

Anexo A
Apéndice sobre Transparencia

No.	1. Información de Pemex de carácter confidencial
Identificación de los pasajes editados (documento, párrafo, página)	Párrafos 105, 141, 612 y el pie de página 162.
Motivos de la solicitud de edición	<p>México solicita la redacción de los párrafos y pie de página identificados al considerar que contienen información confidencial conforme lo establecido en la §4 (i) de la Resolución Procesal No. 3, además de ajustarse a lo resuelto por el Tribunal en el Anexo A de la Resolución Procesal No. 7.</p> <p>La información contenida en los párrafos antes mencionados constituye información reservada en materia comercial de Pemex, cuya divulgación podría causar un perjuicio a dicha empresa, por lo que la Demandada respetuosamente solicita al Tribunal su protección.</p>
Objeciones a la solicitud de edición	<p><u>Paragraph 105:</u></p> <p>Claimants object to the redaction of public information regarding Pemex’s termination of semisubmersible rig contracts with Seamex and with Grupo R contained in bullet point 1 of paragraph 105. The fact that Pemex early terminated its contract with Seamex for the <i>West Pegasus</i> semisubmersible rig and the ultimate agreement between Seamex and Pemex related to the <i>West Pegasus</i> rig was included in the public version of the Statement of Defense at paragraph 211. See SOD, ¶ 211. Further, this information was also publicly reported. See https://www.nasdaq.com/articles/seadrill-sdrl-west-pegasus-contract-terminated-by-pemex-2016-08-23;; https://www.worldoil.com/news/2016/8/22/pemex-cancels-contract-for-seadrill-s-west-pegasus-semisubmersible; https://www.oedigital.com/news/448564-seadrill-disputes-pemex-rig-termination; https://www.eleconomista.com.mx/empresas/Pemex-cancela-contrato-de-plataforma-con-Seadrill-20160824-</p>

[0114.html](#). The fact that Pemex early terminated two semisubmersible rigs and reached a compensatory deal with Offshore Drilling Holdings (“ODH”), a subsidiary of Grupo R, was also included in the public version of the Statement of Claim at paragraph 135. Further, that information was publicly reported. *See Pemex Terminates PDH Bicenario, Centenario GR Contracts, Agrees to \$230M in Fees*, REORG (Jan. 29, 2019 3:58 PM), **C-156**. Respondent has also failed to cite a legal basis for its redactions of this public information.

Claimants also object to the redaction of public information regarding example categories of the types of clauses that Claimants contend were less favorable in the Oro Negro Contracts than in Oro Negro’s competitors’ contracts contained in bullet point 2 of paragraph 105. The fact that the Oro Negro Contracts contained clauses that were less favorable than clauses in the competitors’ contracts, including in regard to terms, personnel costs, and responsibilities, is expressed throughout the public version of the Statement of Claim. *See, e.g.*, SOC, ¶¶ 7, 74-75, 161-62, 177, 215, 452, 509, 516. Moreover, Respondent did not request to redact this information in the Reply, and thus, under Section 5(iii) of PO3, this information will be made public when the Reply and Rejoinder are published. *See, e.g.*, Reply, ¶¶ 80-90. Respondent has also failed to cite a legal basis for its redactions of public information.

Claimants also object to the redaction of public information regarding the fact that the Working Group negotiated amendments with Oro Negro’s competitors, contained in bullet point 3 of paragraph 105. The fact that the Working Group negotiated amendments with Oro Negro’s competitors is publicly available, and appears in the public version of the Statement of Defense. *See* SOD ¶¶ 126-127, 768. Respondent has also failed to cite a legal basis for its redactions of public information.

Paragraph 141:

Claimants object to the redaction of public information regarding the identity of Oro Negro’s competitors whose platforms Pemex allegedly was considering contracting, but did not contract, in substitution of the *Decus*, *Fortius*, and *Impetus* contained in paragraph 141. Perforadora Central and Perforadora Mexico are expressly identified as Oro Negro’s direct competitors in the Reply. *See* Reply, ¶ 82. Respondent did not request to redact this information in the Reply, and thus, under Section 5(iii) of PO3, this information will be made public when the Reply and Rejoinder are published. COSL has been publicly reported as competing in the offshore oil services market in the Gulf of Mexico. *See* <https://www.scmp.com/business/companies/article/2064678/china-oilfield-services-cosl-eyes-greater-overseas-exposure-amid>. Respondent has also failed to cite a legal basis for its redactions of public information.

