1743/9 1743/14 1743/18 1748/17 1748/24 1749/6 1749/8 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1736/11 1737/25 1738/12 1740/24 1754/1 1754/11 1754/14 1754/21 1755/10 1759/17 1759/22 1762/4 1762/5 1771/18 1772/2 1772/4 1772/8 1773/1 1776/20 1777/9 1778/19 1783/9 1788/17 1789/19 1792/1</p>	<p>1792/18 1793/16 1794/16 1794/21 1796/10 1801/17 1802/7 1826/14 1827/8 1842/15 1842/17 1843/5 1843/15 1843/19 1867/9 1871/23 1875/14 1876/23 1886/6 1888/23 1889/14 1889/21 1891/2 1893/25 1894/22 1896/17 1898/4 1900/17 1907/9 1907/22 1908/7 1908/19 1908/24 1910/3 1913/4 1931/25 1932/11 1933/24 1935/16 1936/19 1937/14</p> <p>become [3] 1757/8 1757/25 1896/23</p> <p>becomes [1] 1825/17</p> <p>been [86] 1740/19 1740/25 1741/1 1743/23 1745/19 1747/19 1752/24 1760/4 1761/7 1762/4 1762/10 1763/10 1763/22 1764/1 1766/4 1766/10 1773/21 1776/21 1777/22 1784/3 1786/16 1786/24 1786/24 1789/9 1789/11 1791/9 1792/12 1792/14 1794/22 1796/7 1796/13 1796/18 1797/4 1798/2 1798/4 1798/19 1799/6 1799/19 1799/21 1801/2 1801/4 1801/7 1801/18 1802/8 1804/19 1824/24 1826/15 1826/23 1828/18 1828/19 1828/20 1828/21 1830/7 1834/12 1835/12 1842/19 1867/10 1867/11 1870/3 1870/5 1871/14 1871/19 1872/17 1874/8 1876/16 1878/9 1880/20 1882/5 1882/11 1883/4 1884/20 1885/20 1885/21 1887/9 1889/5 1896/23 1897/21 1905/17</p>	<p>1908/7 1913/18 1913/21 1914/21 1918/16 1932/18 1933/1 1934/22</p> <p>before [33] 1737/16 1737/17 1742/9 1749/24 1751/8 1758/25 1762/25 1763/6 1763/19 1768/20 1784/13 1788/9 1788/10 1790/23 1796/4 1817/15 1821/10 1836/3 1836/8 1838/10 1839/12 1873/18 1874/17 1877/1 1885/24 1886/18 1909/5 1911/21 1911/23 1913/14 1914/15 1932/13 1933/9</p> <p>begin [2] 1743/3 1907/20</p> <p>beginning [4] 1765/1 1825/18 1877/22 1911/13</p> <p>behalf [4] 1733/3 1734/3 1744/21 1831/6</p> <p>behaved [1] 1761/12</p> <p>behind [3] 1825/18 1891/23 1933/20</p> <p>being [30] 1744/7 1747/4 1747/6 1760/3 1764/1 1767/9 1771/24 1777/7 1777/9 1786/2 1801/22 1801/25 1802/19 1803/22 1832/2 1835/11 1835/15 1841/1 1867/11 1868/6 1868/12 1880/18 1886/4 1888/13 1919/9 1925/19 1933/23 1934/19 1935/1 1935/3</p> <p>belief [1] 1798/12</p> <p>believe [19] 1736/14 1742/22 1759/5 1796/13 1796/15 1797/10 1802/13 1826/22 1829/17 1830/16 1835/2 1873/14 1884/11 1885/25 1891/11 1906/14 1908/17 1939/6 1939/23</p> <p>believes [1] 1786/23</p> <p>bell [1] 1773/25</p> <p>benchmark [1] 1803/12</p> <p>best [6] 1796/19</p>
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<p>B</p> <p>best... [5] 1803/23 1826/2 1826/5 1868/9 1938/10</p> <p>better [1] 1920/2</p> <p>between [12] 1741/11 1741/24 1749/21 1778/23 1779/7 1789/4 1801/11 1802/23 1830/5 1876/21 1881/9 1920/3</p> <p>beyond [2] 1773/14 1774/9</p> <p>binding [1] 1799/22</p> <p>biodiversity [1] 1772/17</p> <p>Bird [1] 1771/14</p> <p>bit [12] 1743/20 1743/22 1746/6 1748/12 1798/25 1839/3 1896/11 1907/3 1912/22 1936/12 1936/23 1938/20</p> <p>black [1] 1886/6</p> <p>Blancas [1] 1732/13</p> <p>blank [1] 1738/2</p> <p>board [6] 1799/9 1799/11 1799/14 1906/8 1918/21 1918/22</p> <p>bodies [1] 1773/11</p> <p>body [1] 1919/4</p> <p>bond [7] 1767/21 1767/23 1767/25 1792/11 1792/12 1792/14 1792/23</p> <p>bonds [1] 1792/24</p> <p>bookkeepers [1] 1898/6</p> <p>both [24] 1752/7 1752/9 1752/10 1762/7 1762/9 1778/17 1796/7 1801/14 1864/14 1874/25 1906/13 1913/4 1914/2 1933/1 1933/7 1934/17 1934/17 1934/17 1935/4 1935/8 1935/12 1935/23 1936/11 1936/14</p> <p>bottom [6] 1780/25 1867/19 1869/13 1878/8 1886/10 1908/23</p> <p>bought [3] 1804/9 1804/11 1900/3</p> <p>box [1] 1883/21</p> <p>boxes [3] 1884/4 1886/12 1886/17</p> <p>branch [4] 1760/20</p>	<p>1760/22 1762/7 1762/8</p> <p>branches [1] 1793/17</p> <p>breach [1] 1801/22</p> <p>breaches [1] 1762/3</p> <p>break [20] 1742/2 1777/19 1777/21 1777/23 1777/24 1778/2 1779/19 1795/14 1821/10 1821/13 1821/15 1875/1 1884/2 1888/22 1889/2 1889/4 1889/5 1937/12 1938/3 1938/24</p> <p>break-down [1] 1938/3</p> <p>breaks [2] 1779/9 1938/11</p> <p>brief [7] 1739/3 1749/2 1795/13 1795/16 1825/10 1826/13 1939/2</p> <p>briefed [1] 1826/23</p> <p>briefly [1] 1737/14</p> <p>briefs [1] 1740/10</p> <p>bring [4] 1783/2 1786/14 1786/23 1938/25</p> <p>brings [1] 1940/5</p> <p>brought [9] 1785/9 1786/1 1786/9 1786/11 1786/15 1786/17 1786/21 1787/3 1882/23</p> <p>bundle [1] 1796/9</p> <p>burden [1] 1769/25</p> <p>bureaucratic [1] 1793/15</p> <p>burned [1] 1785/3</p> <p>business [42] 1775/3 1775/6 1797/6 1799/2 1799/9 1802/21 1802/21 1804/18 1835/11 1835/20 1836/2 1837/1 1837/5 1838/6 1838/9 1838/13 1838/15 1838/16 1838/19 1838/22 1838/23 1839/18 1841/2 1841/10 1841/12 1843/20 1885/2 1885/4 1891/7 1892/11 1892/12 1893/6 1893/6 1893/18 1895/23 1895/23 1895/24 1906/4 1910/12 1918/9 1918/17 1920/9</p>	<p>businessperson [1] 1925/14</p> <p>buy [2] 1801/14 1804/15</p> <p>buyer [1] 1801/11</p> <p>byline [1] 1738/1</p> <p>Byron [3] 1734/19 1735/6 1764/6</p> <p>C</p> <p>C-042 [1] 1753/5</p> <p>C-116 [1] 1751/11</p> <p>C-118 [1] 1752/6</p> <p>C-253 [1] 1781/2</p> <p>C-254 [1] 1766/10</p> <p>C-431 [1] 1885/15</p> <p>C-432 [2] 1885/15 1885/21</p> <p>C-55 [6] 1867/7 1883/15 1889/11 1889/12 1889/16 1910/24</p> <p>C-703 [2] 1783/1 1783/3</p> <p>C-O-F-F-E [3] 1744/12 1744/13 1745/5</p> <p>C-O-F-F-E-E [1] 1744/22</p> <p>C-R-E-D [1] 1905/19</p> <p>CAFTA [2] 1797/4 1801/6</p> <p>calculated [3] 1801/20 1801/21 1834/25</p> <p>calculation [2] 1832/11 1834/16</p> <p>calendar [1] 1934/19</p> <p>call [6] 1790/17 1799/6 1868/2 1912/21 1934/19 1938/16</p> <p>called [4] 1798/4 1864/21 1869/5 1880/9</p> <p>came [8] 1781/9 1781/16 1782/12 1782/20 1876/18 1877/23 1879/18 1911/12</p> <p>can [84] 1736/4 1737/13 1738/8 1740/15 1740/23 1741/8 1741/19 1741/24 1742/2 1754/16 1761/16 1771/10 1772/19 1773/22 1774/17 1779/9 1779/21 1784/11 1784/21 1785/2 1785/19 1786/22 1788/3 1789/6 1789/14</p>	<p>1789/18 1790/17 1792/15 1794/15 1797/11 1797/14 1802/11 1802/16 1803/6 1803/11 1803/13 1817/25 1824/19 1826/2 1826/5 1827/3 1827/5 1827/6 1828/10 1838/14 1841/16 1868/19 1878/11 1878/19 1881/18 1882/2 1883/12 1885/11 1885/13 1889/2 1893/21 1895/14 1900/18 1905/12 1908/25 1912/17 1912/22 1913/12 1913/15 1913/23 1914/11 1914/13 1919/14 1932/2 1932/14 1932/16 1934/14 1936/4 1936/7 1936/20 1937/8 1937/11 1937/15 1937/17 1937/18 1938/10 1938/20 1939/10 1939/24</p> <p>can't [3] 1786/22 1871/12 1933/15</p> <p>Canada [2] 1799/12 1914/15</p> <p>Canadian [1] 1799/8</p> <p>canceled [2] 1824/12 1824/19</p> <p>cannot [11] 1747/11 1766/21 1779/9 1784/19 1786/15 1792/19 1792/20 1794/17 1802/7 1821/12 1920/14</p> <p>capacity [1] 1798/5</p> <p>capital [1] 1889/21</p> <p>capitalized [2] 1802/18 1915/5</p> <p>cardboard [1] 1886/12</p> <p>Cardenas [8] 1733/7 1742/22 1763/20 1764/12 1777/18 1780/8 1790/8 1791/8</p> <p>care [4] 1766/20 1767/1 1767/2 1767/6</p> <p>career [1] 1914/7</p> <p>careful [1] 1824/11</p> <p>carefully [2] 1824/5 1824/10</p> <p>Carlisle [1] 1732/16</p> <p>Carlos [2] 1733/19 1867/21</p> <p>carried [1] 1770/22</p> <p>carries [1] 1908/24</p>	<p>carrying [3] 1748/20 1748/25 1909/19</p> <p>case [56] 1731/11 1737/24 1738/17 1749/10 1754/6 1758/21 1760/7 1764/5 1766/25 1767/20 1768/24 1786/5 1786/15 1790/1 1790/14 1790/20 1791/13 1791/23 1792/14 1793/3 1824/25 1826/25 1831/11 1831/13 1831/16 1831/19 1832/24 1833/4 1833/11 1833/13 1833/15 1839/2 1839/5 1839/11 1839/12 1839/22 1840/14 1840/16 1840/21 1841/2 1868/6 1893/8 1893/8 1893/11 1893/12 1893/14 1893/16 1907/18 1908/4 1908/6 1911/12 1925/19 1925/23 1933/2 1933/25 1936/2</p> <p>cases [10] 1743/7 1832/4 1839/2 1840/23 1893/2 1913/9 1913/23 1913/25 1914/15 1934/25</p> <p>cash [12] 1801/10 1802/17 1802/18 1803/19 1803/23 1803/25 1832/6 1832/18 1832/25 1833/7 1842/9 1915/5</p> <p>cassation [1] 1786/13</p> <p>catch [1] 1872/3</p> <p>category [1] 1874/5</p> <p>caught [1] 1933/3</p> <p>caused [1] 1762/3</p> <p>CBV [7] 1905/24 1906/1 1906/4 1906/5 1918/7 1918/9 1919/9</p> <p>CBVs [1] 1799/16</p> <p>CCF [2] 1802/18 1802/19</p> <p>center [1] 1737/23</p> <p>CENTRE [1] 1731/2</p> <p>CER [2] 1796/14 1796/14</p> <p>CER-1 [1] 1796/14</p> <p>CER-4 [1] 1796/14</p> <p>certain [17] 1738/18 1738/18 1741/22 1778/16 1778/19</p>
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<p>C</p> <p>certain... [12] 1792/20 1800/7 1837/10 1839/11 1839/14 1865/5 1866/17 1874/5 1894/14 1895/6 1908/20 1937/2</p> <p>certainly [11] 1736/10 1836/23 1837/23 1838/6 1840/16 1868/15 1875/20 1881/17 1884/7 1932/7 1937/4</p> <p>certainty [5] 1843/19 1843/20 1843/20 1919/15 1919/17</p> <p>certificate [13] 1746/20 1747/17 1753/6 1756/4 1782/1 1782/7 1782/13 1782/16 1782/22 1782/24 1784/6 1791/16 1791/19</p> <p>certificates [2] 1784/4 1894/8</p> <p>certified [1] 1799/4</p> <p>chains [1] 1885/22</p> <p>challenge [7] 1762/15 1790/10 1790/16 1790/18 1790/19 1885/14 1913/16</p> <p>challenging [1] 1803/12</p> <p>Chamorro [1] 1734/16</p> <p>change [12] 1760/4 1764/2 1776/10 1776/14 1800/19 1801/10 1843/11 1864/20 1873/14 1875/18 1875/20 1931/25</p> <p>changed [1] 1843/11</p> <p>chapter [1] 1786/4</p> <p>characterization [1] 1935/1</p> <p>characterize [1] 1772/16</p> <p>charges [1] 1792/25</p> <p>Charles [1] 1732/21</p> <p>chart [1] 1800/16</p> <p>chartered [7] 1799/1 1799/2 1799/9 1906/4 1918/9 1918/16 1920/9</p> <p>chatted [1] 1931/15</p> <p>check [2] 1878/11 1937/25</p> <p>checking [1] 1762/7</p> <p>chiding [1] 1740/18</p>	<p>chief [3] 1761/3 1763/16 1867/23</p> <p>choice [1] 1739/2</p> <p>choose [4] 1936/3 1936/4 1936/13 1936/14</p> <p>CICB [1] 1799/8</p> <p>cij.org [1] 1732/7</p> <p>circulate [1] 1778/24</p> <p>circulating [1] 1739/22</p> <p>circulation [2] 1757/10 1779/4</p> <p>circumstances [2] 1753/11 1931/25</p> <p>cite [7] 1784/21 1839/7 1840/1 1875/9 1876/14 1878/15 1891/4</p> <p>cited [8] 1765/19 1765/21 1766/9 1766/11 1768/9 1839/9 1872/1 1874/20</p> <p>citing [3] 1800/6 1840/20 1879/6</p> <p>City [1] 1756/6</p> <p>Civil [15] 1743/3 1748/17 1765/19 1766/9 1769/22 1770/9 1770/11 1783/22 1785/11 1785/13 1786/4 1788/5 1788/13 1791/15 1793/7</p> <p>claim [1] 1789/8</p> <p>claimant [14] 1731/6 1733/3 1736/21 1737/9 1738/23 1739/20 1778/5 1779/14 1802/7 1830/21 1912/20 1935/25 1936/14 1937/24</p> <p>Claimant's [5] 1737/5 1739/18 1931/11 1936/3 1937/8</p> <p>claimant/plaintiffs [1] 1912/20</p> <p>claimants [1] 1799/6</p> <p>clarification [2] 1739/16 1741/21</p> <p>clarifies [1] 1878/2</p> <p>clarify [4] 1741/14 1746/6 1768/7 1914/13</p> <p>clarifying [2] 1865/19 1873/16</p> <p>clarity [1] 1896/11</p> <p>clause [5] 1743/2 1743/4 1743/6 1907/23 1908/2</p>	<p>clear [11] 1737/3 1739/8 1772/19 1788/9 1796/5 1836/20 1885/4 1890/20 1918/5 1925/24 1935/7</p> <p>clearly [3] 1772/17 1781/23 1906/24</p> <p>clerk [1] 1784/14</p> <p>client [8] 1753/2 1753/5 1906/21 1907/12 1907/23 1908/3 1910/10 1913/5</p> <p>client's [1] 1753/15</p> <p>clients [2] 1751/22 1801/18</p> <p>close [3] 1740/25 1741/2 1874/16</p> <p>closed [8] 1789/9 1796/22 1796/23 1797/20 1797/23 1798/2 1926/4 1932/15</p> <p>closely [1] 1864/15</p> <p>closer [3] 1828/8 1828/10 1938/20</p> <p>closing [12] 1736/10 1736/18 1736/19 1736/24 1824/5 1824/12 1824/12 1824/19 1824/20 1824/22 1825/13 1827/9</p> <p>co [5] 1829/14 1830/11 1831/21 1831/22 1933/16</p> <p>co-author [1] 1933/16</p> <p>co-sign [1] 1831/22</p> <p>co-signed [3] 1829/14 1830/11 1831/21</p> <p>code [18] 1743/3 1743/16 1748/17 1749/7 1765/19 1766/9 1769/22 1770/9 1770/11 1783/22 1785/11 1785/13 1786/4 1786/18 1788/5 1788/13 1791/15 1793/6</p> <p>coffee [11] 1731/5 1744/4 1744/7 1744/11 1744/11 1744/15 1744/21 1745/4 1745/4 1867/15 1894/9</p> <p>Colla [1] 1732/20</p> <p>collateral [1] 1775/20</p> <p>colleague [1]</p>	<p>1762/11</p> <p>colleagues [6] 1739/11 1784/22 1785/1 1795/2 1796/15 1799/11</p> <p>combined [2] 1830/7 1830/9</p> <p>come [10] 1736/4 1740/24 1746/25 1761/21 1779/10 1793/19 1794/18 1841/21 1884/8 1931/22</p> <p>comes [6] 1780/25 1791/18 1879/4 1907/21 1911/12 1939/12</p> <p>comfort [1] 1925/16</p> <p>comfortable [4] 1837/21 1919/3 1919/4 1920/6</p> <p>coming [1] 1877/19</p> <p>comment [5] 1763/21 1768/6 1798/18 1801/20 1840/10</p> <p>commentary [1] 1817/17</p> <p>comments [6] 1737/5 1739/11 1739/25 1797/17 1797/19 1817/7</p> <p>commercial [5] 1829/6 1829/12 1829/13 1830/4 1830/6</p> <p>commitment [2] 1766/22 1889/21</p> <p>committee [4] 1799/15 1799/15 1918/23 1918/25</p> <p>committees [2] 1918/24 1918/24</p> <p>committing [1] 1836/8</p> <p>common [1] 1801/6</p> <p>communicate [5] 1778/11 1778/23 1779/7 1793/22 1868/9</p> <p>communicated [2] 1934/6 1934/7</p> <p>communicates [1] 1784/1</p> <p>communication [12] 1740/14 1743/10 1751/8 1751/11 1751/19 1783/25 1784/8 1789/15 1789/24 1790/3 1790/4 1790/5</p> <p>communications [4] 1740/9 1751/5 1752/9</p>	<p>1793/16</p> <p>company [20] 1745/4 1803/5 1803/10 1833/22 1834/8 1835/7 1835/13 1835/13 1835/18 1835/19 1835/25 1836/9 1836/11 1836/12 1837/3 1837/23 1838/20 1838/25 1840/8 1889/22</p> <p>comparable [3] 1835/17 1835/19 1900/16</p> <p>compare [2] 1744/16 1744/19</p> <p>compared [1] 1839/2</p> <p>comparison [1] 1839/10</p> <p>comparisons [1] 1880/4</p> <p>compensate [1] 1804/17</p> <p>compensation [12] 1869/6 1869/14 1869/24 1870/3 1870/8 1870/9 1870/9 1871/1 1871/6 1871/9 1871/14 1872/6</p> <p>competent [1] 1769/15</p> <p>compiling [1] 1907/4</p> <p>complete [6] 1737/7 1744/15 1782/8 1868/11 1868/16 1888/24</p> <p>completed [1] 1888/25</p> <p>completely [1] 1933/17</p> <p>comply [1] 1906/14</p> <p>composite [1] 1802/3</p> <p>compulsion [1] 1801/14</p> <p>concept [2] 1801/4 1803/21</p> <p>Concerning [1] 1753/14</p> <p>concise [1] 1824/18</p> <p>concluded [3] 1783/14 1784/17 1784/25</p> <p>concludes [1] 1931/1</p> <p>concluding [1] 1768/20</p> <p>conclusion [6] 1792/21 1876/15 1906/22 1908/18</p>
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<p>C</p> <p>conclusion... [2] 1908/22 1909/21</p> <p>conclusions [4] 1897/9 1909/17 1910/17 1911/17</p> <p>condition [4] 1753/14 1753/15 1766/13 1804/19</p> <p>conditions [7] 1751/25 1753/17 1755/1 1755/2 1755/2 1755/20 1756/13</p> <p>conduct [5] 1762/3 1835/16 1890/4 1890/5 1890/17</p> <p>confer [1] 1825/9</p> <p>confidential [5] 1795/25 1796/12 1797/6 1797/22 1797/23</p> <p>confined [1] 1763/7</p> <p>confining [1] 1832/20</p> <p>confirm [21] 1743/5 1747/15 1770/3 1774/6 1781/15 1868/11 1868/19 1871/25 1872/1 1872/5 1874/5 1878/19 1879/13 1879/16 1896/9 1896/12 1897/3 1932/2 1935/11 1937/7 1937/14</p> <p>confirmation [1] 1938/2</p> <p>confirmed [2] 1873/23 1878/5</p> <p>confirming [4] 1746/8 1746/19 1753/7 1878/17</p> <p>confirms [1] 1881/22</p> <p>confiscated [4] 1758/9 1759/11 1759/13 1763/22</p> <p>confiscation [3] 1758/12 1758/14 1764/5</p> <p>confusion [1] 1932/12</p> <p>connected [1] 1789/15</p> <p>connection [12] 1747/3 1768/4 1770/11 1776/8 1777/2 1788/7 1790/14 1791/7 1792/25 1793/11 1794/4 1794/5</p> <p>Conover [1] 1732/13</p> <p>conscience [1]</p>	<p>1798/11</p> <p>Conservancy [1] 1771/14</p> <p>consider [5] 1836/3 1836/7 1836/23 1838/7 1911/10</p> <p>consideration [1] 1824/11</p> <p>considered [11] 1771/7 1776/15 1784/25 1786/25 1824/4 1824/9 1835/6 1865/6 1887/1 1887/2 1909/14</p> <p>considers [1] 1784/16</p> <p>consistent [2] 1781/21 1938/5</p> <p>Constanza [1] 1732/13</p> <p>constitute [1] 1803/18</p> <p>constitution [2] 1773/10 1777/1</p> <p>constructed [1] 1914/2</p> <p>consult [2] 1784/19 1785/6</p> <p>consultant [2] 1770/21 1838/18</p> <p>contact [1] 1886/5</p> <p>contained [1] 1784/5</p> <p>containers [1] 1884/4</p> <p>containing [1] 1840/3</p> <p>contemplated [1] 1894/15</p> <p>content [1] 1776/13</p> <p>contents [1] 1772/14</p> <p>context [4] 1738/2 1781/19 1786/7 1829/14</p> <p>continue [9] 1741/18 1742/15 1742/21 1795/7 1827/16 1827/20 1870/4 1870/5 1892/12</p> <p>CONTINUED [1] 1742/23</p> <p>continues [1] 1785/10</p> <p>continuing [1] 1776/18</p> <p>contrast [1] 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1872/15 1873/18 1873/22 1873/25 1874/4 1875/24</p>	<p>1875/25 1877/1 1878/3 1880/9 1880/11 1881/18 1882/13 1882/24 1883/16 1883/17 1884/1 1885/3 1885/13 1886/8 1886/9 1886/12 1886/14 1887/6 1887/8 1887/13 1889/11 1889/24 1889/25 1890/13 1892/1 1892/14 1892/15 1892/16 1893/5 1895/12 1897/8 1897/8 1897/16 1900/12 1900/21 1907/1 1907/2 1908/25 1910/3 1910/18 1910/19 1913/10 1915/2 1915/7 1919/22 1920/5 1920/9 1920/10 1925/19 1932/14 1934/1 1934/14 1937/11 1938/10</p> <p>document [51] 1739/4 1743/25 1744/4 1744/17 1744/24 1745/6 1746/8 1746/10 1746/10 1746/12 1746/18 1746/19 1747/13 1747/14 1748/2 1748/5 1748/9 1748/10 1749/18 1749/19 1750/2 1752/7 1757/5 1757/14 1770/16 1770/17 1771/14 1771/18 1771/22 1771/23 1772/3 1772/3 1772/5 1772/7 1772/14 1773/6 1781/2 1783/1 1783/5 1783/6 1783/8 1783/13 1784/1 1829/5 1871/18 1878/9 1889/15 1891/18 1892/2 1905/11 1909/21</p> <p>documentation [5] 1753/8 1754/16 1754/22 1754/23 1896/3</p> <p>documents [28] 1737/11 1738/23 1738/24 1739/1 1739/2 1750/5 1754/8 1767/12 1767/22 1774/1 1774/2 1774/4 1774/4 1774/7 1774/9</p>	<p>1782/16 1784/2 1796/12 1885/24 1886/18 1886/21 1895/17 1895/20 1897/14 1897/21 1897/24 1898/5 1898/7</p> <p>does [24] 1736/11 1743/11 1748/7 1748/8 1754/14 1761/1 1776/18 1785/12 1785/23 1786/8 1786/10 1793/13 1793/14 1794/15 1794/16 1803/12 1804/17 