

Waldrip, Rhonda

From: Gilmour, John
Sent: Friday, July 21, 2006 11:30 AM
To: Waldrip, Rhonda
Subject: FW: Requested supplementation

From: Blanco, Ileana [mailto:Ileana.Blanco@bracewellgiuliani.com]
Sent: Friday, July 21, 2006 11:09 AM
To: Gilmour, John
Cc: Connelly, Michael; Jackson, Bill; Marc GROSS; Jeffrey Sirot; Ponig, Christina; Vittor, Jose Luis; Teran, Leticia
Subject: Requested supplementation

Dear John:

This is in response to the letter we just received from you. Please consider the following to supplement all of the non-resident Defendants' responses to Plaintiffs' document requests.

Except (1) as to e-mails as currently requested, (2) in the case of Repsol, YPF only-- requests seeking documents and information that precede Repsol's acquisition of YPF in 1999, and (3) as specifically noted below, no documents are being withheld based upon the asserted objections and if any documents are identified in the future and withheld based upon these objections, Defendant will notify Plaintiffs within one (1) business day that documents are being withheld and identify the asserted objection and the applicable Request for Production.

The non-resident Defendants have not waived the objections to the production of income tax returns for any defendant.

CLHH and YPFH--only-- maintain their burdensome and relevancy objections to the request for documentation of all intercompany transfers in response to Plaintiffs' RFP 6.

Please let me know if this supplementation is not acceptable.

Ileana