	<p><u>Footnote 162:</u></p> <p>Claimants object to the redaction of public information regarding the names of certain platforms owned by Oro Negro’s competitors which Pemex ultimately <i>did not</i> contract in substitution of the <i>Decus</i>, <i>Fortius</i>, and <i>Impetus</i> contained in footnote 162. Perforadora Central and Perforadora Mexico are expressly identified as Oro Negro’s direct competitors in the Reply. <i>See</i> Reply, ¶ 82. Respondent did not request to redact this information in the Reply, and thus, under Section 5(iii) of PO3, this information will be made public when the Reply and Rejoinder are published. COSL has been publicly reported as competing in the offshore oil services market in the Gulf of Mexico. <i>See</i> https://www.scmp.com/business/companies/article/2064678/china-oilfield-services-cosl-eyes-greater-overseas-exposure-amid. Respondent has also failed to cite a legal basis for its redactions of public information.</p> <p><u>Paragraph 612:</u></p> <p>Claimants object to the redaction of public information regarding the threat of imminent litigation between Seamex and Pemex related to the <i>West Pegasus</i> semisubmersible rig contained in paragraph 612. The pendant litigation between Seamex and Pemex related to the <i>West Pegasus</i> was described in the public version of the Statement of Defense. <i>See</i> SOD, ¶ 214. Respondent has also failed to cite a legal basis for its redactions of public information.</p> <p>For clarity, Claimants do not object to Respondent’s redactions of bullet 4 of paragraph 105.</p>
<p>Decisión del Tribunal</p>	<p>The Tribunal accepts the requested redaction for the following part of bullet 4 of paragraph 105: [REDACTED]</p> <p>[REDACTED]</p>

No.	<p>2. Información relacionada con competidores de Perforadora Oro Negro</p> <p>Párrafos 110, 111, 114, 117 y 120, así como los pies de página: 126, 136, 150.</p>
Motivos de la solicitud de edición	<p>México solicita la edición de los párrafos y pies de página identificados debido a que contienen información de competidores de Perforadora Oro Negro, relacionada, <i>inter alia</i>, con litigios sostenidos por los competidores, tarifas de renta diaria y reducciones de tarifas.</p> <p>La Demandada considera que esta información es comercialmente sensible para Pemex, además consiste en información financiera de proveedores, los cuales son terceros que no participan en este arbitraje, así como comunicaciones confidenciales, de conformidad con la §4 (i) de la Resolución Procesal No. 3. Esta solicitud se ajusta a los resuelto por el Tribunal en el Anexo A de la Resolución Procesal No. 7, por lo que la Demandada solicita respetuosamente su protección.</p>
Objeciones a la solicitud de edición	<p><u>Paragraph 110:</u></p> <p>Claimants object to the redaction of public information regarding the termination of Pemex’s contract with Seamex for the <i>West Pegasus</i> contained in paragraph 110. The fact that Pemex and Seamex were having contractual disputes in 2015 was included in the public version of the Statement of Defense at paragraph 209. <i>See</i> SOD, ¶ 209. Further, the fact that Pemex early terminated its contract with Seamex for the <i>West Pegasus</i> semisubmersible and the ultimate agreement between Seamex and Pemex was included in the public version of the Statement of Defense at paragraph 211. <i>See</i> SOD, ¶ 211. Further, that information was publicly reported. <i>See</i> https://www.nasdaq.com/articles/seadrill-sdrl-west-pegasus-contract-terminated-by-pemex-2016-08-23; https://www.worldoil.com/news/2016/8/22/pemex-cancels-contract-for-seadrill-s-west-pegasus-semisubmersible; https://www.oedigital.com/news/448564-seadrill-disputes-pemex-rig-termination; https://www.eleconomista.com.mx/empresas/Pemex-cancela-contrato-de-plataforma-con-Seadrill-20160824-0114.html. Respondent has also failed to cite a legal basis for its redactions of public information.</p>