1878/24 1885/16 1909/1 1910/15 1912/24 1918/8 1919/6</p> <p>doesn't [12] 1738/1 1746/24 1757/23 1759/10 1761/8 1773/25 1784/19 1786/14 1786/21 1786/21 1789/1 1919/19</p> <p>doing [7] 1738/18 1837/5 1840/17 1841/4 1897/14 1914/24 1932/2</p> <p>domestic [1] 1799/17</p> <p>don't [41] 1741/9 1748/16 1749/15 1750/20 1758/20 1759/14 1759/15 1761/10 1761/13 1763/7 1770/1 1775/9 1778/1 1778/12 1778/20 1779/8 1787/10 1802/13 1839/19 1864/24 1868/16 1868/22 1868/25 1869/1 1870/19 1876/23 1881/11 1882/13 1886/11 1886/20 1890/8 1890/12 1894/18 1895/20 1900/19 1906/1 1912/12 1932/25 1934/20 1937/15 1939/23</p> <p>done [10] 1738/6 1740/19 1784/21 1788/15 1797/4 1801/24 1801/25 1875/6 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[4] 1740/16 1762/7 1897/8 1897/10</p> <p>English [7] 1732/16 1751/12 1751/13 1759/20 1787/10 1828/11 1885/15</p> <p>enough [3] 1739/8 1874/16 1874/21</p> <p>ensuing [1] 1876/11</p> <p>ensure [2] 1913/3 1931/16</p> <p>ensuring [1] 1751/25</p> <p>entail [1] 1793/16</p> <p>entered [3] 1772/24 1773/11 1773/15</p> <p>enters [1] 1773/17</p> <p>entire [2] 1797/21 1797/22</p> <p>entirely [4] 1741/2 1762/12 1762/13 1762/22</p> <p>entirety [3] 1796/17 1796/18 1796/23</p> <p>entities [2] 1747/9 1771/16</p> <p>entitled [7] 1749/8 1769/14 1871/6 1871/10 1871/14 1871/20 1871/24</p> <p>entity [1] 1803/18</p> <p>Environment [1] 1755/23</p> <p>Environmental [2] 1770/22 1771/1</p> <p>equally [2] 1935/24 1936/15</p> <p>equipment [4] 1883/20 1884/19 1887/5 1887/21</p> <p>equitable [1] 1801/23</p> <p>equivalents [1] 1801/10</p> <p>error [1] 1872/11</p> <p>especially [2] 1759/6 1792/4</p> <p>essential [3] 1906/20 1907/11 1920/14</p> <p>essentially [5] 1868/2 1868/4 1869/8 1890/1 1934/12</p> <p>establish [1] 1751/24</p> <p>established [3] 1755/20 1756/14 1773/18</p> <p>establishes [2] 1770/9 1773/10</p> <p>estimate [1]</p>	<p>1931/11</p> <p>evaluation [1] 1919/11</p> <p>even [8] 1824/19 1837/21 1870/6 1879/6 1892/18 1908/12 1919/24 1920/8</p> <p>evening [6] 1742/20 1825/25 1826/7 1826/7 1827/6 1827/14</p> <p>event [8] 1794/8 1794/13 1794/14 1794/15 1794/17 1794/19 1895/5 1908/2</p> <p>ever [5] 1752/24 1895/20 1909/23 1911/14 1913/21</p> <p>every [5] 1915/1 1915/2 1915/5 1915/6 1919/10</p> <p>everyone [1] 1792/2</p> <p>everything [3] 1739/24 1896/15 1920/15</p> <p>evidence [19] 1737/6 1738/7 1750/20 1751/4 1757/17 1758/24 1761/17 1762/8 1763/17 1798/17 1798/18 1821/12 1824/24 1825/1 1827/1 1874/21 1887/20 1888/6 1891/18</p> <p>evidently [1] 1781/24</p> <p>exact [2] 1804/19 1892/3</p> <p>exactly [7] 1761/25 1838/3 1838/5 1882/16 1914/25 1938/1 1939/9</p> <p>exam [2] 1799/16 1918/18</p> <p>examination [18] 1736/17 1742/21 1742/23 1759/6 1762/25 1779/13 1780/1 1797/22 1798/15 1825/18 1826/12 1827/21 1827/24 1912/6 1931/2 1931/12 1932/2 1933/22</p> <p>examine [1] 1792/17</p> <p>examines [1] 1790/1</p> <p>example [7] 1738/8 1784/21 1802/9 1803/5 1804/11</p>	<p>1838/24 1919/17</p> <p>excellent [1] 1741/25</p> <p>exchanged [1] 1751/8</p> <p>exclusively [1] 1909/11</p> <p>Excuse [4] 1752/18 1752/18 1764/25 1770/15</p> <p>execute [3] 1836/4 1837/14 1894/15</p> <p>execution [1] 1843/21</p> <p>executive [3] 1760/20 1760/22 1762/7</p> <p>exempt [1] 1793/8</p> <p>exempted [1] 1792/24</p> <p>exert [1] 1775/16</p> <p>exhibit [9] 1743/6 1743/24 1748/18 1749/7 1867/12 1878/9 1885/20 1905/16 1905/20</p> <p>Exhibit C-254 [3] 1743/6 1748/18 1749/7</p> <p>Exhibit C-431 [1] 1885/20</p> <p>Exhibit C-55 [1] 1867/12</p> <p>exhibits [1] 1800/7</p> <p>exist [1] 1738/24</p> <p>existence [2] 1746/24 1782/6</p> <p>existing [2] 1881/6 1882/6</p> <p>exists [1] 1741/9</p> <p>expand [1] 1765/8</p> <p>expanded [1] 1882/5</p> <p>expansion [20] 1764/22 1765/6 1765/9 1875/5 1880/9 1880/18 1880/19 1881/1 1881/16 1881/22 1881/24 1882/14 1882/20 1882/21 1882/22 1883/5 1883/8 1890/4 1892/11 1894/15</p> <p>expansions [2] 1881/2 1890/18</p> <p>expect [7] 1779/13 1827/3 1837/20 1881/25 1882/1 1883/11 1900/8</p> <p>expected [5] 1802/23 1879/22 1882/14 1910/17 1911/16</p>	<p>expecting [2] 1741/16 1883/25</p> <p>experience [16] 1793/12 1799/22 1799/23 1833/17 1833/20 1841/1 1841/12 1841/13 1841/18 1893/2 1893/5 1912/23 1913/8 1913/8 1933/21 1937/21</p> <p>expert [86] 1749/23 1755/15 1758/25 1759/4 1761/9 1761/16 1762/19 1762/23 1762/25 1763/8 1763/17 1764/7 1768/20 1769/11 1774/14 1774/16 1774/19 1775/4 1795/8 1795/10 1798/5 1798/6 1799/17 1799/20 1799/22 1828/24 1829/6 1829/9 1830/1 1831/15 1832/1 1832/4 1832/17 1833/5 1833/10 1833/12 1835/4 1838/9 1841/23 1842/1 1842/5 1842/21 1867/10 1868/5 1870/21 1873/2 1876/19 1879/19 1882/15 1892/23 1893/2 1894/22 1895/2 1895/18 1895/25 1896/2 1897/1 1897/5 1897/6 1897/19 1906/22 1906/23 1906/23 1906/25 1907/4 1907/25 1908/4 1908/16 1909/6 1909/9 1909/15 1909/17 1910/9 1910/18 1911/1 1911/3 1911/17 1920/8 1920/14 1920/15 1933/9 1935/9 1936/3 1936/8 1936/19 1937/22</p> <p>expertise [11] 1762/12 1769/2 1769/6 1774/20 1840/11 1840/13 1840/15 1841/3 1893/25 1894/4 1897/7</p> <p>experts [20] 1734/18 1736/17</p>	<p>1825/19 1825/19 1840/4 1840/16 1840/20 1841/1 1841/12 1920/12 1933/23 1934/17 1934/18 1935/8 1935/12 1936/7 1936/13 1936/15 1936/25 1937/10</p> <p>explain [12] 1737/14 1753/9 1759/23 1772/14 1780/18 1783/5 1783/13 1785/25 1788/1 1789/6 1792/16 1906/1</p> <p>explained [4] 1767/22 1785/1 1868/1 1906/3</p> <p>explains [1] 1781/23</p> <p>explanation [1] 1754/5</p> <p>explicitly [1] 1879/25</p> <p>exploit [1] 1837/4</p> <p>export [1] 1895/7</p> <p>exporting [2] 1837/7 1837/9</p> <p>expressed [2] 1801/9 1906/22</p> <p>expression [2] 1786/11 1786/16</p> <p>expropriation [1] 1801/21</p> <p>extensive [1] 1840/3</p> <p>extensively [1] 1839/7</p> <p>extent [8] 1741/22 1835/18 1874/19 1894/12 1894/25 1919/14 1937/20 1939/9</p> <p>extra [2] 1881/5 1882/19</p> <hr/> <p>F</p> <p>Fabian [1] 1734/8</p> <p>face [1] 1897/14</p> <p>faces [1] 1926/2</p> <p>facilitate [1] 1779/3</p> <p>facilities [4] 1883/20 1884/18 1887/4 1887/21</p> <p>fact [18] 1757/22 1762/19 1762/20 1763/9 1774/19 1776/14 1790/8 1790/9 1790/25 1842/3 1892/24 1895/1 1896/14 1897/24 1906/13 1909/12 1909/25 1913/6</p>
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F	feeds [1] 1911/2	finished [2] 1749/24	1892/12	fundamentally [1]
factor [2] 1834/7	feel [2] 1837/20	1778/19	Foreign [2] 1793/21	1763/11
1836/8	1908/21	firm [2] 1781/22	1793/22	funds [2] 1775/19
factors [2] 1835/3	feels [1] 1786/15	1782/13	forensic [1] 1897/5	1891/22
1835/5	Ferrufino [1]	firm's [1] 1745/22	forensics [1] 1799/4	further [10] 1738/7
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1842/7 1842/12	few [14] 1749/23	1736/6 1741/2	1802/9	1740/23 1753/10
1865/5 1920/13	1758/4 1840/24	1743/14 1743/17	forestland [1]	1762/5 1794/25
1920/16	1841/8 1868/23	1744/3 1744/19	1765/16	1802/16 1926/10
fair [26] 1801/4	1873/8 1874/1	1751/11 1754/4	forget [3] 1787/12	1939/22
1801/5 1801/20	1879/16 1881/1	1770/19 1771/13	1787/14 1926/3	Furthermore [2]
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1802/14 1802/15	1889/15 1890/18	1781/19 1782/11	1939/13	future [5] 1802/24
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1841/10 1842/14	figure [14] 1871/11	1824/16 1828/18	format [1] 1911/8	1755/19 1756/21
1843/17 1866/23	1871/12 1871/17	1868/5 1868/18	former [1] 1762/18	1765/10 1765/15
1867/4 1867/5 1868/7	1872/6 1873/12	1876/2 1876/4 1877/4	forth [2] 1765/25	1767/14 1767/16
1869/11 1875/7	1875/3 1875/4	1880/19 1881/5	1784/5	1775/18 1776/8
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fairly [1] 1920/6	1877/11 1878/5	1895/25 1896/2	1803/21 1828/19	1874/9 1878/23
fairness [1] 1894/18	1879/4 1879/17	1897/1 1898/2 1907/4	1833/6 1871/15	1878/25 1879/23
fall [1] 1869/5	1879/21	1908/16 1911/17	1889/13 1912/13	1880/1 1882/9
falling [1] 1774/20	figures [2] 1869/14	1911/22 1912/14	1915/3	1884/19 1886/23
familiar [12] 1839/4	1869/25	1918/16 1926/16	forward-looking [2]	1887/21
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1919/2	filing [1] 1787/25	1736/18 1826/21	1913/17 1932/23	gain [1] 1794/13
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1891/23 1892/7	1825/11 1825/24	1736/16 1736/18	four [3] 1817/22	1794/20
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1751/5	1799/4 1891/7	1832/25 1833/7	1794/1	1830/8 1833/16
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faster [1] 1872/9	1802/23 1802/24	1803/23	freeze [1] 1775/19	1743/17 1756/15
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fault [1] 1836/17	1890/16 1890/17	1826/21 1869/24	Friday [6] 1741/10	1769/9 1769/13
favor [1] 1772/4	1896/14 1897/17	fold [1] 1880/19	1741/25 1742/9	1769/20 1770/3
favored [1] 1801/24	1898/3 1908/15	follow [7] 1755/24	1824/6 1825/13	1770/5 1772/14
fearful [1] 1751/2	1925/15 1925/16	1756/17 1767/11	1825/21	1772/15 1783/16
feasibility [8]	financially [2]	1897/3 1897/16	front [6] 1737/18	1802/15 1826/17
1838/2 1838/6 1838/7	1891/12 1891/24	1912/10 1914/20	1739/24 1766/5	1883/18
1838/12 1839/16	financing [2]	follow-up [3]	1867/9 1912/17	General's [4]
1839/19 1881/20	1799/24 1833/18	1755/24 1756/17	1912/18	1760/17 1760/19
1883/10	find [3] 1778/24	1897/16	froze [1] 1775/18	1760/25 1762/4
feasible [5] 1828/10	1796/24 1835/17	followed [2] 1772/9	fruit [6] 1875/24	generally [4]
1881/16 1881/17	findings [1] 1737/13	1773/19	1876/7 1876/9	1833/21 1833/23
1881/23 1883/4	finds [3] 1874/19	following [8] 1772/8	1876/17 1877/14	1840/2 1938/11
February [3]	1894/13 1895/6	1780/7 1801/8 1804/6	1877/17	get [24] 1740/23
1747/23 1756/4	fine [4] 1768/12	1824/15 1828/18	fulfilled [1] 1794/23	1761/20 1771/10
1756/6	1769/16 1779/21	1871/6 1939/10	full [2] 1788/11	1784/24 1785/2
February 9 [2]	1789/18	follows [2] 1773/18	1801/23	1793/20 1795/14
1756/4 1756/6	finish [7] 1817/9	1907/24	fully [4] 1759/2	1839/1 1839/1 1839/3
feed [1] 1828/21	1817/11 1817/14	footnote [3] 1781/23	1826/23 1826/25	1840/22 1841/20
feedback [1]	1817/15 1817/21	1782/4 1878/8	1870/15	1843/7 1843/7
1919/23	1831/2 1836/16	forecast [2] 1803/7	fund [1] 1775/20	1869/18 1876/12

<p>G</p> <p>get... [8] 1886/4 1887/16 1895/1 1895/4 1909/24 1912/18 1919/18 1931/17</p> <p>getting [3] 1759/19 1889/14 1907/15</p> <p>Giglio [1] 1732/22</p> <p>give [17] 1740/22 1748/14 1749/16 1750/3 1750/13 1753/19 1759/3 1770/14 1783/4 1797/11 1838/3 1843/15 1912/22 1913/23 1936/9 1936/12 1939/2</p> <p>given [28] 1744/8 1745/3 1745/7 1746/13 1747/2 1747/19 1747/23 1748/1 1749/1 1749/11 1750/19 1759/6 1783/25 1790/19 1790/25 1791/2 1791/7 1791/10 1791/21 1794/18 1824/24 1825/17 1867/10 1874/3 1911/9 1913/24 1931/8 1931/19</p> <p>gives [1] 1770/12</p> <p>giving [3] 1748/1 1763/17 1837/2</p> <p>go [47] 1747/13 1748/12 1757/4 1760/7 1760/8 1763/3 1777/20 1785/2 1785/17 1785/20 1785/22 1793/21 1803/2 1804/10 1817/20 1817/24 1817/25 1824/2 1827/22 1833/24 1835/3 1835/23 1837/9 1843/11 1843/23 1844/3 1864/25 1867/1 1867/20 1868/19 1868/25 1872/9 1872/9 1873/22 1874/4 1875/21 1883/12 1889/8 1889/17 1895/12 1906/17 1909/1 1912/13 1914/5 1919/17 1932/6 1937/17</p> <p>goes [6] 1759/3 1762/9 1762/11 1763/11 1784/10</p>	<p>1936/11</p> <p>going [86] 1738/10 1743/3 1745/13 1749/9 1751/1 1751/7 1751/15 1752/15 1754/20 1755/13 1755/13 1755/15 1757/4 1763/23 1764/18 1765/3 1765/23 1766/5 1770/19 1773/20 1774/12 1774/24 1775/13 1777/10 1777/22 1778/8 1778/16 1778/19 1778/20 1779/6 1780/6 1783/4 1783/5 1784/15 1784/18 1785/18 1793/24 1793/24 1794/20 1801/16 1828/7 1828/19 1833/9 1834/11 1835/3 1837/5 1837/6 1837/6 1837/7 1837/8 1840/22 1840/23 1866/25 1867/1 1867/2 1868/2 1868/23 1868/24 1869/17 1869/18 1871/15 1872/8 1872/9 1874/13 1874/18 1875/21 1876/22 1880/25 1881/1 1885/12 1885/14 1887/24 1888/8 1889/13 1891/8 1893/24 1894/3 1894/18 1895/2 1895/15 1900/11 1912/10 1919/18 1933/12 1934/16 1935/8</p> <p>gold [1] 1839/24</p> <p>gone [4] 1756/22 1835/2 1883/24 1894/1</p> <p>Gonzalez [1] 1734/6</p> <p>González [5] 1741/20 1742/4 1761/21 1779/24 1780/5</p> <p>good [25] 1735/22 1739/14 1742/15 1742/17 1742/18 1742/25 1743/1 1759/22 1759/24 1767/19 1779/21 1780/3 1780/4 1795/18 1795/20 1798/23 1828/4 1876/23 1888/22 1891/23 1912/8</p>	<p>1912/9 1912/9 1938/13 1940/4</p> <p>goods [1] 1837/9</p> <p>got [5] 1772/4 1878/14 1933/3 1933/20 1938/2</p> <p>gotcha [1] 1874/1</p> <p>gotten [3] 1766/13 1887/6 1894/2</p> <p>governed [1] 1773/12</p> <p>governing [1] 1799/11</p> <p>government [18] 1753/2 1758/9 1758/16 1760/23 1768/13 1793/17 1794/6 1794/11 1794/16 1794/20 1892/10 1892/17 1892/24 1893/9 1894/3 1894/6 1894/8 1939/14</p> <p>governmental [1] 1775/1</p> <p>granted [1] 1776/21</p> <p>grants [1] 1906/5</p> <p>great [3] 1843/23 1909/23 1939/8</p> <p>Greenwood [2] 1731/23 1732/9</p> <p>greenwoodarbitratio n.com [1] 1732/9</p> <p>ground [1] 1886/5</p> <p>guaranteed [1] 1777/9</p> <p>guard [5] 1748/2 1791/24 1791/25 1792/5 1792/6</p> <p>guess [4] 1778/18 1888/12 1914/4 1938/9</p> <p>guidance [5] 1740/7 1742/12 1802/2 1803/13 1842/18</p> <p>guided [1] 1801/4</p> <p>guidelines [3] 1918/11 1918/15 1918/18</p> <p>GUNSTER [1] 1733/14</p> <p>Gutiérrez [11] 1764/19 1764/22 1765/4 1775/4 1874/12 1885/9 1886/2 1886/6 1886/15 1892/23 1894/4</p> <p>H</p> <p>Hacienda [22] 1752/25 1753/7 1753/16 1755/19</p>	<p>1756/20 1765/10 1765/15 1767/14 1767/15 1775/18 1776/8 1872/13 1873/20 1874/9 1878/23 1878/24 1879/23 1880/1 1882/9 1884/19 1886/23 1887/21</p> <p>hacked [3] 1896/22 1897/4 1897/7</p> <p>had [87] 1738/20 1738/20 1740/9 1740/14 1740/25 1742/19 1743/23 1750/6 1750/25 1751/3 1762/21 1763/2 1765/13 1768/21 1776/11 1776/12 1780/10 1782/15 1789/9 1791/9 1791/9 1796/10 1796/11 1799/23 1831/20 1840/3 1840/11 1840/14 1840/15 1842/17 1843/6 1868/4 1869/10 1870/3 1871/8 1872/17 1872/25 1873/5 1873/19 1874/8 1875/15 1876/2 1881/17 1883/3 1883/20 1883/24 1884/3 1884/8 1884/18 1884/20 1884/23 1885/2 1886/15 1887/20 1888/24 1890/3 1890/16 1890/16 1892/3 1893/12 1893/14 1893/15 1893/22 1894/1 1895/17 1896/23 1896/23 1897/21 1898/1 1898/8 1907/14 1908/7 1908/19 1910/22 1913/8 1919/24 1925/15 1931/14 1931/21 1932/11 1932/22 1933/1 1933/19 1933/19 1938/25 1939/1 1939/5</p> <p>half [2] 1821/15 1888/21</p> <p>halfway [1] 1752/14</p> <p>handed [1] 1772/22</p> <p>handle [1] 1937/18</p> <p>handled [2] 1779/9 1937/22</p> <p>handover [1] 1755/3</p>	<p>hands [2] 1752/1 1801/10</p> <p>handy [1] 1797/13</p> <p>happen [4] 1785/14 1794/22 1797/12 1832/5</p> <p>happened [7] 1747/5 1843/5 1870/14 1886/22 1886/25 1933/3 1934/24</p> <p>happens [5] 1788/20 1791/2 1791/11 1792/1 1888/11</p> <p>happy [1] 1936/6</p> <p>hard [1] 1828/9</p> <p>Hart [14] 1734/20 1804/17 1931/10 1931/12 1932/11 1932/24 1933/14 1934/6 1934/11 1935/5 1935/23 1936/5 1936/18 1937/17</p> <p>Hart's [2] 1817/8 1933/20</p> <p>harvest [13] 1876/2 1876/5 1876/11 1876/16 1883/24 1883/25 1884/8 1884/9 1884/24 1885/10 1886/22 1887/6 1887/14</p> <p>harvested [1] 1876/8</p> <p>has [74] 1740/25 1743/12 1745/19 1747/19 1749/23 1752/24 1756/22 1758/23 1759/17 1760/8 1761/7 1763/22 1764/4 1765/4 1766/4 1766/10 1766/13 1768/24 1769/23 1772/19 1773/15 1773/21 1774/14 1774/15 1775/6 1775/16 1776/16 1776/21 1777/3 1778/5 1784/16 1784/17 1786/16 1786/24 1786/25 1788/8 1789/2 1789/10 1790/16 1790/19 1791/3 1793/4 1793/17 1793/20 1793/22 1794/8 1794/13 1794/14 1794/18 1798/2 1798/19 1801/7 1802/21 1804/19 1824/4</p>
