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	DISTRICT COURT ICT OF NEW YORK	X		DO EL		NICAL	
KEN WIWA, et a	<u>l.</u> ,	l l		11		.ED: _/0	_
	Plaintiffs,						
-against-			96 (	Civ.	8386	(KMW)	(HBP)
ROYAL DUTCH PE	TROLEUM CO., et al.	,					
	Defendants.						
		X					
KEN WIWA, et a	<u>l.</u> ,	<b> </b>					
	Plaintiffs,						
-against-			01 (	Civ.	1909	(KMW)	(HBP)
BRIAN ANDERSON	,						
	Defendant.						
		 X					
ESTHER KIOBEL,	et al.,						
·	Plaintiffs,	İ					
-against-	1141114114		02 (	Civ.	7618	(KMW)	(HBP)
-	TROI FIIM CO ot al				<u>ORDI</u>	<u> ER</u>	
ROTAL DOTCH PE	TROLEUM CO., et al.	,					
	Defendants.						
KIMBA M. WOOD,	 U.S.D.J.:	X					

The Court is holding a hearing in the three above-captioned cases on October 7, 2008. In preparation for the hearing, parties shall review the enclosed Chart of Outstanding Discovery Issues in <u>Wiwa v. Royal Dutch Shell Petroleum Co.</u>, 96 Civ. 83886,

<u>Wiwa v. Anderson</u>, 01 Civ. 1909, and <u>Kiobel v. Royal Dutch</u>
Petroleum Co., 02 Civ. 7618 ("Outstanding Issues Chart").

By October 6, 2008 at 5:00 PM, all parties shall notify the Court and other parties by fax of any changes or additions that they believe should be made to the Outstanding Issues Chart to make it a full and accurate account of the pending discovery issues in the above-captioned actions. Some documents described in the Outstanding Issues Chart have questions from the Court, which are bracketed and in bold font for easy identification. The party or parties who submitted any document whose description includes bold, bracketed questions shall provide the Court and the other parties with answers to those questions via fax by October 6, 2008 at 5:00 PM. Any document(s) that support(s) a party's proposed change or addition to the Outstanding Issues Chart or responds to a question posed by the Court therein shall also be faxed to the Court and other parties by October 6, 2008 at 5:00 PM.

SO ORDERED.

Dated: New York, New York October 3, 2008

Kimba M. Wood United States District Judge

## CHART OF OUTSTANDING DISCOVERY ISSUES IN WIWA I, WIWA II, AND KIOBEL

The last day for parties to submit discovery requests was May 28, 2004. (96-D.E. 56, 66, 71, 118.)

The last day for Defendants' to respond to Plaintiffs' discovery requests was June 10, 2004. (96-D.E. 138.)

The last day for parties to file pre-trial motions was June 28, 2004. (96-D.E. 56, 66, 71, 118.)

Discovery Request	Outstanding Issues	Current Status
Wiwa Plaintiffs' Second Set of Interrogatories [REGARDING?], served [DATE?].	Wiwa Plaintiffs' May 28, 2004 Letter requests discovery conference regarding Defendants' allegedly inadequate response.	
Wiwa Plaintiffs' Second Document Request [REGARDING?], served [DATE?].	Wiwa Plaintiffs' May 28, 2004 Letter requests discovery conference regarding Defendants' allegedly inadequate response.	
Wiwa Plaintiffs' Fourth Request for Production [REGARDING?], served [DATE?].	Wiwa Plaintiffs' May 28, 2004 Letter requests discovery conference regarding Defendants' allegedly inadequate response.	
Wiwa Plaintiffs' 30(b)(6) Interrogatories and Document Demands [REGARDING?], served [DATE?].	Wiwa Plaintiffs' May 28, 2004 Letter requests discovery conference regarding Defendants' allegedly inadequate response.	
Wiwa and Kiobel Plaintiffs' joint request to redepose Defendants' witnesses Emeka Achebe, Brian Anderson, Alan Detheridge, and Egbert Imomoh, served [DATE?].	<ol> <li>Wiwa and Kiobel Plaintiffs' May 28, 2004 Letter requests discovery conference regarding Defendants' allegedly inadequate response.</li> <li>Defendants' Cross-Motion for Protective Order, June 28, 2004.</li> </ol>	
Kiobel Plaintiffs' Third Document Request [REGARDING?], served [DATE?].	Kiobel Plaintiffs' May 28, 2004 Letter requests discovery conference regarding Defendants' allegedly inadequate response.	