Paragraph 111:

Claimants object to the redaction of public information regarding the agreement between Pemex and Seamex in 2015 to reduce the daily rates of the *West Pegasus* and Seamex's other five rigs contained in paragraph 111. The *West Pegasus*'s dayrates of USD \$467,500 and \$365,000 were publicly disclosed. *See* <https://seadrillpartners.com/application/files/7515/7321/3772/conference-call-28-05-2015.pdf> at 7 (USD \$467,500) <https://seadrillpartners.com/application/files/8715/7321/3772/2q-2015-presentation.pdf> at 8 (USD \$365,000). The fact that Pemex and Seamex agreed to reduce the day rates for these rigs was publicly reported. *See* <https://www.vesselfinder.com/news/7013-Seadrill-Receives-Notice-of-Contract-Cancellation-for-the-West-Pegasus>. Respondent has also failed to cite a legal basis for its redactions of public information.

Paragraph 114:

Claimants object to the redaction of public information regarding the rates for the Seamex Contracts. Seamex generally publishes this information on its website in its fleet status reports. *See, e.g.,* <https://mb.cision.com/Public/18925/2990549/a903b83cc3e7cdbe.pdf>; https://www.seadrill.com/application/files/1616/2148/8423/Seadrill_Consolidated_-_Fleet_Status_-_Q1-21.pdf; <https://mb.cision.com/Public/18925/2990612/9cb72eb94040f0f5.pdf>. Respondent has also failed to cite a legal basis for its redactions of public information.

Paragraph 117:

Claimants object to the redaction of public information regarding platforms with which Pemex contracted as represented in two charts taken from **Exhibit C-283**, contained in paragraph 117. One of these two charts is depicted in the Reply. *See* Reply, ¶ 107. Further, the information contained in these two charts, and pages 7 and 8 of this exhibit containing these two charts, are cited throughout the Reply. *See* Reply, ¶ 107, nn. 201-02, 236, 281, 283, 285, 296, 300, 308, 316, 336, 366, 367, 401, 433, 1640, 1869, 2090. Respondent did not request to redact this information in the Reply, and thus, under Section 5(iii) of PO3, this information will be made public when the Reply and Rejoinder are published. Respondent has also failed to cite a legal basis for its redactions of public information.

	<p><u>Paragraph 120:</u></p> <p>Claimants object to the redaction of public information regarding the dayrate of the <i>West Pegasus</i> semisubmersible rig contained in paragraph 120. The <i>West Pegasus</i>'s dayrate of USD \$467,500 was publicly disclosed. See https://seadrillpartners.com/application/files/7515/7321/3772/conference-call-28-05-2015.pdf at 7. Respondent has also failed to cite a legal basis for its redactions of public information.</p> <p><u>Footnote 126:</u></p> <p>Claimants object to the redaction of public information regarding the termination of the <i>West Pegasus</i> contract between Pemex and Seamex effective August 16, 2016 contained in footnote 126. The cancellation of the <i>West Pegasus</i> contract effective August 16, 2016 was publicly reported. See https://www.vesselfinder.com/news/7013-Seadrill-Receives-Notice-of-Contract-Cancellation-for-the-West-Pegasus. Respondent has also failed to cite a legal basis for its redactions of public information.</p> <p><u>Footnote 150</u></p> <p>Claimants object to the redaction of public information regarding the termination of the <i>West Pegasus</i> contract between Pemex and Seamex effective August 16, 2016 contained in footnote 150. The cancellation of the <i>West Pegasus</i> contract effective August 16, 2016 was publicly reported. See https://www.vesselfinder.com/news/7013-Seadrill-Receives-Notice-of-Contract-Cancellation-for-the-West-Pegasus. Respondent has also failed to cite a legal basis for its redactions of public information.</p> <p>For clarity, Claimants do not object to Respondent's redactions of footnote 136.</p>
<p>Decisión del Tribunal</p>	<p>The Tribunal only accepts the requested redaction in footnote 136 ("[...] below is a reference to the invoices, their corresponding COPADE, amount, the date of receipt and acceptance by the PPS, the date in which they should have been paid – deadline – (under the terms of the CONTRACT), the late date in which they were paid and the number</p>