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<p>H</p> <p>has... [19] 1824/11 1824/24 1824/24 1826/18 1835/12 1841/12 1867/11 1878/22 1885/20 1885/21 1894/5 1894/22 1900/6 1910/14 1914/21 1932/18 1934/10 1934/14 1934/23</p> <p>Hass [12] 1764/23 1765/7 1872/24 1873/4 1876/17 1883/21 1887/22 1909/6 1909/8 1909/12 1909/17 1909/25</p> <p>hate [2] 1907/21 1918/6</p> <p>Havana [2] 1737/20 1939/18</p> <p>have [230]</p> <p>haven't [4] 1749/18 1749/19 1871/21 1882/1</p> <p>having [9] 1739/15 1760/4 1764/1 1772/10 1774/5 1783/14 1783/17 1801/24 1828/9</p> <p>he [41] 1741/15 1753/13 1761/8 1769/13 1769/14 1769/16 1774/15 1774/17 1784/16 1792/6 1792/6 1795/8 1867/23 1871/13 1871/14 1871/19 1871/24 1879/21 1879/21 1879/22 1879/25 1880/2 1880/4 1885/13 1885/16 1886/10 1886/15 1886/16 1888/15 1888/18 1908/25 1909/1 1932/7 1933/15 1933/16 1933/19 1934/6 1934/12 1934/13 1934/13 1934/14</p> <p>He'll [1] 1932/7</p> <p>he's [7] 1761/15 1761/16 1762/13 1763/10 1769/11 1774/18 1795/12</p> <p>header [2] 1869/5 1872/13</p> <p>headers [1] 1938/4</p> <p>hear [8] 1753/18 1753/23 1765/1 1770/15 1775/11</p>	<p>1775/21 1826/3 1898/5</p> <p>heard [3] 1752/4 1775/12 1776/14</p> <p>hearing [25] 1731/14 1736/16 1740/10 1740/16 1741/10 1742/9 1778/13 1779/8 1784/4 1787/22 1824/7 1824/13 1824/14 1824/17 1824/21 1824/21 1824/23 1825/5 1825/14 1825/24 1826/24 1827/10 1828/19 1934/19 1940/8</p> <p>hearings [1] 1786/5</p> <p>heart [2] 1760/7 1763/9</p> <p>hectare [7] 1881/6 1881/16 1882/11 1882/16 1882/22 1883/4 1900/16</p> <p>hectares [13] 1764/23 1765/7 1765/11 1765/11 1765/13 1765/14 1765/16 1880/15 1880/20 1881/5 1881/11 1881/19 1882/24</p> <p>heiskananlegal.com [1] 1732/5</p> <p>Heiskanen [2] 1731/21 1732/5</p> <p>held [2] 1754/24 1824/6</p> <p>Hello [1] 1828/3</p> <p>help [4] 1768/7 1826/14 1831/20 1920/2</p> <p>helpful [5] 1740/19 1796/3 1841/17 1894/9 1939/20</p> <p>her [6] 1742/4 1749/12 1764/6 1764/7 1769/12 1769/13</p> <p>here [33] 1738/8 1744/2 1747/18 1754/7 1756/5 1759/16 1761/12 1762/10 1763/9 1774/7 1792/6 1795/12 1828/18 1831/7 1840/14 1843/16 1869/25 1872/12 1875/23 1880/19 1880/23 1881/18 1883/15 1883/18 1891/10</p>	<p>1892/1 1892/9 1893/21 1907/18 1908/24 1913/15 1913/17 1919/7</p> <p>here's [1] 1935/22</p> <p>Hernaldo [1] 1734/16</p> <p>Hernández [2] 1770/20 1771/16</p> <p>hey [2] 1882/16 1908/19</p> <p>high [1] 1919/24</p> <p>higher [1] 1900/8</p> <p>highest [1] 1801/9</p> <p>highlight [2] 1818/1 1869/1</p> <p>highlighted [1] 1890/11</p> <p>highly [2] 1933/11 1935/1</p> <p>Hill [1] 1733/15</p> <p>him [4] 1749/12 1933/15 1933/20 1934/9</p> <p>himself [2] 1934/14 1935/6</p> <p>hired [1] 1838/20</p> <p>his [24] 1745/22 1749/24 1758/23 1759/2 1759/3 1761/9 1762/8 1762/13 1762/14 1762/23 1764/7 1765/5 1774/16 1774/20 1796/6 1886/16 1886/17 1909/17 1909/20 1909/20 1909/21 1926/10 1932/8 1933/19</p> <p>historical [6] 1802/23 1803/1 1803/6 1804/8 1804/8 1834/3</p> <p>history [1] 1802/20</p> <p>holdings [2] 1892/3 1892/4</p> <p>home [3] 1791/21 1886/16 1886/17</p> <p>homework [1] 1920/6</p> <p>Honduras [3] 1831/14 1925/19 1925/23</p> <p>honest [1] 1933/17</p> <p>honor [1] 1798/11</p> <p>hope [2] 1742/19 1829/22</p> <p>hopes [1] 1920/1</p> <p>horizon [1] 1834/10</p> <p>HOSTETLER [1] 1734/5</p> <p>hour [4] 1777/23 1821/11 1821/15</p>	<p>1888/21</p> <p>hours [14] 1736/12 1736/16 1736/16 1736/16 1736/18 1736/19 1736/20 1736/21 1736/23 1788/16 1788/19 1788/21 1931/11 1932/3</p> <p>house [8] 1804/12 1804/12 1804/14 1804/15 1900/3 1900/7 1900/12 1900/14</p> <p>housekeeping [5] 1736/2 1736/3 1778/5 1778/6 1825/20</p> <p>how [33] 1741/5 1745/19 1761/12 1763/12 1788/10 1790/1 1790/4 1792/8 1793/13 1793/14 1826/18 1829/9 1829/25 1830/24 1830/25 1831/3 1831/5 1831/25 1837/25 1871/4 1887/12 1887/13 1900/11 1900/12 1912/8 1912/9 1913/23 1914/6 1914/21 1918/14 1938/11 1938/14 1939/15</p> <p>however [1] 1800/18</p> <p>hurts [1] 1933/21</p> <p>hypothetical [7] 1801/11 1801/12 1837/3 1879/8 1879/9 1879/11 1879/13</p>	<p>1763/23 1765/3 1766/4 1766/5 1772/13 1776/16 1780/5 1780/6 1783/4 1783/5 1785/18 1793/8 1796/15 1799/4 1800/3 1801/16 1826/4 1828/18 1829/2 1829/18 1829/20 1832/22 1833/9 1835/3 1835/16 1836/21 1837/2 1840/2 1841/6 1841/15 1842/9 1866/25 1867/1 1867/2 1868/2 1868/23 1869/3 1869/17 1870/15 1871/16 1871/16 1872/21 1873/25 1874/4 1874/14 1874/14 1874/18 1876/14 1876/22 1878/17 1880/24 1880/25 1881/23 1882/21 1883/9 1885/12 1885/14 1887/12 1888/13 1889/13 1890/14 1891/10 1892/18 1893/24 1894/3 1894/18 1894/20 1895/2 1895/15 1896/6 1900/11 1900/17 1905/14 1905/23 1912/10 1914/24 1918/19 1919/2 1919/18 1919/18 1920/6 1920/15 1931/24 1932/13 1933/22 1934/24 1938/21 1938/21 1939/23</p> <p>I've [33] 1737/23 1799/5 1799/8 1799/17 1799/19 1799/21 1799/23 1801/6 1801/18 1801/25 1828/20 1829/14 1833/2 1837/16 1838/23 1839/6 1839/9 1877/1 1887/9 1910/3 1911/5 1911/7 1911/9 1913/10 1913/11 1913/17 1914/1 1914/2 1914/3 1914/17 1918/16 1920/4 1934/20</p> <p>icj [1] 1732/7</p> <p>icj-cij.org [1] 1732/7</p> <p>ICSID [4] 1731/11</p>
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<p>I</p> <p>ICSID... [3] 1830/15 1830/16 1831/11</p> <p>idea [2] 1772/19 1782/11</p> <p>ideal [1] 1803/3</p> <p>identified [9] 1745/8 1745/16 1757/6 1764/22 1766/10 1770/17 1773/21 1774/5 1774/10</p> <p>identifies [2] 1737/23 1886/3</p> <p>identify [5] 1737/25 1738/8 1749/12 1792/19 1881/3</p> <p>identifying [1] 1739/5</p> <p>identity [1] 1939/13</p> <p>ideologies [1] 1839/15</p> <p>ii [1] 1911/19</p> <p>III [1] 1880/10</p> <p>illegal [1] 1775/6</p> <p>illustrated [1] 1910/4</p> <p>image [1] 1747/6</p> <p>imagine [1] 1740/16</p> <p>immediately [1] 1795/8</p> <p>impact [3] 1776/7 1776/10 1776/20</p> <p>implementation [1] 1781/24</p> <p>important [10] 1792/17 1826/22 1835/10 1835/15 1836/3 1836/23 1837/11 1837/13 1838/1 1913/2</p> <p>imposition [1] 1753/17</p> <p>improper [1] 1763/12</p> <p>INAGROSA [55] 1743/23 1744/8 1746/7 1747/8 1747/12 1748/11 1768/14 1768/18 1768/21 1771/7 1771/21 1771/22 1771/25 1772/2 1773/4 1776/8 1776/18 1781/9 1781/16 1787/19 1789/7 1791/6 1800/3 1800/24 1834/13 1842/13 1843/1 1867/24 1868/4 1869/9 1873/19 1875/5 1876/15 1883/3 1883/4 1883/20 1884/18</p>	<p>1885/2 1887/4 1887/20 1889/20 1890/3 1890/16 1890/21 1891/1 1891/7 1891/12 1891/20 1891/24 1893/22 1894/14 1895/17 1897/21 1897/25 1909/18</p> <p>INAGROSA'S [5] 1765/7 1767/10 1876/4 1892/11 1896/22</p> <p>inappropriate [3] 1933/11 1933/18 1935/1</p> <p>include [4] 1765/15 1800/10 1875/12 1919/6</p> <p>included [8] 1755/14 1764/23 1774/7 1804/4 1830/5 1877/15 1879/18 1880/14</p> <p>includes [2] 1736/9 1736/23</p> <p>including [3] 1797/8 1825/16 1826/15</p> <p>income [2] 1802/16 1802/16</p> <p>incompatible [1] 1766/17</p> <p>Incorporation [1] 1744/17</p> <p>increase [1] 1881/9</p> <p>indeed [2] 1754/13 1897/4</p> <p>independence [1] 1913/2</p> <p>independent [2] 1759/3 1842/21</p> <p>independently [20] 1866/18 1866/23 1867/3 1869/20 1870/1 1871/11 1871/12 1873/18 1873/22 1874/2 1874/8 1877/2 1881/15 1883/2 1883/19 1887/10 1910/4 1910/5 1919/10 1919/25</p> <p>INDEX [1] 1735/3</p> <p>indicate [5] 1744/20 1751/18 1770/23 1789/12 1796/11</p> <p>indicated [13] 1736/8 1736/11 1746/15 1750/25 1754/3 1772/22 1774/21 1780/11 1781/8 1784/16 1790/7 1796/9</p>	<p>1888/23</p> <p>indicates [4] 1745/3 1747/18 1749/10 1757/7</p> <p>indication [1] 1826/18</p> <p>indirectly [1] 1781/25</p> <p>individual [2] 1754/12 1897/10</p> <p>individually [1] 1749/12</p> <p>individuals [2] 1841/2 1841/13</p> <p>indulge [1] 1829/22</p> <p>industry [3] 1835/13 1835/17 1838/12</p> <p>infeasible [1] 1909/19</p> <p>inference [1] 1934/21</p> <p>information [60] 1753/5 1755/4 1779/2 1781/21 1785/2 1793/19 1795/25 1796/7 1796/8 1796/21 1797/5 1797/6 1803/11 1838/4 1842/16 1842/16 1842/18 1842/25 1843/3 1843/6 1843/10 1843/12 1866/17 1866/20 1866/22 1867/1 1867/4 1868/3 1868/8 1868/10 1868/12 1869/21 1869/22 1874/3 1896/5 1896/10 1896/12 1896/14 1896/17 1898/1 1898/3 1906/20 1907/5 1907/11 1907/14 1907/15 1907/15 1907/19 1907/19 1907/20 1908/3 1908/7 1908/15 1908/20 1910/16 1911/2 1911/8 1911/15 1919/14 1939/7</p> <p>infrastructure [1] 1884/1</p> <p>initial [3] 1740/14 1768/10 1883/24</p> <p>initially [3] 1764/23 1765/6 1842/15</p> <p>input [3] 1871/4 1874/5 1874/18</p> <p>inputs [3] 1919/13 1920/5 1920/7</p> <p>inquiry [2] 1897/15 1897/16</p>	<p>instance [5] 1803/25 1839/4 1839/17 1884/4 1895/7</p> <p>instances [1] 1800/2</p> <p>instead [2] 1798/15 1824/22</p> <p>institute [5] 1799/9 1905/24 1906/1 1906/5 1906/8</p> <p>institution [4] 1758/24 1794/19 1918/21 1918/22</p> <p>instructed [1] 1873/2</p> <p>instruction [2] 1865/4 1935/4</p> <p>instructions [3] 1865/5 1873/8 1873/11</p> <p>instruments [2] 1756/25 1773/11</p> <p>intended [1] 1883/22</p> <p>intent [1] 1772/20</p> <p>intention [1] 1797/3</p> <p>interest [2] 1800/20 1800/20</p> <p>interested [5] 1772/10 1773/2 1836/2 1841/9 1939/10</p> <p>interesting [1] 1738/19</p> <p>interests [2] 1767/9 1925/15</p> <p>internal [1] 1793/16</p> <p>international [14] 1731/2 1733/5 1750/16 1773/11 1773/12 1794/1 1799/18 1829/6 1829/12 1829/13 1829/24 1830/1 1830/4 1912/16</p> <p>interpret [1] 1755/4</p> <p>interpretation [1] 1789/12</p> <p>interpretations [1] 1792/18</p> <p>interpreted [1] 1784/10</p> <p>interpreter [1] 1766/3</p> <p>INTERPRETERS [1] 1732/19</p> <p>interrupt [1] 1931/14</p> <p>interrupted [1] 1836/21</p> <p>interrupting [1] 1749/20</p> <p>interruption [1] 1764/25</p>	<p>intervene [1] 1888/23</p> <p>introduce [1] 1737/6</p> <p>introduced [1] 1740/25</p> <p>intuition [1] 1794/21</p> <p>invalid [1] 1791/12</p> <p>invasion [2] 1765/10 1870/14</p> <p>Inversiones [2] 1747/19 1748/13</p> <p>invest [4] 1833/21 1834/8 1835/7 1836/8</p> <p>investigation [1] 1939/8</p> <p>investigations [1] 1738/14</p> <p>investigative [1] 1737/13</p> <p>investing [1] 1836/3</p> <p>investment [32] 1731/2 1767/13 1767/14 1767/15 1776/22 1776/22 1777/4 1829/24 1830/2 1830/6 1830/6 1830/13 1830/14 1830/18 1832/5 1832/9 1832/20 1832/22 1832/24 1833/6 1833/13 1833/14 1834/4 1834/7 1834/10 1834/11 1834/12 1836/1 1838/11 1839/12 1839/24 1889/21</p> <p>investments [1] 1775/17</p> <p>investor [10] 1830/19 1835/6 1835/16 1835/21 1836/2 1837/20 1841/4 1841/7 1841/9 1841/11</p> <p>investor's [3] 1835/10 1837/12 1840/25</p> <p>investors [2] 1833/21 1834/3</p> <p>invite [4] 1824/14 1825/2 1825/4 1825/15</p> <p>invited [1] 1740/10</p> <p>involved [1] 1925/20</p> <p>involving [1] 1914/16</p> <p>is [453]</p> <p>isn't [6] 1758/10 1803/1 1835/14 1840/25 1841/10 1911/4</p> <p>issue [22] 1737/6</p>
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<p>I</p> <p>issue... [21] 1739/15 1740/25 1752/25 1758/25 1762/2 1762/18 1762/21 1763/1 1763/17 1768/7 1778/5 1778/7 1778/10 1793/25 1886/15 1925/16 1925/17 1931/21 1932/10 1934/1 1938/18</p> <p>issued [8] 1743/21 1756/5 1760/1 1760/3 1763/24 1782/1 1783/25 1793/18</p> <p>issues [35] 1736/2 1736/3 1739/25 1740/3 1740/5 1741/14 1741/16 1760/6 1760/7 1760/8 1761/11 1761/16 1761/17 1762/1 1762/5 1762/8 1762/11 1763/10 1778/12 1778/16 1779/9 1796/5 1825/6 1825/13 1825/20 1826/8 1826/15 1826/21 1826/22 1826/23 1838/3 1932/23 1937/11 1938/19 1938/24</p> <p>it [354]</p> <p>it's [67] 1737/3 1738/3 1738/5 1738/15 1739/8 1740/14 1741/4 1745/14 1758/2 1759/12 1761/8 1764/13 1772/2 1772/3 1778/10 1781/1 1781/5 1781/5 1783/11 1784/7 1784/9 1784/14 1785/2 1785/4 1785/5 1786/4 1786/25 1793/14 1802/20 1828/19 1836/12 1839/21 1841/17 1867/21 1868/15 1868/17 1871/17 1872/10 1872/23 1874/16 1878/19 1879/1 1879/13 1882/2 1887/24 1889/5 1889/14 1890/2 1890/15 1893/25 1900/5 1900/13 1910/2 1913/2 1913/5 1913/5 1913/16 1914/7 1915/4 1926/2 1926/4</p>	<p>1932/6 1933/17 1935/1 1936/2 1936/12 1938/19</p> <p>italics [1] 1781/6</p> <p>item [3] 1738/15 1749/10 1825/11</p> <p>items [1] 1826/9</p> <p>its [17] 1756/17 1756/21 1757/10 1758/1 1762/15 1771/21 1789/7 1793/22 1793/25 1869/10 1876/2 1883/21 1886/22 1887/19 1890/21 1895/17 1896/22</p> <p>itself [1] 1891/18</p> <p>IV [1] 1744/10</p> <p>J</p> <p>Jaguar [1] 1771/15</p> <p>jam [1] 1741/17</p> <p>James [1] 1734/10</p> <p>January [1] 1873/6</p> <p>January 2014 [1] 1873/6</p> <p>Jinotega [3] 1782/2 1783/17 1793/19</p> <p>Jo [7] 1733/18 1773/21 1773/23 1774/13 1774/21 1775/14 1776/3</p> <p>joint [1] 1796/9</p> <p>jointly [1] 1935/13</p> <p>judge [5] 1783/25 1784/1 1784/15 1784/15 1784/16</p> <p>judgment [1] 1866/21</p> <p>judicial [17] 1743/15 1746/20 1747/17 1750/16 1761/24 1762/8 1763/12 1766/14 1766/18 1766/19 1766/25 1767/16 1781/4 1784/23 1785/4 1786/19 1792/3</p> <p>July [10] 1731/15 1735/1 1782/2 1782/23 1884/9 1884/11 1884/12 1885/9 1885/22 1886/2</p> <p>July 13 [1] 1782/2</p> <p>July 2018 [2] 1885/9 1885/22</p> <p>July 29 [1] 1886/2</p> <p>jump [3] 1868/24 1872/8 1918/6</p> <p>jumped [1] 1836/17</p> <p>jumping [1] 1868/22</p> <p>June [21] 1782/2</p>	<p>1801/25 1802/4 1834/13 1835/1 1869/11 1870/10 1870/11 1870/14 1871/1 1871/7 1871/9 1873/19 1880/16 1883/19 1883/23 1884/3 1884/22 1886/24 1887/2 1888/11</p> <p>June 16 [9] 1801/25 1802/4 1834/13 1880/16 1883/19 1883/23 1884/3 1886/24 1887/2</p> <p>June 16th [1] 1888/11</p> <p>June 18th [1] 1884/22</p> <p>June 2018 [7] 1869/11 1870/10 1870/11 1871/1 1871/7 1871/9 1873/19</p> <p>June 30th [1] 1782/2</p> <p>juridical [1] 1749/10</p> <p>jurisdiction [5] 1731/14 1760/13 1760/16 1799/7 1912/21</p> <p>just [93] 1737/4 1737/8 1738/11 1741/18 1743/5 1747/14 1747/17 1748/12 1753/19 1759/15 1770/3 1772/6 1774/6 1774/11 1779/20 1783/4 1783/12 1792/6 1798/16 1817/21 1826/10 1826/17 1829/2 1829/18 1829/20 1829/21 1830/9 1831/12 1831/18 1832/16 1835/4 1836/15 1836/19 1837/2 1837/15 1838/4 1839/3 1840/22 1841/20 1841/25 1842/8 1844/3 1844/3 1865/1 1866/16 1866/16 1868/11 1868/19 1868/22 1870/7 1871/25 1872/5 1873/1 1874/1 1874/20 1877/8 1877/16 1878/11 1878/14 1878/17 1879/13 1879/16 1880/13 1880/24</p>	<p>1881/11 1881/14 1882/20 1883/18 1884/2 1888/7 1890/9 1890/20 1891/10 1894/20 1895/15 1897/12 1900/12 1911/21 1913/12 1914/13 1914/20 1918/5 1920/17 1925/18 1925/22 1925/24 1925/25 1934/2 1935/11 1937/7 1937/14 1938/2 1938/9</p> <p>Justice [5] 1761/3 1761/4 1763/16 1793/18 1793/20</p> <p>K</p> <p>keep [6] 1741/7 1766/12 1766/20 1774/18 1874/13 1875/21</p> <p>keeping [1] 1743/16</p> <p>Kenneth [1] 1734/21</p> <p>kept [1] 1785/4</p> <p>kg [13] 1875/23 1876/9 1876/12 1876/15 1876/17 1876/18 1876/24 1876/25 1877/2 1877/5 1877/6 1877/7 1878/5</p> <p>kilogram [1] 1879/17</p> <p>kilograms [2] 1877/11 1877/13</p> <p>kilos [1] 1876/6</p> <p>kind [4] 1755/3 1778/12 1784/7 1790/13</p> <p>kinds [2] 1784/2 1787/4</p> <p>knew [1] 1754/20</p> <p>know [51] 1738/12 1741/6 1745/11 1745/13 1748/14 1750/12 1750/15 1750/18 1761/2 1768/9 1768/23 1769/19 1770/1 1770/20 1771/17 1772/5 1775/9 1778/20 1778/24 1785/13 1785/15 1785/25 1794/15 1794/16 1800/21 1817/14 1821/11 1829/21 1833/20 1833/25 1835/5 1836/3 1836/16 1836/19 1839/19 1840/1 1868/16</p>	<p>1875/2 1892/1 1892/23 1900/21 1909/2 1909/16 1911/21 1912/10 1926/6 1932/25 1933/10 1933/12 1937/15 1938/18</p> <p>knowledge [17] 1745/25 1747/1 1747/10 1748/16 1749/16 1758/23 1776/16 1788/25 1794/13 1794/21 1801/15 1840/17 1840/18 1840/20 1909/10 1910/16 1911/15</p> <p>known [2] 1783/23 1784/2</p> <p>Kotecha [33] 1779/15 1795/9 1795/17 1795/19 1797/23 1797/25 1798/3 1817/5 1821/9 1821/11 1827/17 1827/18 1828/3 1836/21 1841/11 1865/3 1866/25 1867/8 1869/3 1874/19 1877/10 1885/16 1885/18 1888/13 1889/13 1889/19 1905/23 1909/3 1912/8 1926/9 1931/2 1931/5 1931/18</p> <p>Kotecha's [1] 1796/6</p> <p>Kratovil [7] 1734/21 1932/25 1934/13 1935/24 1936/5 1936/18 1937/18</p> <p>L</p> <p>La [1] 1757/11</p> <p>labor [2] 1935/14 1936/1</p> <p>lack [7] 1743/20 1778/15 1789/8 1842/15 1842/16 1896/5 1907/5</p> <p>lady [1] 1776/15</p> <p>land [8] 1753/3 1765/14 1804/18 1837/6 1881/18 1882/11 1893/17 1893/19</p> <p>lands [2] 1765/9 1804/5</p> <p>language [2] 1841/15 1843/18</p> <p>large [1] 1763/2</p> <p>last [25] 1736/9 1737/9 1745/21</p>
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<p>L</p> <p>last... [22] 1745/23 1751/16 1751/21 1752/19 1756/3 1756/5 1779/13 1788/23 1798/20 1799/5 1799/23 1800/19 1824/25 1829/15 1867/20 1884/25 1889/18 1890/21 1894/12 1910/7 1911/6 1918/17</p> <p>late [1] 1885/22</p> <p>later [7] 1758/8 1840/23 1876/16 1877/23 1889/14 1897/20 1911/3</p> <p>latest [1] 1827/14</p> <p>Laurie [1] 1732/16</p> <p>law [22] 1745/22 1760/6 1760/25 1760/25 1761/11 1767/2 1768/14 1769/1 1769/5 1769/13 1769/15 1772/9 1773/12 1773/19 1776/17 1781/22 1782/13 1788/11 1789/13 1792/18 1794/4 1794/5</p> <p>lawyer [11] 1754/6 1754/12 1762/20 1785/7 1787/22 1789/14 1792/2 1908/11 1908/12 1908/13 1912/11</p> <p>lawyers [10] 1733/5 1750/25 1751/20 1751/20 1784/22 1842/14 1843/1 1882/2 1886/22 1887/19</p> <p>leading [1] 1868/5</p> <p>learn [5] 1781/9 1781/16 1782/12 1782/20 1897/24</p> <p>learned [2] 1843/9 1933/14</p> <p>least [12] 1762/24 1802/12 1870/25 1874/20 1878/6 1880/15 1914/7 1914/8 1914/14 1915/7 1920/4 1933/12</p> <p>leave [6] 1737/9 1737/11 1738/23 1741/12 1795/15 1895/2</p> <p>left [4] 1739/9 1885/19 1886/1</p>	<p>1911/9</p> <p>legal [21] 1750/16 1754/7 1754/21 1756/21 1761/16 1768/17 1773/13 1774/18 1775/4 1776/24 1779/17 1779/19 1783/24 1789/2 1794/1 1801/18 1842/5 1892/23 1894/22 1895/2 1907/22</p> <p>legislative [1] 1773/10</p> <p>length [2] 1801/13 1824/17</p> <p>let [25] 1745/13 1746/6 1752/6 1756/3 1761/20 1765/18 1770/16 1784/12 1785/13 1785/18 1831/2 1831/4 1833/25 1836/16 1870/15 1875/1 1875/1 1887/17 1892/20 1900/19 1908/24 1909/2 1912/13 1914/11 1937/7</p> <p>let's [35] 1741/23 1744/6 1744/24 1747/12 1747/12 1748/17 1764/10 1764/14 1774/17 1777/23 1778/4 1779/23 1785/17 1795/13 1795/14 1795/18 1797/23 1821/10 1826/6 1827/16 1836/7 1837/19 1839/3 1841/22 1869/24 1870/17 1874/13 1885/13 1889/4 1889/8 1896/16 1896/20 1907/10 1910/7 1912/18</p> <p>letter [31] 1746/23 1747/1 1752/7 1752/8 1752/11 1754/9 1754/19 1762/17 1762/20 1781/22 1785/1 1785/8 1785/24 1867/14 1867/17 1867/19 1867/21 1868/2 1868/14 1868/17 1870/25 1872/2 1874/4 1883/12 1889/16 1895/14 1910/21 1910/22 1911/1 1911/7 1911/12</p>	<p>letters [4] 1750/15 1793/13 1793/23 1911/6</p> <p>level [2] 1840/16 1897/7</p> <p>Levine [1] 1734/12</p> <p>liable [1] 1935/13</p> <p>lifetime [2] 1788/12 1802/12</p> <p>light [3] 1824/25 1826/25 1926/7</p> <p>like [25] 1738/13 1739/24 1740/23 1742/20 1743/22 1751/13 1754/3 1759/23 1762/14 1779/3 1780/12 1781/12 1785/25 1787/24 1797/2 1797/11 1799/25 1831/7 1835/5 1871/21 1886/12 1892/4 1892/6 1895/6 1933/10</p> <p>likely [2] 1803/19 1826/20</p> <p>Likewise [1] 1782/5</p> <p>Lillian [1] 1733/8</p> <p>limit [2] 1786/21 1825/3</p> <p>limitation [2] 1770/13 1907/16</p> <p>limitations [9] 1768/24 1769/4 1769/7 1769/9 1769/19 1769/22 1770/1 1770/7 1906/24</p> <p>limited [5] 1738/15 1841/3 1841/13 1841/16 1843/6</p> <p>line [16] 1741/21 1745/10 1745/15 1747/23 1780/25 1800/9 1817/24 1817/24 1817/25 1818/1 1866/24 1884/25 1888/24 1888/25 1889/3 1926/7</p> <p>liquidating [2] 1891/19 1891/21</p> <p>list [4] 1731/25 1732/23 1733/20 1826/21</p> <p>listed [3] 1826/10 1880/4 1933/1</p> <p>listing [1] 1829/19</p> <p>Literal [3] 1782/6 1782/15 1782/23</p> <p>literally [1] 1781/2</p> <p>litigant [1] 1793/12</p> <p>litigation [3] 1799/3</p>	<p>1799/18 1799/20</p> <p>little [13] 1792/3 1798/25 1802/22 1803/6 1829/22 1839/3 1869/18 1872/9 1896/11 1907/3 1912/22 1936/23 1938/22</p> <p>live [1] 1796/1</p> <p>LLC [4] 1731/5 1744/11 1744/22 1889/23</p> <p>LLP [1] 1733/10</p> <p>loan [2] 1890/21 1890/25</p> <p>located [1] 1882/11</p> <p>Lodge [1] 1771/15</p> <p>logical [1] 1753/4</p> <p>logistics [1] 1883/16</p> <p>long [8] 1752/15 1788/11 1793/13 1793/14 1826/21 1837/25 1889/5 1912/12</p> <p>longer [3] 1785/4 1821/15 1932/6</p> <p>look [26] 1745/2 1751/15 1752/6 1754/11 1755/15 1756/3 1756/18 1765/18 1774/1 1784/4 1793/2 1833/21 1834/3 1834/6 1834/9 1834/10 1835/14 1865/21 1867/8 1877/4 1888/18 1892/8 1907/22 1908/23 1910/7 1913/4</p> <p>looked [3] 1864/14 1873/1 1873/8</p> <p>looking [5] 1740/7 1803/21 1835/6 1910/23 1915/3</p> <p>looks [3] 1738/13 1739/23 1742/20</p> <p>loose [1] 1881/8</p> <p>loss [4] 1799/19 1800/22 1801/3 1915/2</p> <p>lost [4] 1804/18 1836/22 1908/8 1926/6</p> <p>lot [4] 1759/16 1767/6 1792/1 1841/1</p> <p>lower [1] 1780/22</p> <p>LP [1] 1733/5</p> <p>Lucy [2] 1731/23 1732/9</p> <p>lucy.greenwood [1] 1732/9</p> <p>Luis [2] 1764/19</p>	<p>1765/4</p> <p>lunch [4] 1821/10 1821/15 1932/23 1938/24</p> <p>Lupo [1] 1734/22</p> <p>Luz [1] 1761/2</p> <hr/> <p>M</p> <p>made [18] 1743/16 1744/3 1746/22 1748/14 1749/16 1750/3 1750/13 1754/22 1763/22 1764/12 1792/12 1797/7 1818/2 1890/10 1890/21 1896/8 1920/4 1934/21</p> <p>maintaining [1] 1898/7</p> <p>make [19] 1754/12 1754/20 1754/23 1761/16 1775/6 1796/1 1798/6 1798/8 1829/20 1843/24 1865/20 1878/11 1879/15 1911/23 1912/25 1918/5 1919/11 1933/22 1934/1</p> <p>makes [7] 1748/9 1748/10 1772/7 1786/11 1790/15 1878/8 1920/17</p> <p>making [7] 1738/24 1749/21 1749/22 1780/12 1798/14 1834/4 1919/11</p> <p>man [1] 1931/6</p> <p>management [21] 1755/22 1756/15 1756/24 1765/7 1772/18 1772/24 1772/24 1838/21 1869/5 1869/10 1871/5 1910/11 1910/11 1910/14 1910/15 1910/21 1910/22 1911/5 1911/6 1911/11 1919/24</p> <p>management's [1] 1876/21</p> <p>Managua [2] 1756/6 1897/22</p> <p>many [16] 1826/18 1829/9 1829/25 1830/24 1830/25 1831/3 1831/5 1831/25 1842/7 1842/12 1895/24 1896/3 1910/5 1913/23 1914/6</p>
