

SUBPOENA

Superior Court of the District of Columbia
CIVIL DIVISION
500 Indiana Avenue, N.W., Suite 5000
Washington, D.C. 20001 Telephone (202) 879-1133

United States Virgin Islands
Office of the Attorney General
3438 Kronprindsens Gade **Plaintiff**
GERS Complex, 2nd Floor
St. Thomas, U.S. Virgin Islands 00802

SUBPOENA IN A CIVIL CASE

16 - 00 24 6 9

ExxonMobil Oil Corp.,
a New Jersey corporation, **Defendant**
5959 Las Colinas Blvd, Irving, TX 75039

CASE NUMBER: _____

TO: Competitive Enterprise Institute
1899 L Street NW
Washington, DC 20036

YOU ARE COMMANDED to appear in this Court at the place, date, and time specified below to testify in the above case.

COURTROOM	DATE	TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE	TIME

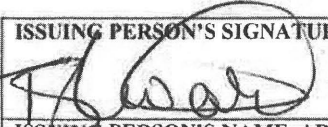
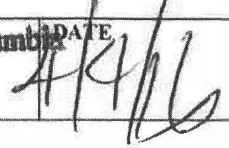
Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Super. Ct. Civ. R. 30(b)(6)

YOU ARE COMMANDED to produce and permit inspection copying of the following documents or objects at the place, date, and time specified below (*list documents or objects*):

DOCUMENTS OR OBJECTS		
See Attachment A.		
PLACE OF PRODUCTION	DATE	TIME
Linda Singer, Esq. Cohen Milstein Sellers & Toll PLLC 1100 New York Avenue NW, Suite 500, Washington, DC 20005	April 30, 2016	5:00 p.m.

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE	TIME

ISSUING PERSON'S SIGNATURE AND TITLE (indicate if attorney for plaintiff or defendant)		DATE
 Linda Singer, Esq. Superior Court of the District of Columbia Civil Division 500 Indiana Avenue, N.W. Room 5000 Washington, D.C. 20001		 #K/16
ISSUING PERSON'S NAME, ADDRESS AND PHONE NUMBER		
Linda Singer, Esq. Cohen Milstein Sellers & Toll PLLC 1100 New York Avenue NW, Suite 500, Washington, DC 20005		

(SEE SUPERIOR COURT RULE OF CIVIL PROCEDURE 45(c)-(d) ON REVERSE)



Case Number: _____

Court Date: _____

Authorization as required by D.C. Code § 14-307 and *Brown v. U.S.*, 567 A.2d 426 (D.C. 1989), is hereby given for issuance of a subpoena for medical records concerning a person who has not consented to disclosure of the records and has not waived the privilege relating to such records.

Judge To Whom Case is Assigned

PROOF OF SERVICE

SERVED	DATE	TIME	PLACE

SERVED ON

NAME	TITLE

MANNER OF SERVICE (attach return receipt if service was made by registered or certified mail)

I served the subpoena by delivering a copy to the named person as follows:

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the District of Columbia that I am at least 18 years of age and not a party to the above entitled cause and that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____
DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

SUPERIOR COURT RULE OF CIVIL PROCEDURE 45(c)-(d)

(c) Protection of persons subject to subpoenas.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The Court shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this Rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the Court. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the Court shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;
(ii) requires a person who is not a party or an officer of a party to travel to a place more than 25 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this Rule, such a person may in order to attend trial be commanded to travel from any such place to the place of trial, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 25 miles to attend trial, the Court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the Court may order appearance or production only upon specified conditions.

(d) Duties in responding to subpoena.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

ATTACHMENT A

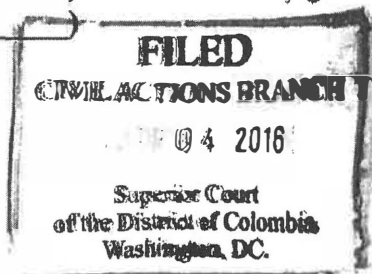
UNITED STATES VIRGIN ISLANDS
DEPARTMENT OF JUSTICE

IN RE INVESTIGATION OF VIOLATIONS)
OF THE CRIMINALLY INFLUENCED AND)
CORRUPT ORGANIZATIONS ACT)

