

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:17-mc-00151-LPS
)	
BOLIVARIAN REPUBLIC OF VENEZUELA,)	
)	
Defendant.)	
_____)	

DECLARATION OF SAMUEL HALL

Pursuant to 28 U.S.C. ¶ 1746, I, Samuel Hall, declare as follows:

1. I am an attorney and am admitted to practice in the District of Columbia. I represent PDV Holding, Inc. (“PDVH”) and CITGO Petroleum Corp. (“CITGO”) in the above-captioned lawsuit.
2. I am over the age of eighteen and have personal knowledge of the facts in this declaration.
3. On April 6, 2023, I, along with cocounsel for PDVH and CITGO, met with U.S. Government officials as part of the above-captioned lawsuit and requested written materials relating to a January 12, 2023 meeting between Special Master Robert B. Pincus and the Department of Justice (the “January 12 Meeting”). We subsequently followed up with correspondence requesting the same.
4. I also represent Willkie Farr & Gallagher LLP (“Willkie”), as well as PDVH, in the following Freedom of Information Act (“FOIA”) lawsuits: *PDV Holding, Inc. v. U.S. Dep’t of Treasury et al.*, No. 23-cv-01304 (D.D.C.); *Willkie Farr & Gallagher LLP v. U.S. Dep’t of Justice*, No. 23-cv-1591 (D.D.C.); *Willkie Farr & Gallagher LLP v. U.S. Dep’t of State*, No. 23-cv-1593 (D.D.C.) (the “FOIA Litigation”).

5. As part of the FOIA Litigation, on April 4, 2024, the U.S. Department of Justice produced to Willkie a PowerPoint presentation relating to the January 12 Meeting (the “Presentation”). A true and correct copy of the Presentation is attached as Exhibit B of the Venezuela Parties’ Renewed Motion to Disqualify, filed with this declaration.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on April 26, 2024, in Washington, D.C.

/s/ Samuel Hall
Samuel Hall