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<p>M</p> <p>many... [1] 1925/15</p> <p>map [1] 1882/9</p> <p>Marco [2] 1734/7 1828/5</p> <p>MARENA [5] 1755/14 1755/24 1756/17 1756/22 1757/15</p> <p>marked [1] 1905/17</p> <p>market [14] 1801/5 1801/5 1801/13 1801/20 1801/21 1802/14 1802/15 1803/9 1803/9 1803/24 1804/1 1804/7 1804/15 1915/4</p> <p>markets [1] 1895/12</p> <p>marks [1] 1781/6</p> <p>material [2] 1762/19 1887/15</p> <p>materially [2] 1910/17 1911/16</p> <p>materials [3] 1759/1 1762/23 1797/3</p> <p>math [1] 1881/9</p> <p>Matt [1] 1734/22</p> <p>matter [19] 1740/2 1740/10 1742/12 1754/4 1754/7 1759/10 1776/14 1783/10 1784/17 1784/25 1800/21 1802/7 1830/13 1830/14 1840/11 1913/3 1935/15 1937/19 1939/1</p> <p>matters [6] 1740/11 1799/20 1801/18 1829/7 1829/10 1939/3</p> <p>maturation [1] 1802/22</p> <p>maxim [1] 1792/19</p> <p>may [34] 1736/3 1741/11 1741/13 1749/2 1759/15 1768/7 1778/11 1779/12 1785/9 1786/1 1786/7 1786/9 1786/11 1786/17 1786/20 1787/2 1787/9 1788/24 1791/21 1792/5 1803/7 1825/22 1828/17 1836/13 1838/7 1840/9 1840/19 1877/9 1895/11 1908/19 1925/21 1926/15 1931/13 1938/10</p> <p>maybe [8] 1827/6</p>	<p>1840/15 1870/6 1870/16 1884/6 1908/25 1912/17 1925/21</p> <p>me [69] 1741/16 1742/7 1744/14 1746/6 1747/14 1751/4 1752/18 1752/18 1753/18 1753/19 1754/18 1755/4 1755/12 1758/7 1761/20 1764/25 1768/6 1770/15 1770/16 1773/5 1773/9 1773/25 1778/9 1783/8 1783/10 1784/12 1785/13 1786/7 1789/18 1797/14 1798/24 1829/23 1831/2 1831/4 1831/20 1833/25 1842/18 1868/9 1869/19 1870/15 1874/2 1875/1 1875/1 1878/3 1878/22 1880/22 1881/20 1882/10 1885/11 1887/17 1891/9 1892/20 1893/15 1900/11 1900/14 1900/19 1907/19 1909/2 1910/2 1910/6 1911/9 1912/13 1914/11 1920/6 1925/16 1925/19 1937/7 1937/13 1939/3</p> <p>mean [14] 1754/14 1757/23 1784/19 1786/8 1786/14 1786/21 1790/12 1797/1 1832/12 1836/16 1838/5 1912/24 1919/19 1935/7</p> <p>means [8] 1737/14 1781/25 1782/9 1891/23 1907/13 1913/15 1918/9 1938/1</p> <p>meant [2] 1741/21 1933/2</p> <p>meantime [1] 1826/8</p> <p>measure [32] 1744/2 1745/1 1745/2 1746/2 1746/14 1748/20 1748/25 1750/10 1750/21 1750/24 1751/9 1776/5 1776/11 1776/21 1777/5</p>	<p>1781/3 1781/10 1781/17 1781/25 1782/6 1782/21 1782/21 1783/15 1783/17 1784/13 1787/21 1790/17 1790/20 1791/8 1792/11 1793/3 1793/12</p> <p>measures [5] 1767/11 1786/6 1787/19 1790/20 1801/22</p> <p>media [5] 1737/11 1737/12 1739/7 1939/11 1939/12</p> <p>meet [3] 1751/24 1828/6 1828/7</p> <p>Melva [7] 1733/18 1773/21 1773/23 1774/13 1774/21 1775/14 1776/3</p> <p>Melva Jo [4] 1773/21 1773/23 1774/13 1776/3</p> <p>member [2] 1791/21 1840/8</p> <p>members [4] 1799/12 1889/23 1892/6 1906/5</p> <p>Memorial [2] 1774/22 1774/25</p> <p>memory [1] 1893/5</p> <p>mention [4] 1802/5 1878/23 1878/24 1882/20</p> <p>mentioned [22] 1741/18 1743/22 1747/14 1747/17 1769/5 1771/3 1771/4 1771/23 1774/15 1777/11 1790/6 1830/12 1831/21 1833/16 1834/3 1834/6 1843/23 1878/4 1895/16 1918/23 1925/19 1932/11</p> <p>mentions [3] 1775/15 1792/23 1886/10</p> <p>MERITS [1] 1731/14</p> <p>method [4] 1832/18 1832/25 1833/7 1914/16</p> <p>microphone [4] 1765/25 1766/1 1766/4 1828/8</p> <p>mid [1] 1870/14</p> <p>might [6] 1738/19 1787/20 1796/14 1826/19 1878/14 1931/14</p>	<p>Miguel [2] 1748/2 1748/4</p> <p>million [3] 1891/6 1891/13 1891/20</p> <p>mind [5] 1746/25 1774/18 1867/6 1889/11 1890/8</p> <p>minds [2] 1825/7 1825/7</p> <p>mine [1] 1778/10</p> <p>minimum [1] 1762/24</p> <p>mining [2] 1839/21 1840/5</p> <p>ministerial [2] 1757/8 1758/2</p> <p>ministry [4] 1737/24 1755/23 1793/21 1793/21</p> <p>minor [1] 1742/1</p> <p>minute [2] 1770/14 1817/11</p> <p>minutes [20] 1736/21 1736/22 1777/23 1777/24 1779/14 1798/15 1798/16 1798/18 1817/6 1840/24 1841/8 1868/23 1873/8 1874/1 1879/17 1881/1 1887/3 1889/5 1889/16 1890/18</p> <p>misabeled [1] 1897/22</p> <p>missed [3] 1800/6 1828/17 1911/9</p> <p>missing [3] 1800/10 1895/24 1897/13</p> <p>misunderstood [1] 1830/3</p> <p>model [21] 1800/18 1832/6 1834/14 1834/15 1842/8 1842/8 1842/9 1842/13 1843/12 1843/16 1843/25 1874/22 1875/2 1875/10 1878/1 1879/18 1881/3 1887/1 1914/1 1914/1 1919/13</p> <p>models [10] 1865/6 1867/2 1876/10 1894/17 1909/13 1913/25 1914/3 1914/3 1914/22 1920/10</p> <p>Molina [5] 1734/7 1827/21 1828/5 1889/9 1931/4</p> <p>moment [6] 1736/5 1753/19 1781/8</p>	<p>1782/11 1783/4 1875/8</p> <p>moments [1] 1782/10</p> <p>money [2] 1890/25 1891/19</p> <p>monitoring [2] 1755/24 1756/17</p> <p>month [1] 1747/22</p> <p>months [1] 1868/5</p> <p>more [12] 1741/11 1748/12 1761/13 1829/22 1833/3 1889/3 1896/11 1898/5 1898/8 1905/11 1912/22 1913/16</p> <p>morning [23] 1736/1 1737/4 1740/12 1741/15 1742/17 1742/18 1742/25 1743/1 1743/4 1777/24 1780/3 1780/4 1791/5 1795/18 1795/20 1798/23 1825/21 1931/17 1933/25 1939/2 1939/5 1939/24 1940/6</p> <p>most [1] 1801/23</p> <p>mostly [1] 1762/2</p> <p>motion [6] 1786/12 1786/13 1786/13 1786/14 1786/23 1787/25</p> <p>move [15] 1755/13 1763/18 1796/21 1797/20 1817/7 1817/22 1828/8 1828/10 1874/17 1880/6 1889/13 1895/15 1900/18 1932/14 1932/16</p> <p>moving [7] 1782/12 1782/20 1875/21 1888/17 1888/20 1891/19 1912/18</p> <p>Mr [22] 1731/22 1732/7 1732/21 1732/22 1733/11 1733/12 1733/15 1733/19 1734/7 1734/8 1734/10 1734/11 1734/12 1734/13 1734/16 1734/19 1734/20 1734/21 1734/22 1741/13 1795/17 1938/18</p> <p>Mr. [128] 1737/15 1739/19 1741/14 1742/17 1742/25 1748/4 1748/15</p>
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<p>M</p> <p>Mr.... [121] 1749/17 1750/3 1750/7 1750/14 1751/12 1752/14 1752/23 1753/24 1755/8 1758/19 1758/22 1760/11 1761/19 1764/6 1764/18 1764/19 1764/22 1765/4 1766/8 1778/8 1778/14 1779/12 1779/15 1779/25 1780/3 1780/14 1781/7 1787/17 1795/9 1795/19 1796/2 1796/6 1797/23 1797/25 1804/17 1817/5 1817/8 1821/9 1821/11 1825/23 1827/4 1827/12 1827/17 1827/18 1827/21 1827/23 1828/3 1836/21 1841/11 1865/3 1866/25 1867/8 1867/21 1869/3 1870/18 1871/2 1871/8 1871/25 1872/1 1872/5 1874/12 1874/19 1877/10 1880/7 1885/9 1885/9 1885/12 1885/16 1885/18 1886/2 1886/2 1886/6 1886/15 1888/13 1889/9 1889/10 1889/11 1889/13 1889/19 1890/10 1892/23 1895/13 1905/12 1905/23 1909/3 1912/4 1912/8 1914/23 1926/8 1926/9 1931/2 1931/4 1931/5 1931/10 1931/12 1931/13 1931/15 1931/18 1932/1 1932/11 1932/21 1932/24 1932/25 1933/14 1933/20 1934/5 1934/6 1934/8 1934/11 1934/13 1934/25 1935/5 1935/23 1935/24 1936/5 1936/5 1936/18 1936/18 1937/17 1937/18 1939/6</p> <p>Mr. Appleton [8] 1741/14 1752/14</p>	<p>1752/23 1753/24 1755/8 1796/2 1825/23 1931/15</p> <p>Mr. Byron [1] 1764/6</p> <p>Mr. Ferrufino [1] 1739/19</p> <p>Mr. Gutiérrez [7] 1764/22 1874/12 1885/9 1886/2 1886/6 1886/15 1892/23</p> <p>Mr. Hart [13] 1804/17 1931/10 1931/12 1932/11 1932/24 1933/14 1934/6 1934/11 1935/5 1935/23 1936/5 1936/18 1937/17</p> <p>Mr. Hart's [2] 1817/8 1933/20</p> <p>Mr. Kotecha [31] 1779/15 1795/9 1795/19 1797/23 1797/25 1817/5 1821/9 1821/11 1827/17 1827/18 1828/3 1836/21 1841/11 1865/3 1866/25 1867/8 1869/3 1874/19 1877/10 1885/16 1885/18 1888/13 1889/13 1889/19 1905/23 1909/3 1912/8 1926/9 1931/2 1931/5 1931/18</p> <p>Mr. Kotecha's [1] 1796/6</p> <p>Mr. Kratovil [6] 1932/25 1934/13 1935/24 1936/5 1936/18 1937/18</p> <p>Mr. Luis [2] 1764/19 1765/4</p> <p>Mr. Miguel [1] 1748/4</p> <p>Mr. Molina [3] 1827/21 1889/9 1931/4</p> <p>Mr. Mullins [6] 1912/4 1914/23 1932/1 1932/21 1934/5 1934/8</p> <p>Mr. Mullins' [1] 1934/25</p> <p>Mr. President [15] 1737/15 1758/22 1761/19 1778/8 1778/14 1779/12 1779/25 1787/17 1827/4 1827/12 1827/23 1889/10 1926/8 1931/13</p>	<p>1939/6</p> <p>Mr. Ricky [6] 1867/21 1880/7 1885/12 1889/11 1895/13 1905/12</p> <p>Mr. Rondón [9] 1748/15 1749/17 1750/3 1750/7 1750/14 1872/1 1885/9 1886/2 1890/10</p> <p>Mr. Russ [1] 1870/18</p> <p>Mr. Sequeira [9] 1742/17 1742/25 1751/12 1758/19 1760/11 1764/18 1766/8 1780/3 1781/7</p> <p>Mr. Sequeira's [1] 1780/14</p> <p>Mr. Welty [4] 1871/2 1871/8 1871/25 1872/5</p> <p>Mrs. [1] 1925/13</p> <p>Mrs. Rondón's [1] 1925/13</p> <p>Ms [11] 1731/23 1732/9 1732/13 1732/16 1732/17 1732/20 1733/7 1733/8 1733/18 1734/6 1734/9</p> <p>Ms. [15] 1741/20 1742/4 1742/22 1761/21 1763/20 1764/12 1771/16 1771/17 1774/21 1775/14 1777/18 1779/24 1780/8 1790/8 1791/8</p> <p>Ms. Cardenas [7] 1742/22 1763/20 1764/12 1777/18 1780/8 1790/8 1791/8</p> <p>Ms. Dania [1] 1771/17</p> <p>Ms. González [4] 1741/20 1742/4 1761/21 1779/24</p> <p>Ms. Hernández [1] 1771/16</p> <p>Ms. Melva Jo [2] 1774/21 1775/14</p> <p>much [21] 1737/1 1741/5 1743/19 1760/6 1777/17 1795/1 1795/4 1798/13 1801/16 1803/1 1821/8 1827/15 1894/23 1900/11 1900/12 1913/16 1914/21 1926/11 1931/10 1940/5 1940/7</p>	<p>Mullins [8] 1733/11 1912/4 1914/23 1932/1 1932/21 1934/5 1934/8 1938/18</p> <p>Mullins' [1] 1934/25</p> <p>multiple [3] 1797/14 1797/15 1803/24</p> <p>must [2] 1766/11 1788/15</p> <p>my [101] 1739/11 1740/21 1746/24 1751/17 1753/20 1753/21 1755/5 1755/6 1759/21 1762/10 1766/23 1769/1 1769/6 1770/5 1771/2 1776/13 1781/1 1781/4 1788/11 1792/22 1795/2 1796/15 1798/10 1798/11 1798/12 1799/7 1799/10 1799/22 1800/1 1802/6 1802/10 1804/4 1804/5 1804/12 1804/12 1828/5 1831/2 1834/17 1836/17 1836/22 1841/6 1841/10 1841/14 1865/3 1865/12 1868/3 1870/2 1870/13 1871/8 1871/10 1871/12 1871/20 1871/23 1872/21 1873/7 1873/17 1875/14 1875/16 1877/4 1878/11 1882/3 1883/7 1883/23 1884/22 1884/25 1885/17 1885/23 1887/13 1887/14 1888/8 1891/2 1892/21 1893/25 1894/2 1894/5 1895/5 1895/22 1897/3 1897/7 1897/23 1898/2 1900/14 1906/3 1908/6 1908/10 1908/14 1909/10 1909/22 1910/4 1910/20 1912/25 1918/18 1918/21 1919/4 1920/4 1920/16 1925/18 1925/25 1926/1 1926/6 1934/23</p> <p>myself [1] 1799/1</p>	<p>N</p> <p>Nahila [1] 1734/9</p> <p>name [10] 1744/15 1745/15 1745/21 1745/22 1745/23 1783/24 1795/22 1828/5 1831/12 1893/22</p> <p>namely [1] 1736/7</p> <p>names [1] 1792/20</p> <p>narrow [1] 1741/8</p> <p>nation [1] 1801/24</p> <p>national [2] 1757/10 1801/24</p> <p>natural [2] 1755/23 1837/4</p> <p>nature [4] 1778/15 1790/21 1836/10 1939/6</p> <p>near [1] 1765/24</p> <p>necessarily [1] 1884/6</p> <p>necessary [16] 1750/24 1771/12 1775/2 1783/11 1836/25 1883/20 1884/4 1890/17 1894/21 1894/25 1895/1 1895/3 1895/9 1907/9 1910/3 1920/7</p> <p>necessity [1] 1910/9</p> <p>need [35] 1738/1 1741/6 1749/12 1753/10 1753/19 1754/23 1759/14 1771/17 1772/11 1772/16 1772/16 1775/5 1778/12 1779/2 1779/4 1779/8 1779/17 1779/18 1779/20 1788/9 1795/25 1798/6 1817/14 1817/15 1825/23 1884/7 1884/14 1887/15 1887/25 1888/7 1889/3 1896/11 1908/21 1933/12 1937/12</p> <p>need to [1] 1779/20</p> <p>needed [7] 1754/20 1755/3 1837/25 1843/2 1884/23 1891/3 1891/25</p> <p>needs [5] 1788/15 1793/19 1794/21 1870/20 1870/21</p> <p>negatively [2] 1894/16 1895/9</p> <p>neither [1] 1801/13</p> <p>net [1] 1892/5</p> <p>never [10] 1760/1 1763/24 1777/11</p>
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<p>N</p> <p>never... [7] 1777/14 1790/11 1802/11 1832/3 1907/6 1934/20 1934/22 new [5] 1737/6 1740/25 1798/18 1799/16 1843/12 newly [1] 1898/7 newspaper [2] 1737/21 1757/10 next [13] 1749/24 1764/14 1785/21 1801/17 1817/11 1817/15 1817/21 1825/11 1872/9 1880/6 1881/18 1882/3 1908/25 NICARAGUA [53] 1731/8 1744/1 1750/6 1750/7 1750/9 1750/12 1750/14 1750/22 1750/23 1751/1 1751/9 1751/20 1751/21 1751/23 1752/13 1753/3 1753/4 1753/24 1754/2 1755/8 1755/11 1760/20 1762/21 1765/20 1766/25 1767/18 1767/21 1768/3 1768/18 1769/16 1769/20 1773/14 1773/14 1774/22 1774/25 1775/3 1775/6 1775/14 1775/16 1775/17 1775/18 1780/6 1780/11 1780/21 1784/23 1785/2 1793/4 1793/4 1793/8 1793/13 1800/24 1879/2 1892/19 Nicaragua's [1] 1751/17 Nicaraguan [5] 1768/13 1773/9 1776/17 1781/22 1783/24 nice [3] 1742/19 1828/6 1828/7 night [1] 1736/9 nine [3] 1736/20 1736/21 1868/17 nine hours [1] 1736/20 nine-page [1] 1868/17 no [120] 1731/11 1742/14 1745/12 1745/25 1747/11</p>	<p>1750/4 1755/12 1757/17 1760/1 1763/25 1766/23 1767/20 1767/25 1768/1 1768/16 1768/19 1769/5 1770/3 1770/5 1771/6 1772/1 1772/1 1774/1 1774/7 1774/11 1775/25 1777/6 1779/21 1783/11 1783/21 1785/4 1785/8 1786/1 1786/9 1786/11 1786/16 1786/20 1787/2 1788/12 1788/14 1788/18 1791/10 1792/12 1792/14 1793/1 1794/15 1794/21 1794/24 1795/2 1797/19 1803/19 1821/17 1821/17 1825/23 1827/7 1831/2 1831/2 1832/21 1832/21 1833/8 1835/19 1836/5 1836/9 1843/19 1843/19 1843/20 1869/21 1872/2 1873/4 1873/13 1873/20 1875/19 1876/18 1876/18 1877/3 1878/23 1880/24 1881/20 1882/7 1882/12 1882/18 1883/5 1883/8 1883/10 1883/22 1885/3 1886/23 1887/11 1887/23 1887/25 1888/1 1888/3 1888/4 1888/7 1888/7 1890/25 1891/10 1892/10 1892/24 1893/7 1893/14 1893/20 1894/21 1894/24 1894/24 1898/3 1905/22 1909/10 1909/14 1910/1 1911/25 1914/17 1914/17 1926/10 1926/12 1933/14 1935/7 1935/7 1935/14 1936/1 No. [4] 1797/9 1800/9 1800/16 1878/10 No. 2 [1] 1800/9 No. 3 [1] 1797/9 No. 6 [1] 1800/16 No. C-138 [1] 1878/10</p>	<p>No.2 [1] 1831/8 nondisclosure [1] 1759/7 nonresponse [1] 1740/18 not [243] not an [1] 1936/10 notation [2] 1760/5 1764/2 note [4] 1765/12 1781/18 1878/14 1890/2 noted [2] 1879/21 1910/17 nothing [6] 1764/4 1775/23 1826/12 1934/14 1937/6 1940/2 notice [41] 1743/16 1743/21 1744/8 1745/3 1746/9 1746/10 1746/13 1746/20 1746/21 1747/2 1747/7 1747/17 1747/19 1747/23 1748/1 1748/11 1748/15 1748/25 1749/9 1749/11 1749/16 1750/3 1750/13 1753/6 1784/5 1784/6 1789/8 1790/19 1790/25 1791/2 1791/6 1791/9 1791/12 1791/12 1791/16 1791/19 1791/21 1792/3 1792/4 1793/10 1794/19 notices [1] 1750/18 notification [1] 1768/11 notified [7] 1743/23 1746/1 1746/19 1747/10 1760/1 1763/25 1790/9 notifying [4] 1791/18 1791/20 1791/24 1792/8 notwithstanding [2] 1757/10 1760/3 November [5] 1751/10 1781/11 1782/7 1782/15 1782/24 November 1 [1] 1782/7 November 11 [1] 1782/24 November 2021 [1] 1751/10 November 2022 [1] 1781/11</p>	<p>now [58] 1738/11 1740/22 1743/14 1743/20 1743/22 1744/6 1744/24 1744/24 1745/18 1746/24 1747/12 1747/16 1748/14 1749/6 1752/6 1756/3 1757/4 1759/9 1761/20 1763/3 1764/10 1765/18 1771/13 1777/19 1777/23 1779/2 1779/6 1780/15 1785/7 1787/12 1788/7 1797/21 1798/8 1801/16 1817/5 1821/10 1825/1 1826/2 1826/5 1827/1 1827/8 1833/9 1835/3 1865/21 1866/25 1872/8 1872/12 1879/18 1888/21 1888/25 1889/4 1894/20 1931/7 1932/16 1933/22 1933/24 1934/16 1939/9 nowhere [2] 1765/24 1771/23 null [2] 1788/4 1789/5 nullity [14] 1743/7 1743/9 1743/11 1743/12 1786/15 1787/1 1787/1 1787/23 1787/24 1788/1 1789/17 1789/20 1790/23 1791/4 number [23] 1750/5 1751/5 1754/25 1765/19 1782/8 1783/10 1790/6 1790/7 1791/17 1792/13 1800/1 1830/7 1830/9 1872/1 1875/16 1875/17 1875/18 1875/20 1878/1 1879/6 1880/4 1914/2 1918/23 numbers [2] 1796/16 1869/25 numerous [1] 1934/11</p>	<p>objections [2] 1761/20 1821/15 objective [5] 1782/18 1840/10 1842/23 1875/18 1888/6 obligates [1] 1767/2 obligation [9] 1766/20 1766/24 1767/6 1767/16 1767/17 1767/17 1777/3 1793/4 1793/9 obligations [2] 1765/20 1777/7 obtain [2] 1894/14 1910/20 obtaining [2] 1771/10 1910/10 obvious [1] 1936/10 obviously [6] 1736/11 1828/11 1842/17 1867/17 1873/21 1937/20 occur [1] 1834/11 occurred [1] 1882/22 off [4] 1766/1 1798/25 1799/25 1867/23 offered [1] 1751/6 office [10] 1760/17 1760/19 1761/1 1761/25 1783/16 1783/17 1784/14 1784/22 1784/24 1785/5 officer [5] 1791/18 1791/20 1791/24 1792/9 1867/24 official [4] 1738/17 1757/11 1905/19 1939/15 often [2] 1796/15 1803/22 oftentimes [2] 1791/14 1792/1 Oh [2] 1752/22 1832/19 okay [42] 1737/3 1739/10 1739/14 1742/20 1744/6 1747/12 1748/23 1750/21 1752/5 1752/6 1752/11 1752/22 1765/3 1777/22 1778/4 1779/23 1785/17 1789/17 1789/18 1790/24 1792/5 1792/22 1794/20 1817/9 1827/11 1827/16 1844/4 1844/5 1868/24</p>