SUBPOENA

16 - 00 24 69

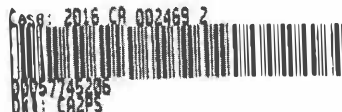
TO: Competitive Enterprise Institute
1899 L Street NW
Washington, DC 20036



ExxonMobil is suspected to have engaged in, or be engaging in, conduct constituting a civil violation of the Criminally Influenced and Corrupt Organizations Act, 14 V.I.C. § 605, by having engaged or engaging in conduct misrepresenting its knowledge of the likelihood that its products and activities have contributed and are continuing to contribute to Climate Change in order to defraud the Government of the United States Virgin Islands (“the Government”) and consumers in the Virgin Islands, in violation of 14 V.I.C. § 834 (prohibiting obtaining money by false pretenses) and 14 V.I.C. § 551 (prohibiting conspiracy to obtain money by false pretenses).

In relation to the Government’s investigation of the above matter, YOU ARE HEREBY DIRECTED, by the authority granted to the Attorney General of the United States Virgin Islands (“USVI”), pursuant to the provisions of 14 V.I.C. § 612, to produce and deliver the documents responsive to the inquiries set forth herein, on or before **April 30, 2016**, directed to the attention of Attorney General Claude Earl Walker, Esq.

Failure to comply with this subpoena may result in an enforcement action being brought against you pursuant to 14 V.I.C. § 612(k).



COMPLETED

INSTRUCTIONS

A. If any document, report, study, memorandum or other written material or information is withheld or not identified under claim of privilege, furnish a list identifying each document or requested information together with the following information (as relevant): date, author, sender, recipient, persons to whom copies were furnished or information provided together with their job titles, subject matter of the document, the basis for the privilege, and the paragraph or paragraphs of the Request(s) to which the document or information is responsive.

B. In each instance in which a document is produced in response to a Request, the current version should be produced together with all earlier versions, or predecessor documents serving the same function during the relevant time period, even though the title of earlier documents may differ from current versions.

C. Any document produced whose text is not already searchable should be processed through Optical Character Recognition (“OCR”) so that it is fully searchable.

D. This Investigative Subpoena calls for all described documents in your possession, custody, or control without regard to the person or persons by whom or for whom the documents were prepared (e.g., your company employees, contractors, vendors, distributors, service providers, competitors, or others).

E. The following procedures shall apply to the production, inspection, and copying of documents:

- (a) You shall produce original, complete documents. Documents shall be produced in the order that the documents are maintained in your files, in original folders,

with the folder's original file tabs. In response to this Subpoena, true copies of original documents may be submitted in lieu of originals, provided that you retain the original documents in such manner as to be able to produce them if later required.

1. Any documents produced in response to this Investigative Subpoena should be provided as a Group 4 compression single-page "TIFF" image that reflects how the source document would have appeared if printed out to a printer attached to a computer viewing the file. Extracted text should be included in the manner provided herein. **To the extent that extracted text does not exist, these images should be processed through OCR so that they are fully searchable.** Extracted text and OCR should be provided in separate document level text files. "Load files" shall be produced to accompany the images and shall facilitate the use of the litigation support database systems to review the produced images.
2. Document Unitization. Each page of a document shall be electronically converted into an image as described above. If a document is more than one page, the unitization of the document and any attachments and/or affixed notes shall be maintained as it existed in the original when creating the image file and appropriately designated in the load files. The corresponding parent/attachment relationships, to the extent possible, shall be provided in the load files furnished with each production.
3. Bates Numbering. Each page of a produced document shall have a legible, unique page identifier ("Bates Number") electronically branded onto the image at a location that does not obliterate, conceal, or interfere with any information from the source document. To ensure that the Bates Numbers do not obscure portions of the documents, the images may be proportionally reduced to create a larger margin in which the Bates Number may be branded. There shall be no other legend or stamp placed on the document image, except those sections of a document that are redacted to eliminate material protected from disclosure by the attorney-client or work product privileges shall have the legend "REDACTED" placed in the location where the redaction(s) occurred or shall otherwise note the location and/or location of the information for which such protections are claimed.
4. File Naming Conventions. Each document image file shall be named with the unique Bates Number of the page of the document in the case of single-page TIFFs, followed by the extension "TIF". Each document shall be named with a unique document identifier. Attachments shall have their own unique document identifiers.
5. Production Media. The documents should be produced on CD-ROM, DVD, external hard drive (with standard Windows PC compatible interface), (the "Production Media"). Each piece of Production Media