<sup>&</sup>lt;sup>1</sup> Wiwa ν. Royal Dutch Petroleum Co., 96 Civ. 8386.
<sup>2</sup> Wiwa ν. Anderson, 01 Civ. 1909.

<sup>&</sup>lt;sup>3</sup> Kiobel v. Royal Dutch Petroleum Co., 02 Civ. 7618

Discovery Request	Outstanding Issues	Current Status
Kiobel Plaintiffs' Fourth Document Request [REGARDING?], served [DATE?].	Kiobel Plaintiffs' May 28, 2004 Letter requests discovery conference regarding Defendants' allegedly inadequate response.	
Wiwa and Kiobel Plaintiffs' Motion to Compel Payment of Deposition Expenses, served [DATE?].		Fully briefed, [DATE?]
Kiobel Plaintiffs' Motion to Compel Production of the report "Peace and Security in the Niger Delta" and related documents, served [DATE?].	Wiwa Plaintiffs' request to join pending.	
Defendants' Motion to Strike <i>Kiobel</i> Plaintiffs' Interrogatory Answers and their October 10, 2004 Amended Responses to the Second Set of Interrogatories as well as to Preclude Testimony regarding <i>Kiobel</i> Plaintiffs' response to Royal Dutch Petroleum Co.'s First Set of Interrogatories, filed April 23, 2003. (02-D.E. 71.)	Request to file motion pending.	Fully briefed, May 20, 2004.
Defendants Fourth and Fifth Set of Requests for Admission ("RFAs") [REGARDING?] from Wiwa and Kiobel Plaintiffs, served April 27 and April 30, 2004.	<ol> <li>Wiwa and Kiobel Plaintiffs objected to the number and content of the RFAs [DATE(S)?].</li> <li>Defendants request permission to move to compel Plaintiffs' responses to the RFAs [DATE?]</li> <li>Plaintiffs' Obligation to respond stayed by MJ Pitman's June 2, 2004 Order.</li> </ol>	Fully briefed regarding Wiwa Plaintiffs, June 25, 2004.  Kiobel Plaintiffs contend they do not have to file opposition papers.  Request to file the motion still

