

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE PETITION OF ESTHER KIOBEL,
Applicant,

For an Order Granting Leave to Issue
Subpoenas to Cravath, Swaine & Moore LLP for
Production of Documents Pursuant to 28 U.S.C.
§ 1782

Civil Action No. 1:16-cv-07992

**PETITION OF ESTHER KIOBEL, PURSUANT TO 28 U.S.C. § 1782, FOR LEAVE TO
ISSUE SUBPOENAS TO CRAVATH, SWAINE & MOORE LLP FOR THE
PRODUCTION OF DOCUMENTS FOR USE IN A FOREIGN PROCEEDING**

PETITION

Petitioner Esther Kiobel, through her Dutch counsel and attorney-in-fact Channa Samkalden, respectfully petitions this Court, pursuant to 28 U.S.C. § 1782, for an Order granting Petitioner leave to issue subpoenas to obtain discovery from Respondent Cravath, Swaine & Moore LLP (“Cravath”).¹ Petitioner seeks this discovery for use in contemplated proceedings in the Netherlands to which Petitioner will be a party. The discovery sought is limited to information that was previously produced by Cravath’s clients in prior litigation.

This Petition is based upon the accompanying memorandum of law and supporting exhibits.

Date: October 18, 2016

Respectfully submitted,

/s/ BENJAMIN HOFFMAN, ESQ.

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¹ Section 1782(a) provides: “The district court of the district in which a person resides or is found may order him to give his testimony or statement or to produce a document or other thing for use in a proceeding in a foreign or international tribunal ... upon the application of any interested person...” 28 U.S.C. § 1782.

² Based in CT; admitted in NY; does not practice in DC’s courts.