	of days of delay in which the payment was [...] Additionally, in 2013, financial expenses had also been generated for late payment of various invoices”).)
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No.	<p>3. Investigaciones y Auditorias</p> <p>Párrafos 143, 286, 287, 291, 298, 304, 305, 308, 323, y los pies de página: 334, 398, 401, 424, 429, 430.</p>
<p>Motivos de la solicitud de edición</p>	<p>México solicita la edición de los párrafos y pies de página identificados debido a que contienen información relacionada con procesos y juicios penales. Como ha sido anteriormente por la Demandada, el sistema jurídico mexicano prevé la figura de secrecía o reserva penal, de conformidad con el artículo 218 del Código Nacional de Procedimientos Penales, el cual dispone:</p> <p>Artículo 218. Reserva de los actos de investigación Los registros de la investigación, así como todos los documentos, independientemente de su contenido o naturaleza, los objetos, los registros de voz e imágenes o cosas que le estén relacionados, <u>son estrictamente reservados</u>, por lo que únicamente las partes, podrán tener acceso a los mismos, con las limitaciones establecidas en este Código y demás disposiciones aplicables. [énfasis añadido]</p> <p>Por lo anterior, de conformidad con el la §4 (iii) de la Resolución Procesal No. 3, y en línea con lo determinado por el Tribunal en la Resolución Procesal No. 7, la Demandada respetuosamente solicita la protección de la información antes señalada.</p>
<p>Objeciones a la solicitud de edición</p>	<p><u>Paragraph 143:</u></p> <p>Claimants object to the redaction of information regarding the Declaration of August 2019 of Alonso del Val contained in paragraph 143. Most of the quotation that Respondent designates was included in the public version of the Statement of Defense at paragraphs 242 and 630. <i>See</i> SOD, ¶¶ 242, 630. In addition, the Declaration of August 2019 of Mr. del Val is liberally cited and quoted from in the public version of the Statement of Defense. <i>See</i> SOD, ¶¶ 79, 80, 224, 309, 342, 354, 371, 379, 479, 630, nn. 242, 104, 108, 315, 388, 445, 472, 579, 752. Further, Respondent did not request to redact citations to and quotations from the Declaration of August 2019 of Mr. del Val in the Reply, and thus, under Section 5(iii) of PO3, this information will be made public when the Reply and Rejoinder are published. <i>See, e.g.,</i> Reply, ¶ 380, nn. 1018-19. Respondent has also failed to cite a legal basis for its redactions of public information.</p>

Paragraph 286:

Claimants object to the redaction of information regarding Investigation 997/2019 contained in paragraph 286. Respondent is not entitled to redact this information against the wishes of Jose Antonio Cañedo White, a defendant in the relevant criminal proceeding and a Claimant in this arbitration. While Article 218 of the National Code of Criminal Procedure establishes that information related to criminal investigations is reserved, very importantly, such reservation does not apply to the parties to the investigation or proceeding. In addition, the reservation cannot be applied to the detriment of the defendant and his or her defense. Moreover, the Tribunal has twice rejected Respondent's contention that Article 218 prevents production of the files of criminal proceedings in this case. *See* Procedural Order No. 8 at Annex A, Request Nos. 25, 27-32, 34, 72; Procedural Order No. 9 at ¶¶ 5-6. Respondent merely reiterates its prior arguments regarding Article 218 and thus has failed to cite a legal basis for countermanding the Tribunal's prior orders.

Paragraph 287:

Claimants object to the redaction of information regarding Investigation 997/2019 contained in paragraph 287. Respondent is not entitled to redact this information against the wishes of Jose Antonio Cañedo White, a defendant in the relevant criminal proceeding and a Claimant in this arbitration. While Article 218 of the National Code of Criminal Procedure establishes that information related to criminal investigations is reserved, very importantly, such reservation does not apply to the parties to the investigation or proceeding. In addition, the reservation cannot be applied to the detriment of the defendant and his or her defense. Moreover, the Tribunal has twice rejected Respondent's contention that Article 218 prevents production of the files of criminal proceedings in this case. *See* Procedural Order No. 8 at Annex A, Request Nos. 25, 27-32, 34, 72; Procedural Order No. 9 at ¶¶ 5-6. Respondent merely reiterates its prior arguments regarding Article 218 and thus has failed to cite a legal basis for countermanding the Tribunal's prior orders.