Discovery Request  Discovery Request  Defendants' Interrogatories to Wiwa and Kiobel Plaintiffs' vignesses and payments Plaintiffs regarding sources of information for Plaintiffs' vignesses and payments Plaintiffs allegedly made or offered to witnesses or potential allegedly made or offered to witnesses or protential witnesses for false testimony, served April 28, 2004.  Defendants' Second Set of Requests for Production of Documents [REGARDING?], served May 21, 2004.  Defendants' Second Set of Requests for Production of Documents [REGARDING?], served May 21, 2004.  Defendants Second Set of Requests for Production of Documents [REGARDING?], served May 21, 2004.  Defendants Royal Dutch Petroleum Co and Shell Transport and Trading Co., p.l.e.'s Contention Interrogatories for Kiobel Plaintiffs, served May 28, 2004.  Defendants Royal Dutch Petroleum Co and Shell Transport and Trading Co., p.l.e.'s Contention Interrogatories for Kiobel Plaintiffs, served May 28, 2004.  Defendants Royal Dutch Petroleum Co and Shell Defendants Royal Dutch Petroleum Co. 2004.  Defendants Royal Dutch Petroleum Co. 2006.  Defendants Royal Dutch Petroleum Co. 2006.  Defendants Royal Dutch Petroleum Co. 2006.  Defendants Royal Dutch Petroleum Co. 2007.  Defendants Royal Dutch Petroleum Co. 2008.  Defendants Royal Dutch Petroleum Co. 2009.  Defendants Royal			
idants' Interrogatories to Wiwa and Kiobel tiffs regarding sources of information for tiffs' witnesses and payments Plaintiffs edly made or offered to witnesses or potential sses for false testimony, served April 28, 2004.  Idants' Second Set of Requests for Production cuments [REGARDING?], served May 21, and and Trading Co., p.l.c.'s Contention ogatories for Kiobel Plaintiffs, served May 28,	Discovery Request	Outstanding Issues	<b>Current Status</b>
sses for false testimony, served April 28, 2004. sses for false testimony, served April 28, 2004.  Idants' Second Set of Requests for Production cuments [REGARDING?], served May 21,  Idants Royal Dutch Petroleum Co. and Shell port and Trading Co., p.l.c.'s Contention ogatories for Kiobel Plaintiffs, served May 28,	Defendants' Interrogatories to Wiwa and Kiobel Plaintiffs regarding sources of information for Plaintiffs' witnesses and payments Plaintiffs	1. Wiwa and Kiobel Plaintiffs' June 7, 2004 letter requests (1) discovery conference to address their complaint that these discovery requests are untimely, and (2) a protective order against further such discovery requests.	
ndants' Second Set of Requests for Production cuments [REGARDING?], served May 21, served May 21, or contention ogatories for Kiobel Plaintiffs, served May 28,	allegedly made or offered to witnesses or potential witnesses for false testimony, served April 28, 2004.	2. Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.	
ndants' Second Set of Requests for Production cuments [REGARDING?], served May 21, endants Royal Dutch Petroleum Co. and Shell port and Trading Co., p.l.c.'s Contention ogatories for Kiobel Plaintiffs, served May 28,		3. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]	
ndants Royal Dutch Petroleum Co. and Shell port and Trading Co., p.l.c.'s Contention ogatories for <i>Kiobel</i> Plaintiffs, served May 28,	Defendants' Second Set of Requests for Production of Documents [ <b>REGARDING?</b> ], served May 21, 2004.	1. Wiwa and Kiobel Plaintiffs' June 7, 2004 letter requests (1) discovery conference to address their complaint that these discovery requests are untimely and improper, and (2) a protective order against further such discovery requests.	
ndants Royal Dutch Petroleum Co. and Shell port and Trading Co., p.l.c.'s Contention ogatories for <i>Kiobel</i> Plaintiffs, served May 28,		Obligation to respond stayed by	
ndants Royal Dutch Petroleum Co. and Shell port and Trading Co., p.l.c.'s Contention ogatories for <i>Kiobel</i> Plaintiffs, served May 28,		3. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]	
<ol> <li>Defendants request permission to file a motio Plaintiffs' July 2, 2004.</li> <li>Plaintiffs' Obligation to respond stayed by 2004 Order.</li> </ol>	Defendants Royal Dutch Petroleum Co. and Shell Transport and Trading Co., p.l.c.'s Contention Interrogatories for <i>Kiobel</i> Plaintiffs, served May 28,	1. Wiwa and Kiobel Plaintiffs' June 7, 2004 letter requests (1) discovery conference to address their complaint that these discovery requests are untimely, and (2) a protective order against further such discovery requests.	
	2004.	2. Defendants request permission to file a motion to compel <i>Kiobel</i> Plaintiffs' July 2, 2004.	