shall identify a production number corresponding to the production “wave” the documents on the Production Media are associated with (e.g., “V001”, “V002”), as well as the volume of the material in that production wave (e.g., “-001”, “-002”). For example, if the first production wave comprises document images on three hard drives, you shall label each hard drive in the following manner: “V001-001”, “V001-002”, “V001-003”. Additional information that shall be identified on the physical Production Media shall include: (1) text referencing that it was produced in response to this Investigative Subpoena, (2) your name, (3) the production date, and (4) the Bates Number range of the materials contained on the Production Media.

6. Objective Coding/Extracted Meta Data. You shall produce with each production of documents extracted metadata for each document (the “Objective Coding”) included in the load file. The data file shall include the fields and type of content set forth in the “SPECIAL INSTRUCTIONS FOR ELECTRONICALLY STORED MATERIAL” section. Objective Coding shall be labeled and produced on Production Media in accordance with the provisions set forth above.
 7. Native format for Excel and databases. To the extent that such documents exist in Excel or some other spreadsheet, produce the document in Excel. To the extent that the document constitutes a database, produce the document in Access.
- (b) All attachments to responsive documents shall be produced attached to the responsive documents.
 - (c) No portion of any documents will be masked and the entire document shall be produced.
 - (d) The documents shall be produced at the location set forth or at such other locations as counsel agree.
 - (e) Documents shall be available on reasonable notice for inspection and copying after initial production throughout the term of the investigation or litigation. The documents shall be maintained in the order in which they were produced.
 - (f) You shall label each group of documents in the following manner: Response to Request No. 1; Response to Request No. 2, etc., and identify the Bates Number range for the corresponding documents that are responsive or written responses.
 - (g) Provide a key to all abbreviations used in the documents, providing a method of identifying all documents requiring use of the key.
 - (h) If you obtain information or documents responsive to any request after you have submitted your written responses or production, you should supplement your

responses and/or production with any new and or different information and/or documents that become available to you.

(i) If any document responsive to this Subpoena was lost or has been removed, destroyed, or altered prior to the service of this Subpoena, furnish the following information with respect to each such document:

- a description to the extent known, and the last time and location that the document was known to be or is believed to have existed;
- the date, sender, recipient, and other persons to whom copies were sent, subject matter, present location, and location of any copies; and
- the identity of any person authorizing or participating in any removal, destruction, or alteration; date of such removal, destruction or alteration; and the method and circumstances of such removal, destruction, or alteration.

F. This subpoena imposes a continuing duty to produce promptly any responsive information or item that comes into your knowledge, possession, custody, or control after your initial production of responses to the requests.

SPECIAL INSTRUCTIONS

Electronic documents should be produced in accordance with the following instructions:

A. Single page TIFFs at a 300 DPI resolution which are named for the Bates Number of the page. There should NOT be more than 1000 images per folder.

B. **Document level text files containing OCR or extracted text** named with the Bates Number of the first page of the document.

C. Data load file containing all of the metadata fields (both system and application – see list below) from the original Native documents – .dat for Concordance.

D. The Concordance .dat file of extracted metadata should be delimited with the Concordance default characters – ASCII 020 for the comma character and ASCII 254 for the quote character. The use of commas and quotes as delimiters is not acceptable.

E. The database field names should be included in the first line of the metadata file listed in the order they appear in the file.

F. An image load file for Concordance – such as “.opt.”

G. For electronic documents created in Excel (spreadsheets) or Access (databases), provide those documents in Native format as well as a TIFF placeholder.

