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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
KEN WIWA, et al.,

Plaintiffs,

-against-

ROYAL DUTCH PETROLEUM CO., et al.,

Defendants.
-----X

96 Civ. 8386 (KMW) (HBP)

KEN WIWA, et al.,

Plaintiffs,

-against-

BRIAN ANDERSON,

Defendant.
-----X

01 Civ. 1909 (KMW) (HBP)

ESTHER KIOBEL, et al.,

Plaintiffs,

-against-

ROYAL DUTCH PETROLEUM CO., et al.,

Defendants.
-----X

02 Civ. 7618 (KMW) (HBP)

ORDER

KIMBA M. WOOD, U.S.D.J.:

The Court is holding a hearing in the three above-captioned

cases on October 7, 2008. At that hearing parties shall provide the Court with further information regarding (1) Plaintiffs' efforts to receive full, ancillary, or limited letters of administration from the New York State Surrogate's Court for the County of New York, and (2) Plaintiffs' status as, or efforts to become, administrators, executors, or recipients of probate under Nigerian law for the decedents on whose behalf they are bringing claims. (3) Parties shall also inform the Court of any issues that need to be resolved or actions that need to be taken in order for these cases to be ready for trial. (4) Lastly, the Court shall hear arguments on the Kiobel Plaintiffs' motion to stay.

In preparation for the hearing, parties shall review the following enclosed documents: (1) Chart of Claims in the above-captioned actions ("Claims Chart"), (2) Questions for Plaintiffs in Wiwa v. Royal Dutch Shell Petroleum Co., 96 Civ. 83886 ("Wiwa I"), & Wiwa v. Anderson ("Wiwa II"), 01 Civ. 1909 ("Wiwa Questions"), and (3) Questions for Plaintiffs in Kiobel v. Royal Dutch Petroleum Co., 02 Civ. 7618 ("Kiobel"; "Kiobel Questions").

By October 6, 2008 at 5:00 PM, all parties shall notify the Court and other parties by fax of any changes they believe should be made to the Claims Chart to make it a full and accurate account of the nature and status of the causes of action in the Wiwa I, Wiwa II, and Kiobel cases. Any document(s) docketed in

these cases that support(s) a party's proposed change in the Claims Chart shall also be faxed to the Court and other parties by October 6, 2008 at 5:00 PM.

By October 6, 2008 at 5:00 PM, Plaintiffs' counsel shall provide the Court and other parties by fax their responses to the questions posed in the Wiwa Questions and the Kiobel Questions. Counsel for the Wiwa I and Wiwa II Plaintiffs shall respond to the Wiwa Questions; counsel for the Kiobel Plaintiffs shall respond to the Kiobel Questions. All responses by Plaintiffs' counsel shall comply with 28 U.S.C. § 1746.

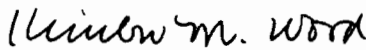
Shortly, the Court shall provide all parties with a document summarizing the outstanding issues that need to be resolved in order to ready these cases for trial ("Outstanding Issues Document"). By October 6, 2008 at 5:00 PM, all parties shall notify the Court and other parties by fax of any changes they believe should be made to the Outstanding Issues Document in order to make it a full and accurate account of the issues that need to be resolved in order to ready these cases for trial. Any document(s) docketed or submitted in these cases that support(s) a party's proposed change in the Outstanding Issues Document shall also be faxed to the Court and other parties by October 6, 2008 at 5:00 PM.

All parties are given an extension until 5:00 PM October 3, 2008 to notify the Court and other parties of the names and

expected testimony of any witnesses they intend to call at the October 7, 2008 hearing.

SO ORDERED.

Dated: New York, New York
October 2, 2008



Kimba M. Wood
United States District Judge

CHART OF CLAIMS IN
WIWA v. ROYAL DUTCH SHELL PETROLEUM CO., 96 CIV. 8386, & WIWA v. ANDERSON, 01 CIV. 1909

KEY:

I = Individual Claim

R = Representative Claim (claim brought on behalf of a third-party or parties)