Discovery Request  Discovery Request  Discovery Request  Defendants Royal Dutch Petroleum Co. and Shell  Transport and Trading Co., p.l.c.'s Contention  Interrogatories for Wiwa Plaintiffs, served May 28,  2004.  Defendant Brian Anderson's Contention  Interrogatories for Wiwa Plaintiffs, served May 28,  Defendant Brian Anderson's Contention  Defendant Brian Plaintiffs, served May 28,  Defendants' Request for Production of Documents  Defendants' Request for Production of Doc			
port and Trading Co., p.l.c.'s Contention ogatories for Wiwa Plaintiffs, served May 28, ogatories for Wiwa Plaintiffs, served May 28, idant Brian Anderson's Contention ogatories for Wiwa Plaintiffs, served May 28, ogatories for Wiwa Plaintiffs, served May 28, idants' Request for Production of Documents ARDING?], served May 28, 2004.	Discovery Request	Outstanding Issues	Current Status
idant Brian Anderson's Contention ogatories for Wiwa Plaintiffs, served May 28, dants' Request for Production of Documents ARDING?], served May 28, 2004.	Defendants Royal Dutch Petroleum Co. and Shell Transport and Trading Co., p.l.c.'s Contention Interrogatories for <i>Wiwa</i> Plaintiffs, served May 28,	1. Wiwa and Kiobel Plaintiffs' June 7, 2004 letter requesting (1) discovery conference to address their complaint that these discovery requests are untimely, and (2) a protective order against further such discovery requests.	
idant Brian Anderson's Contention ogatories for Wiwa Plaintiffs, served May 28, odants' Request for Production of Documents ARDING?], served May 28, 2004.	2004.	2. Defendants request permission to file a motion to compel <i>Wiwa</i> Plaintiffs' response July 2, 2004.	
idant Brian Anderson's Contention ogatories for Wiwa Plaintiffs, served May 28, ogatories for Production of Documents idants' Request for Production of Documents ARDING?], served May 28, 2004.		3. Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.	
	Defendant Brian Anderson's Contention Interrogatories for <i>Wiwa</i> Plaintiffs, served May 28, 2004.	1. Wiwa and Kiobel Plaintiffs' June 7, 2004 letter requests (1) discovery conference to address their complaint that these discovery requests are untimely, and (2) a protective order against further such discovery requests.	
		<ol> <li>Defendants request permission to file a motion to compel July 2, 2004.</li> <li>Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order</li> </ol>	
<ol> <li>2. Kiobel Plaintiffs request permission to file a protective order [DATE?].</li> <li>3. Defendants file a cross-motion to compel discovery July 2, 2004.</li> <li>4. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]</li> </ol>	Defendants' Request for Production of Documents [REGARDING?], served May 28, 2004.	1. Wiwa and Kiobel Plaintiffs' contest that these discovery requests are untimely and improper.	
3. Defendants file a cross-motion to compel discovery July 2, 2004.  4. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]		2. Kiobel Plaintiffs request permission to file a protective order [DATE?].	
4. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]		3. Defendants file a cross-motion to compel discovery July 2, 2004.	
		4. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]	

