

# **EXHIBIT 2534**

**From:** Steven Donziger  
**To:** William Langewiesche  
**Sent:** Thur 3/1/2007 3:21:58 PM GMT  
**Subject:** check this out

let me know if this works. i was a little aggressive in the editing.  
srd

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**[draftchevron.march1.doc](#)**

Thursday March 1, 2007

Dear Mr. Campbell,

Thank you for your email, which I passed on your email to my editors at Vanity Fair. Those editors are fully aware and supportive of my work, not only on the present subject, but on other subjects I have written about worldwide over the past fifteen years. With all due respect for the defensive nature of Chevron's position, and for the necessary sensitivity when discussing ongoing litigation, I was I was taken aback by the tone and implication of your note. It is not evident to me why a meeting with the staffers you propose would provide greater clarity in than the responses to the specific questions I submitted to you in writing. Indeed I would expect that a written response would be the norm here, because it would allow Chevron to state the facts unambiguously, reducing the possibility of erroneous communication confusion or erroneous communication. In my experience this is a routine preference practice for most corporations and government agencies when approached by journalists seeking detailed information--and for good reason. Since transparency is one of Chevron's stated goals, I continue to believe that the best way to proceed is to establish a public and written record of answers to the questions I have submitted, before consuming people's anyone's valuable time with private meetings. I am completely open to such meetings if required to expand upon or contextualize the facts once I have the written response in hand, and have had time to consider it carefully, but I am not going to accept your invitation to meet at this point. I would re-emphasize that the questions I submitted are narrow and finite, and to a large degree amount are simply to a request that you provide requests for sources and verifiable documentation to back up the statements that Chevron itself has made. I assume you already have such specifics in hand, since they must have informed your position. As for the motivation behind my questions, in every case it is to find real answers. I have no pre-formed partisan interest here, as my writings in the past on a variety of subjects should make abundantly clear. Please understand that I will conduct my research as I determine; it is not for Chevron to tell me what I must do to gather information and write a story. And please understand that this is not an issue about me refusing an offer to meet your staffers. This is an issue about Chevron refusing to respond in the most efficient manner to a perfectly reasonable request for information.

I am under no obligation to answer the suggestion in your email that I am somehow not being fully open to Chevron's position, but once more I will take the time to clarify to avoid any misunderstandings. As for the manner in which I work: I traveled to Ecuador with complete independence in my capacity as Vanity Fair's international correspondent, with no obligation to inform the Chevron Corporation or anyone else of my itinerary in advance. As I said to you on the phone, I was aware that Pablo Fajardo would be in Lago Agrio, that I would have the opportunity to speak to him on the record, without handlers, and that there would be a public hearing in the judge's chambers, which would be attended by Chevron's attorneys. I sat through that hearing with great interest. Soon after the hearing, I approached Pablo Fajardo's exact counterpart, Chevron's chief Ecuadorian attorney, Dr. Adolfo Callejas, presented him with my card, and asked for the opportunity to speak to him. He was very gracious, but declined, explaining that it was as a matter of Chevron policy that he was not to talk to me. To say the least, I find it noteworthy that Chevron would have such a policy, since Dr. Callejas is the person who manages the litigation day to day and who is the person who likely knows the most about

the details of the case and the evidence. That night we stayed in the same hotel, but were unable because of Chevron's policy to do much more than acknowledge one another's presence. If I had been able to talk to Dr. Callejas, I have no doubt that much of this back and forth with you and your public relations team as well as many of my written questions would not have been necessary.

Several days later, when I met in Quito with Chevron's public relations team representatives, I explained what I was doing in the region of Lago Agrio, emphasized that I was traveling independently, and expressed frustration that Dr. Callejas was unable to speak. I would have made unlimited time for him in Lago Agrio or in Quito had Chevron allowed this to happen. For the record, I had agreed on a meeting with your scientist Sara McMillen, who had made no mention in advance of Mr. Robertson's participation--behavior which frankly struck me as disconcerting unusual under the circumstances, as clearly Chevron made a decision to include Robertson in the meeting and never bothered to inform me in advance. In any event, my lack of significant and germane access to Chevron on the ground in Ecuador was entirely Chevron's doing--which speaks to Chevron wishes, not to my own. I did not however desist, and I have spent substantial time d having carefully read Chevron's voluminous literature on the subject. literature, I

responded to an offer of assistance that Further, Mr. Robertson offered to assist me in any way possible during our meeting. had made during the lunch that we shared. I have sought this assistance my. My response took the form of writing the email containing the

45 written questions. It is obvious that these questions are detailed, specific, and grounded in considerable research. The email was not "dashed off," as you suggested today on the phone, but rather was written very carefully over many days in a serious attempt to clarify the vagueness of Chevron's press and web documents, among other pieces of literature and claims by the plaintiffs that I felt required Chevron's response. The purpose of the questions was and is to fully explore Chevron's position. I have continued with that attempt though numerous phone calls and emails, including this one. By now I have put more time and energy into attempting to obtain specific information from Chevron than I did into actually obtaining such information, largely in writing, from the plaintiffs' team.

It has now been over a week since I submitted the questions to Chevron you. I remain open to whatever information or perspectives you would like to provide, but I believe that written responses are absolutely necessary for purposes of transparency, efficiency, and clarity at this time. I will be disappointed if Chevron refuses to respond to this perfectly reasonable and customary request, but if that is your company's position, I will do my best to accurately reflect Chevron's perspective as appropriate in the article based on publicly available information, the document given to me by Mr. Robertson, and the interview with Mr. Robertson and Ms. McMillian in Quito.

Thank you for your consideration.

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