

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

PERENCO ECUADOR LTD.,)	
<i>Petitioner,</i>)	
v.)	
THE REPUBLIC OF ECUADOR,)	Case No. 19-cv-02943-KBJ
<i>Respondent.</i>)	
)	

**MOTION FOR ISSUANCE OF A LETTER ROGATORY PURSUANT TO THE
INTER-AMERICAN CONVENTION ON LETTERS ROGATORY**

Petitioner Perenco Ecuador Ltd. (“Perenco”), by and through undersigned counsel, requests that this Court issue a letter rogatory in the form attached hereto pursuant to the Inter-American Convention on Letters Rogatory (the “Inter-American Convention”), directed to the appropriate authorities of the Republic of Ecuador (“Ecuador”).¹

The United States of America and Ecuador have both ratified the Inter-American Convention and its Additional Protocol (the “IACAP”), which apply to the service of process. The process prescribed by the IACAP for service of process through a foreign central authority cannot begin without the Court’s signature and seal on the Inter-American Convention Request Form (the “USM-272 Form”), the official form for

¹ Pursuant to Federal Rule of Civil Procedure 4(j)(1) and 28 U.S.C. § 1608(a), in the absence of a special arrangement for service between the plaintiff and a foreign state, service on a foreign state shall be made in accordance with an applicable international convention on service of judicial documents.

requesting service abroad pursuant to the Convention. The USM-272 Form is attached hereto as Exhibit A. A copy of Spanish translations of the papers to be served along with the USM-272 Form, comprising the papers Petitioner filed in this Court on October 1, 2019 and the Summons in a Civil Action issued by this Court on October 3, 2019, is attached hereto as Exhibit B.

Perenco requested that Respondent's counsel accept service within 24 hours via an email sent at 5:43 PM EDT on October 1, 2019. At 9:05 AM EDT on October 2, 2019 Respondent's counsel informed Perenco that it would not accept service.

Perenco hereby respectfully requests that the Court grant this Motion and execute the Proposed Order, which is attached hereto as Exhibit C.

Dated: October 3, 2019
Washington, DC

Respectfully submitted,

/s/ Ada Fernandez Johnson

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