

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CHEVRON CORPORATION,	:	
	:	
Plaintiff,	:	
	:	
v.	:	11-CV-0691 (LAK)
	:	
STEVEN DONZIGER, et al.,	:	
	:	
Defendants.	:	
	:	
-----	X	

**NOTICE OF RELEVANT AUTHORITY**

Plaintiff Chevron Corporation respectfully requests that the Court take notice of the attached First Partial Award entered September 17, 2013, by the Bilateral Investment Treaty Arbitration Tribunal in the arbitration between Chevron and the Republic of Ecuador, Case No. 2009-23. *See* Ex. A. The Tribunal held that the 1995 Settlement Agreement and 1998 Final Release between Ecuador and Texaco Petroleum, Inc. serve to preclude “diffuse” or “collective” claims for environmental harm against Chevron “made by any individual not claiming personal harm,” and that Chevron is entitled to seek relief “both defensively and offensively” to vindicate its right as a released party under those releases. *Id.* ¶¶ 91, 112; *see also id.* ¶ 108.

Dated: September 19, 2013

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