Defendants' Request for Deposition of [WHOM?].  Defendants' Notice of Document Subpocts to the Nigerian government, served June 4, 2008.  Defendants' Request for Letters Rogatory to the Nigerian government, served June 4, 2008.  Defendants' Interrogatories regarding Wiwa Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.  Defendants' RCO claims, served June 7, 2004.  Defendants' RCO claims, served June 7, 2004.  Defendants' Request for Letters Rogatory to the Nigerian government, served June 7, 2004.  Defendants' Interrogatories regarding Wiwa Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.  Defendants' Plaintiffs' Nume 7, 2004 letter request (1) discovery requests are untimely, and (2) a protective order against further such discovery requests are untimely, and (2) a protective order against further such discovery requests are untimely.  1. Wiwa Plaintiffs' June 7, 2004 letter request (1) discovery requests are untimely, and (2) a protective order against further such discovery requests are untimely.  Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.			
dants' Request for Deposition of [WHOM?].  1. Wiwa and Kiobel Plaintiffs' contest that these discovery requests are untimely and improper.  2. Kiobel Plaintiffs request permission to file a protective order [DATE?].  3. Defendants file a cross-motion to compel discovery July 2, 2004.  4. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]  1. Wiwa and Kiobel Plaintiffs' June 7, 2004 letter request (1) discovery requests are untimely and improper, and (2) a protective order against further such discovery requests.  2. Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order in Kiobel Plaintiffs' June 7, 2004 letter request (1) discovery individuals. Request for Letters Rogatory to the untimely, and (2) a protective order against further such discovery requests were inappropriate. [WHERE / HOW?]  Wiwa and Kiobel Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order in Kiobel Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 letter request (1) discovery requests are untimely.  1. Wiwa Plaintiffs contend this request was untimely.  2. Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.	Discovery Request	Outstanding Issues	Current Status
3. Defendants file a cross-motion to compel discovery July 2, 2004.  4. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]  1. Wiwa and Kiobel Plaintiffs' June 7, 2004 letter request (1) discovery conference to address their complaint that these discovery requests are untimely and improper, and (2) a protective order against further such discovery requests.  2. Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.  3. Wiwa Plaintiffs' contend that the Court's September 29, 2006 Order in Kiobel determined that these croquests were inappropriate. [WHERE / HOW?]  Wiwa and Kiobel Plaintiffs' June 7, 2004 letter request (1) discovery conference to address their complaint that these discovery requests are untimely, and (2) a protective order against further such discovery requests are untimely.  1. Wiwa Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.	Defendants' Request for Deposition of [WHOM?], served May 28, 2004.	<ol> <li>Wiwa and Kiobel Plaintiffs' contest that these discovery requests are untimely and improper.</li> <li>Kiobel Plaintiffs request permission to file a protective order [DATE?].</li> </ol>	
Kiobel determined that these requests were inappropriate. [WHERE / HOW?]  1. Wiwa and Kiobel Plaintiffs' June 7, 2004 letter request (1) discovery conference to address their complaint that these discovery requests are untimely and improper, and (2) a protective order against further such discovery requests.  2. Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.  3. Wiwa Plaintiffs contend that these request were inappropriate. [WHERE / HOW?]  Wiwa and Kiobel Plaintiffs contend that these requests were inappropriate. [WHERE / HOW?]  Wiwa and Kiobel Plaintiffs' June 7, 2004 letter request (1) discovery conference to address their complaint that these discovery requests are untimely, and (2) a protective order against further such discovery requests are untimely, and (2) a protective order against further such discovery requests are untimely, and (2) a protective order against further such discovery requests are untimely, and (2) a protective order against further such discovery requests are untimely, and (2) a protective order against further such discovery requests are untimely, and (2) a protective order against further such discovery requests.  2. Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.		3. Defendants file a cross-motion to compel discovery July 2, 2004.	
I. Wiwa and Kiobel Plaintiffs' June 7, 2004 letter request (1) discovery conference to address their complaint that these discovery requests are untimely and improper, and (2) a protective order against further such discovery requests.  2. Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.  3. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]  Wiwa and Kiobel Plaintiffs' June 7, 2004 letter request (1) discovery conference to address their complaint that these discovery requests are untimely, and (2) a protective order against further such discovery requests.  1. Wiwa Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.		4. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]	
2. Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.  3. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]  to the Wiwa and Kiobel Plaintiffs' June 7, 2004 letter request (1) discovery conference to address their complaint that these discovery requests are untimely, and (2) a protective order against further such discovery requests.  1. Wiwa Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.	Defendants' Notice of Document Subpoena to the National Union of Ogoni Students, served June 2, 2004.	1. Wiwa and Kiobel Plaintiffs' June 7, 2004 letter request (1) discovery conference to address their complaint that these discovery requests are untimely and improper, and (2) a protective order against further such discovery requests.	
3. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]  to the Wiwa and Kiobel Plaintiffs' June 7, 2004 letter request (1) discovery conference to address their complaint that these discovery requests are untimely, and (2) a protective order against further such discovery requests.  1. Wiwa Plaintiffs contend this request was untimely.  2. Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.		2. Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.	
Wiwa and Kiobel Plaintiffs' June 7, 2004 letter request (1) discovery conference to address their complaint that these discovery requests are untimely, and (2) a protective order against further such discovery requests.  1. Wiwa Plaintiffs contend this request was untimely. 2. Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.		3. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]	
	Defendants' Request for Letters Rogatory to the Nigerian government, served June 4, 2008.	Wiwa and Kiobel Plaintiffs' June 7, 2004 letter request (1) discovery conference to address their complaint that these discovery requests are untimely, and (2) a protective order against further such discovery requests.	Fully briefed June 25, 2004.
	Defendants' Interrogatories regarding <i>Wiwa</i> Plaintiffs' RICO claims, served June 7, 2004.	<ol> <li>Wiwa Plaintiffs contend this request was untimely.</li> <li>Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.</li> </ol>	