Strikethrough = Dismissed by Order of the Court Sept. 29, 2006

	Wiwa v. Royal Dutch Shell Petroleum Co.	Wiwa v. Anderson
Defendants →	1. Shell Petroleum, N.V., formerly Royal Dutch Petroleum Company 2. Shell Transport and Trading Co., Ltd, formerly Shell Transport and Trading Co., p.l.c. 3. Royal Dutch Shell, p.l.c.	1. Brian Anderson
Plaintiff ↓	Claims ↓ Alien Tort Statute ("ATS") Claims 1. Summary Execution (R) 2. Crimes Against Humanity (R, I) ² 3. Torture (R) 4. Cruel, Inhuman, or Degrading Treatment (R) 5. Arbitrary Arrest & Detention (R) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (R) ³ State Law Claims 7. Wrongful Death (R) 8. Assault & Battery (R) 9. Intentional Infliction of Emotional Distress (R) 10. Negligent Infliction of Emotional Distress (R) 11. Negligence (R, I)	Claims ↓ ATS Claims 1. Summary Execution (R) 2. Crimes Against Humanity (R, I) 3. Torture (R) 4. Cruel, Inhuman, or Degrading Treatment (R, I) 5. Arbitrary Arrest & Detention (R) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (R) State Law Claims 7. Wrongful Death (R) 8. Assault & Battery (R) 9. Intentional Infliction of Emotional Distress (R) 10. Negligent Infliction of Emotional Distress (R) 11. Negligence (R, I)

¹ Limited, ancillary, and full letters of administration are all referred to as "letters of administration."

² Beginning in Second Am. Compl. Plaintiffs allege this claim on behalf of "All Plaintiffs" rather than any specifically named plaintiffs.

³ Added in First Am. Compl. All state claims numbered one lower in original complaint as a result.

Defendants →	<i>Wiwa v. Royal Dutch Shell Petroleum Co.</i>	<i>Wiwa v. Anderson</i>
	1. Shell Petroleum, N.V., formerly Royal Dutch Petroleum Company 2. Shell Transport and Trading Co., Ltd, formerly Shell Transport and Trading Co., p.l.c. 3. Royal Dutch Shell, p.l.c.	1. Brian Anderson
Plaintiff ↓	Claims ↓	Claims ↓
Owens Wiwa (I)	ATS Claims 2. Crimes Against Humanity (¶) 4. Cruel, Inhuman, or Degrading Treatment (¶) 5. Arbitrary Arrest & Detention (¶) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (¶) State Law Claims 8. Assault & Battery (¶) 9. Intentional Infliction of Emotional Distress (¶) 10. Negligent Infliction of Emotional Distress (¶) 11. Negligence (¶) 12. RICO Violations (¶)	ATS Claims 2. Crimes Against Humanity (¶) 4. Cruel, Inhuman, or Degrading Treatment (¶) 5. Arbitrary Arrest & Detention (¶) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (¶) State Law Claims 8. Assault & Battery (¶) 9. Intentional Infliction of Emotional Distress (¶) 10. Negligent Infliction of Emotional Distress (¶) 11. Negligence (I) 12. RICO Violations (¶)
Blessing Kpuinen (I/R) (John Kpuinen—husband) Received letters of administration from Surrogate's Court on November 1, 2007. Resides in United States.	ATS Claims 1. Summary Execution (R) 2. Crimes Against Humanity (R, ¶) 3. Torture (R) 4. Cruel, Inhuman, or Degrading Treatment (R, ¶) 5. Arbitrary Arrest & Detention (R) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (R) State Law Claims 7. Wrongful Death (R) 8. Assault & Battery (R, ¶) 9. Intentional Infliction of Emotional Distress (R, ¶) 10. Negligent Infliction of Emotional Distress (R, ¶) 11. Negligence (R, ¶)	ATS Claims 1. Summary Execution (R) 2. Crimes Against Humanity (R, ¶) 3. Torture (R) 4. Cruel, Inhuman, or Degrading Treatment (R, ¶) 5. Arbitrary Arrest & Detention (R) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (R) State Law Claims 7. Wrongful Death (R) 8. Assault & Battery (R, I) 9. Intentional Infliction of Emotional Distress (R, ¶) 10. Negligent Infliction of Emotional Distress (R, ¶) 11. Negligence (R, ¶)