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[13] 1872/4 1872/8 1872/23 1881/3 1881/4 1889/4 1889/8 1909/4 1925/22 1926/2 1932/9 1935/22 1938/13</p> <p>old [1] 1802/11</p> <p>omits [1] 1741/20</p> <p>once [14] 1743/4 1744/2 1745/4 1747/8 1748/9 1748/10 1782/4 1787/20 1787/21 1789/8 1884/14 1885/3 1925/21 1937/15</p> <p>one [82] 1737/8 1737/17 1739/4 1741/2 1741/3 1741/21 1741/24 1753/19 1762/11 1763/4 1774/3 1774/4 1777/23 1786/22 1787/12 1788/15 1788/18 1821/11 1825/9 1825/16 1826/13 1829/14 1829/16 1830/11 1830/12 1831/7 1831/10 1831/18 1831/22 1832/11 1832/12 1832/13 1832/15 1832/16 1832/23 1832/23 1833/2 1833/3 1833/4 1834/7 1838/7 1838/14 1865/13 1869/2 1870/16 1873/11 1874/5 1878/12 1878/19 1879/8 1879/9 1881/5 1885/19 1885/20 1890/11 1893/8 1893/22 1894/12 1896/20 1897/8 1900/7 1905/11 1910/23 1913/1 1915/5 1915/6 1915/8 1918/23 1918/24 1919/19 1919/20 1926/2 1931/15 1933/4 1934/21 1935/9 1936/7 1936/13 1936/20 1937/2 1937/11 1938/19</p> <p>one-line [1] 1741/21</p> <p>ones [3] 1774/10 1774/11 1911/7</p> <p>ongoing [1] 1889/21</p> <p>online [1] 1828/22</p> <p>only [25] 1738/3</p>	<p>1743/7 1743/15 1744/3 1763/4 1784/13 1784/14 1825/23 1829/18 1831/23 1831/24 1841/3 1867/9 1868/18 1880/14 1885/15 1888/24 1900/17 1909/22 1911/2 1912/11 1913/1 1931/20 1931/24 1935/9</p> <p>Ontario [5] 1745/9 1913/11 1913/12 1913/13 1913/19</p> <p>onward [1] 1937/20</p> <p>onwards [1] 1891/22</p> <p>open [4] 1789/11 1801/13 1932/14 1932/16</p> <p>opened [2] 1824/3 1932/18</p> <p>opening [6] 1736/18 1736/19 1743/23 1906/3 1910/4 1932/8</p> <p>operate [3] 1775/3 1893/7 1893/10</p> <p>operates [1] 1753/3</p> <p>operating [1] 1867/24</p> <p>operation [1] 1765/8</p> <p>operational [4] 1755/22 1756/16 1756/16 1893/6</p> <p>operations [5] 1802/20 1840/18 1890/4 1892/11 1895/18</p> <p>opine [2] 1895/2 1909/24</p> <p>opined [2] 1892/24 1894/4</p> <p>opinion [10] 1757/19 1764/8 1776/10 1781/16 1802/6 1804/6 1835/4 1840/1 1890/2 1890/15</p> <p>opinions [1] 1913/24</p> <p>opportunisticly [1] 1835/23</p> <p>opportunity [2] 1790/10 1804/18</p> <p>oppose [1] 1749/2</p> <p>opposed [2] 1762/22 1800/2</p> <p>opposing [2] 1768/4 1768/4</p> <p>opposition [1] 1790/18</p> <p>option [5] 1825/22 1825/22 1936/9 1936/13 1936/14</p>	<p>options [3] 1739/6 1824/9 1824/10</p> <p>oral [4] 1824/19 1824/20 1824/22 1827/8</p> <p>orchard [2] 1872/25 1873/5</p> <p>order [31] 1737/25 1739/24 1743/21 1744/25 1745/2 1745/3 1746/1 1746/2 1749/1 1753/20 1759/25 1760/3 1760/3 1762/1 1762/2 1763/24 1764/1 1764/1 1778/15 1778/18 1783/19 1783/23 1784/5 1784/7 1786/18 1796/10 1796/20 1797/9 1797/10 1797/11 1801/3</p> <p>ordered [1] 1783/19</p> <p>orders [5] 1783/23 1784/3 1797/7 1797/12 1797/15</p> <p>ordinary [1] 1935/2</p> <p>organic [2] 1760/25 1773/19</p> <p>organizations [1] 1773/12</p> <p>organized [1] 1739/23</p> <p>original [2] 1872/24 1873/4</p> <p>originally [1] 1933/7</p> <p>other [59] 1738/12 1740/4 1740/18 1752/7 1753/8 1754/19 1766/12 1766/17 1778/20 1779/18 1790/22 1793/1 1801/22 1802/22 1803/13 1803/18 1831/9 1831/10 1831/10 1832/11 1832/12 1832/15 1832/16 1832/23 1833/4 1833/11 1835/3 1835/9 1840/11 1840/16 1840/21 1865/4 1865/5 1866/20 1874/6 1874/10 1883/7 1887/18 1888/5 1891/17 1893/2 1893/8 1893/12 1893/14 1895/11 1906/21 1907/13 1907/23 1910/12 1911/11 1913/2 1913/15 1920/12</p>	<p>1934/21 1934/25 1937/3 1937/3 1938/24 1939/3</p> <p>otherwise [5] 1891/1 1906/21 1907/24 1908/4 1908/8</p> <p>our [20] 1739/6 1753/5 1775/3 1775/6 1775/17 1775/18 1775/20 1777/24 1796/19 1797/3 1802/12 1825/7 1826/23 1840/14 1872/24 1873/4 1881/18 1886/24 1933/18 1933/21</p> <p>out [20] 1748/20 1748/25 1770/22 1778/24 1786/18 1787/20 1787/21 1789/9 1791/20 1793/19 1870/17 1886/4 1898/6 1906/24 1909/19 1911/9 1932/23 1933/6 1934/2 1938/12</p> <p>outside [10] 1741/19 1750/7 1750/14 1758/18 1796/24 1838/18 1893/25 1897/7 1900/15 1920/16</p> <p>outstanding [1] 1826/9</p> <p>over [16] 1779/17 1799/5 1799/23 1801/7 1802/11 1817/23 1824/25 1831/4 1834/10 1876/9 1877/14 1889/1 1890/23 1911/6 1914/6 1914/15</p> <p>overall [1] 1894/2</p> <p>overlap [1] 1938/10</p> <p>oversees [2] 1799/16 1906/6</p> <p>own [7] 1762/18 1771/4 1793/25 1817/25 1841/5 1887/14 1925/25</p> <p>owned [1] 1759/10</p> <p>owner [1] 1756/22</p> <p>ownership [5] 1751/23 1752/25 1753/11 1767/18 1777/6</p>	<p>page [41] 1737/18 1743/6 1743/24 1744/3 1744/6 1744/19 1744/24 1747/13 1747/18 1748/18 1752/14 1755/16 1756/3 1770/19 1771/13 1773/6 1785/21 1791/9 1800/9 1800/16 1825/3 1867/20 1868/17 1868/18 1868/21 1868/25 1869/3 1869/13 1872/10 1872/12 1878/8 1880/7 1880/8 1880/10 1883/14 1889/18 1906/17 1906/18 1908/25 1910/7 1910/8</p> <p>page 3 [3] 1868/25 1869/3 1910/8</p> <p>page 39 [1] 1743/6</p> <p>page 4 [2] 1755/16 1872/12</p> <p>page 5 [2] 1743/24 1880/10</p> <p>page 55 [2] 1747/13 1747/18</p> <p>page 6 [2] 1800/9 1883/14</p> <p>page 65 [1] 1800/16</p> <p>page 7 [1] 1744/6</p> <p>page 8 [1] 1744/24</p> <p>page 9 [2] 1868/21 1869/13</p> <p>Page 92 [1] 1748/18</p> <p>paid [4] 1804/12 1871/13 1871/23 1871/24</p> <p>panel [1] 1933/19</p> <p>paragraph [49] 1736/15 1737/10 1737/10 1743/15 1745/2 1745/10 1747/24 1748/19 1751/16 1751/21 1752/15 1752/18 1752/21 1755/17 1756/9 1757/6 1764/20 1764/21 1765/5 1773/22 1774/12 1774/21 1775/13 1780/24 1781/12 1781/18 1782/9 1782/18 1783/22 1785/10 1785/12 1800/5 1800/9 1800/14 1865/1 1872/10 1872/14 1875/22 1877/3 1883/12</p>
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<p>P</p> <p>paragraph... [9] 1883/14 1889/17 1889/19 1890/11 1892/8 1907/10 1909/22 1911/3 1911/5</p> <p>paragraph 10 [1] 1875/22</p> <p>paragraph 13 [1] 1737/10</p> <p>paragraph 16.3 [1] 1781/12</p> <p>paragraph 17 [1] 1736/15</p> <p>paragraph 187 [2] 1764/20 1765/5</p> <p>paragraph 1992 [1] 1800/5</p> <p>Paragraph 2.6 [1] 1800/9</p> <p>paragraph 22 [2] 1883/12 1883/14</p> <p>paragraph 23 [1] 1773/22</p> <p>paragraph 30 [1] 1775/13</p> <p>paragraph 33 [2] 1774/12 1774/21</p> <p>paragraph 4 [1] 1755/17</p> <p>paragraph 42 [2] 1889/17 1890/11</p> <p>paragraph 43 [1] 1892/8</p> <p>paragraph 5 [5] 1745/2 1745/10 1783/22 1785/10 1785/12</p> <p>paragraph 6 [1] 1757/6</p> <p>paragraph 8.3 [2] 1800/14 1865/1</p> <p>paragraph 9 [2] 1872/10 1872/14</p> <p>paragraphs [7] 1776/1 1776/2 1783/12 1868/25 1869/4 1869/4 1869/8</p> <p>paraphrasing [1] 1774/23</p> <p>part [24] 1736/4 1743/6 1743/18 1760/19 1760/22 1771/20 1772/8 1773/3 1773/4 1774/1 1774/16 1780/23 1788/23 1799/14 1799/14 1799/22 1817/6 1817/7 1817/17 1821/16 1832/6 1841/2 1877/19 1919/9</p>	<p>PARTICIPANTS [3] 1732/1 1733/1 1734/1</p> <p>participated [1] 1830/18</p> <p>particular [13] 1749/8 1763/1 1766/10 1770/1 1770/18 1787/11 1797/6 1836/14 1837/1 1839/10 1871/4 1874/12 1893/8</p> <p>particularly [3] 1745/7 1839/20 1894/9</p> <p>parties [23] 1736/4 1736/13 1736/15 1737/1 1737/2 1739/22 1740/23 1741/11 1778/11 1784/1 1785/2 1785/5 1787/9 1796/8 1824/14 1824/18 1825/2 1825/4 1825/15 1826/14 1826/14 1840/4 1934/18</p> <p>parties' [1] 1824/5</p> <p>parts [2] 1937/1 1937/8</p> <p>party [22] 1733/17 1734/15 1736/23 1768/3 1768/4 1773/2 1782/12 1782/20 1784/19 1786/22 1788/24 1790/16 1790/19 1791/3 1791/18 1794/18 1831/6 1832/1 1889/20 1892/13 1906/21 1907/23</p> <p>pass [1] 1912/1</p> <p>passage [1] 1753/23</p> <p>past [5] 1803/2 1821/11 1870/16 1889/6 1907/22</p> <p>patient [1] 1888/13</p> <p>Paul [2] 1734/12 1762/18</p> <p>Paul Reichler [1] 1762/18</p> <p>pause [1] 1749/23</p> <p>pauses [1] 1749/21</p> <p>pay [1] 1891/20</p> <p>payment [1] 1768/25</p> <p>pdf [3] 1743/6 1744/6 1748/18</p> <p>peaceful [1] 1742/20</p> <p>peers [1] 1918/21</p> <p>Pena [1] 1733/8</p> <p>penalties [1] 1794/5</p> <p>penalty [5] 1794/7</p>	<p>1794/9 1794/11 1794/15 1794/17</p> <p>people [10] 1738/3 1738/3 1840/14 1841/17 1869/10 1869/15 1870/1 1882/14 1912/21 1926/2</p> <p>people or [1] 1738/3</p> <p>per [12] 1783/21 1785/10 1875/24 1876/6 1876/9 1876/12 1876/17 1876/18 1876/24 1877/11 1877/13 1879/17</p> <p>percent [3] 1868/16 1881/9 1919/3</p> <p>percentage [3] 1900/13 1900/21 1914/21</p> <p>performance [4] 1802/24 1802/24 1803/2 1803/6</p> <p>perhaps [7] 1754/15 1754/16 1754/19 1763/3 1783/12 1788/2 1885/11</p> <p>period [15] 1768/23 1769/23 1770/4 1770/5 1787/25 1788/14 1790/10 1790/12 1790/14 1790/15 1802/21 1871/19 1877/15 1881/21 1882/4</p> <p>periods [3] 1770/6 1770/12 1796/2</p> <p>perishable [1] 1837/9</p> <p>permit [1] 1893/22</p> <p>permits [15] 1775/2 1775/5 1836/13 1837/24 1893/7 1893/9 1893/24 1894/3 1894/13 1894/14 1894/21 1894/25 1895/1 1895/3 1895/6</p> <p>permitted [1] 1792/7</p> <p>permitting [6] 1835/25 1836/4 1837/10 1837/14 1837/21 1838/3</p> <p>person [12] 1738/9 1749/1 1754/17 1754/24 1772/9 1785/23 1791/20 1791/23 1792/2 1792/3 1792/5 1939/14</p> <p>personal [3] 1755/2</p>	<p>1892/4 1892/5</p> <p>personally [1] 1892/4</p> <p>persons [1] 1749/11</p> <p>perspective [6] 1835/10 1837/12 1837/12 1840/25 1908/12 1913/3</p> <p>Peru [1] 1880/3</p> <p>phcouvreurh [1] 1732/7</p> <p>Philippe [2] 1731/22 1732/7</p> <p>physical [1] 1892/11</p> <p>pick [2] 1870/17 1896/20</p> <p>picked [4] 1884/5 1884/15 1884/20 1885/3</p> <p>picture [2] 1737/23 1738/9</p> <p>pictured [2] 1737/18 1738/17</p> <p>piece [3] 1738/7 1767/3 1767/3</p> <p>pieces [2] 1751/7 1939/19</p> <p>pitching [1] 1836/1</p> <p>place [20] 1794/14 1795/14 1836/4 1836/6 1836/7 1836/13 1836/24 1836/24 1837/14 1837/17 1837/17 1837/18 1837/22 1837/22 1838/7 1886/23 1887/5 1887/6 1893/19 1934/10</p> <p>placed [3] 1752/1 1836/6 1886/6</p> <p>plaintiffs [3] 1799/6 1912/20 1912/24</p> <p>plan [20] 1755/22 1756/15 1756/24 1764/22 1765/6 1765/9 1772/18 1772/24 1835/11 1835/20 1836/25 1837/5 1837/25 1838/13 1838/15 1840/7 1885/2 1885/4 1892/13 1935/3</p> <p>planned [4] 1824/6 1824/20 1825/12 1890/5</p> <p>plans [10] 1755/22 1756/16 1756/16 1837/18 1837/19 1837/19 1838/6 1838/23 1839/18 1880/9</p> <p>plantation [15]</p>	<p>1876/2 1879/7 1879/14 1879/23 1880/2 1880/14 1881/6 1881/10 1882/5 1882/6 1882/24 1883/21 1887/23 1909/13 1910/1</p> <p>plantations [1] 1879/2</p> <p>planted [6] 1872/18 1873/19 1874/8 1875/3 1877/16 1880/15</p> <p>planting [3] 1872/16 1873/14 1874/24</p> <p>plastic [2] 1886/6 1886/12</p> <p>please [36] 1737/13 1741/7 1742/4 1742/22 1747/15 1749/23 1751/14 1753/9 1753/15 1761/18 1763/18 1766/2 1766/7 1769/18 1777/21 1778/1 1778/23 1779/7 1780/13 1780/18 1781/14 1781/15 1783/3 1783/7 1785/16 1785/17 1788/1 1798/9 1798/21 1827/22 1833/1 1867/7 1876/13 1883/13 1911/18 1934/4</p> <p>pledge [3] 1891/4 1891/6 1891/13</p> <p>plenty [1] 1933/20</p> <p>plot [2] 1882/11 1882/16</p> <p>plus [3] 1736/16 1796/13 1797/15</p> <p>PO11 [2] 1736/13 1736/15</p> <p>point [15] 1740/24 1742/2 1750/12 1770/25 1783/14 1792/22 1826/17 1843/15 1877/19 1882/10 1897/20 1912/25 1932/5 1932/6 1933/24</p> <p>pointed [1] 1937/17</p> <p>portion [1] 1937/2</p> <p>portions [1] 1937/3</p> <p>pose [1] 1937/8</p> <p>posed [1] 1762/10</p> <p>posing [1] 1749/24</p> <p>position [5] 1751/22 1779/2 1799/10 1801/1 1802/8</p>
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[19] 1731/21 1737/15 1741/13 1758/22 1761/7 1761/19 1778/8 1778/14 1779/12 1779/25</p>	<p>1787/17 1827/4 1827/12 1827/23 1867/23 1889/10 1926/8 1931/13 1939/6</p> <p>press [1] 1757/9</p> <p>pressure [1] 1775/17</p> <p>pretty [1] 1736/25</p> <p>prevented [1] 1775/19</p> <p>preventive [2] 1776/6 1782/14</p> <p>price [4] 1801/9 1804/12 1900/8 1900/9</p> <p>pricing [2] 1800/17 1800/18</p> <p>primary [2] 1803/18 1877/20</p> <p>principle [1] 1788/22</p> <p>prior [2] 1760/2 1763/25</p> <p>private [14] 1755/18 1755/21 1756/10 1756/12 1756/15 1756/20 1758/7 1771/8 1771/11 1771/21 1772/10 1772/20 1777/4 1777/4</p> <p>probably [2] 1830/3 1932/6</p> <p>problem [1] 1905/22</p> <p>problems [1] 1751/17</p> <p>procedural [12] 1778/15 1788/22 1789/24 1796/10 1797/8 1797/10 1797/11 1797/16 1932/10 1938/18 1938/24 1939/1</p> <p>procedurally [1] 1790/18</p> <p>procedure [19] 1743/3 1743/13 1748/18 1765/20 1766/9 1767/12 1773/18 1773/19 1783/22 1785/11 1785/13 1786/4 1788/6 1788/13 1791/15 1793/7 1934/2 1934/9 1935/17</p> <p>proceed [17] 1761/18 1764/14 1766/7 1769/18 1778/4 1779/18 1779/21 1779/23 1796/20 1797/24 1798/21 1826/12</p>	<p>1878/3 1932/14 1936/17 1938/9 1938/14</p> <p>proceeding [7] 1737/2 1744/23 1771/20 1773/2 1779/20 1785/23 1798/5</p> <p>proceedings [1] 1793/15</p> <p>process [13] 1753/12 1761/23 1763/10 1763/12 1784/17 1786/16 1797/16 1799/16 1883/21 1884/15 1887/22 1913/14 1913/17</p> <p>processed [1] 1756/23</p> <p>processing [1] 1786/5</p> <p>produce [4] 1737/11 1738/23 1879/23 1909/8</p> <p>produced [3] 1877/16 1885/9 1885/19</p> <p>producing [1] 1877/14</p> <p>product [1] 1909/20</p> <p>production [1] 1872/13</p> <p>profession [3] 1799/12 1906/6 1907/22</p> <p>professional [2] 1799/1 1866/21</p> <p>professor [5] 1733/6 1742/21 1758/6 1777/25 1795/4</p> <p>profits [2] 1799/19 1915/3</p> <p>prohibitive [2] 1894/7 1895/4</p> <p>project [4] 1785/14 1836/1 1840/2 1909/18</p> <p>projected [1] 1784/3</p> <p>projections [5] 1874/22 1875/13 1875/18 1894/17 1895/10</p> 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<p>P</p> <p>public... [8] 1758/11 1758/15 1760/5 1760/12 1764/3 1768/12 1768/18 1782/1</p> <p>publication [3] 1757/9 1757/11 1758/1</p> <p>publicly [1] 1803/11</p> <p>published [3] 1757/15 1875/13 1911/22</p> <p>pull [1] 1912/17</p> <p>purchase [4] 1753/1 1753/7 1754/8 1900/8</p> <p>purchased [1] 1900/9</p> <p>purports [1] 1932/24</p> <p>purpose [4] 1766/17 1783/15 1800/25 1911/13</p> <p>purposes [1] 1755/25</p> <p>purview [1] 1920/17</p> <p>put [30] 1753/19 1762/14 1762/25 1780/7 1780/24 1781/14 1784/12 1785/16 1786/6 1801/1 1802/7 1833/6 1837/18 1837/22 1838/15 1842/7 1842/12 1875/9 1882/9 1885/12 1891/8 1895/14 1905/12 1907/6 1907/16 1908/18 1908/21 1925/24 1936/4 1938/4</p> <p>puts [1] 1935/25</p> <p>putting [3] 1826/19 1867/6 1889/11</p> <hr/> <p>Q</p> <p>qualification [5] 1793/1 1907/7 1908/18 1908/21 1913/14</p> <p>qualifications [1] 1913/16</p> <p>qualified [5] 1799/19 1906/23 1913/18 1935/24 1936/15</p> <p>qualifies [1] 1799/16</p> <p>quantification [2] 1800/22 1800/25</p> <p>quantify [1] 1801/3</p> <p>quantity [1] 1876/6</p> <p>quantum [6] 1825/19 1833/12 1842/1 1893/2 1894/6</p>	<p>1920/15</p> <p>quarter [1] 1889/6</p> <p>quarterback [1] 1933/14</p> <p>query [1] 1736/7</p> <p>question [92] 1737/8 1741/4 1749/21 1749/24 1755/5 1755/6 1761/14 1762/10 1763/5 1763/14 1764/14 1764/15 1764/16 1765/2 1765/3 1769/12 1769/14 1769/15 1769/17 1769/21 1770/5 1771/2 1773/5 1774/18 1774/20 1776/4 1778/8 1779/5 1779/16 1783/7 1786/19 1791/5 1795/21 1825/17 1826/13 1829/25 1830/3 1831/2 1831/25 1833/1 1833/2 1833/9 1837/17 1841/6 1841/10 1841/14 1865/3 1865/12 1870/13 1871/11 1871/20 1873/7 1873/17 1873/17 1874/18 1875/16 1877/1 1877/8 1881/13 1882/3 1883/18 1884/13 1884/17 1884/25 1885/23 1887/9 1888/5 1888/16 1888/19 1890/7 1894/12 1894/19 1895/5 1896/19 1897/3 1897/23 1900/20 1908/6 1909/22 1910/20 1914/20 1914/23 1931/7 1933/15 1934/12 1935/9 1935/10 1935/25 1936/4 1936/5 1936/15 1937/21</p> <p>questioning [5] 1817/14 1885/1 1888/25 1889/1 1889/3</p> <p>questions [43] 1737/3 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<p>Rapid [2] 1770/22 1771/1</p> <p>rate [1] 1834/6</p> <p>rather [11] 1745/21 1765/22 1777/7 1778/9 1785/4 1786/22 1791/6 1797/22 1801/17 1841/2 1841/13</p> <p>ratified [2] 1773/16 1773/17</p>	<p>ray [3] 1771/8 1772/12 1772/13</p> <p>reach [4] 1741/24 1742/10 1792/20 1898/6</p> <p>reached [1] 1802/21</p> <p>react [1] 1841/21</p> <p>read [44] 1737/23 1752/4 1753/23 1754/18 1754/25 1755/4 1755/7 1755/12 1763/23 1775/8 1775/9 1776/2 1781/13 1781/19 1783/4 1783/7 1783/9 1783/11 1783/12 1785/7 1785/8 1785/19 1785/19 1788/23 1791/9 1800/4 1800/9 1800/14 1800/19 1817/25 1828/15 1839/6 1871/3 1871/4 1878/20 1879/4 1879/15 1880/23 1885/16 1896/24 1907/9 1907/10 1908/1 1908/24</p> <p>reader [2] 1782/11 1782/19</p> <p>reading [8] 1752/19 1752/20 1776/15 1828/20 1908/11 1908/12 1908/13 1925/12</p> <p>reads [1] 1870/25</p> <p>ready [6] 1740/20 1777/19 1779/18 1833/25 1891/19 1909/2</p> <p>real [1] 1783/18</p> <p>really [5] 1871/16 1887/25 1888/7 1888/13 1933/21</p> <p>realm [1] 1838/1</p> <p>reason [7] 1750/23 1759/16 1760/9 1771/19 1802/12 1876/19 1931/24</p> <p>reasonability [1] 1920/7</p> <p>reasonable [11] 1801/15 1843/2 1843/21 1866/22 1875/6 1877/5 1877/6 1877/7 1879/12 1919/15 1919/21</p> <p>reasonably [4] 1895/8 1910/16 1911/16 1932/3</p> <p>reasons [4] 1765/8 1907/6 1931/25 1938/24</p>	<p>rebuttals [1] 1825/10</p> <p>recall [10] 1736/14 1762/16 1770/25 1886/14 1886/20 1925/12 1931/14 1935/11 1938/23 1939/17</p> <p>receipt [1] 1871/21</p> <p>receive [3] 1740/12 1791/19 1827/4</p> <p>received [12] 1737/4 1739/17 1741/15 1746/9 1767/1 1768/22 1782/2 1782/7 1842/25 1866/18 1871/9 1898/1</p> <p>receiving [1] 1793/24</p> <p>Recess [4] 1778/3 1795/16 1824/1 1889/7</p> <p>recognition [4] 1755/18 1756/10 1756/12 1771/11</p> <p>recognize [1] 1933/2</p> <p>recollection [1] 1746/24</p> <p>reconsider [1] 1786/18</p> <p>reconsideration [2] 1786/13 1787/3</p> <p>reconvene [1] 1939/24</p> <p>record [31] 1737/6 1739/22 1759/9 1759/13 1761/18 1764/13 1773/3 1773/4 1786/3 1798/8 1824/2 1825/1 1827/1 1829/2 1829/19 1830/9 1831/12 1841/25 1842/8 1844/3 1865/2 1866/16 1868/20 1880/13 1881/15 1882/20 1892/2 1905/17 1905/20 1925/24 1925/24</p> <p>record's [1] 1836/20</p> <p>records [5] 1895/23 1895/23 1895/24 1896/15 1897/17</p> <p>red [2] 1796/11 1797/1</p> <p>redirect [6] 1777/19 1778/21 1779/13 1780/1 1912/3 1912/6</p> <p>reducing [1] 1876/20</p> <p>REED [3] 1733/10 1832/2 1925/22</p>