Paragraph 291:

Claimants object to the redaction of information regarding Investigation 864/2018 contained in paragraph 291. Respondent did not request to redact information drawn directly from the underlying **Exhibit C-469** in the Reply, and thus, under Section 5(iii) of PO3, this information will be made public when the Reply and Rejoinder are published. *See, e.g.,* Reply, ¶ 327, nn. 872-73. Respondent has also failed to cite a legal basis for its redactions of public information.

Paragraph 298:

Claimants object to the redaction of information regarding Investigation 787/2018 contained in paragraph 298. Respondent is not entitled to redact this information against the wishes of Jose Antonio Cañedo White and Carlos Williamson Nasi, defendants in the relevant criminal proceeding and Claimants in this arbitration. While Article 218 of the National Code of Criminal Procedure establishes that information related to criminal investigations is reserved, very importantly, such reservation does not apply to the parties to the investigation or proceeding. In addition, the reservation cannot be applied to the detriment of the defendant and his or her defense. Moreover, the Tribunal has twice rejected Respondent's contention that Article 218 prevents production of the files of criminal proceedings in this case. *See* Procedural Order No. 8 at Annex A, Request Nos. 25, 27-32, 34, 72; Procedural Order No. 9 at ¶¶ 5-6. Respondent merely reiterates its prior arguments regarding Article 218 and thus has failed to cite a legal basis for countermanding the Tribunal's prior orders.

Paragraph 304:

Claimants object to the redaction of information regarding the Declaration of August 2019 of Alonso del Val contained in paragraph 304. The Declaration of August 2019 of Mr. del Val is liberally cited and quoted from in the public version of the Statement of Defense. *See* SOD, ¶¶ 79, 80, 224, 309, 342, 354, 371, 379, 479, 630, nn. 242, 104, 108, 315, 388, 445, 472, 579, 752. Further, Respondent did not request to redact citations to and quotations from the Declaration of August 2019 of Mr. del Val in the Reply, and thus, under Section 5(iii) of PO3, this information will be made public when the Reply and Rejoinder are published. *See, e.g.,* Reply, ¶ 380, nn. 1018-19. Respondent has also failed to cite a legal basis for its redactions of public information.

Paragraph 305:

Claimants object to the redaction of information regarding the Declaration of September 2019 of Alonso del Val contained in paragraph 305. The prior Declaration of August 2019 of Mr. del Val is liberally cited and quoted from in the public version of the Statement of Defense. *See* SOD, ¶¶ 79, 80, 224, 309, 342, 354, 371, 379, 479, 630, nn. 242, 104, 108, 315, 388, 445, 472, 579, 752. Further, Respondent did not request to redact citations to and quotations from the Declaration of August 2019 of Mr. del Val in the Reply, and thus, under Section 5(iii) of PO3, this information

will be made public when the Reply and Rejoinder are published. *See, e.g.*, Reply, ¶ 380, nn. 1018-19. Respondent provides no compelling basis for redacting the Declaration of September 2019 of Mr. del Val when his prior Declaration does not merit redaction. Respondent has also failed to cite a legal basis for its redactions of public information.

Paragraph 308:

Claimants object to the redaction of information regarding the Declaration of September 2019 of Alonso del Val contained in paragraph 308. The prior Declaration of August 2019 of Mr. del Val is liberally cited and quoted from in the public version of the Statement of Defense. *See* SOD, ¶¶ 79, 80, 224, 309, 342, 354, 371, 379, 479, 630, nn. 242, 104, 108, 315, 388, 445, 472, 579, 752. Further, Respondent did not request to redact citations to and quotations from the Declaration of August 2019 of Mr. del Val in the Reply, and thus, under Section 5(iii) of PO3, this information will be made public when the Reply and Rejoinder are published. *See, e.g.*, Reply, ¶ 380, nn. 1018-19. Respondent provides no compelling basis for redacting the Declaration of September 2019 of Mr. del Val when his prior Declaration does not merit redaction. Respondent has also failed to cite a legal basis for its redactions of public information.