	<i>Wiwa v. Royal Dutch Shell Petroleum Co.</i>	<i>Wiwa v. Anderson</i>
Defendants →	1. Shell Petroleum, N.V., formerly Royal Dutch Petroleum Company 2. Shell Transport and Trading Co., Ltd, formerly Shell Transport and Trading Co., p.l.c. 3. Royal Dutch Shell, p.l.c.	1. Brian Anderson
Plaintiff ↓	Claims ↓	Claims ↓
Karololo Kogbara (I)	2. Crimes Against Humanity (f) 3. Torture (f) 4. Cruel, Inhuman, or Degrading Treatment (f) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (f) State Law Claims 8. Assault & Battery (f) 9. Intentional Infliction of Emotional Distress (f) 10. Negligent Infliction of Emotional Distress (f) 11. Negligence (f) RICO 12. RICO Violations (f)	
Michael Tema Vizor (I)	2. Crimes Against Humanity (f) 3. Torture (f) 4. Cruel, Inhuman, or Degrading Treatment (f) 5. Arbitrary Arrest & Detention (f) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (f) State Law Claims 8. Assault & Battery (f) 9. Intentional Infliction of Emotional Distress (f) 10. Negligent Infliction of Emotional Distress (f) 11. Negligence (f) RICO 12. RICO Violations (f)	ATS Claims 2. Crimes Against Humanity (f) 4. Cruel, Inhuman, or Degrading Treatment (f) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (f) State Law Claims 8. Assault & Battery (f) 9. Intentional Infliction of Emotional Distress (f) 10. Negligent Infliction of Emotional Distress (f) 11. Negligence (f) RICO 12. RICO Violations (f)

	<i>Wiwa v. Royal Dutch Shell Petroleum Co.</i>	<i>Wiwa v. Anderson</i>
Defendants →	1. Shell Petroleum, N.V., formerly Royal Dutch Petroleum Company 2. Shell Transport and Trading Co., Ltd, formerly Shell Transport and Trading Co., p.l.c. 3. Royal Dutch Shell, p.l.c.	1. Brian Anderson
Plaintiff ↓ Lucky Doobee (R, I) (Saturday Doobee—brother) Application for letters of administration from Surrogate's Court pending.	Claims ↓ ATS Claims 1. Summary Execution (R) 2. Crimes Against Humanity (R, ¶) 3. Torture (R) 4. Cruel, Inhuman, or Degrading Treatment (R, I) 5. Arbitrary Arrest & Detention (R) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (R) State Law Claims 7. Wrongful Death (R) 8. Assault & Battery (R) 9. Intentional Infliction of Emotional Distress (R, ¶) 10. Negligent Infliction of Emotional Distress (R, ¶) 11. Negligence (R, ¶)	Claims ↓ ATS Claims 1. Summary Execution (R) 2. Crimes Against Humanity (R, ¶) 3. Torture (R) 4. Cruel, Inhuman, or Degrading Treatment (R, ¶) 5. Arbitrary Arrest & Detention (R) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (R) State Law Claims 7. Wrongful Death (R) 8. Assault & Battery (R) 9. Intentional Infliction of Emotional Distress (R, ¶) 10. Negligent Infliction of Emotional Distress (R, ¶) 11. Negligence (R, ¶)
Friday Nuate (R, I) (Felix Nuate—husband) Application for letters of administration from Surrogate's Court pending.	Claims ↓ ATS Claims 1. Summary Execution (R) 2. Crimes Against Humanity (R, ¶) 3. Torture (R) 4. Cruel, Inhuman, or Degrading Treatment (R, ¶) 5. Arbitrary Arrest & Detention (R) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (R) State Law Claims 7. Wrongful Death (R) 8. Assault & Battery (R) 9. Intentional Infliction of Emotional Distress (R, ¶) 10. Negligent Infliction of Emotional Distress (R, ¶) 11. Negligence (R, ¶)	Claims ↓ ATS Claims 1. Summary Execution (R) 2. Crimes Against Humanity (R, ¶) 3. Torture (R) 4. Cruel, Inhuman, or Degrading Treatment (R, ¶) 5. Arbitrary Arrest & Detention (R) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (R) State Law Claims 7. Wrongful Death (R) 8. Assault & Battery (R) 9. Intentional Infliction of Emotional Distress (R, ¶) 10. Negligent Infliction of Emotional Distress (R, ¶) 11. Negligence (R, ¶)

