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Date:	August 7, 2014		
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From:	Alan J. Lenczner, Q.C.	Fax:	416-865-2844
Email:	alenczner@litigate.com	Phone:	416-865-3090
RE:	Chevron Corporation et al v. Daniel Carolos Lusitande Yaguaje et al Supreme Court of Canada File No.: 35682		
File No.:	43222		

Please find attached the Responses of Chevron Corporation and Chevron Canada Limited to the motions for intervention.

NUMBER OF PAGES, INCLUDING THIS COVER PAGE: 3
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August 7, 2014

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VIA FACSIMILE AND COURIER

Mr. Roger Bilodeau, Q.C.
Registrar
Supreme Court of Canada
301 Wellington Street
Ottawa, ON
K1A 0J1

Dear Mr. Bilodeau:

RE: Motions For Intervention
Chevron Corporation et al v. Daniel Carlos Lusitande Yaiguaje et al
Supreme Court File No.: 35682
Our File No.: 43222

This letter is written pursuant to Rules 49(1) and (2) in response to the motions for intervention filed pursuant to Rule 55 by:

1. The United States Chamber of Commerce (“US Chamber”);
2. The Canadian Bar Association (“CBA”);
3. The International Human Rights Program, University of Toronto Faculty of Law, MiningWatch Canada, and the Canadian Centre for International Justice (collectively, the “Joint Intervenors”); and
4. The Justice and Corporate Accountability Project (“JCAP”).

The Respondents have no objection to the proposed interventions, but request the right to file a Factum of no more than five pages in length in response to each of the Facta filed by the US Chamber and by the CBA.

The Respondents point out that Chevron Corp. is incorrect when it states that the forum of necessity doctrine does not arise in this case. First, the Court’s Decision in *Club Resorts Ltd. v. Van Breda* raises the doctrine of necessity as a relevant factor in determining jurisdiction. Second, as Chevron Corp. knows, the Respondents are enjoined

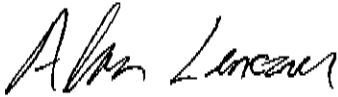
Mr. Roger Bilodeau, Q.C.

August 7, 2014

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from instituting an enforcement action on their Ecuadorean Judgment in the U.S.A. JCAP's intervention proposes to address this issue.

Yours very truly,


Alan J. Lenczner, Q.C. / per BFM

AJL/klh

- c. Clarke Hunter, Q.C., Anne Kirker, Q.C., Jung Lee, Robert Frank and Sally Gomery,
Norton Rose Fulbright
Benjamin Zarnett, Suzy Kauffman and Peter Krolla, **Goodmans LLP**
Jeffrey S. Leon, Ranjan K. Agarwal and Christiaan A. Jordaan, **Bennett Jones LLP**
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