Paragraph 323:

Claimants object to the redaction of information regarding the dates of initiation and probable dates of termination of the baseless tax audits of Oro Negro and its subsidiaries undertaken by the SAT contained in paragraph 323. Respondent does not explain how or why its only cited legal basis for redaction—Article 2018 of the National Code of Criminal Procedure—would apply to tax audits. Moreover, the month and year of the starting dates of five of these investigations were included in the public version of the Statement of Claim at paragraph 544. *See*, SOD, ¶ 544(c). Respondent also cites no legal basis for the redaction of information related to tax audits.

Footnote 334:

Claimants object to the redaction of information regarding the Declaration of August 2019 of Alonso del Val contained in footnote 334. The Declaration of August 2019 of Mr. del Val is liberally cited and quoted from in the public version of the Statement of Defense. *See* SOD, ¶¶ 79, 80, 224, 309, 342, 354, 371, 379, 479, 630, nn. 242, 104, 108, 315, 388,

445, 472, 579, 752. Further, Respondent did not request to redact citations to and quotations from the Declaration of August 2019 of Mr. del Val in the Reply, and thus, under Section 5(iii) of PO3, this information will be made public when the Reply and Rejoinder are published. *See, e.g.*, Reply, ¶ 380, nn. 1018-19. Respondent has also failed to cite a legal basis for its redactions of public information.

Footnote 398:

Claimants object to the redaction of information regarding Investigation 997/2019 contained in footnote 398. Respondent is not entitled to redact this information against the wishes of Jose Antonio Cañedo White, a defendant in the relevant criminal proceeding and a Claimant in this arbitration. While Article 218 of the National Code of Criminal Procedure establishes that information related to criminal investigations is reserved, very importantly, such reservation does not apply to the parties to the investigation or proceeding. In addition, the reservation cannot be applied to the detriment of the defendant and his or her defense. Moreover, the Tribunal has twice rejected Respondent's contention that Article 218 prevents production of the files of criminal proceedings in this case. *See* Procedural Order No. 8 at Annex A, Request Nos. 25, 27-32, 34, 72; Procedural Order No. 9 at ¶¶ 5-6. Respondent merely reiterates its prior arguments regarding Article 218 and thus has failed to cite a legal basis for countermanding the Tribunal's prior orders.

Footnote 401:

Claimants object to the redaction of information regarding Investigation 997/2019 contained in footnote 401. Respondent is not entitled to redact this information against the wishes of Jose Antonio Cañedo White, a defendant in the relevant criminal proceeding and a Claimant in this arbitration. While Article 218 of the National Code of Criminal Procedure establishes that information related to criminal investigations is reserved, very importantly, such reservation does not apply to the parties to the investigation or proceeding. In addition, the reservation cannot be applied to the detriment of the defendant and his or her defense. Moreover, the Tribunal has twice rejected Respondent's contention that Article 218 prevents production of the files of criminal proceedings in this case. *See* Procedural Order No. 8 at Annex A, Request Nos. 25, 27-32, 34, 72; Procedural Order No. 9 at ¶¶ 5-6. Respondent merely reiterates its prior arguments regarding Article 218 and thus has failed to cite a legal basis for countermanding the Tribunal's prior orders.

Footnote 424:

Claimants object to the redaction of information regarding the Declaration of September 2019 of Alonso del Val contained in footnote 424. The prior Declaration of August 2019 of Mr. del Val is liberally cited and quoted from in the public version of the Statement of Defense. *See* SOD, ¶¶ 79, 80, 224, 309, 342, 354, 371, 379, 479, 630, nn. 242, 104, 108, 315, 388, 445, 472, 579, 752. Further, Respondent did not request to redact citations to and quotations from the Declaration of August 2019 of Mr. del Val in the Reply, and thus, under Section 5(iii) of PO3, this information will be made public when the Reply and Rejoinder are published. *See, e.g.*, Reply, ¶ 380, nn. 1018-19. Respondent provides no compelling basis for redacting the Declaration of September 2019 of Mr. del Val when his prior Declaration does not merit redaction. Respondent has also failed to cite a legal basis for its redactions of public information.

