

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

In re Application of:	)	
	)	
Daniel Carlos Lusitand Yaiguaje, et al.,	)	
	)	
Applicants,	)	Case No. 10-MC-80324 CRB (EMC)
	)	
For the Issuance of a Subpoena for the	)	
Taking of Depositions and the	)	
Production of Documents in a Foreign	)	
Proceeding Under 28 U.S.C. § 1782	)	
_____	)	

In re Application of:	)	
	)	
THE REPUBLIC OF ECUADOR,	)	
	)	
Applicant,	)	Case No. 10-MC-80225 CRB (EMC)
	)	(Related case)
For the Issuance of a Subpoena for the	)	
Taking of Depositions and the	)	
Production of Documents in a Foreign	)	
Proceeding Under 28 U.S.C. § 1782	)	
_____	)	

**DECLARATION OF KAREN HINTON**

I, KAREN HINTON, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the owner and principal of Hinton Communications, a public affairs firm, located at 1215 19<sup>th</sup> Street, NW, Washington, DC 20036.
2. Hinton Communications is employed by the Ecuadorian plaintiffs to advise and consult on media relations strategy related to the ongoing litigation involving Chevron Corporation.
3. On August 10<sup>th</sup>, 2011, I received a phone call from Adam Klasfeld, who I know to be a reporter for Courthouse News Service.
4. During the course of my August 10<sup>th</sup>, 2011, telephone conversation Mr. Klasfeld requested that I comment on an August 5<sup>th</sup>, 2011, Sealed Order

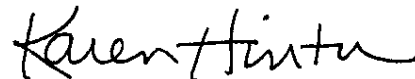
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issued by Judge Breyer in *re Application* of Daniel Carlos Lusitand Yaiguaje, et al., docket No. 3: 11-MC-80087 (CRB). I indicated to Mr. Klasfeld that I was not familiar with the August 5<sup>th</sup>, 2011, Sealed Order because I had not earlier been provided a copy of the Order.

5. I subsequently contacted counsel for the Ecuadorian plaintiffs and was informed that the August 5<sup>th</sup>, 2011, Sealed Order was, in fact, under seal. Counsel advised me that I should not discuss with Mr. Klasfeld the contents of the Order or the documents quoted therein.
6. I phoned Mr. Klasfeld to advise him that the August 5<sup>th</sup>, 2011, Sealed Order was under seal. He informed me that he had personally received the August 5<sup>th</sup>, 2011, Sealed Order from Chevron Corporation on August 10<sup>th</sup>, 2011, and that he was unable to obtain this document from the court's PACER system.
7. Mr. Klasfeld informed me that he subsequently contacted Chevron Corporation spokesman Kent Robertson. As relayed to me by Mr. Klasfeld, Mr. Robertson indicated that he knew the August 5<sup>th</sup>, 2011, Sealed Order, was under seal but indicated to Mr. Klasfeld that the Order was initially public and then placed under seal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 11, 2011.



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KAREN HINTON