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<p>R</p> <p>refer [9] 1749/9 1770/16 1770/19 1774/12 1775/13 1781/12 1785/13 1786/10 1790/24</p> <p>reference [19] 1737/10 1744/3 1748/9 1748/10 1771/24 1780/12 1780/25 1786/12 1788/16 1790/15 1792/13 1797/10 1797/12 1875/23 1878/9 1883/15 1892/9 1905/15 1905/18</p> <p>referenced [1] 1880/19</p> <p>references [1] 1788/21</p> <p>referred [3] 1786/2 1893/9 1939/19</p> <p>referring [14] 1780/19 1780/20 1785/24 1785/25 1790/13 1829/3 1839/20 1840/12 1842/9 1878/7 1879/14 1882/21 1896/6 1896/17</p> <p>refers [2] 1786/17 1787/3</p> <p>reflect [2] 1800/17 1843/12</p> <p>reflective [2] 1804/11 1804/13</p> <p>refuses [3] 1791/11 1791/12 1791/19</p> <p>regard [1] 1753/12</p> <p>regarding [5] 1752/25 1763/21 1768/9 1786/5 1912/15</p> <p>Regina [1] 1732/17</p> <p>region [1] 1835/20</p> <p>registration [1] 1754/15</p> <p>registry [6] 1760/6 1760/12 1764/3 1776/17 1782/1 1783/19</p> <p>regulated [1] 1769/22</p> <p>regulation [2] 1768/15 1771/10</p> <p>regulatory [1] 1919/4</p> <p>Reichler [1] 1762/18</p> <p>related [15] 1737/13 1738/15 1763/15 1765/20 1777/3 1782/1 1782/13</p>	<p>1782/22 1790/4 1792/11 1799/18 1868/13 1895/17 1937/19 1939/7</p> <p>relates [1] 1800/21</p> <p>relating [1] 1913/24</p> <p>relation [1] 1939/1</p> <p>relationship [1] 1759/2</p> <p>relationships [1] 1759/7</p> <p>relative [6] 1743/7 1743/9 1787/1 1787/23 1787/25 1789/16</p> <p>relatively [1] 1938/19</p> <p>released [3] 1769/24 1795/5 1796/21</p> <p>relevant [17] 1738/16 1738/19 1758/20 1759/1 1761/6 1761/8 1763/13 1801/15 1835/6 1836/8 1871/19 1875/12 1877/22 1881/21 1882/2 1882/4 1937/22</p> <p>reliable [2] 1843/17 1843/18</p> <p>relied [3] 1762/6 1867/2 1909/11</p> <p>rely [5] 1803/2 1866/22 1894/3 1920/11 1920/16</p> <p>remaining [5] 1736/8 1736/20 1798/17 1826/8 1931/20</p> <p>remedies [5] 1786/12 1789/7 1789/25 1790/6 1790/22</p> <p>remedy [3] 1790/13 1791/3 1791/4</p> <p>remember [15] 1766/14 1788/2 1833/18 1864/20 1864/24 1870/12 1870/14 1873/8 1876/7 1886/11 1886/24 1887/7 1887/8 1925/19 1931/23</p> <p>remind [4] 1787/9 1798/16 1885/11 1931/21</p> <p>reminder [1] 1777/25</p> <p>reminding [2] 1739/22 1932/17</p> <p>removal [1] 1763/16</p>	<p>removed [2] 1761/5 1761/8</p> <p>Renaldy [2] 1775/4 1894/4</p> <p>renewal [2] 1791/7 1793/11</p> <p>renewing [1] 1746/2</p> <p>rep [3] 1911/6 1911/6 1911/11</p> <p>repeat [2] 1765/3 1894/19</p> <p>repetitive [1] 1869/18</p> <p>replace [1] 1802/11</p> <p>replaced [2] 1824/7 1824/13</p> <p>Reply [1] 1739/18</p> <p>report [82] 1736/8 1744/21 1755/15 1755/15 1757/18 1758/18 1761/9 1763/8 1763/8 1764/7 1768/20 1770/18 1770/18 1770/23 1771/2 1771/4 1771/13 1773/24 1774/5 1774/16 1776/13 1781/9 1781/13 1796/6 1797/21 1798/20 1800/1 1800/8 1817/8 1829/19 1830/1 1831/5 1831/19 1831/23 1831/24 1832/1 1832/5 1832/17 1833/5 1834/17 1839/7 1843/24 1864/25 1868/1 1868/6 1868/13 1873/2 1873/7 1876/19 1877/4 1877/12 1878/11 1879/19 1886/19 1890/2 1894/23 1895/19 1895/25 1896/3 1897/1 1897/20 1898/2 1906/23 1906/25 1907/4 1907/7 1907/17 1908/10 1908/14 1908/16 1910/15 1910/18 1911/2 1911/3 1911/17 1911/22 1919/23 1926/16 1935/13 1937/16 1937/17 1938/3</p> <p>Reporter [2] 1732/16 1732/17</p> <p>REPORTERS [1] 1732/15</p> <p>reports [31] 1796/6</p>	<p>1796/13 1797/21 1799/17 1804/4 1828/24 1829/6 1829/10 1832/7 1833/11 1840/3 1841/22 1841/23 1842/1 1864/14 1867/10 1875/9 1876/14 1882/16 1890/15 1897/9 1906/13 1914/18 1915/6 1919/6 1934/17 1935/12 1935/14 1937/2 1937/2 1937/25</p> <p>represent [3] 1780/11 1829/5 1830/19</p> <p>representation [14] 1780/20 1869/9 1876/21 1876/24 1887/10 1887/13 1890/1 1890/10 1892/16 1892/22 1896/8 1910/13 1910/22 1911/24</p> <p>representations [6] 1887/19 1888/6 1897/13 1910/10 1910/11 1920/11</p> <p>representative [2] 1734/15 1749/11</p> <p>representatives [5] 1733/17 1755/9 1756/21 1838/16 1910/12</p> <p>represented [8] 1762/21 1767/13 1830/24 1831/6 1832/2 1896/8 1919/24 1934/20</p> <p>represents [2] 1760/21 1760/24</p> <p>REPUBLIC [8] 1731/8 1743/25 1753/3 1766/25 1767/18 1768/3 1780/5 1800/24</p> <p>request [16] 1737/5 1737/9 1737/11 1738/25 1739/19 1740/8 1749/2 1754/22 1767/25 1768/12 1771/7 1774/9 1781/2 1783/15 1821/14 1825/8</p> <p>requested [5] 1750/10 1750/22 1782/15 1783/16 1792/23</p> <p>requesting [2] 1738/23 1785/23</p>	<p>requests [1] 1744/1</p> <p>require [4] 1753/9 1889/20 1893/7 1893/9</p> <p>required [11] 1753/5 1767/21 1792/12 1792/15 1792/15 1892/10 1892/25 1893/24 1894/13 1894/14 1919/10</p> <p>requirement [1] 1772/9</p> <p>requirements [2] 1771/9 1794/22</p> <p>requires [1] 1778/18</p> <p>reserve [12] 1755/19 1755/21 1756/11 1756/13 1756/15 1756/20 1756/22 1771/8 1771/11 1771/22 1772/11 1772/21</p> <p>resignation [1] 1762/17</p> <p>resolution [19] 1755/14 1755/16 1757/5 1757/8 1757/15 1757/19 1757/21 1757/22 1757/23 1757/25 1758/2 1772/22 1772/23 1783/21 1785/9 1786/7 1787/5 1891/5 1891/14</p> <p>resolutions [1] 1743/15</p> <p>resolve [1] 1742/7</p> <p>resources [3] 1755/24 1837/4 1889/22</p> <p>respect [13] 1761/24 1762/1 1762/15 1778/21 1787/5 1787/18 1797/7 1883/6 1891/14 1894/2 1894/6 1897/16 1908/13</p> <p>respectful [1] 1896/18</p> <p>respects [2] 1839/11 1839/14</p> <p>respond [3] 1739/21 1740/11 1740/20</p> <p>respondent [15] 1731/9 1734/3 1736/22 1739/12 1739/18 1740/11 1763/15 1797/18 1821/16 1830/20 1920/8 1932/24 1934/3 1936/6 1936/16</p> <p>Respondent's [5]</p>
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[5] 1737/5 1739/18 1909/14 1909/17 1939/25</p> <p>respondents [2] 1799/7 1912/20</p> <p>respondents/defendants [1] 1912/20</p> <p>responding [1] 1754/4</p> <p>response [2] 1740/12 1763/20</p> <p>restitution [3] 1802/6 1802/6 1802/13</p> <p>restrictive [1] 1894/7</p> <p>result [1] 1892/12</p> <p>resulted [1] 1790/9</p> <p>resulting [1] 1800/22</p> <p>resume [2] 1795/18 1940/6</p> <p>retained [4] 1799/6 1912/19 1912/23 1913/1</p> <p>return [4] 1754/21 1834/7 1834/9 1834/12</p> <p>returned [1] 1804/19</p> <p>returning [1] 1753/16</p> <p>revenues [1] 1803/7</p> <p>review [8] 1762/6 1763/3 1773/22 1773/23 1774/6 1774/9 1800/6 1897/9</p> <p>reviewed [7] 1770/17 1771/24 1774/4 1774/5 1774/8 1774/15 1910/14</p> <p>revise [2] 1873/2 1873/12</p> <p>revised [2] 1800/17 1800/18</p> <p>Rica [1] 1885/6</p> <p>Ricky [10] 1734/13 1867/6 1867/21 1870/19 1880/7 1885/12 1889/11 1895/13 1905/12 1908/25</p> <p>right [62] 1746/24 1748/2 1748/5 1750/23 1752/5 1752/21 1753/18 1758/12 1761/5 1766/5 1767/14 1770/5 1775/11 1776/23 1779/1 1786/14 1786/21</p>	<p>1788/10 1788/18 1789/22 1789/23 1792/2 1834/4 1835/23 1838/20 1840/7 1865/22 1868/11 1869/6 1871/7 1873/3 1873/7 1873/11 1873/25 1874/13 1874/14 1877/12 1879/24 1880/18 1880/19 1884/15 1885/18 1885/21 1890/11 1890/14 1891/4 1891/17 1894/20 1895/5 1896/4 1896/23 1900/3 1905/18 1906/7 1909/6 1909/16 1909/19 1911/1 1919/19 1932/6 1933/8 1935/16</p> <p>rights [1] 1770/10</p> <p>rigorous [1] 1913/17</p> <p>ring [1] 1773/25</p> <p>RIVERSIDE [63] 1731/5 1744/4 1744/7 1744/11 1744/15 1744/21 1745/4 1745/25 1746/7 1746/8 1746/13 1746/19 1747/9 1747/10 1748/11 1750/25 1751/20 1753/25 1760/4 1760/5 1764/2 1764/3 1768/4 1768/5 1776/9 1776/21 1777/9 1781/9 1787/19 1790/8 1790/9 1793/11 1800/2 1801/1 1801/4 1842/13 1843/1 1867/14 1868/4 1874/11 1875/5 1876/1 1876/4 1880/16 1885/19 1886/21 1889/17 1890/3 1890/16 1890/20 1891/1 1891/5 1891/11 1891/19 1891/21 1891/23 1896/21 1897/20 1909/8 1909/23 1911/14 1911/21 1911/23</p> <p>Riverside's [5] 1767/13 1885/8 1887/18 1894/22 1909/25</p> <p>RL [1] 1785/17</p> <p>RL-0001 [1] 1785/17</p> <p>Roberts [1] 1732/21</p>	<p>rogatory [5] 1746/23 1747/1 1750/15 1793/14 1793/23</p> <p>role [1] 1920/16</p> <p>Rondón [12] 1733/18 1733/19 1748/15 1749/17 1750/3 1750/7 1750/14 1867/21 1872/1 1885/9 1886/2 1890/10</p> <p>Rondón's [1] 1925/13</p> <p>room [1] 1795/15</p> <p>roughly [4] 1881/8 1881/9 1882/21 1900/12</p> <p>round [2] 1825/9 1889/5</p> <p>rounds [1] 1825/16</p> <p>rule [4] 1743/17 1760/6 1761/11 1789/24</p> <p>ruled [1] 1763/6</p> <p>rules [5] 1760/25 1791/17 1793/25 1798/16 1821/12</p> <p>ruling [1] 1934/1</p> <p>run [1] 1825/18</p> <p>rush [1] 1827/7</p> <p>Russ [2] 1870/18 1870/22</p> <hr/> <p>S</p> <p>SA [1] 1747/19</p> <p>said [54] 1738/20 1749/15 1751/4 1754/23 1758/7 1763/23 1766/23 1775/11 1778/23 1780/19 1781/10 1781/10 1782/13 1784/23 1787/14 1790/8 1791/10 1791/25 1792/11 1830/4 1834/9 1840/1 1841/8 1843/3 1843/4 1870/7 1872/17 1872/20 1872/21 1872/24 1874/2 1876/22 1876/24 1878/4 1878/6 1879/16 1885/16 1887/3 1894/20 1894/23 1894/24 1894/24 1900/2 1907/14 1908/16 1909/11 1910/3 1912/21 1914/14 1933/10 1934/5 1934/9 1934/22 1935/3</p> <p>salary [1] 1871/20</p>	<p>same [34] 1747/13 1749/6 1752/12 1766/13 1777/25 1801/1 1801/25 1802/8 1804/19 1827/2 1829/25 1831/25 1838/14 1839/15 1840/9 1840/15 1840/20 1873/17 1877/1 1878/12 1878/19 1883/2 1883/6 1883/7 1884/13 1884/17 1887/9 1887/24 1894/4 1911/13 1932/12 1935/8 1938/3 1938/6</p> <p>sample [1] 1882/8</p> <p>samples [2] 1882/4 1883/8</p> <p>sampling [1] 1881/19</p> <p>Santa [22] 1752/25 1753/7 1753/16 1755/19 1756/21 1765/10 1765/15 1767/14 1767/16 1775/18 1776/8 1872/13 1873/20 1874/9 1878/23 1878/25 1879/23 1880/1 1882/9 1884/19 1886/23 1887/21</p> <p>Santa Fé [22] 1752/25 1753/7 1753/16 1755/19 1756/21 1765/10 1765/15 1767/14 1767/16 1775/18 1776/8 1872/13 1873/20 1874/9 1878/23 1878/25 1879/23 1880/1 1882/9 1884/19 1886/23 1887/21</p> <p>sat [1] 1906/8</p> <p>saw [2] 1871/18 1918/11</p> <p>say [38] 1738/2 1755/17 1757/18 1789/1 1792/5 1794/20 1824/20 1824/20 1825/23 1829/2 1832/12 1833/22 1835/22 1838/17 1839/11 1841/11 1842/8 1842/14 1843/17 1843/18 1876/13 1879/5 1881/11 1881/17 1890/15 1891/11 1892/21</p>	<p>1906/13 1908/10 1908/14 1911/18 1912/19 1912/23 1913/10 1914/7 1915/1 1918/19 1937/15</p> <p>saying [15] 1774/3 1784/9 1785/10 1789/17 1793/8 1832/23 1874/14 1874/24 1876/14 1880/22 1890/9 1891/10 1894/20 1900/17 1908/19</p> <p>says [58] 1744/9 1744/10 1744/11 1744/13 1745/6 1745/9 1745/10 1747/21 1747/22 1748/1 1748/3 1748/6 1748/7 1748/13 1748/19 1749/14 1751/21 1752/14 1752/23 1753/13 1754/7 1756/10 1756/11 1756/18 1757/25 1766/11 1772/7 1773/8 1781/19 1784/15 1785/8 1785/22 1786/1 1786/8 1786/20 1787/2 1787/6 1788/17 1789/3 1791/17 1837/5 1866/15 1866/24 1868/21 1870/11 1870/22 1871/5 1871/10 1873/4 1876/8 1881/18 1889/19 1897/21 1906/19 1910/8 1910/13 1911/7 1912/11</p> <p>scared [1] 1755/10</p> <p>schedule [3] 1737/1 1873/15 1874/25</p> <p>schedules [1] 1838/3</p> <p>scope [6] 1758/18 1763/7 1800/6 1824/16 1906/24 1907/16</p> <p>screen [12] 1780/13 1780/16 1781/14 1785/14 1785/16 1788/3 1865/21 1867/8 1867/10 1885/13 1885/20 1889/12</p> <p>scroll [2] 1747/18 1756/9</p> <p>second [21] 1745/15 1747/23 1752/19</p>
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<p>S</p> <p>second... [18] 1753/14 1817/8 1834/17 1839/7 1843/24 1864/25 1868/1 1873/2 1873/7 1882/19 1882/21 1886/19 1897/19 1906/17 1918/20 1919/23 1937/16 1938/17</p> <p>seconds [1] 1749/23</p> <p>secretary [3] 1732/12 1736/9 1739/21</p> <p>section [9] 1744/7 1785/7 1785/24 1880/8 1880/10 1937/17 1937/18 1937/20 1938/4</p> <p>sector [2] 1835/14 1838/10</p> <p>securely [1] 1752/1</p> <p>security [5] 1748/2 1791/24 1791/25 1792/5 1792/6</p> <p>see [68] 1740/23 1741/8 1744/2 1744/10 1745/9 1745/10 1745/14 1745/18 1745/23 1746/5 1748/12 1748/19 1749/4 1752/3 1752/20 1753/21 1755/1 1755/17 1756/1 1756/2 1756/5 1756/6 1756/8 1756/9 1757/2 1757/6 1757/12 1757/17 1764/21 1765/16 1771/24 1772/19 1774/11 1774/17 1776/20 1776/24 1777/8 1780/15 1780/23 1796/9 1829/19 1837/20 1867/12 1867/15 1868/18 1870/22 1870/24 1872/12 1872/15 1875/24 1878/7 1880/9 1881/18 1883/16 1885/13 1886/1 1886/8 1886/9 1886/12 1886/14 1889/24 1889/25 1892/14 1892/15 1907/1 1910/18 1910/19 1911/19</p> <p>seeing [1] 1828/18</p> <p>seeking [2] 1740/21 1763/5</p> <p>seeks [1] 1789/12</p>	<p>seem [2] 1738/16 1758/20</p> <p>seems [1] 1748/21</p> <p>seen [23] 1746/7 1746/18 1746/18 1746/21 1749/18 1749/19 1750/2 1750/5 1751/3 1760/2 1763/25 1838/23 1871/21 1882/3 1882/8 1885/8 1885/23 1887/20 1891/18 1891/21 1892/2 1892/5 1893/21</p> <p>sees [1] 1792/2</p> <p>seizure [2] 1758/12 1758/13</p> <p>sell [4] 1801/14 1804/14 1885/4 1900/7</p> <p>seller [1] 1801/12</p> <p>send [6] 1779/14 1784/15 1784/18 1827/5 1827/6 1886/11</p> <p>sense [4] 1760/2 1772/7 1920/17 1936/12</p> <p>sent [8] 1736/8 1751/19 1752/12 1771/25 1793/14 1793/24 1886/15 1911/23</p> <p>sentence [1] 1756/5</p> <p>separate [1] 1838/12</p> <p>separately [1] 1866/23</p> <p>September [2] 1752/9 1867/15</p> <p>September 12 [1] 1867/15</p> <p>September 9 [1] 1752/9</p> <p>Sequeira [14] 1734/19 1735/6 1742/17 1742/21 1742/25 1751/12 1758/19 1760/11 1764/7 1764/18 1766/8 1777/25 1780/3 1781/7</p> <p>Sequeira's [1] 1780/14</p> <p>series [1] 1780/6</p> <p>served [4] 1760/4 1764/2 1799/8 1911/13</p> <p>service [2] 1791/22 1793/5</p> <p>services [3] 1792/25 1801/23 1883/16</p>	<p>servicing [3] 1869/10 1893/2 1913/5</p> <p>session [15] 1796/22 1796/23 1796/23 1797/21 1798/2 1824/3 1824/12 1825/12 1825/24 1826/7 1926/5 1932/14 1932/15 1932/17 1932/18</p> <p>sessions [1] 1931/16</p> <p>set [6] 1739/20 1784/5 1786/18 1788/14 1788/14 1906/24</p> <p>SETTLEMENT [1] 1731/2</p> <p>several [5] 1770/9 1787/18 1900/18 1934/24 1934/24</p> <p>severally [1] 1935/13</p> <p>shall [8] 1745/3 1748/25 1749/11 1757/8 1786/8 1817/9 1906/23 1910/9</p> <p>share [2] 1758/13 1827/13</p> <p>she [12] 1741/21 1761/2 1761/3 1761/5 1763/22 1763/23 1770/24 1770/25 1771/4 1776/16 1785/8 1791/9</p> <p>she's [1] 1770/21</p> <p>sheet [1] 1892/6</p> <p>ship [2] 1883/21 1887/22</p> <p>shipment [1] 1883/16</p> <p>should [38] 1738/24 1754/12 1756/19 1769/14 1774/19 1777/19 1777/20 1785/14 1792/9 1792/12 1792/14 1792/15 1794/6 1794/10 1798/7 1800/4 1800/14 1800/19 1804/2 1817/7 1824/6 1824/7 1824/23 1825/19 1826/1 1826/25 1827/9 1827/13 1831/22 1835/21 1872/11 1910/14 1911/10 1919/15 1931/8 1931/9 1931/20 1936/14</p> <p>show [4] 1751/7 1764/18 1773/20 1780/13</p> <p>showed [3] 1791/8</p>	<p>1871/19 1889/15</p> <p>showing [7] 1750/2 1751/4 1754/8 1780/22 1869/3 1869/9 1905/23</p> <p>shown [7] 1745/21 1747/7 1782/25 1788/8 1791/6 1867/11 1886/18</p> <p>shows [5] 1746/13 1757/15 1771/13 1773/6 1892/2</p> <p>side [6] 1738/12 1830/19 1830/21 1913/1 1913/15 1940/1</p> <p>side's [1] 1778/20</p> <p>sides [2] 1778/17 1913/4</p> <p>sign [6] 1748/4 1748/7 1748/8 1791/12 1792/7 1831/22</p> <p>signatory [2] 1831/23 1831/24</p> <p>signature [3] 1756/23 1791/10 1867/20</p> <p>signed [10] 1756/20 1829/14 1829/14 1830/11 1830/11 1831/21 1867/19 1867/21 1893/14 1934/17</p> <p>significance [1] 1841/16</p> <p>significant [1] 1841/12</p> <p>signs [1] 1867/23</p> <p>Silvia [1] 1732/20</p> <p>similar [3] 1839/11 1882/6 1882/19</p> <p>simple [3] 1738/11 1911/8 1938/19</p> <p>simply [5] 1781/5 1788/17 1841/10 1875/16 1910/20</p> <p>since [8] 1738/22 1753/1 1798/19 1870/4 1873/1 1885/15 1888/22 1900/5</p> <p>sincere [1] 1798/12</p> <p>single [3] 1915/5 1915/6 1919/10</p> <p>sir [10] 1752/5 1764/17 1792/10 1794/24 1798/1 1827/19 1828/4 1828/6 1896/12 1914/9</p> <p>sit [1] 1918/21</p> <p>site [1] 1738/18</p>	<p>sitting [6] 1766/5 1843/16 1891/10 1892/1 1893/21 1897/22</p> <p>situate [2] 1782/11 1782/19</p> <p>situation [6] 1789/18 1791/14 1803/4 1842/19 1843/5 1843/8</p> <p>situations [1] 1781/23</p> <p>size [1] 1881/10</p> <p>slide [13] 1780/13 1780/15 1780/22 1817/13 1817/15 1817/17 1817/18 1817/23 1833/24 1834/2 1841/21 1878/15 1912/16</p> <p>slide 1 [1] 1912/16</p> <p>slide 22 [1] 1833/24</p> <p>slide 26 [1] 1878/15</p> <p>Slide 29 [1] 1817/23</p> <p>slide 30 [2] 1817/13 1817/17</p> <p>slide 5 [2] 1780/13 1780/15</p> <p>slides [3] 1778/25 1801/17 1817/22</p> <p>SMITH [3] 1733/10 1832/2 1925/23</p> <p>so [239]</p> <p>social [3] 1739/7 1939/11 1939/12</p> <p>soil [5] 1882/3 1882/5 1882/6 1882/8 1883/8</p> <p>solemnly [1] 1798/10</p> <p>soliciting [1] 1836/1</p> <p>some [39] 1738/2 1740/7 1740/9 1740/11 1744/17 1754/15 1754/16 1768/7 1768/10 1770/6 1776/25 1780/23 1786/24 1787/24 1794/22 1795/25 1796/4 1796/18 1799/25 1800/8 1803/13 1828/20 1835/3 1838/2 1839/2 1839/14 1840/15 1842/18 1842/18 1843/10 1843/24 1870/6 1906/21 1907/23 1919/23 1925/16 1935/4 1938/10 1939/12</p> <p>somebody [8] 1738/8 1739/5</p>