Defendants →	<i>Wiwa v. Royal Dutch Shell Petroleum Co.</i>	<i>Wiwa v. Anderson</i>
	1. Shell Petroleum, N.V., formerly Royal Dutch Petroleum Company 2. Shell Transport and Trading Co., Ltd, formerly Shell Transport and Trading Co., p.l.c. 3. Royal Dutch Shell, p.l.c.	1. Brian Anderson
Plaintiff ↓	Claims ↓	Claims ↓
Monday Gbokoo (R, I) (Daniel Gbokoo—brother) Application for letters of administration from Surrogate's Court pending.	ATS Claims 1. Summary Execution (R) 2. Crimes Against Humanity (R, ¶) 3. Torture (R) 4. Cruel, Inhuman, or Degrading Treatment (R, ¶) 5. Arbitrary Arrest & Detention (R) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (R) State Law Claims 7. Wrongful Death (R) 8. Assault & Battery (R) 9. Intentional Infliction of Emotional Distress (R, ¶) 10. Negligent Infliction of Emotional Distress (R, ¶) 11. Negligence (R, ¶)	ATS Claims 1. Summary Execution (R) 2. Crimes Against Humanity (R, ¶) 3. Torture (R) 4. Cruel, Inhuman, or Degrading Treatment (R, ¶) 5. Arbitrary Arrest & Detention (R) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (R) State Law Claims 7. Wrongful Death (R) 8. Assault & Battery (R) 9. Intentional Infliction of Emotional Distress (R, ¶) 10. Negligent Infliction of Emotional Distress (R, ¶) 11. Negligence (R, ¶)
David Kiobel (R, I) (Stella Kiobel, Leesi Kiobel, Baridi Kiobel—siblings; Angela Kiobel, Godwill Kiobel—minor siblings for harm to Barinem Kiobel—father)	ATS Claims 1. Summary Execution (R) 2. Crimes Against Humanity (R, ¶) 3. Torture (R) 4. Cruel, Inhuman, or Degrading Treatment (R, ¶) 5. Arbitrary Arrest & Detention (R) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (R) State Law Claims 7. Wrongful Death (R) 8. Assault & Battery (R) 9. Intentional Infliction of Emotional Distress (R, ¶) 10. Negligent Infliction of Emotional Distress (R, ¶) 11. Negligence (R, ¶)	ATS Claims 1. Summary Execution (R) 2. Crimes Against Humanity (R, ¶) 3. Torture (R) 4. Cruel, Inhuman, or Degrading Treatment (R, ¶) 5. Arbitrary Arrest & Detention (R) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (R) State Law Claims 7. Wrongful Death (R) 8. Assault & Battery (R) 9. Intentional Infliction of Emotional Distress (R, ¶) 10. Negligent Infliction of Emotional Distress (R, ¶) 11. Negligence (R, ¶)

	<i>Wiwa v. Royal Dutch Shell Petroleum Co.</i>	<i>Wiwa v. Anderson</i>
Defendants →	1. Shell Petroleum, N.V., formerly Royal Dutch Petroleum Company 2. Shell Transport and Trading Co., Ltd, formerly Shell Transport and Trading Co., p.l.c. 3. Royal Dutch Shell, p.l.c.	1. Brian Anderson
Plaintiff ↓ James B. N-Nah (R, I) (Uebari N-Nah— brother) Application for letters of administration from Surrogate's Court pending.	Claims ↓ ATS Claims 1. Summary Execution (R) 2. Crimes Against Humanity (R, I) 3. Torture (R) 4. Cruel, Inhuman, or Degrading Treatment (R, I) 6. Viol. of the Rts to Life, Lib. and Sec'y of Person and Peaceful Assembly and Ass'n (R) State Law Claims 7. Wrongful Death (R) 8. Assault & Battery (R) 9. Intentional Infliction of Emotional Distress (R, I) 10. Negligent Infliction of Emotional Distress (R, I) 11. Negligence (R, I)	Claims ↓

CHART OF CLAIMS IN *KIOBEL v. ROYAL DUTCH SHELL*, 02 CIV. 7618

KEY:

I=Individual Claim

R=Representative Claim (claim brought on behalf of a third-party or parties)

Double Strikethrough = Dismissed by order of the Court, September 29, 2006; Order on appeal to the Second Circuit

