

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KEN WIWA, <i>et al.</i> ,	Plaintiffs,	
– against –		96 Civ. 8386 (KMW)(HBP)
ROYAL DUTCH PETROLEUM COMPANY, <i>et al.</i> ,	Defendants.	
KEN WIWA, <i>et al.</i> ,	Plaintiffs,	
– against –		01 Civ. 1909 (KMW)(HBP)
BRIAN ANDERSON,	Defendant.	

**NOTICE OF MOTION TO COMPEL PLAINTIFFS' COMPLIANCE WITH THE  
COURT'S OCTOBER 7, 2008 AND MARCH 16, 2009 ORDERS**

PLEASE TAKE NOTICE that, upon the Declaration of Rory O. Millson, executed April 20, 2009, with appendices and exhibits thereto, the Second Declaration of Rory O. Millson, executed April 20, 2009, with exhibits thereto, and all prior pleadings and proceedings herein, defendants Shell Petroleum, N.V., as successor to Royal Dutch Petroleum Company, Shell Transport and Trading Company, Ltd., formerly The "Shell" Transport and Trading Company, p.l.c., and Brian Anderson hereby move this Court before the Honorable Kimba M. Wood, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, for an order pursuant to Federal Rules of Civil Procedure 36(a)(6), 37(b)(2), and 37(c) compelling plaintiffs to comply with the Court's October 7, 2008 and March 16, 2009 Orders, as set forth more fully in

the accompanying Memorandum of Law, and granting such other and further relief as the Court deems just and proper.

April 20, 2009

CRAVATH, SWAINE & MOORE LLP,

by 

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