

EXHIBIT EX

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From: Karen Hinton [karen@hintoncommunications.com]
Sent: Sunday, January 25, 2009 8:06 PM
To: Steven Donziger
Cc: Andrew Woods
Subject: Re: Questions for Cuomo to ask

I mentioned to you a couple of weeks ago that Steven Cohen, Andrew's chief of staff, offered to talk to you. I sent you his numbers. You never called.

Here they are again. 212-[REDACTED]; 646-[REDACTED], cell. If you leave a message, remind him that you and I are working together on this. I will let him know to expect your call.

On 1/24/09 8:26 PM, "Steven Donziger" <sdonziger@gmail.com> wrote:

Karen:

The more I think about it, the more you might want to involve me directly in the process as these are very fact-driven questions. Read them and let me know what you think. Maybe have him talk to Rep. McGovern or read his letter, and then reference that as a basis to question the claims of the company on behalf of New York shareholders and fact Texaco was headquartered in New York when this went down. I have copied Andrew Woods in case we need him to do more research.

SRD

Questions to pose to Chevron:

Have you set aside funds to cover a potential \$27 billion judgment so that shareholders are protected?

Have you adequately disclosed this potential liability to shareholders (reference public filings in SEC which downplay it via misleading statements – Andrew Woods can help)?

The court-appointed expert has indicated that the overwhelming majority of thousands of analytical results from soil sampling done by Chevron and the plaintiffs at the trial suggest dangerous levels of toxicity where Texaco operated. How can you downplay the potential liability when these are the findings?

Did Chevron vet the potential liability in Ecuador before it purchased Texaco? If so, what exactly did it do to vet Texaco's liability in Ecuador? Did it independently sample soils in its so-called remediated sites to see if the results were as Texaco represented? If so, give details of locations and results. If not, why not.

Has Texaco or Chevron ever funded a peer-reviewed epidemiological study or health evaluation of the area to determine the truth of the allegations of health impacts? If so, what are the results?

How can you maintain your release absolves you of further responsibility for clean-up when it expressly excludes third party claims, and when two of your own lawyers are under indictment in Ecuador for lying about sampling results to secure the release?

How much money has the company spent on lawyers and technical experts in the Lago trial and the ancillary litigations before Judge Sand in New York and in the international arbitration? Have you revealed this to shareholders? Is the amount greater than what Texaco originally spent on its purported "remediation"?

Has the Board of Directors of Chevron, or Chevron management, commissioned an independent review by outside counsel of the company's liability in this matter? If so, what did it say and who did it?

Any attempt to calculate how much this cost the company in terms of time devoted from its in-house lawyers, management, public relations team, etc.?

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