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Discovery Request	Outstanding Issues	Current Status
Defendants' Document and Deposition Subpoena Regarding MPTC Security, served June 17, 2004.	1. Wiwa and Kiobel Plaintiffs' contest that these discovery requests are untimely and improper.	
	2. Kiobel Plaintiffs request permission to file a protective order [DATE?].	
	3. Defendants file a cross-motion to compel discovery July 2, 2004.	
	4. Plaintiffs' Obligation to respond stayed by MJ Pitman's July 15, 2004 Order.	
	5. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]	
Defendants' Motion [TO WHAT?] the allegedly perjurious Benin testimony, served June 28, 2004.	1. Wiwa and Kiobel Plaintiffs' June 7, 2004 letter requests (1) discovery conference to address their complaint that these discovery requests are untimely, and (2) a protective order against further such discovery requests.	
	2. Wiwa Plaintiffs contend that the Court's September 29, 2006 Order in Kiobel determined that these requests were inappropriate. [WHERE / HOW?]	
Defendants' Notice of Deposition of Keith G. Mabray, served [DATE?].	Wiwa and Kiobel Plaintiffs' June 7, 2004 letter requests (1) discovery conference to address their complaint that these discovery requests are untimely, and (2) a protective order against further such discovery requests.	
Defendants' Third Set of RFAs to Wiwa Plaintiffs	1. Wiwa Plaintiffs object to [WHAT?] [DATE?]	
[REGARDING?], served [DATE?]	2. Wiwa Plaintiffs' time to respond adjourned sine die by MJ Pitman on January 26, 2004.	
	3. MJ Pitman considered Plaintiffs' objection at a February [DAY?], 2004 hearing but the dispute was not resolved.	
Defendants' Request to Re-depose Dornubari Anslem John-Miller, served [DATE?].	Kiobel Plaintiffs consent [DATE?] but re-deposition has not yet occurred.	

Discovery Request  Defendants' Motion for Discovery Sanctions [REGARDING?] pursuant to Federal Rule of Civil Procedure 37, filed [DATE?].  Defendants' Motion to Vacate Kiobel Plaintiffs' designation of Dornubari Anslem John-Miller's deposition transcript as confidential, filed [DATE?]  2. Defendants' November 27, 2006 Letter to Court challenging Kiobel Plaintiffs' designation of remaining portions of John-Miller's deposition transcript as confidential.  Current Status  Fully briefed July 23, 2004.  Request to file the motion [DATE?].			
Federal Rule of Civil  Kiobel Plaintiffs' em John-Miller's transcript [DATE?].  2. Defendants' November 27, 2006 Letter to Court challenging Kiobel Plaintiffs' designation of remaining portions of John-Miller's deposition transcript as confidential.		Outstanding Issues	Current Status
Kiobel Plaintiffs' em John-Miller's transcript [DATE?].  1. Kiobel Plaintiffs agree to de-designate much of John-Miller's deposition transcript [DATE?].  2. Defendants' November 27, 2006 Letter to Court challenging Kiobel Plaintiffs' designation of remaining portions of John-Miller's deposition transcript as confidential.	Defendants' Motion for Discovery Sanctions		Fully briefed July 23, 2004.
<ol> <li>Kiobel Plaintiffs agree to de-designate much of John-Miller's deposition transcript [DATE?].</li> <li>Defendants' November 27, 2006 Letter to Court challenging Kiobel Plaintiffs' designation of remaining portions of John-Miller's deposition transcript as confidential.</li> </ol>	[REGARDING?] pursuant to Federal Rule of Civil Procedure 37, filed [DATE?].		Request to file the motion [ <b>DATE</b> ?].
		gree to de-designate much of John-Miller's deposition	Fully briefed June 25, 2004.
		2. Defendants' November 27, 2006 Letter to Court challenging <i>Kiobel</i> Plaintiffs' designation of remaining portions of John-Miller's deposition transcript as confidential.	