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<p>S</p> <p>somebody... [6] 1786/15 1791/11 1791/22 1838/18 1933/3 1933/3</p> <p>someone [2] 1786/23 1838/20</p> <p>something [18] 1737/21 1737/22 1738/21 1739/7 1754/25 1763/11 1764/6 1765/23 1796/24 1835/14 1881/25 1891/8 1892/17 1911/4 1933/3 1934/22 1936/22 1938/25</p> <p>sometime [1] 1882/22</p> <p>sometimes [2] 1874/2 1874/3</p> <p>somewhat [5] 1803/11 1841/16 1877/7 1879/11 1935/2</p> <p>somewhere [1] 1770/23</p> <p>soon [1] 1868/14</p> <p>sorry [27] 1748/21 1749/20 1763/19 1778/7 1826/3 1826/4 1830/25 1831/2 1831/4 1831/21 1833/1 1834/7 1836/21 1836/22 1837/12 1872/21 1874/14 1876/13 1884/22 1890/16 1895/22 1905/14 1912/23 1931/14 1932/13 1932/22 1938/21</p> <p>sort [10] 1767/20 1768/14 1776/25 1784/2 1785/3 1839/19 1868/12 1881/25 1893/18 1939/15</p> <p>sought [1] 1741/22</p> <p>soul [1] 1763/9</p> <p>sound [1] 1843/1</p> <p>source [3] 1738/10 1753/4 1920/1</p> <p>Spanish [5] 1732/17 1759/19 1828/13 1828/15 1885/16</p> <p>speak [7] 1741/12 1743/22 1751/12 1778/1 1828/13 1935/12 1938/20</p> <p>speaking [5] 1782/10 1784/8 1790/18 1832/8</p>	<p>1879/25</p> <p>speaks [1] 1743/9</p> <p>specialist [2] 1892/18 1909/24</p> <p>specializes [1] 1799/3</p> <p>specific [5] 1738/15 1769/8 1770/6 1871/17 1884/6</p> <p>specifically [18] 1761/22 1800/24 1829/11 1832/8 1832/20 1833/14 1834/15 1836/25 1837/9 1869/4 1869/22 1872/17 1874/24 1876/5 1878/24 1890/15 1891/4 1939/5</p> <p>specificity [1] 1939/9</p> <p>Spector [1] 1732/17</p> <p>spelled [2] 1744/22 1745/5</p> <p>spells [2] 1744/11 1745/22</p> <p>spend [2] 1778/12 1801/16</p> <p>spoke [3] 1743/20 1790/23 1936/24</p> <p>spoken [1] 1760/11</p> <p>spread [1] 1886/4</p> <p>squarely [2] 1762/11 1762/12</p> <p>staff [4] 1869/5 1869/11 1871/5 1933/20</p> <p>staggered [1] 1877/19</p> <p>stand [2] 1797/1 1918/8</p> <p>standard [4] 1843/22 1906/19 1908/24 1919/16</p> <p>standards [10] 1801/19 1905/23 1906/10 1906/14 1918/19 1918/24 1919/1 1919/3 1919/5 1919/9</p> <p>standpoint [1] 1776/24</p> <p>stands [1] 1931/12</p> <p>start [11] 1754/4 1797/2 1798/25 1799/25 1831/4 1836/7 1868/22 1890/7 1931/8 1931/9 1931/17</p> <p>started [5] 1835/1 1840/24 1880/12 1884/9 1888/22</p> <p>starting [3] 1878/1</p>	<p>1886/1 1886/3</p> <p>starts [2] 1817/17 1880/8</p> <p>startup [1] 1803/5</p> <p>state [15] 1759/10 1760/21 1760/24 1762/21 1773/16 1777/3 1777/7 1788/6 1792/15 1792/24 1794/10 1794/15 1794/16 1824/25 1826/25</p> <p>State-owned [1] 1759/10</p> <p>stated [5] 1750/9 1776/5 1780/10 1801/6 1894/23</p> <p>statement [20] 1744/20 1762/14 1763/23 1764/13 1764/13 1764/19 1765/1 1765/5 1767/5 1773/20 1773/23 1774/10 1774/13 1774/16 1775/14 1776/3 1798/11 1892/5 1897/17 1925/13</p> <p>statements [7] 1736/10 1736/18 1736/19 1736/24 1873/23 1874/10 1874/11</p> <p>States [1] 1895/7</p> <p>statute [7] 1768/24 1769/3 1769/8 1769/19 1769/21 1770/7 1770/12</p> <p>statutes [1] 1769/25</p> <p>stay [1] 1932/15</p> <p>steps [2] 1794/10 1896/9</p> <p>still [10] 1753/21 1754/24 1779/2 1779/4 1787/1 1789/19 1825/6 1931/12 1932/3 1938/17</p> 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T	1734/13	1841/13 1865/4	1865/1 1866/15	1783/6 1783/13
table [3] 1736/12	tee [1] 1838/2	1887/18 1888/5	1866/24 1869/18	1785/9 1785/20
1800/4 1800/17	tell [6] 1783/8	1891/17 1900/8	1870/11 1870/13	1788/22 1790/23
tag [1] 1935/7	1786/7 1900/11	1913/17 1938/22	1871/3 1871/20	1791/19 1793/20
tag-teaming [1]	1911/14 1939/8	thank [61] 1737/1	1871/22 1872/4	1793/20 1797/22
1935/7	1939/10	1742/7 1742/11	1872/20 1872/24	1798/17 1804/1
take [18] 1751/2	telling [1] 1798/25	1743/19 1750/1	1875/14 1876/8	1804/13 1804/14
1753/25 1755/9	ten [5] 1798/18	1764/17 1777/17	1876/23 1877/18	1825/11 1825/17
1767/2 1767/6 1779/1	1817/15 1821/11	1777/18 1778/2	1878/9 1878/12	1827/16 1866/20
1781/18 1793/13	1919/17 1919/18	1779/25 1781/7	1880/9 1880/18	1869/13 1876/25
1793/14 1794/10	ten minutes [1]	1782/25 1785/7	1880/22 1881/12	1877/6 1877/23
1794/11 1837/25	1798/18	1787/16 1792/10	1890/11 1891/12	1878/22 1884/25
1839/3 1878/18	term [8] 1741/22	1794/3 1794/24	1894/22 1894/24	1893/24 1895/5
1889/2 1896/9	1758/13 1772/14	1794/25 1795/1	1895/22 1896/6	1897/19 1898/4
1934/13 1936/16	1788/18 1788/19	1795/4 1795/4 1795/6	1900/14 1905/16	1907/15 1907/24
taken [7] 1778/3	1793/6 1799/8	1797/19 1798/1	1908/5 1912/21	1910/13 1911/2
1787/20 1794/14	1838/12	1798/13 1798/23	1914/23 1918/9	1918/20 1920/1
1801/2 1824/1 1889/7	terms [14] 1741/5	1821/8 1827/11	1919/22 1933/6	1933/13 1933/15
1934/10	1741/5 1746/7	1827/15 1827/19	1934/7 1934/22	1936/7 1937/8
taking [2] 1788/20	1755/19 1756/13	1827/23 1828/7	1935/16 1936/2	1937/18 1939/3
1893/18	1759/1 1784/12	1831/25 1836/20	1936/23 1939/15	1939/17 1939/18
talk [13] 1746/6	1790/7 1797/4 1797/9	1841/19 1865/19	1939/20	1940/5
1747/12 1755/13	1801/9 1900/13	1869/2 1878/2	their [27] 1738/12	there [106] 1736/1
1769/23 1788/9	1935/14 1936/1	1889/10 1894/11	1750/25 1751/23	1736/3 1737/15
1837/19 1839/14	test [2] 1803/13	1895/13 1896/6	1752/1 1762/18	1744/9 1746/12
1839/15 1839/16	1918/18	1905/11 1905/21	1763/7 1763/8 1772/4	1746/16 1748/19
1841/22 1871/25	tested [1] 1804/1	1912/1 1912/3	1772/11 1776/19	1750/15 1751/4
1872/5 1933/12	testified [16]	1914/19 1926/9	1777/9 1834/10	1751/16 1752/23
talked [7] 1831/10	1758/23 1759/18	1926/10 1926/11	1835/16 1836/6	1752/24 1753/10
1831/11 1881/2	1760/9 1765/4	1926/13 1931/3	1841/5 1842/14	1758/5 1758/6
1893/12 1925/21	1769/11 1830/25	1931/3 1931/5	1843/1 1876/23	1759/25 1760/1
1933/13 1939/1	1831/3 1833/11	1932/17 1932/19	1883/22 1883/24	1761/23 1762/4
talking [17] 1737/20	1833/12 1838/10	1935/10 1939/21	1892/4 1894/7	1763/24 1763/25
1746/11 1747/8	1893/1 1906/7	1940/2 1940/4 1940/6	1919/18 1937/1	1764/25 1765/8
1750/22 1769/24	1913/10 1913/11	Thankfully [1]	1937/5 1937/16	1766/23 1767/20
1770/2 1770/4	1914/9 1914/14	1775/3	1937/16	1767/25 1770/3
1772/13 1790/22	testify [8] 1761/8	thanks [3] 1737/1	them [29] 1741/15	1770/5 1770/6 1771/6
1837/24 1839/17	1831/17 1913/14	1872/8 1873/16	1749/2 1750/6	1772/18 1773/19
1870/16 1872/16	1913/18 1933/1	that [984]	1751/24 1752/10	1774/11 1776/25
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1911/4 1933/9	testifying [8]	1738/10 1738/19	1797/13 1827/5	1780/24 1781/23
talks [3] 1737/22	1737/17 1761/15	1738/20 1739/4	1827/6 1827/7 1827/8	1782/4 1782/10
1790/3 1869/13	1761/22 1763/10	1739/8 1741/6	1827/14 1835/12	1782/14 1783/21
taught [1] 1758/5	1828/11 1831/15	1743/17 1743/17	1843/3 1843/4 1844/4	1784/9 1787/4
tax [4] 1769/1	1833/10 1913/8	1744/9 1745/6	1870/6 1870/6	1787/24 1788/4
1769/5 1769/8	testimony [16]	1747/21 1747/23	1870/10 1882/15	1788/14 1788/18
1871/21	1739/19 1762/13	1748/3 1748/6	1886/7 1887/6 1933/4	1789/13 1791/3
taxes [5] 1768/25	1762/22 1762/24	1748/18 1749/14	1933/7 1935/5	1791/16 1792/25
1769/11 1769/13	1763/9 1764/6 1778/2	1757/3 1761/1	1935/25 1936/25	1794/8 1795/2
1769/17 1792/25	1829/21 1874/20	1762/10 1763/5	1937/8	1796/12 1799/12
team [2] 1779/19	1887/18 1888/5	1771/19 1772/21	then [68] 1737/4	1800/1 1800/8
1831/20	1895/16 1909/12	1773/8 1778/16	1737/12 1737/21	1802/14 1802/22
teamed [1] 1933/23	1912/15 1920/11	1778/22 1778/23	1739/15 1739/17	1803/1 1817/14
teaming [1] 1935/7	1920/12	1781/4 1781/5 1789/6	1742/10 1742/15	1827/7 1832/23
teams [1] 1779/17	text [2] 1780/23	1795/21 1796/25	1750/16 1752/20	1835/19 1838/6
technical [8]	1798/7	1803/3 1817/16	1753/13 1756/18	1839/16 1839/24
1795/14 1796/5	textualist [1]	1826/11 1828/10	1758/8 1759/14	1843/5 1843/19
1840/11 1840/12	1907/21	1828/22 1829/20	1760/4 1761/21	1843/19 1843/20
1840/15 1881/21	than [17] 1740/18	1831/6 1832/1	1762/5 1764/2	1865/12 1871/18
1881/23 1883/10	1778/9 1832/15	1835/11 1835/20	1773/16 1779/10	1872/17 1873/21
technically [2]	1832/16 1832/23	1837/4 1838/12	1779/16 1779/21	1873/22 1873/22
1782/10 1784/8	1833/4 1833/11	1840/12 1841/6	1780/24 1780/24	1873/24 1877/21
technician [1]	1840/7 1841/2	1841/13 1843/14	1781/22 1782/4	1878/4 1879/6 1888/6

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[23] 1892/8 1892/23 1893/18 1894/21 1895/24 1896/4 1897/24 1907/4 1907/19 1907/24 1908/7 1909/1 1911/9 1919/23 1932/10 1935/14 1936/11 1937/1 1937/5 1938/9 1938/18 1939/11 1939/12</p> <p>there's [42] 1737/10 1737/20 1738/2 1762/19 1763/9 1763/11 1765/23 1779/10 1780/25 1781/22 1786/24 1793/25 1796/24 1797/10 1802/15 1802/20 1803/5 1803/19 1821/14 1826/11 1866/17 1872/10 1872/13 1874/21 1875/23 1878/8 1880/8 1881/20 1883/15 1886/1 1890/25 1892/1 1908/23 1913/13 1919/20 1933/15 1935/4 1935/7 1936/1 1937/20 1939/11 1939/17</p> <p>thereafter [1] 1876/25</p> <p>therefore [5] 1771/19 1777/5 1784/18 1877/6 1896/22</p> <p>therein [1] 1784/5</p> <p>these [49] 1740/15 1740/17 1741/18 1753/11 1753/17 1755/1 1755/2 1756/25 1758/17 1758/18 1759/5 1760/6 1761/11 1761/16 1761/17 1771/16 1775/25 1776/9 1778/11 1779/8 1784/2 1784/12 1788/1 1788/20 1793/15 1796/13 1825/6 1826/9 1826/15 1837/8 1838/2 1844/2 1869/4 1869/8 1869/10 1869/17 1869/25 1884/5 1884/14 1885/18 1885/21 1885/23</p>	<p>1886/18 1905/24 1906/10 1906/14 1908/19 1919/6 1936/19</p> <p>they [109] 1738/12 1749/2 1749/3 1750/19 1751/1 1751/1 1754/1 1754/18 1754/19 1754/20 1754/20 1755/10 1755/17 1758/20 1761/11 1767/6 1770/8 1770/10 1772/3 1772/4 1772/11 1772/15 1772/16 1782/15 1782/22 1784/23 1784/23 1787/20 1787/21 1793/16 1796/7 1796/14 1824/7 1827/8 1827/9 1834/6 1834/9 1834/10 1835/14 1835/18 1836/7 1836/23 1836/25 1838/14 1839/14 1839/16 1839/18 1840/9 1840/11 1840/17 1840/17 1840/18 1840/19 1842/17 1842/19 1843/6 1870/3 1870/4 1875/14 1876/5 1876/21 1876/24 1877/23 1881/17 1882/2 1883/24 1883/25 1884/3 1884/5 1884/7 1884/20 1884/21 1884/22 1884/23 1885/3 1885/3 1887/14 1887/15 1887/16 1888/9 1888/9 1893/24 1894/1 1894/1 1894/1 1894/25 1895/1 1895/3 1895/12 1895/22 1898/7 1907/18 1907/20 1912/11 1915/3 1918/18 1919/25 1933/1 1933/6 1935/17 1936/17 1936/18 1936/25 1937/9 1937/10 1937/13 1937/17 1938/4 1939/19</p> <p>they're [13] 1737/18 1777/9 1782/16 1789/17 1801/17 1839/17 1839/20 1869/9 1884/14</p>	<p>1886/4 1886/5 1931/20 1938/4</p> <p>they've [3] 1796/17 1797/3 1907/14</p> <p>thing [1] 1908/25</p> <p>things [6] 1738/18 1740/17 1754/3 1766/12 1778/19 1838/8</p> <p>think [75] 1738/16 1739/8 1754/18 1759/8 1760/7 1761/10 1761/11 1766/1 1787/10 1788/9 1789/14 1789/22 1789/23 1790/2 1796/3 1796/25 1797/2 1826/1 1828/10 1828/17 1834/9 1835/5 1836/10 1836/22 1837/16 1837/23 1838/5 1838/14 1840/11 1841/4 1841/16 1841/17 1842/15 1865/1 1866/24 1867/9 1868/15 1870/20 1872/10 1872/11 1874/7 1874/16 1876/23 1881/11 1881/14 1882/2 1882/13 1884/3 1888/15 1890/22 1894/18 1895/20 1900/13 1900/14 1905/17 1905/18 1905/19 1906/3 1908/10 1910/2 1912/12 1913/2 1925/13 1925/21 1931/10 1931/19 1932/5 1933/11 1933/17 1933/21 1934/5 1934/20 1937/13 1938/8 1938/11</p> <p>thinking [1] 1754/6</p> <p>third [6] 1745/10 1803/15 1825/8 1840/4 1889/20 1892/13</p> <p>third request [1] 1825/8</p> <p>third-party [2] 1889/20 1892/13</p> <p>this [286]</p> <p>those [41] 1736/4 1739/5 1741/16 1746/16 1750/18 1762/11 1763/4 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1736/12 1736/15 1736/20 1738/18 1738/24 1739/13 1741/23 1742/10 1750/13</p>	<p>1753/24 1760/13 1765/10 1768/21 1770/25 1778/13 1779/8 1782/11 1782/19 1788/4 1790/10 1790/13 1795/5 1796/18 1801/16 1817/14 1817/25 1827/2 1828/9 1829/15 1830/22 1831/9 1833/3 1834/16 1834/25 1836/14 1842/20 1869/15 1870/9 1875/8 1875/15 1877/15 1878/18 1883/11 1884/7 1884/23 1887/6 1888/9 1888/22 1895/23 1895/24 1896/4 1896/5 1896/20 1897/25 1926/10 1931/7</p> <p>timely [1] 1779/4</p> <p>times [18] 1737/20 1766/4 1782/17 1829/9 1829/25 1830/24 1830/25 1831/3 1831/5 1831/25 1900/18 1914/2 1914/6 1914/15 1914/15 1914/18 1934/24 1939/18</p> <p>timetable [1] 1932/20</p> <p>Timothy [1] 1734/20</p> <p>title [9] 1753/3 1754/13 1754/24 1760/5 1764/3 1766/24 1770/11 1775/18 1776/8</p> <p>titling [1] 1776/18</p> <p>today [27] 1741/7 1756/21 1760/16 1778/17 1778/17 1800/3 1800/7 1804/11 1804/13 1804/14 1833/16 1833/25 1840/23 1891/10 1892/1 1893/21 1895/16 1900/7 1918/12 1919/7 1931/8 1931/9 1931/18 1932/1 1934/2 1938/22 1940/5</p> <p>today's [2] 1804/15 1909/5</p> <p>together [4] 1838/16 1907/10 1908/2 1939/16</p>
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<p>T</p> <p>told [7] 1750/23 1753/24 1755/8 1896/25 1933/7 1933/8 1937/13</p> <p>tomorrow [12] 1740/24 1741/8 1778/17 1825/24 1826/7 1827/6 1827/7 1827/14 1932/7 1938/15 1939/24 1940/6</p> <p>too [2] 1828/7 1919/24</p> <p>took [3] 1886/23 1897/12 1939/3</p> <p>top [3] 1771/14 1868/21 1906/18</p> <p>topic [1] 1933/10</p> <p>Toronto [2] 1745/8 1900/15</p> <p>total [4] 1736/11 1830/5 1830/6 1831/1</p> <p>tough [1] 1914/23</p> <p>towards [1] 1906/18</p> <p>traffic [1] 1741/17</p> <p>trafficking [1] 1754/16</p> <p>train [1] 1836/22</p> <p>transcript [1] 1888/18</p> <p>transcripts [1] 1828/20</p> <p>transfer [3] 1766/24 1777/6 1890/25</p> <p>transferring [1] 1891/22</p> <p>transition [1] 1894/9</p> <p>translate [2] 1752/15 1774/24</p> <p>translated [2] 1751/14 1752/4</p> <p>translation [6] 1749/22 1751/16 1751/17 1774/23 1787/10 1787/15</p> <p>translations [1] 1787/13</p> <p>translator [2] 1765/24 1765/24</p> <p>transportation [1] 1883/15</p> <p>travel [2] 1751/1 1755/10</p> <p>traveling [1] 1754/1</p> <p>treatment [2] 1801/23 1801/24</p> <p>treaty [5] 1773/15 1830/7 1830/14 1832/20 1832/22</p> <p>tree [11] 1875/24 1876/6 1876/9 1876/12 1876/17</p>	<p>1876/18 1876/24 1877/11 1877/11 1877/13 1879/17</p> <p>trees [16] 1802/9 1802/10 1802/11 1872/17 1872/18 1873/5 1873/12 1873/13 1873/20 1874/8 1875/3 1877/14 1877/15 1877/19 1877/21 1880/15</p> <p>TRIBUNAL [35] 1731/20 1732/3 1732/12 1736/2 1736/9 1737/7 1737/16 1737/17 1739/21 1740/9 1741/1 1742/6 1758/25 1763/1 1779/11 1795/3 1804/2 1824/4 1824/11 1826/18 1827/2 1839/12 1843/16 1874/19 1875/17 1876/20 1894/13 1895/6 1920/2 1926/14 1934/1 1934/18 1935/4 1935/19 1935/21</p> <p>Tribunal's [3] 1762/16 1914/20 1936/12</p> <p>tried [1] 1775/16</p> <p>trier [1] 1913/5</p> <p>triggering [1] 1794/8</p> <p>true [6] 1843/13 1843/25 1876/17 1879/8 1895/19 1933/6</p> <p>trust [1] 1797/14</p> <p>try [13] 1742/10 1761/20 1803/6 1825/4 1825/9 1825/15 1826/1 1826/4 1826/9 1838/21 1889/13 1895/15 1920/8</p> <p>trying [8] 1740/17 1754/19 1825/3 1837/4 1871/16 1873/25 1874/4 1890/14</p> <p>turn [7] 1743/24 1744/6 1744/24 1748/17 1749/6 1766/2 1933/16</p> <p>turns [1] 1933/6</p> <p>tweaks [1] 1843/24</p> <p>two [33] 1736/19 1736/23 1737/12</p>	<p>1738/3 1747/9 1751/7 1754/3 1776/1 1776/2 1782/10 1782/16 1782/16 1788/21 1796/6 1796/13 1817/12 1824/25 1825/16 1829/14 1830/11 1832/8 1832/9 1841/23 1869/8 1880/19 1881/2 1920/3 1932/22 1933/23 1935/12 1935/13 1936/7 1938/18</p> <p>two hours [2] 1736/19 1736/23</p> <p>two weeks [1] 1824/25</p> <p>two-fold [1] 1880/19</p> <p>type [1] 1786/19</p> <p>types [3] 1769/25 1787/19 1829/10</p> <p>typically [1] 1838/15</p> <p>typographical [1] 1872/11</p> <p>U</p> <p>ultimately [1] 1913/4</p> <p>unavailable [4] 1906/22 1907/25 1908/4 1908/8</p> <p>unaware [2] 1752/17 1752/24</p> <p>under [20] 1739/15 1744/10 1756/24 1760/12 1760/16 1767/1 1771/9 1773/18 1789/20 1801/14 1801/20 1801/22 1804/7 1869/5 1870/18 1870/22 1872/12 1897/24 1906/17 1911/19</p> <p>underlying [2] 1803/17 1910/12</p> <p>underneath [1] 1886/6</p> <p>understand [59] 1736/6 1743/25 1744/25 1746/15 1746/16 1747/13 1747/16 1751/8 1754/9 1757/18 1766/6 1767/5 1770/21 1771/6 1774/3 1776/15 1778/5 1778/22 1779/20 1788/15 1788/19 1791/23 1795/24 1801/5 1817/16 1821/14</p>	<p>1825/22 1827/21 1829/22 1832/17 1837/13 1838/11 1838/13 1842/10 1842/11 1866/17 1867/3 1870/7 1876/1 1879/5 1879/24 1880/14 1881/12 1882/24 1884/13 1884/16 1888/10 1890/14 1896/7 1897/8 1908/1 1909/20 1909/21 1913/12 1920/2 1935/23 1936/20 1938/1 1938/8</p> <p>understanding [17] 1802/10 1870/2 1870/8 1870/17 1871/8 1871/13 1871/23 1875/14 1883/23 1884/18 1885/1 1887/4 1891/2 1934/23 1935/17 1938/11 1938/14</p> <p>understood [12] 1738/22 1739/10 1749/25 1750/6 1764/11 1767/24 1789/1 1865/20 1877/18 1914/19 1933/2 1939/20</p> <p>unfair [1] 1936/12</p> <p>unfolded [1] 1824/24</p> <p>Unfortunately [2] 1888/2 1926/4</p> <p>unilaterally [1] 1758/15</p> <p>United [1] 1895/7</p> <p>university [9] 1758/5 1758/6 1758/7 1758/8 1758/11 1759/9 1763/21 1763/22 1764/5</p> <p>unless [3] 1796/23 1870/20 1935/3</p> <p>unlike [1] 1913/15</p> <p>unlikely [1] 1796/25</p> <p>unrecoverable [1] 1896/23</p> <p>unrestricted [1] 1801/13</p> <p>unsaid [1] 1937/15</p> <p>until [6] 1741/10 1742/10 1777/24 1821/11 1871/13 1889/5</p> <p>unusual [1] 1933/18</p> <p>unworkable [1] 1775/7</p> <p>up [34] 1748/12 1755/24 1756/9</p>	<p>1756/17 1780/7 1780/13 1780/16 1781/14 1783/2 1785/8 1785/14 1785/16 1798/14 1817/7 1817/13 1838/2 1867/6 1867/10 1868/5 1868/23 1871/13 1882/9 1882/24 1885/12 1891/6 1891/8 1891/20 1897/3 1897/16 1905/12 1912/10 1912/17 1914/20 1931/22</p> <p>upcoming [1] 1887/14</p> <p>update [3] 1744/1 1800/17 1939/3</p> <p>updated [3] 1750/19 1879/18 1937/16</p> <p>updates [1] 1745/1</p> <p>updating [2] 1744/25 1746/13</p> <p>UPOLI [3] 1758/5 1758/7 1758/9</p> <p>upon [6] 1757/9 1798/10 1867/2 1908/12 1919/12 1920/16</p> <p>upwards [2] 1873/3 1873/12</p> <p>urgency [2] 1760/2 1763/25</p> <p>urgent [2] 1781/3 1790/21</p> <p>us [19] 1740/22 1740/23 1752/6 1756/3 1765/18 1768/7 1770/12 1770/14 1775/19 1778/18 1788/11 1796/11 1826/20 1890/23 1912/22 1913/23 1932/17 1940/2 1940/5</p> <p>use [11] 1766/21 1767/7 1767/8 1788/16 1803/24 1803/24 1839/10 1875/2 1876/10 1876/22 1919/13</p> <p>used [19] 1739/7 1760/4 1764/1 1764/2 1771/20 1771/22 1773/4 1800/2 1801/7 1802/20 1803/1 1803/4 1803/14 1803/17 1804/17 1866/21 1876/19 1895/21 1911/3</p> <p>uses [1] 1766/16</p>
