

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

_____)	
PERENCO ECUADOR LTD,)	
)	
Petitioner,)	
)	Case No. 1:19-cv-02943-KBJ
v.)	
)	
THE REPUBLIC OF ECUADOR,)	
)	
Respondent.)	
_____)	

**DECLARATION OF MARK W. FRIEDMAN IN SUPPORT OF
PERENCO’S CONSOLIDATED RESPONSE TO THE REPUBLIC OF
ECUADOR’S PARTIAL OPPOSITION TO PETITION TO ENFORCE
ARBITRAL AWARD AND CROSS-MOTION FOR SETOFF**

I, Mark W. Friedman, hereby declare as follows:

1. I am a member of the law firm of Debevoise & Plimpton LLP, counsel to Petitioner Perenco Ecuador Limited (“Perenco”) in the above-captioned action. I am admitted to practice in the U.S. District Court for the District of Columbia.

2. I make this declaration in support of Perenco’s Consolidated Response to the Republic of Ecuador’s Partial Opposition to Petition to Enforce Arbitral Award and Cross-Motion for Setoff.

3. Attached to this Declaration as Exhibit 1 are excerpts of a true and correct copy of the transcript of the January 13, 2020 Hearing on the Stay of Enforcement during

the Annulment Proceeding in ICSID Case ARB/08/6, *Perenco Ecuador Limited v. Republic of Ecuador* (“Stay Hearing”).

4. Attached to this Declaration as Exhibit 2 is a true and correct copy of the “Statement by the Minister of Economy and Finance of Ecuador, Richard Martínez Alvarado, at the Hearing on January 13, 2020 in relation to suspension of the execution of the Award,” which counsel for the Republic of Ecuador (“Ecuador”) introduced as an exhibit during the Stay Hearing, and a certified translation of the statement.

5. Attached to this Declaration as Exhibit 3 is a true and correct copy of the Letter from Minister Martínez to the Members of the ICSID Annulment Committee dated April 20, 2020, and a certified translation of the letter.

6. Attached to this Declaration as Exhibit 4 is a true and correct copy of Official Letter No. 203R from Ecuador’s Attorney General, Dr. Íñigo Salvador Crespo, to Ecuador’s President, Guillermo Lasso Mendoza, dated July 1, 2021, and a certified translation of the letter.

7. Attached to this Declaration as Exhibit 5 is a true and correct copy of a press release by Ecuador's Ministry of Economy and Finance titled "Ecuador and Perenco Continue Negotiations" and dated July 28, 2021, and a certified translation of the press release.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: September 20, 2021

/s/Mark W. Friedman
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