<i>Kiobel v. Royal Dutch Shell, et al.</i> , 02 Civ. 7618	
Defendants →	1. Shell Petroleum, N.V., formerly Royal Dutch Petroleum Company 2. Shell Transport and Trading Co., Ltd, formerly Shell Transport and Trading Co., p.l.c. 3. Royal Dutch Shell, p.l.c.
Plaintiff ↓	Alien Tort Statute Claims ↓
Esther Kiobel (R, I) (Dr. Barinem Kiobel—husband)	1. Extrajudicial Killing (R, I) 2. Crimes Against Humanity (R, I) 3. Torture; Cruel, Inhuman, or Degrading Treatment (R, I) 4. Arbitrary Arrest & Detention (R) 5. Viol. of the Rts to Life, Lib. See "y and Ass'n (R) 6. Forced Exile (R, I) 7. Property Destruction (R, I)
Bishop Augustine Numene John-Miller (I)	2. Crimes Against Humanity (I) 3. Torture; Cruel, Inhuman, or Degrading Treatment (I) 4. Arbitrary Arrest & Detention (I) 5. Viol. of the Rts to Life, Lib. See "y and Ass'n (I) 6. Forced Exile (I) 7. Property Destruction (I)

	<i>Kiobel v. Royal Dutch Shell, et al.</i>, 02 Civ. 7618
Defendants →	1. Shell Petroleum, N.V., formerly Royal Dutch Petroleum Company 2. Shell Transport and Trading Co., Ltd, formerly Shell Transport and Trading Co., p.l.c. 3. Royal Dutch Shell, p.l.c.
Plaintiff ↓	Alien Tort Statute Claims ↓
Charles Baridom Wiwa (f)	2. Crimes Against Humanity (f) 3. Torture; Cruel, Inhuman, or Degrading Treatment (f) 4. Arbitrary Arrest & Detention (f) 5. Viol. of the Rte to Life, Lib. See'y and Ass'n (f) 6. Forced Exile (f)
Israel Pyakene Nwidor (f)	2. Crimes Against Humanity (f) 3. Torture; Cruel, Inhuman, or Degrading Treatment (f) 4. Arbitrary Arrest & Detention (f) 6. Forced Exile (f)
Kendricks Dorle Nwikpo (f)	2. Crimes Against Humanity (f) 3. Torture; Cruel, Inhuman, or Degrading Treatment (f) 4. Arbitrary Arrest & Detention (f) 5. Viol. of the Rte to Life, Lib. See'y and Ass'n (f) 6. Forced Exile (f) 7. Property Destruction (f)
Anthony B. Kote-Witah (f)	2. Crimes Against Humanity (f) 3. Torture; Cruel, Inhuman, or Degrading Treatment (f) 4. Arbitrary Arrest & Detention (f) 6. Forced Exile (f)
Victor B. Wifa (f)	2. Crimes Against Humanity (f) 3. Torture; Cruel, Inhuman, or Degrading Treatment (f) 4. Arbitrary Arrest & Detention (f) 6. Forced Exile (f)

	<i>Kiobel v. Royal Dutch Shell, et al.</i>, 02 Civ. 7618
Defendants →	1. Shell Petroleum, N.V., formerly Royal Dutch Petroleum Company 2. Shell Transport and Trading Co., Ltd, formerly Shell Transport and Trading Co., p.l.c. 3. Royal Dutch Shell, p.l.c.
Plaintiff ↓	Alien Tort Statute Claims ↓
Dumle J. Kunenu (f)	2. Crimes Against Humanity (f) 3. Torture; Cruel, Inhuman, or Degrading Treatment (f) 4. Arbitrary Arrest & Detention (f) 5. Viol. of the Rts to Life, Lib. See 'y and Ass'n (f) 6. Forced Exile (f)
Benson Magnus Ikari (f)	2. Crimes Against Humanity (f) 3. Torture; Cruel, Inhuman, or Degrading Treatment (f) 6. Forced Exile (f)
Legbara Tony Idigima (f)	2. Crimes Against Humanity (f) 3. Torture; Cruel, Inhuman, or Degrading Treatment (f) 4. Arbitrary Arrest & Detention (f) 6. Forced Exile (f)
Pius Nwinee (f)	2. Crimes Against Humanity (f) 3. Torture; Cruel, Inhuman, or Degrading Treatment (f) 6. Forced Exile (f)
Kpobari Tusima (R, f) (Clement Tusima—father)	2. Crimes Against Humanity (R, f) 3. Torture; Cruel, Inhuman, or Degrading Treatment (R, f) 4. Arbitrary Arrest & Detention (R, f) 5. Viol. of the Rts to Life, Lib. See 'y and Ass'n (R, f) 6. Forced Exile (R, f) 7. Property Destruction (R, f)