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<p>U</p> <p>using [4] 1772/2 1772/3 1803/10 1837/6</p> <p>usual [1] 1938/22</p> <p>usually [2] 1802/20 1911/11</p> <hr/> <p>V</p> <p>valid [8] 1757/19 1757/21 1757/22 1758/1 1758/3 1786/25 1789/2 1875/17</p> <p>validation [1] 1788/22</p> <p>valuable [1] 1778/12</p> <p>valuation [22] 1799/3 1799/12 1799/19 1799/20 1799/21 1838/9 1874/9 1875/3 1885/2 1887/22 1890/5 1890/24 1892/3 1893/22 1894/16 1895/9 1913/24 1915/1 1915/2 1919/12 1920/10 1920/13</p> <p>valuation/litigation [1] 1799/20</p> <p>valuator [6] 1799/2 1906/4 1918/9 1918/17 1919/9 1920/10</p> <p>Valuators [1] 1799/9</p> <p>value [21] 1801/5 1801/5 1801/20 1801/21 1802/14 1802/15 1803/10 1803/18 1803/19 1803/21 1803/22 1803/22 1803/24 1804/5 1804/7 1804/11 1834/4 1893/17 1897/14 1900/5 1900/13</p> <p>valued [1] 1802/3</p> <p>values [1] 1803/17</p> <p>variety [1] 1907/5</p> <p>various [2] 1801/8 1867/1</p> <p>Veijo [2] 1731/21 1732/5</p> <p>Velasquez [2] 1748/2 1748/4</p> <p>Venezuela [2] 1839/5 1839/13</p> <p>venue [1] 1791/18</p> <p>verified [4] 1867/3 1877/5 1887/12 1919/25</p> <p>verify [22] 1768/21</p>	<p>1794/14 1866/18 1869/20 1870/1 1870/6 1871/11 1871/12 1873/18 1873/22 1874/2 1874/8 1877/2 1881/15 1883/3 1883/19 1887/10 1887/13 1897/6 1910/5 1919/10 1919/14</p> <p>verifying [1] 1866/23</p> <p>versions [1] 1885/15</p> <p>versus [1] 1841/16</p> <p>very [51] 1738/3 1738/15 1739/3 1739/14 1742/1 1742/15 1743/19 1751/15 1752/11 1753/22 1756/5 1758/25 1759/1 1760/6 1777/17 1783/9 1783/14 1788/2 1792/17 1795/1 1795/4 1795/13 1796/5 1796/25 1798/13 1802/22 1802/25 1803/2 1803/5 1821/8 1827/15 1844/4 1864/14 1871/17 1876/23 1880/13 1881/8 1885/4 1888/13 1900/16 1906/10 1911/7 1919/1 1919/2 1925/14 1926/11 1935/6 1938/13 1940/4 1940/4 1940/6</p> <p>vetting [1] 1841/10</p> <p>vheiskanen [1] 1732/5</p> <p>via [2] 1758/12 1791/16</p> <p>video [2] 1828/21 1939/11</p> <p>view [4] 1826/23 1835/11 1835/21 1936/16</p> <p>viewpoint [1] 1793/6</p> <p>VIMAL [2] 1795/17 1798/3</p> <p>violated [4] 1786/16 1789/22 1789/23 1789/24</p> <p>violation [4] 1768/12 1768/14 1786/24 1789/13</p> <p>vitae [1] 1829/3</p> <p>viva [1] 1741/12</p> <p>viva voce [1]</p>	<p>1741/12</p> <p>voce [1] 1741/12</p> <p>void [2] 1788/5 1789/5</p> <p>voidability [2] 1788/7 1788/25</p> <p>voidable [2] 1789/5 1789/16</p> <p>Volume [1] 1731/16</p> <hr/> <p>W</p> <p>wait [1] 1749/23</p> <p>walking [1] 1765/25</p> <p>want [25] 1740/22 1741/5 1741/9 1763/3 1825/10 1829/20 1829/22 1832/17 1835/4 1837/20 1841/11 1844/3 1844/3 1867/2 1879/13 1880/6 1888/23 1896/7 1896/18 1896/18 1900/19 1911/21 1933/7 1933/25 1936/17</p> <p>wanted [10] 1736/2 1792/13 1841/20 1865/19 1918/5 1925/24 1931/21 1937/14 1938/25 1939/2</p> <p>wants [2] 1769/16 1934/1</p> <p>warehouse [2] 1886/5 1897/22</p> <p>was [226]</p> <p>Washington [1] 1731/17</p> <p>wasn't [5] 1769/12 1891/3 1907/9 1908/7 1938/23</p> <p>waste [2] 1741/23 1779/8</p> <p>watching [1] 1828/21</p> <p>water [1] 1837/7</p> <p>way [22] 1738/7 1738/14 1739/3 1739/9 1778/24 1795/22 1796/19 1797/2 1798/24 1803/23 1829/18 1835/24 1836/6 1839/1 1841/4 1843/11 1868/9 1870/25 1871/3 1933/8 1937/9 1938/9</p> <p>ways [2] 1797/15 1936/11</p> <p>we [197] 1736/4 1736/6 1736/25 1736/25 1737/4</p>	<p>1737/8 1738/1 1738/16 1738/20 1738/21 1739/2 1739/2 1739/6 1739/7 1739/8 1739/17 1739/19 1739/23 1740/6 1740/14 1740/24 1741/9 1741/12 1741/17 1741/19 1741/25 1742/2 1742/8 1742/11 1742/15 1742/20 1743/2 1743/20 1743/24 1744/2 1744/19 1745/2 1747/18 1749/6 1750/5 1752/17 1752/24 1754/23 1756/9 1757/5 1758/17 1759/22 1760/11 1761/19 1762/14 1762/20 1763/2 1763/3 1763/4 1767/11 1769/22 1769/24 1771/10 1771/17 1771/24 1772/18 1774/11 1775/1 1775/4 1775/23 1777/19 1777/20 1777/22 1778/4 1778/12 1778/19 1779/2 1779/8 1779/13 1779/14 1779/17 1779/18 1779/20 1779/21 1780/13 1781/13 1783/2 1787/10 1787/13 1787/14 1787/16 1788/9 1788/16 1788/21 1788/23 1790/13 1790/23 1792/17 1793/2 1793/3 1795/7 1795/24 1795/25 1796/1 1796/4 1796/4 1796/22 1796/24 1797/20 1799/6 1817/18 1821/14 1824/2 1824/9 1824/9 1824/14 1824/17 1825/2 1825/4 1825/12 1825/15 1825/18 1825/19 1825/22 1825/23 1826/1 1826/2 1826/5 1826/8 1826/11 1826/12 1826/20 1826/22 1827/1 1827/3 1827/5 1827/5 1827/6 1827/13 1827/20 1827/21</p>	<p>1831/10 1831/11 1839/15 1840/14 1868/19 1868/22 1868/25 1873/1 1873/8 1874/1 1874/17 1876/8 1880/12 1881/2 1881/11 1883/12 1888/21 1888/22 1889/2 1889/5 1889/15 1890/18 1893/12 1905/12 1906/17 1907/3 1907/9 1908/1 1910/23 1912/17 1912/21 1914/11 1925/21 1925/23 1931/7 1931/8 1931/8 1931/9 1931/14 1931/17 1931/19 1931/21 1932/14 1932/14 1932/14 1932/16 1932/22 1934/10 1934/22 1935/22 1935/23 1936/9 1936/16 1936/20 1938/9 1938/14 1938/14 1938/16 1938/17 1939/1 1939/24</p> <p>we'd [2] 1740/20 1759/22</p> <p>we'll [12] 1746/6 1826/2 1826/4 1826/5 1839/1 1839/1 1840/22 1841/20 1841/21 1843/7 1843/7 1940/5</p> <p>we're [33] 1737/19 1738/10 1739/5 1740/6 1740/13 1740/16 1740/17 1740/22 1741/1 1741/2 1746/11 1755/13 1755/15 1757/4 1759/19 1759/24 1763/5 1769/24 1779/21 1784/15 1784/18 1790/22 1796/5 1817/19 1837/5 1837/5 1837/6 1837/7 1837/8 1868/23 1870/16 1872/8 1875/21</p> <p>we've [7] 1760/2 1763/25 1833/10 1880/24 1893/9 1907/6 1909/5</p> <p>weeks [1] 1824/25</p> <p>welcome [2] 1797/25 1827/18</p> <p>well [46] 1737/3</p>
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<p>W</p> <p>well... [45] 1740/6 1744/8 1746/6 1750/15 1751/15 1752/11 1753/22 1754/7 1758/13 1759/1 1780/23 1781/19 1783/9 1783/14 1783/24 1784/4 1784/9 1785/18 1788/2 1788/3 1789/21 1789/25 1793/15 1794/8 1802/10 1825/14 1826/16 1839/19 1839/21 1840/9 1841/15 1869/24 1870/11 1871/5 1873/4 1876/8 1877/4 1879/9 1886/24 1909/15 1914/3 1914/9 1918/20 1925/22 1933/10</p> <p>Welty [6] 1870/18 1870/22 1871/2 1871/8 1871/25 1872/5</p> <p>went [4] 1768/2 1784/23 1937/2 1937/3</p> <p>were [99] 1743/2 1749/16 1750/18 1750/19 1751/1 1751/2 1751/5 1751/8 1753/18 1754/1 1754/8 1754/18 1754/20 1755/9 1755/10 1758/5 1763/4 1765/8 1768/20 1769/13 1770/4 1773/22 1778/8 1780/7 1780/9 1780/11 1780/18 1780/19 1780/20 1781/7 1781/13 1782/10 1782/25 1787/8 1787/18 1790/6 1790/7 1791/5 1791/6 1792/10 1793/10 1800/1 1802/10 1804/14 1831/15 1831/22 1832/19 1834/2 1836/24 1836/25 1838/6 1840/17 1842/13 1871/5 1873/2 1873/22 1877/16 1877/21 1883/18 1883/25 1884/5 1885/19 1886/18 1887/9 1892/10 1892/24</p>	<p>1894/13 1894/21 1894/21 1895/1 1895/3 1895/4 1895/8 1895/9 1895/18 1895/24 1895/25 1896/8 1896/25 1896/25 1897/17 1897/22 1897/24 1898/5 1898/6 1900/7 1907/4 1910/6 1910/23 1912/14 1912/19 1914/11 1918/7 1919/24 1919/25 1920/5 1931/17 1934/10 1934/18</p> <p>wet [4] 1745/9 1745/11 1745/11 1745/14</p> <p>what [151] 1737/14 1737/19 1738/10 1738/12 1740/13 1740/19 1741/4 1741/6 1741/21 1741/22 1744/9 1745/6 1745/11 1746/11 1747/5 1747/21 1748/3 1748/6 1749/14 1749/16 1750/9 1752/4 1752/6 1752/18 1753/8 1755/3 1755/7 1755/12 1761/1 1766/24 1767/5 1767/23 1768/23 1768/23 1770/1 1770/8 1772/19 1773/8 1775/11 1776/4 1778/20 1779/3 1780/18 1780/22 1781/1 1781/16 1782/9 1783/6 1783/8 1783/13 1784/7 1784/8 1784/21 1785/12 1785/25 1786/2 1786/7 1786/10 1787/14 1787/24 1788/5 1788/17 1788/20 1789/2 1789/6 1789/14 1790/12 1790/13 1791/2 1791/11 1794/6 1794/10 1794/21 1801/19 1803/7 1804/13 1817/16 1817/18 1830/10 1831/9 1833/20 1834/9 1834/12 1835/9 1835/20 1835/25 1836/12</p>	<p>1836/24 1837/2 1837/3 1837/19 1837/24 1837/25 1838/5 1839/19 1840/12 1840/17 1841/9 1842/19 1843/14 1866/15 1866/24 1866/25 1867/2 1867/11 1869/8 1870/7 1870/11 1871/22 1872/20 1872/24 1873/4 1874/24 1874/25 1875/14 1876/8 1879/22 1885/2 1886/22 1890/7 1893/16 1894/22 1894/24 1894/24 1895/11 1896/6 1896/9 1896/12 1900/21 1906/1 1906/17 1907/13 1912/21 1912/24 1913/15 1918/7 1919/18 1919/21 1919/22 1920/12 1931/8 1933/9 1933/10 1933/10 1933/12 1934/5 1934/7 1934/9 1937/13 1938/1 1939/9</p> <p>what's [5] 1766/5 1784/3 1792/22 1831/12 1834/24</p> <p>whatever [1] 1824/20</p> <p>whatnot [1] 1894/8</p> <p>whatsoever [1] 1750/13</p> <p>wheelhouse [1] 1892/21</p> <p>when [80] 1738/24 1743/16 1748/20 1748/24 1750/9 1750/21 1751/5 1766/19 1772/13 1772/20 1773/23 1777/5 1778/19 1778/24 1780/19 1780/20 1781/8 1781/16 1782/12 1782/12 1782/20 1782/22 1784/23 1785/7 1788/2 1790/18 1791/11 1792/17 1793/14 1801/13 1801/14 1802/20 1803/4 1803/17 1804/9 1827/3 1828/8 1829/2 1829/15 1830/4 1832/12 1833/16</p>	<p>1833/21 1833/25 1834/2 1834/4 1834/7 1834/24 1834/24 1835/6 1839/16 1841/9 1842/8 1871/10 1871/12 1879/21 1881/17 1882/20 1884/7 1891/10 1891/25 1895/18 1895/25 1896/7 1896/8 1896/25 1897/19 1906/20 1907/3 1907/11 1907/13 1908/6 1909/2 1909/13 1912/10 1912/23 1918/17 1920/9 1920/10 1925/23</p> <p>whenever [5] 1742/6 1769/24 1772/21 1787/20 1913/3</p> <p>where [42] 1736/25 1740/22 1743/25 1744/10 1744/20 1745/10 1745/15 1746/6 1748/19 1756/10 1764/21 1770/23 1775/14 1780/25 1781/24 1785/8 1785/22 1786/1 1786/8 1786/20 1787/2 1793/23 1794/6 1800/2 1803/1 1826/7 1826/11 1832/4 1832/24 1833/6 1865/1 1876/21 1876/24 1881/1 1882/5 1882/10 1882/16 1886/16 1891/5 1909/1 1912/25 1935/22</p> <p>whereas [1] 1745/22</p> <p>whether [47] 1736/8 1741/8 1746/12 1747/10 1750/12 1750/18 1751/3 1754/24 1755/7 1759/10 1761/7 1761/23 1763/21 1768/21 1770/10 1771/2 1771/4 1772/5 1774/17 1776/9 1776/16 1787/12 1795/10 1824/5 1824/7 1825/9 1825/10 1825/19 1825/21 1836/23 1837/17 1866/21 1874/5 1879/9 1890/25 1892/22</p>	<p>1895/3 1896/9 1897/6 1915/4 1931/8 1931/9 1931/10 1934/14 1936/4 1936/17 1936/17</p> <p>which [46] 1737/23 1740/19 1743/5 1744/22 1744/25 1747/13 1749/10 1749/22 1753/3 1755/16 1759/2 1762/14 1763/14 1763/17 1769/16 1779/3 1781/23 1782/22 1785/20 1789/16 1797/4 1801/10 1825/12 1830/19 1834/11 1838/8 1869/22 1879/5 1879/10 1889/17 1893/11 1895/3 1898/2 1900/15 1900/15 1906/18 1910/7 1910/16 1911/15 1934/2 1934/10 1936/3 1936/13 1937/8 1937/11 1937/11</p> <p>while [8] 1740/16 1763/2 1801/5 1891/21 1898/1 1918/22 1918/22 1936/24</p> <p>who [19] 1737/16 1738/8 1754/20 1761/2 1762/20 1770/20 1770/24 1771/4 1791/9 1838/24 1840/4 1841/1 1841/3 1841/17 1892/23 1894/4 1936/8 1936/19 1939/14</p> <p>who's [4] 1738/8 1838/20 1933/12 1939/14</p> <p>whole [4] 1741/17 1843/15 1897/25 1933/20</p> <p>why [17] 1738/19 1738/20 1739/8 1750/23 1753/9 1763/5 1771/19 1772/21 1778/22 1781/5 1789/15 1792/14 1829/20 1868/22 1868/25 1881/11 1906/1</p> <p>wildlife [11] 1755/18 1755/21 1756/11 1756/12 1756/15 1756/20 1771/8</p>
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W	1763/8 1764/14 1764/17 1765/5 1769/10 1773/20 1773/23 1774/10 1774/15 1774/19 1775/24 1776/16 1795/14 1796/4 1798/5 1798/6 1836/16 1842/3 1870/20 1873/23 1874/10 1874/11 1877/9 1912/1 1931/20 1933/18 witnesses [7] 1736/17 1737/17 1763/6 1887/19 1909/12 1909/25 1920/12 Wolfe [1] 1762/19 won't [4] 1817/24 1817/25 1826/21 1867/9 word [7] 1800/2 1868/3 1876/22 1876/23 1895/21 1895/22 1907/24 words [9] 1779/18 1781/1 1781/5 1802/22 1803/19 1835/9 1878/5 1907/13 1911/11 work [6] 1770/24 1792/5 1906/24 1909/20 1914/21 1933/8 worked [5] 1758/6 1771/4 1777/11 1777/14 1925/23 working [5] 1738/10 1771/16 1837/6 1838/21 1925/22 works [2] 1763/12 1770/24 world [5] 1799/13 1838/11 1879/10 1892/18 1935/8 worth [3] 1804/13 1892/5 1900/12 would [153] 1737/19 1738/1 1738/16 1738/21 1739/1 1739/3 1739/4 1739/6 1739/7 1740/18 1740/22 1741/4 1744/14 1751/13 1751/24 1753/4 1753/10 1754/3 1761/14 1762/14 1762/24 1763/12 1766/17 1769/16 1771/15 1772/15 1773/5 1775/1 1775/6 1779/3 1780/12	1787/14 1796/3 1796/22 1796/23 1797/3 1797/13 1798/7 1798/25 1801/2 1801/10 1802/8 1803/4 1804/14 1825/4 1825/8 1825/15 1825/21 1830/5 1830/7 1831/8 1833/20 1834/12 1835/1 1835/5 1835/5 1835/14 1835/16 1835/21 1835/21 1836/2 1836/3 1836/7 1836/23 1837/11 1837/13 1837/20 1837/24 1837/25 1838/1 1841/4 1841/7 1841/9 1841/11 1842/19 1843/3 1843/4 1843/11 1870/3 1870/5 1871/14 1871/19 1874/22 1875/5 1875/18 1875/20 1876/16 1877/6 1877/6 1877/7 1877/16 1878/22 1879/15 1880/20 1881/19 1881/20 1881/24 1881/25 1882/5 1882/9 1882/11 1882/16 1882/22 1882/23 1883/3 1883/3 1883/25 1884/3 1884/7 1884/9 1884/23 1885/3 1887/1 1887/2 1887/5 1887/15 1887/16 1888/9 1888/22 1891/6 1891/11 1891/24 1894/1 1894/1 1894/8 1895/1 1895/9 1900/8 1900/21 1909/23 1910/16 1911/15 1913/10 1915/1 1915/7 1915/7 1920/2 1931/16 1933/4 1933/8 1933/8 1933/9 1933/14 1933/16 1934/7 1934/11 1934/11 1934/22 1935/9 1935/9 1935/17 1937/21 1939/7 would've [1] 1894/16 wouldn't [2] 1835/10 1883/11 wrap [1] 1817/7	writes [1] 1791/20 writing [5] 1753/21 1907/7 1910/10 1911/14 1911/24 written [4] 1745/19 1757/9 1824/13 1891/13 wrong [5] 1796/14 1874/20 1908/19 1919/20 1937/6 wrongful [5] 1800/23 1800/23 1801/2 1802/9 1804/20 wrote [6] 1782/13 1792/6 1831/18 1897/19 1918/17 1937/14	1795/23 1824/3 1828/11 1828/12 1829/4 1829/7 1829/8 1830/23 1832/14 1832/19 1833/19 1833/23 1834/1 1835/8 1836/5 1836/6 1836/9 1839/5 1839/9 1839/13 1839/22 1839/23 1839/24 1839/25 1840/6 1841/23 1841/24 1842/1 1844/1 1864/20 1866/18 1866/19 1867/22 1867/24 1867/25 1868/14 1868/17 1868/21 1869/7 1869/12 1869/15 1869/21 1872/2 1872/15 1872/18 1873/10 1873/20 1874/11 1875/11 1875/13 1875/19 1875/20 1876/2 1876/12 1877/3 1878/1 1878/19 1879/14 1879/19 1880/3 1880/5 1880/16 1880/17 1880/21 1881/7 1881/10 1881/22 1882/6 1882/11 1883/1 1883/5 1883/22 1884/5 1885/3 1885/25 1886/23 1887/10 1887/23 1887/25 1887/25 1888/3 1888/4 1888/6 1888/7 1890/19 1890/23 1891/15 1891/16 1893/3 1893/4 1893/7 1894/17 1895/10 1896/24 1897/1 1897/2 1897/15 1898/4 1900/5 1906/8 1906/11 1908/9 1910/1 1911/20 1912/5 1914/10 1918/13 1919/8 1919/15 1931/23 1932/17 1932/22 1934/4 1935/18 1938/7 1938/21 yesterday [19] 1736/22 1739/20 1743/2 1747/4 1747/5 1747/6 1751/3 1758/4 1760/11 1766/8 1777/11 1778/1 1780/9 1781/8 1781/13 1782/25
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<p>Y</p> <p>yesterday... [3] 1787/13 1790/6 1790/7</p> <p>yet [1] 1803/6</p> <p>yield [1] 1919/18</p> <p>yields [1] 1919/23</p> <p>you [675]</p> <p>you'd [1] 1797/11</p> <p>you'll [5] 1780/23 1788/2 1795/24 1796/9 1798/14</p> <p>you're [42] 1738/24 1749/21 1752/5 1753/21 1769/3 1774/3 1775/11 1817/13 1828/11 1832/8 1833/25 1837/24 1838/9 1839/4 1839/21 1840/2 1840/5 1840/12 1840/20 1841/8 1841/25 1842/3 1842/5 1842/21 1842/23 1867/11 1867/17 1871/22 1879/6 1890/20 1891/8 1894/20 1896/4 1896/21 1906/10 1907/15 1908/11 1909/2 1909/6 1913/3 1913/5 1939/10</p> <p>you've [38] 1747/14 1749/15 1750/2 1755/4 1763/6 1775/9 1783/9 1797/7 1797/14 1829/5 1830/18 1832/9 1832/24 1833/6 1834/25 1838/10 1839/2 1867/1 1867/3 1867/9 1868/1 1879/4 1879/18 1881/14 1890/9 1891/13 1891/17 1891/18 1892/2 1893/1 1894/23 1898/2 1907/14 1909/11 1909/11 1911/8 1914/9 1919/6</p> <p>your [171] 1738/25 1741/4 1742/12 1743/23 1744/19 1744/21 1751/16 1751/22 1753/2 1753/15 1755/14 1755/15 1757/18 1757/19 1763/20 1765/1 1765/1 1765/18 1766/8 1767/5 1768/10 1768/20 1770/18</p>	<p>1770/18 1771/4 1773/24 1774/5 1774/10 1776/10 1776/14 1777/19 1778/1 1778/10 1779/1 1780/10 1780/15 1781/8 1781/13 1781/15 1789/22 1789/23 1792/20 1793/12 1795/5 1795/22 1797/8 1798/17 1798/19 1817/6 1817/7 1817/25 1821/12 1824/20 1824/25 1825/6 1826/25 1827/9 1828/9 1828/24 1829/19 1829/21 1830/3 1833/1 1833/16 1833/24 1834/13 1835/4 1835/11 1837/11 1837/16 1839/7 1840/10 1841/15 1841/22 1842/7 1842/9 1842/23 1843/10 1843/11 1843/12 1843/18 1843/24 1843/24 1844/2 1864/14 1864/25 1865/6 1866/21 1867/2 1867/10 1868/1 1868/5 1868/13 1870/8 1870/17 1873/1 1873/7 1874/7 1874/22 1874/22 1875/2 1875/4 1875/9 1875/10 1875/18 1876/10 1876/14 1876/15 1876/22 1877/12 1877/20 1877/20 1877/22 1878/5 1878/15 1878/18 1879/18 1881/3 1882/1 1882/15 1884/17 1885/1 1885/19 1886/19 1887/3 1888/24 1888/25 1890/2 1890/2 1890/7 1890/14 1890/15 1894/17 1894/23 1895/10 1895/16 1895/18 1895/25 1896/18 1897/1 1897/19 1900/2 1900/12 1900/18 1906/13 1906/14 1907/4 1907/16 1908/12 1908/13 1908/16 1908/18</p>	<p>1909/13 1911/1 1911/3 1911/17 1911/22 1912/14 1912/21 1912/22 1913/7 1913/16 1914/12 1914/21 1920/10 1920/13 1926/16 1931/1 1936/5 1937/10 1938/25</p> <p>yourself [3] 1783/13 1785/19 1831/18</p> <hr/> <p>Z</p> <p>Zetina [1] 1734/8</p> <p>zoom [2] 1870/19 1870/21</p> <p>Zuniga [1] 1734/11</p>		
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