Footnote 429:

Claimants object to the redaction of information regarding the Declaration of September 2019 of Alonso del Val contained in footnote 429. The prior Declaration of August 2019 of Mr. del Val is liberally cited and quoted from in the public version of the Statement of Defense. *See* SOD, ¶¶ 79, 80, 224, 309, 342, 354, 371, 379, 479, 630, nn. 242, 104, 108, 315, 388, 445, 472, 579, 752. Further, Respondent did not request to redact citations to and quotations from the Declaration of August 2019 of Mr. del Val in the Reply, and thus, under Section 5(iii) of PO3, this information will be made public when the Reply and Rejoinder are published. *See, e.g.*, Reply, ¶ 380, nn. 1018-19. Respondent provides no compelling basis for redacting the Declaration of September 2019 of Mr. del Val when his prior Declaration does not merit redaction. Respondent has also failed to cite a legal basis for its redactions of public information.

Footnote 430:

Claimants object to the redaction of information regarding the Declaration of August 2019 of Alonso del Val contained in footnote 430. The Declaration of August 2019 of Mr. del Val is liberally cited and quoted from in the public version of the Statement of Defense. *See* SOD, ¶¶ 79, 80, 224, 309, 342, 354, 371, 379, 479, 630, nn. 242, 104, 108, 315, 388, 445, 472, 579, 752. Further, Respondent did not request to redact citations to and quotations from the Declaration of August 2019 of Mr. del Val in the Reply, and thus, under Section 5(iii) of PO3, this information will be made public

	when the Reply and Rejoinder are published. <i>See, e.g.</i> , Reply, ¶ 380, nn. 1018-19. Respondent has also failed to cite a legal basis for its redactions of public information.
Decisión del Tribunal	The Tribunal rejects the requested redaction in its entirety.

No.	<p>4. Documentos sujetos a las <i>Protective Orders</i></p> <p>Párrafos 142, 162, 165, 166, 170, 171, 172, 173, 180, 181, 184, 185, 189, 190, 191, 192, 193, 194, 206, 210, 211, 448, 581, 737, así como los pies de página 23, 46, 56, 211, 219, 248, 293, 295, 594, 1041- 1050.</p>
Motivos de la solicitud de edición	Bajo el principio de buena fe y cooperación, México solicita la edición de los párrafos y pies de página identificados debido a que contienen información sujeta a las órdenes de protección de las cortes de los Estados Unidos de América de conformidad con las Resoluciones Procesales Número 3, 11 y 12.
Objeciones a la solicitud de edición	<p><u>Paragraph 448/Footnote 23/Footnote 594:</u></p> <p>Claimants note that this paragraph and accompanying footnote are unrelated to the Protective Orders and instead, relate to documents that the Claimants produced to Respondent. Nonetheless, Claimants do not object to redacting Paragraph 448, Footnote 23, and Footnote 594.</p> <p><u>Footnote 46/Footnote 248</u></p> <p>Claimants do not object to the redaction of these two footnotes.</p> <p>Claimants do not, in principle, object to Respondent’s redactions over the remaining aforelisted paragraphs and footnotes. However, where Respondent’s list of paragraphs and footnotes that should be redacted overlaps with Claimants’ list found in their own transparency schedule, Claimants submit that their own redactions of material protected by the Protective Orders are more comprehensive as well as more precise. Moreover, the consequences for noncompliance with the Protective Orders lie exclusively with Claimants, who are signatories to those orders, and thus bear the burden of appropriately designating confidential material pursuant to them. Respondent has not undertaken to comply with the Protective Orders and cannot bear this responsibility. Accordingly, Claimants recommend that the Tribunal approve Claimants’, rather than Respondent’s, redactions in this respect.</p> <p>For clarity, Claimants do not object to Respondent’s redactions of paragraph 448 or footnotes 23, 46, 248, and 594.</p>

Decisión del Tribunal	The Tribunal takes note of the Claimants' comments and accepts the redaction of paragraph 448, footnotes 23, 46, 248 and 594.
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