

EXHIBIT B

From: [Ondrej Krehel](#)
To: [Burke, Matthew](#)
Cc: [Steven Donziger](#); [Neuman, Andrea E.](#)
Subject: RE: Chevron Corp. v. Donziger
Date: Monday, March 11, 2019 11:12:43 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

[External Email]

Dear Esq. Burke,

Per the Court's Order provided to me, I (Ondrej Krehel) or LIFARS general mailbox did not receive the listing #1 or #2 from Mr. Donziger.

Kind Regards,

Ondrej Krehel

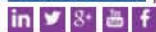


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From: Burke, Matthew <RMBurke@gibsondunn.com>

Sent: Monday, March 11, 2019 11:00 AM

To: Ondrej Krehel <ondrej.krehel@lifars.com>

Cc: Steven Donziger <sdonziger@donzigerandassociates.com>; Neuman, Andrea E. <ANEuman@gibsondunn.com>

Subject: Chevron Corp. v. Donziger

Dear Mr. Krehel,

Per the Court's Order, Mr. Donziger was required to provide to you and Chevron's Forensic Expert, Spencer Lynch, a listing, "under penalty of perjury," of:

1. "[A]ll devices he has used to access or store information or for communication since March 4, 2012 – including, but not limited to, personal computers, tablets, phones, and external storage devices, such as external hard drives and thumb drives – (the 'Devices'), indicating for each of the Devices whether he has possession, custody, or control of the Devices, and if not, stating the reasons why that is so, i.e., whether they were destroyed, lost, etc. and the present location of the Devices"; and
2. "[A]ll accounts – including, but not limited to, email accounts (including web-based

email accounts); accounts (including web- or cloud-based) related to any document management services, such as Dropbox; and accounts related to any messaging services, such as WhatsApp, Facebook Messenger, instant messages, etc. – Donziger has used since March 4, 2012 (the ‘Media’), indicating whether he presently has the ability to access those accounts and, if not, stating the reasons why that is so.”

See Dkt. 2172 at 1-2. Mr. Lynch has informed us that he did not receive the ordered listing from Mr. Donziger. Can you please confirm to us and Mr. Donziger (copied here) today whether you received the list?

Thank you for your prompt attention to this matter.

Best,
R. Matthew Burke

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