

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

CONOCOPHILLIPS PETROZUATA B.V.,  
et al.,

Petitioners,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Respondent.

Civil Action No. 1:19-cv-00683 (CJN)

**REQUEST FOR AN ENTRY OF DEFAULT AGAINST  
RESPONDENT THE BOLIVARIAN REPUBLIC OF VENEZUELA**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Petitioners ConocoPhillips Petrozuata B.V., ConocoPhillips Hamaca B.V., and ConocoPhillips Gulf of Paria B.V. (collectively, “Petitioners”), by and through their attorneys, Freshfields Bruckhaus Deringer US LLP, D. Brian King, and Kobre & Kim LLP, respectfully request that the Clerk of the Court enter a default against Respondent the Bolivarian Republic of Venezuela (“Venezuela”).

On March 11, 2019, Petitioners filed this action seeking recognition of an arbitration award (the “Award”) pursuant to 22 U.S.C. § 1650a and Article 54 of the Convention on the Settlement of Investment Disputes between States and Nationals of Other States, Mar. 18, 1965, 17 U.S.T. 1270, 575 U.N.T.S. 159 (the “ICSID Convention”). *See* Petition to Confirm Arbitration Award, ECF No. 1. On January 10, 2020, Venezuela was served pursuant to 28 U.S.C. § 1608(a)(4). *See* Return of Service, ECF No. 20. Under the Foreign Sovereign Immunities Act, 28 U.S.C. § 1608(d), Venezuela had until March 10, 2020 to serve its answer or other responsive pleading. *See* Status Report Regarding Service of Process 2, Jan. 17, 2020, ECF No. 21. Venezuela failed to do so. Further, Venezuela has made no appearance in this case, has not filed any pleadings or served

any pleadings upon Petitioners or their counsel, and has neither requested nor received any extension of time to file any pleadings.

A stay of enforcement pursuant to Article 52(5) of the ICSID Convention was previously in effect with respect to the Award. *See* Status Report 2, May 12, 2021, ECF No. 31. That stay was lifted on September 29, 2021. *See* Friedman Decl. 4, Sept. 30, 2021.

Venezuela is neither an infant nor an incompetent person. A default should therefore be entered against Venezuela, and Petitioners respectfully request that the Clerk enter a default. *See* Fed. R. Civ. P. 55(a).

Dated: September 30, 2021  
New York, New York

Respectfully submitted,  
By: \_\_\_\_\_/s/ Elliot Friedman\_\_\_\_\_

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