Questions for Plaintiffs in Wiwa v. Royal Dutch Shell Petroleum Co., 96 Civ. 8386, & Wiwa v. Anderson, 01 Civ. 1909	
QUESTION	RESPONSE
1) Has the New York State Surrogate's Court ("Surrogate's Court") issued letters of administration to Ken Wiwa , as predicted by Jennifer Green in her 2008 Declaration? If not, does counsel have any information as to why the	Y N
Surrogate's Court has not done so?	
When are the letters now expected?	
2) Has the Surrogate's Court received the outstanding Nigerian signature necessary to complete Ken Wiwa's application? If so, when will it be provided? Did the outstanding signature need to be sent to the New York State Department of Taxation and Finance?	Y N Date:
If so, was it sent?	Y N
When was it sent?	Date:
3) Have the following Plaintiffs received their letters of administration from the Surrogate's Court?	
Doobee?	Y N
Gboko?	Y N
N-Nah?	Y N

Questions for Plaintiffs in Wiwa v. Royal Dutch Shell Petroleum Co., 96 Civ. 8386, & Wiwa v. Anderson, 01 Civ. 1909		
	Nuate?	Y ☐ N ☐
4)	If not, have the following Plaintiffs filed their revised applications with the Surrogate's Court as promised in the 2008 Green Declaration? If so, when did they do so?	
	Doobee?	Y ☐ N ☐ Date: _____
	Gboko?	Y ☐ N ☐ Date: _____
	N-Nah?	Y ☐ N ☐ Date: _____
	Nuate?	Y ☐ N ☐ Date: _____
5)	Have the following Plaintiffs sent in their requests for waivers and consents from the New York State Department of Taxation and Finance as promised in the 2008 Green Declaration? If so, when did they do so?	
	Doobee?	Y ☐ N ☐ Date: _____
	Gboko?	Y ☐ N ☐ Date: _____
	N-Nah?	Y ☐ N ☐ Date: _____
	Nuate?	Y ☐ N ☐ Date: _____

Questions for Plaintiffs in Wiwa v. Royal Dutch Shell Petroleum Co., 96 Civ. 8386, & Wiwa v. Anderson, 01 Civ. 1909	
6) If it took 5 months for Blessing Kpuinen to receive her letters of administration after filing her corrected application with the Surrogate's Court, why does Wiwa counsel think it will only take four to six weeks for Plaintiffs Ken Wiwa, Doobee, Gbokoo, N-Nah, and Nuate to receive Surrogate's Court letters after completing their applications?	
7) Did any of the following Wiwa Plaintiffs lack a death certificate for the person on whose behalf they sought letters from the Surrogate's Court?	
Ken Wiwa?	Y ___ N ___
Doobee?	Y ___ N ___
Gbokoo?	Y ___ N ___
N-Nah?	Y ___ N ___
Nuate?	Y ___ N ___
8) Other than having signatures verified by a U.S. embassy or consulate in Nigeria, did the following Plaintiffs encounter difficulties complying with the application requirements for New York State letters of administration? If yes, please describe. Ken Wiwa?	Y ___ N ___ Difficulties:

Questions for Plaintiffs in Wiwa v. Royal Dutch Shell Petroleum Co., 96 Civ. 8386, & Wiwa v. Anderson, 01 Civ. 1909	
	Y ___ N ___ Difficulties:
Doobee?	
Gboko?	Y ___ N ___ Difficulties:
N-Nah?	Y ___ N ___ Difficulties:
Nuate?	Y ___ N ___ Difficulties:
9) Under Nigerian law, are any of the following Wiwa Plaintiffs recipients of letters of administration, executors, or recipients of the probate of a will for the decedents on whose behalf they are bringing claims?	
Ken Wiwa?	Y ___ N ___
Doobee?	Y ___ N ___
Gboko?	Y ___ N ___
N-Nah?	Y ___ N ___