H. For all documents produced, provide the following:

Field #	Field Name	Format	Description
1	BEGDOCNO	Text	Image key of first page of document
2	ENDDOCNO	Text	Image key of last page of document
3	BEGATTACH	Text	For emails/attachments ONLY: Image key of the first page of the parent email. Please DO NOT populate these fields for emails with no attachments.
4	ENDATTACH	Text	For emails/attachments ONLY: Image key of the last page of the last attachment. Please DO NOT populate these fields for emails with no attachments.
5	CUSTODIAN	Text	Custodian from whom documents were collected (semi-colon delimited, if multiple entries)
6	AUTHOR	Text	Email “From” data or user/author name from electronic files

Field #	Field Name	Format	Description
7	RECIPIENT	Text	Email "To" data (semi-colon delimited, if multiple entries)
8	CC	Text	Email "CC" data (semi-colon delimited, if multiple entries)
9	BCC	Text	Email "BCC" data (semi-colon delimited, if multiple entries)
10	MAILSUBJECT	Text	Email subject. This value should be populated down to any children/attachments of the parent email.
11	MAILDATE	MM/DD/YYYY	Email date sent. This value should be populated down to any children/attachments of the parent email.
12	MAILTIME	HH:MM:SS	Email time sent, in military time. This value should be populated down to any children/attachments of the parent email.
13	ATTACHMENTS	Text	Semi-colon delimited list of the original file names of any attachments to an email
14	FILENAME	Text	For emails: Mail subject For attachments and e-files: File name from source media
15	HASH_VALUE	Text	Hash value generated for purposes of de-duplication if performed
16	FileExt	Text	Original file extension for the email or electronic file being produced (e.g., .eml, .pdf, .xls, .doc)

DEFINITIONS

1. "All" shall be construed to include the collective as well as the singular and shall mean "each," "any," and "every."
2. "Any" shall be construed to mean "any and all."

3. “Climate Change” refers to the general subject matter of changes in global or regional climates that persist over time, whether due to natural variability or as a result of human activity. All Documents or Communications concerning the likelihood, certainty, uncertainty, scope, causes, or impacts of Climate Change concern Climate Change. Any Documents or Communications using any of the terms “climate change,” “climatology,” “climate science,” “climate model,” “climate modeling,” “global warming,” “greenhouse gas,” “greenhouse effect,” “CO₂ greenhouse,” “Kyoto Protocol,” “UNFCCC,” “IPCC,” “climate skeptics,” “climate skepticism,” “global cooling,” “solar variation,” “arctic shrinkage,” “carbon tax,” “climate legislation,” or “Keeling Curve” concern Climate Change, although Documents or Communications need not include any of these terms to concern Climate Change. Any Documents or Communications concerning rising sea levels, Arctic and/or Antarctic ice melt, declining sea ice, melting glaciers, declining snowfall, oceanic warming, ocean acidification, or increases in extreme weather events—or the opposites of these phenomena (e.g., dropping sea levels, oceanic cooling)—concern Climate Change, although Documents or Communications need not refer to any of these phenomena to concern Climate Change.

4. “Communications” mean any exchange of information by any means of transmissions, sending or receipt of information of any kind by or through any means including but not limited to: verbal expression; gesture; writings; documents; language (machine, foreign, or otherwise) of any kind; computer electronics; email; SMS, MMS, or other “text” messages; messages on “social networking” platforms (including but not limited to Facebook, Google+, MySpace, and Twitter); shared applications from cell phones, “smartphones,” netbooks, and laptops; sound, radio, or video signals; telecommunication; telephone; teletype; facsimile;

telegram; microfilm; or by any other means. "Communications" also shall include, without limitation, all originals and copies of inquiries, discussions, conversations, correspondence, negotiations, agreements, understandings, meetings, notices, requests, responses, demands, complaints, press, publicity or trade releases and the like that are provided by you or to you by others. Any Communications produced, including emails, should include the original sender, all original recipients, the date and time, and any files originally attached to such emails in the form and filetype in which they were originally attached.

5. "Concerning" means directly or indirectly mentioning or describing, relating to, referring to, regarding, evidencing, setting forth, identifying, memorializing, created in connection with or as a result of, commenting on, embodying, evaluating, analyzing, tracking, reflecting, or constituting, in whole or in part, a stated subject matter.

