

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

Case No: 1:17-mc-00151

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant,

PETRÓLEOS DE VENEZUELA, S.A. ,

Defendant

FILED  
U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2020 JUL 13 PM 1:07  
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**PROPOSED ORDER**

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MEMORANDUM AND ORDER

- 81. Taken into account the facts and circumstances presented by Jorge Alejandro Rodriguez-Moreno and Avanzada Progresista (*Amici*), this Court rules,
- 82. A 180 day motion for stay is granted by the court in order to analyze all circumstances relevant to this case.
- 83. *Amici* are granted hereby permission to file electronically Pro Se in the EC/MCF system in this Honorable Court of Law for this case .
- 84. Court grants *Amici* to seek discovery from the Republic and counsel, Mr. Hernandez, Crystallex and counsel, Ambassador Vecchio, PDVSA and counsel on the communications pertaining to the relationship between Mr. Hernandez, Mr. Vecchio and Crystallex.

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85. Court requests the Department of Justice to inform this Court on the current situation of the alleged investigation request made in August 2019 by *Amici* of a possible breach of the FCPA by Crystallex and Mr. Hernandez. Information to be provided to this Court no later than August 2nd, 2020.
86. Court orders PDVSA, PDVSA Ad Hoc and CITGO to refrain from issuing any type of debt without the permission of this Court, in order to prevent any substantial change in its equity, unreasonable issuance of debt or any other event which might damage its final owners, the people of Venezuela.
87. Court orders PDVSA, PDVSA Ad Hoc and CITGO to make public disclosure of all debt incurred since June 1st 2014, including issuance terms, holder and all financial information pertaining to it. Information to be disclosed by public internet access no later than August 2nd, 2020.
88. Court orders PDVSA, PDVSA Ad Hoc and CITGO to make public disclosure of all crude purchases June 1st 2014, including contract terms, sellers and all relevant financial information pertaining to it. Information to be disclosed by public internet access no later than August 2nd, 2020.
89. Court orders Mr. Jose Hernandez and Mr. Luis Pacheco to provide this Court of Law with a complete audio, transcript and sworn translation of the June 3rd, 2020 Venezuela National Assembly Hearing to Mr. Jose Hernandez and Mr. Luis Pacheco. Information to be provided to this Court no later than August 2nd, 2020.
90. Court orders Mr. Jose Hernandez, Mr. Carlos Vecchio, Mr. Luis Pacheco and Mrs. Luisa Palacios to provide this court detailed description and discovery of all documents pertaining to their relationship with Crystallex, Owens-Illinois,

Conoco-Philips and Exxon Mobil as well as any meetings held with executives of  
Crystallex, ExxonMobil, Conoco-Philips and Owens-Illinois, since Jan 1st, 2019

Wilmington, Delaware

/s/ \_\_\_\_\_

HONORABLE LEONARD P. STARK

UNITED STATES DISTRICT JUDGE

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