Questions for Plaintiffs in <i>Wiwa v. Royal Dutch Shell Petroleum Co.</i> , 96 Civ. 8386, & <i>Wiwa v. Anderson</i> , 01 Civ. 1909			
	Nuate?	Y ___ N ___	
10) If any of the following Wiwa Plaintiffs are not administrators, executors, or recipients of probate under Nigerian law for the decedents on whose behalf they are bringing claims, have they taken any steps towards acquiring such status? If so, what steps were taken? When?			
	Ken Wiwa?	Y ___ N ___ Date ___ Steps Taken: _____	
	Doobee?	Y ___ N ___ Date ___ Steps Taken: _____	
	Gboko?	Y ___ N ___ Date ___ Steps Taken: _____	

Questions for Plaintiffs in <i>Wiwa v. Royal Dutch Shell Petroleum Co., 96 Civ. 8386, & Wiwa v. Anderson, 01 Civ. 1909</i>			
	N-Nah?	Y ___ N ___ Date ___ Steps Taken:	
	Nuate?	Y ___ N ___ Date ___ Steps Taken:	
11) If any of the following Wiwa Plaintiffs are not administrators, executors, or recipients of probate under Nigerian law for the decedents on whose behalf they are bringing claims but have taken any steps towards acquiring such status, have they encountered any difficulties in doing so? If yes, what are the difficulty/ies? When did each difficulty occur?			
	Ken Wiwa?	Y ___ N ___ Difficulties (include dates):	

Questions for Plaintiffs in Wiwa v. Royal Dutch Shell Petroleum Co., 96 Civ. 8386, & Wiwa v. Anderson, 01 Civ. 1909	
Doobee?	Y___ N___ Difficulties (include dates):
Gboko?	Y___ N___ Difficulties (include dates):
N-Nah?	Y___ N___ Difficulties (include dates):
Nuate?	Y___ N___ Difficulties (include dates):

Questions for Plaintiffs in <i>Wiwa v. Royal Dutch Shell Petroleum Co.</i> , 96 Civ. 8386, & <i>Wiwa v. Anderson</i> , 01 Civ. 1909	
12) If any of the following Wiwa Plaintiffs are not administrators, executors, or recipients of probate under Nigerian law for the decedents on whose behalf they are bringing claims, and have not taken steps towards acquiring such status, why have they not done so?	
Ken Wiwa?	
Doobee?	
Gboko?	

Questions for Plaintiffs in Wiwa v. Royal Dutch Shell Petroleum Co., 96 Civ. 8386, & Wiwa v. Anderson, 01 Civ. 1909	N-Nah?	Nuate?
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QUESTIONS FOR PLAINTIFFS IN WIWA V. ROYAL DUTCH SHELL PETROLEUM CO., 96 CIV. 8386, & WIWA V. ANDERSON, 01 CIV. 1909	
QUESTIONS FOR PLAINTIFFS ESTHER KIOBEL AND KPOBARI TUSIMA IN KIOBEL V. ROYAL DUTCH PETROLEUM CO., 02 CIV. 7618	
QUESTION	RESPONSE
1) Have Esther Kiobel or Kpobari Tusima applied for letters of administration from the New York Surrogate's Court? If yes, when do they anticipate receiving them?	
Esther Kiobel?	Y ☐ N ☐ Date: _____
Kpobari Tusima?	Y ☐ N ☐ Date: _____
2) If Esther Kiobel and/or Kpobari Tusima have not applied for letters of administration from the Surrogate's Court, do they plan to do so? If yes, when?	
Esther Kiobel?	Y ☐ N ☐ Date: _____
Kpobari Tusima?	Y ☐ N ☐ Date: _____
3) Can Plaintiff Kiobel receive letters of administration from the Surrogate's Court despite the fact that no death certificate was issued for her husband on behalf of whose estate she might seek them?	Y ☐ N ☐
4) Under Nigerian law, are either of the following Kiobel Plaintiffs recipients of letters of administration, executors, or recipients of the probate of a will for the decedents on whose behalf they are bringing claims?	
Esther Kiobel?	Y ☐ N ☐
Kpobari Tusima?	Y ☐ N ☐