6. "Documents" mean any writing or any other tangible thing, whether printed, recorded (in audio, video, electronically or by any other means), reproduced by any process, or written or produced by hand, including but not limited to: letters; memoranda; notes; opinions; books; reports; studies; agreements; statements; communications (including inter-company and intra-company communications); correspondence; telegrams; email; instant messages; chat logs; SMS, MMS or other "text" messages; posted information; messages; chat logs on "social networking" platforms (including but not limited to Facebook, Google+, MySpace and Twitter); logs; bookkeeping entries; summaries or records of personal conversations; diaries; calendars; telephone messages and logs; forecasts; photographs; images; tape recordings; models; statistical statements; graphs; laboratory and engineering reports; notebooks; charts; tabulations; maps; plans; drawings; minutes; bylaws; resolutions; records of conferences; expressions or statements of policy; lists of persons attending meetings or

conferences; lists of clients or customers or suppliers; reports or summaries of interviews; opinions or reports of negotiations; brochures; pamphlets; advertisements; circulars; trade letters; press releases; drafts of any document and revisions of drafts of any document; and any other similar paper or record in any form or medium whatsoever. The term also includes a copy of a document where the copy is not exactly the same as the original. The term also includes emails and other documents made or stored in electronic form, whether kept on computers, computer tapes, disks, drives, Cloud storage, or other media upon which information may be recorded of any type.

7. "ExxonMobil" refers to Exxon Mobil Corporation and any present or former predecessor, successor, parent, subsidiary, division, d/b/a company, and affiliated entities, as well as all owners, officers, agents, employers, employees, or other representatives thereof, or any other person acting in whole or in part on behalf of any of the foregoing entities. This term also refers to the ExxonMobil Foundation, formerly known as the Esso Education Foundation, and/or the Exxon Education Foundation, and any affiliated entities or persons.

8. "Identify" means:

- (a) When used in connection with a Document, provide the nature of the Document, its title, its description (e.g., memorandum, letter, contract), date, author, its current location, its current custodian, and the number of pages.
- (b) When used in connection with a natural person, provide that person's name, current residential address and telephone number, job title, and current business address and telephone number. (If current information is not available, provide last-known address and telephone number.)
- (c) When used in reference to an "artificial person" or entity such as a corporation or partnership, provide (1) the organization's full name and trade name, if any; (2) the address and telephone number of its principle place of business; and (3) the names and titles of the entity's officers, directors, managing agents, or employees.

- (d) When used in connection with an oral communication, provide the nature of that communication, the parties to it, the date, place, and substance of that communication, and the identification of any document concerning it.
9. "Including" means "including but not limited to." "Including" is used merely to illustrate, and should not be construed as limiting a Request in any way.
10. "Person" means any natural person or such person's legal representative; any partnership, domestic or foreign corporation, or limited liability company; any company, trust, business entity, or association; and any agent, employee, salesman, partner, officer, director, member, stockholder, associate, or trustee.
11. "You" and "Your" refer to Competitive Enterprise Institute, any present or former predecessor, successor, parent, subsidiary, division, d/b/a company, and affiliated entities, as well as all owners, officers, agents, employers, employees, or other representatives thereof, or any other Person acting in whole or in part on behalf of any of the foregoing entities. These terms include the Cooler Heads Coalition, GlobalWarming.org, CEI Studios, and any affiliated entities or persons.

RELEVANT TIME PERIOD

The relevant time period, unless otherwise indicated in a specific request, is from January 1, 1997 to January 1, 2007. The time limits should not be construed as date limits; for example, if a policy, contract, or other document in effect during the relevant time period was created before the relevant time period, then such document must be produced.

DOCUMENTS AND INFORMATION TO BE PROVIDED

1. All Documents and Communications sent to or received from ExxonMobil, or third parties acting on behalf of ExxonMobil, concerning Climate Change, including strategies to address Climate Change or impact public views on Climate Change.
2. All Documents and Communications concerning the likelihood that or extent to which any of the products sold by or activities carried out by ExxonMobil directly or indirectly impact Climate Change.
3. All Documents and Communications reflecting or concerning studies, research, reviews, events, or publications funded by ExxonMobil (in whole or in part, directly or indirectly, including through Donors Trust or Donors Capital Fund or other third parties acting on behalf of ExxonMobil) concerning carbon dioxide or concerning the likelihood, certainty, uncertainty, scope, causes, or impacts of Climate Change.
4. All public statements You have drafted, reviewed, edited, made, or published on behalf of or in connection with efforts directed, assisted, or funded by ExxonMobil (in whole or in part, directly or indirectly, including through Donors Trust or Donors Capital Fund or other third parties acting on behalf of ExxonMobil), including but not limited to advertisements, op-eds, letters to the editor, speeches, and publications, concerning Climate Change. In Your Response to this Request include any Communications with ExxonMobil concerning any of the materials responsive to this Request.
5. All Documents and Communications concerning any potential impacts on ExxonMobil's sales, revenue, or business caused by Climate Change itself, by public policies responding to

Climate Change (including any legislation or regulation concerning Climate Change), or by public perceptions of Climate Change.

