

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In the Matter of the Application of the

PEOPLE OF THE STATE OF NEW YORK, by
ERIC T. SCHNEIDERMAN,
Attorney General of the State of New York,

Petitioner,

-against-

PRICEWATERHOUSECOOPERS LLP and
EXXON MOBIL CORPORATION,

Respondents.

Index No. 451962/2016

IAS Part 61

Hon. Barry R. Ostrager

Motion Sequence No. ____

AFFIRMATION OF INTENT TO RESTRICT ACCESS

DANIEL J. TOAL, an attorney duly admitted to practice law before the
Courts of the State of New York, affirms the following under penalties of perjury.

1. I am a member of the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, counsel for Exxon Mobil Corporation (“ExxonMobil”).
2. On May 19, 2017, my firm, on behalf of ExxonMobil, electronically filed placeholders for documents that ExxonMobil wishes to have permanently sealed.
3. Specifically, placeholders for certain documents were filed publicly on NYSCEF. These documents are:
 - a. Exxon Mobil Corporation’s Brief in Support of its Motion to Quash and for a Protective Order (NYSCEF No. 130);

- b. The Affirmation of Justin Anderson in Support of Exxon Mobil Corporation's Motion to Quash and for a Protective Order (NYSCEF No. 132)
 - c. The Affirmation of Good Faith (NYSCEF No. 131)
 - d. Exhibit S to the Affirmation of Justin Anderson in Support of Exxon Mobil Corporation's Motion to Quash and for a Protective Order, which is a letter, dated May 3, 2017, from John Oleske to Michele Hirshman, Theodore Wells, and Daniel Toal (NYSCEF No. 156);
 - e. Exhibit U to the Affirmation of Justin Anderson in Support of Exxon Mobil Corporation's Motion to Quash and for a Protective Order, which is a subpoena dated May 8, 2017 (NYSCEF No. 158);
 - f. Exhibit V to the Affirmation of Justin Anderson in Support of Exxon Mobil Corporation's Motion to Quash and for a Protective Order, which is a subpoena dated May 8, 2017 (NYSCEF No. 159);
 - g. Exhibit W to the Affirmation of Justin Anderson in Support of Exxon Mobil Corporation's Motion to Quash and for a Protective Order, which is a subpoena dated May 8, 2017 (NYSCEF No. 160);
 - h. Exhibit X to the Affirmation of Justin Anderson in Support of Exxon Mobil Corporation's Motion to Quash and for a Protective Order (NYSCEF No. 161).
4. The remaining documents ExxonMobil filed on May 19, 2017 were publicly filed on NYSCEF.

5. I respectfully request that the Clerk permit the documents listed above to be filed as restricted from public view for a period of 10 days.

6. To further comply with the e-filing protocol I will move by Order to Show Cause or Proposed Stipulation to Be So Ordered to have these documents filed under seal and permanently removed from public view within 10 days of filing this affirmation. I understand that if I comply by filing an Order to Show Cause or Proposed Stipulation to Be So Ordered I will be given an additional 14 days of restricted status.

Dated: New York, New York
May 19, 2017



Daniel J. Toal