Questions for Plaintiffs in Wiwa v. Royal Dutch Shell Petroleum Co., 96 Civ. 8386, & Wiwa v. Anderson, 01 Civ. 1909		
5) If either of the Klobel Plaintiffs are not administrators, executors, or recipients of probate under Nigerian law for the decedents on whose behalf they are bringing claims, have they taken any steps towards acquiring such status? If so, what steps?		
Esther Klobel?	Y ___ N ___ Steps Taken:	
Kpobari Tusima?	Y ___ N ___ Steps Taken:	
6) If either of the Klobel Plaintiffs are not administrators, executors, or recipients of probate under Nigerian law for the decedents on whose behalf they are bringing claims but have taken any steps towards acquiring such status, have they encountered any difficulties in doing so? If yes, what are they?		

Questions for Plaintiffs in <i>Wiwa v. Royal Dutch Shell Petroleum Co.</i>, 96 Civ. 8386, & <i>Wiwa v. Anderson</i>, 01 Civ. 1909	Esther Kiobel?	Y ___ N ___ Difficulties:
Kpobari Tusima?	Y ___ N ___ Difficulties:	
7) If either of the Kiobel Plaintiffs are not administrators, executors, or recipients of probate under Nigerian law for the decedents on whose behalf they are bringing claims, and have not taken steps towards acquiring such status, why not?	Esther Kiobel?	

Questions for Plaintiffs in Wiwa v. Royal Dutch Shell Petroleum Co., 96 Civ. 8386, & Wiwa v. Anderson, 01 Civ. 1909	Kpobari Tusima?
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Questions for Plaintiffs Kiobel and Tusima in Kiobel v. Royal Dutch Petroleum Co., 02 Civ. 7618			
	QUESTION	RESPONSE	
1)	Have Esther Kiobel or Kpobari Tusima applied for letters of administration from the New York Surrogate's Court? If yes, when do they anticipate receiving them?		
	Esther Kiobel?	Y ☐ N ☐ Date: _____	
	Kpobari Tusima?	Y ☐ N ☐ Date: _____	
2)	If Esther Kiobel and/or Kpobari Tusima have not applied for letters of administration from the Surrogate's Court, do they plan to do so? If yes, when?		
	Esther Kiobel?	Y ☐ N ☐ Date: _____	
	Kpobari Tusima?	Y ☐ N ☐ Date: _____	
3)	Can Plaintiff Kiobel receive letters of administration from the Surrogate's Court despite the fact that no death certificate was issued for her husband on behalf of whose estate she might seek them?		
		Y ☐ N ☐	

Questions for Plaintiffs Kiobel and Tusima in Kiobel v. Royal Dutch Petroleum Co., 02 Civ. 7618	
4) Under Nigerian law, are either of the following Kiobel Plaintiffs recipients of letters of administration, executors, or recipients of the probate of a will for the decedents on whose behalf they are bringing claims?	
Kiobel?	Y ☐ N ☐
Tusima?	Y ☐ N ☐
5) If either of the Kiobel Plaintiffs are not administrators, executors, or recipients of probate under Nigerian law for the decedents on whose behalf they are bringing claims, have they taken any steps towards acquiring such status? If so, what steps were taken?	
Kiobel?	Y ☐ N ☐ Steps Taken:

Questions for Plaintiffs Kiobel and Tusima in Kiobel v. Royal Dutch Petroleum Co., 02 Civ. 7618	
Tusima?	Y ___ N ___ Steps Taken:
6) If either of the Kiobel Plaintiffs are not administrators, executors, or recipients of probate under Nigerian law for the decedents on whose behalf they are bringing claims but have taken any steps towards acquiring such status, have they encountered any difficulties in doing so? If yes, what are the difficulty/ies? When did each difficulty occur?	
Kiobel?	Y ___ N ___ Difficulties (include dates):

Questions for Plaintiffs Kiobel and Tusima in Kiobel v. Royal Dutch Petroleum Co., 02 Civ. 7618	
	Y ___ N ___ Difficulties (include dates):
Tusima?	
7) If either of the Kiobel Plaintiffs are not administrators, executors, or recipients of probate under Nigerian law for the decedents on whose behalf they are bringing claims, and have not taken steps towards acquiring such status, why not?	
Kiobel?	

Questions for Plaintiffs Kiobel and Tusima in Kiobel v. Royal Dutch Petroleum Co., 02 Civ. 7618	
Tusima?	