6. All Documents concerning Climate Change published by You that were directed, drafted, prepared, reviewed, edited, approved, or funded by ExxonMobil (in whole or in part, directly or indirectly, including through Donors Trust or Donors Capital Fund or other third parties acting on behalf of ExxonMobil), and all Communications about such Documents.
7. All Documents reflecting or concerning meetings with or including ExxonMobil and/or third parties acting on behalf of ExxonMobil concerning Climate Change, including but not limited to meetings discussing or presenting: strategies, plans, or activities to address Climate Change; strategies, plans, or activities to impact public views on Climate Change; the likelihood that or extent to which carbon dioxide, methane, oil and gas extraction or use, or any of the products sold or activities carried out by ExxonMobil impact Climate Change directly or indirectly; the accuracy or credibility of research or researchers examining Climate Change; or the accuracy or credibility of models or assessments of the likelihood, certainty, uncertainty, scope, causes, or impacts of Climate Change.
8. All Documents and Communications concerning or reflecting ExxonMobil's activities using, working with, or funding third parties (including Donors Trust or Donors Capital Fund), or its strategies or plans to do so, to disseminate information or opinions concerning Climate Change.
9. Documents sufficient to identify the amount and date of all payments to You from ExxonMobil (directly or indirectly, including through Donors Trust or Donors Capital Fund or other third parties acting on behalf of ExxonMobil) to support work concerning Climate

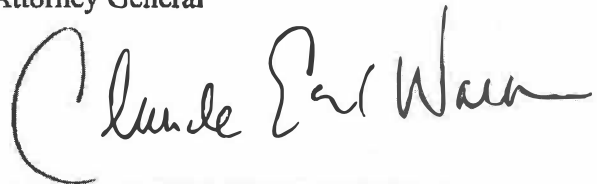
Change and the nature and dates of the work being funded by those payments. Please arrange payment records by year.

NOTE: This subpoena does not require that you travel to the United States Virgin Islands or to the Department of Justice. You may comply with this Subpoena Duces Tecum by forwarding a true and correct copy of any document or other item requested, postmarked prior to the date for which production has been designated, with a signed and notarized copy of the attached "CERTIFICATE OF CUSTODIAN OF RECORDS." Failure to appear with, or deliver the requested information, as stated above, shall be deemed a violation of 14 V.I.C. § 612 and will subject you to such sanctions and penalties as are determined by law. Failure to deliver a signed and notarized copy of the attached "CERTIFICATE OF CUSTODIAN OF RECORDS" will be considered a failure to comply with this subpoena.

WHEREFORE, I have set my hand this 29th day of March, 2016.

SUBMITTED BY:

CLAUDE EARL WALKER
Attorney General



By:

Claude Earl Walker, Esq.
Attorney General
3438 Kronprindsens Gade
GERS Complex, 2nd Floor
St. Thomas, U.S. Virgin Islands 00802
(340) 774-5666

CERTIFICATE OF CUSTODIAN OF RECORDS

UNITED STATES VIRGIN ISLANDS)
)
)

COMES NOW _____, first being duly sworn, deposes and says:

1. That the deponent is the _____ for Exxon Mobil Corporation and, in such capacity, is its custodian of records.

2. That on the ___ day of _____, 2016, the deponent was served with a subpoena calling for the production of records.

3. That the deponent has examined the original of those records and has made or caused to be made a true and exact copy of them and that the reproduction of them attached hereto is true and complete.

4. That the original of those records was made at or near the time of the act, event, condition or opinion recited therein by or from information transmitted by a person with knowledge, in the course of a regularly conducted activity of the deponent or the office or company in which the deponent is engaged.

5. I further certify to the best of my knowledge, information, and belief that all documents or things required to be produced pursuant to the attached subpoena issued on _____, 2016 have been produced.

DATED this ___ day of _____, 2016.

CUSTODIAN OF RECORDS

SUBSCRIBED and SWORN TO before me
by _____ this
_____ day of _____, 2016.

NOTARY PUBLIC