

EXHIBIT 150

To: File

From: Andrew Woods

Date: March 18, 2010; 2:46pm

Re: Conversation with Steven Donziger regarding Constantine Cannon's decision to not participate in case

This is an incomplete recounting of a conversation, however I am attempting, to the best of my recollection, to memorialize my conversation with Steven today.

Approximately 1 hour ago I spoke with Steven where Steven revealed to me that (1) Jeff Shinder, managing partner of Constantine Cannon, engaged in a day-long interview on March 17 with Doug Beltman, Executive Vice President of Stratus Consulting and lead scientific expert for the plaintiffs in *Aguinda v. Chevron/Texaco*, (2) Shinder called Steven this morning to indicate that his firm was unwilling to continue in its representations of the *Aguinda* clients, and (3) Shinder's lack of willingness was due to his discomfort with the level of cooperation that took place between Beltman and the scientific expert in Ecuador, Richard Cabrera. Steven indicated that Shinder said that he felt that know that he knows the level of cooperation between Beltman and Cabrera, by way of the plaintiffs local counsel, the plaintiffs had functionally written Cabrera's report for him, while we held Cabrera out as an independent expert to the world.

I inquired to Steven regarding the level of cooperation with Cabrera, since I had been under the impression that while we had turned over voluminous levels of materials to Cabrera, some with the expectation that they had been adopted, that we had not worked directly with him, and that all materials had been turned over on the record. Steven indicated that while we had not worked directly with Cabrera, that Beltman had worked in the area continuously and with the understanding that material was being turned over to plaintiffs' local counsel which was in turn being turned over directly to Cabrera, in a manner that was in accordance with the court order but which was not turned over to the court and which was understood that it was going to be adopted directly by Cabrera. Steven indicated that this would not create an ethical problem under Ecuadorian law but he was unsure as to what impact it would have under U.S. ethical rules.

I indicated to Steven that this was the first I had heard that any conduct by plaintiffs' experts may have exceeded the contacts that were permitted by court order and crossed over into cooperation with Cabrera or writing of the report. Steven responded clearly that Beltman was not working with Cabrera directly, but it was understood that the plaintiffs' experts were functionally writing the report. He also indicated that this was the first he was finding out about the extent of this contact, that he had been relying on local counsel to ensure that this was in accordance with court rules.

I advised Steven that if Shinder has reviewed the information and felt that it was inappropriate for him to be involved in the case, that it probably presented a problem for us as well. I also advised Steven that since I did not have the level of access to the information that Shinder did, I was concerned that the issue might present questions of personal liability and that we had a duty to inform all parties with an interest in the case of the full elements of this information and that we should cease using the Cabrera report estimates as an "independent expert" opinion immediately until we determine the issues at hand. I also advised Steven to seek outside counsel regarding any potential liability or issues that arose, and expressed to him that it was my assessment that he may be facing some personal issues regarding his involvement in the production of the expert reports.

Steven agreed with my points and evidenced a grave concern regarding the potential implications of this information. He indicated that he was preparing a memorandum to distribute to all interested parties identifying the information he had learned from the interviews with Beltman and he intended to distribute it over the next week to inform all parties of the developments. In the meantime, he directed me to "freeze" operations as much as possible to minimize any new actions that may be taken in reliance upon the Cabrera report, given the new information. He expressed that he was unsure what his ethical duty was in this instance and reiterated that he did not want us to do anything unethical and directed me to attempt to identify counsel who may be able to counsel him regarding these issues.

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AUTHOR : Andrew M. Woods
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