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7  
 8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
 9 **COUNTY OF SAN FRANCISCO**  
 10

11 LARRY BOWOTO, et al.,

12 Plaintiffs,

13 v.

14 CHEVRONTEXACO CORPORATION, et al.,

15 Defendants.  
 16  
 17

**Case No: CGC 03-417580**

**ROBINSON UROUPA'S OBJECTIONS  
 TO DEFENDANTS' FIRST SET OF  
 REQUESTS FOR ADMISSION**

18  
 19 **PROPOUNDING PARTY:** Defendant CHEVRONTEXACO CORPORATION

20 **RESPONDING PARTY:** ROBINSON UROUPA

21 **SET NO.:** One

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2 **INTRODUCTORY STATEMENT AND GENERAL OBJECTIONS**

3 Responding plaintiff objects to these Requests for Admission on the ground that they are unduly  
4 burdensome and oppressive. As defendants are aware, responding to defendants' discovery requires  
5 plaintiffs' counsel to fly to Nigeria and travel to various remote areas of the country to meet with their  
6 clients and review and confirm responses, using translators for the two different languages spoken by  
7 their clients, and then to engage in further communications to obtain proper verifications. For this  
8 reason, plaintiffs requested a reasonable extension of the deadline for responding to these Requests for  
9 Admission. Defendants have refused.

10 Responding plaintiff's research, investigation, discovery and preparation for trial in this matter  
11 are presently ongoing and not yet complete. All the responses and objections ("Responses") contained  
12 herein are based only upon such information and documents as are currently available and specifically  
13 known to responding plaintiff and his or her attorneys and disclose only those contentions which  
14 currently occur to responding plaintiff and his or her attorneys. Responding plaintiff anticipates that  
15 continuing discovery, review, research, investigation, and analysis will supply additional facts, add  
16 meaning to the known facts, modify plaintiff's present analysis, and establish entirely new factual  
17 conclusions and legal contentions, all of which may lead to substantial additions to, changes in and  
18 variations from the contentions herein set forth, upon which plaintiffs may rely at trial.

19 Responding plaintiff objects to defendant ChevronTexaco Corporation's Requests for Admission  
20 to the extent that they seek information that is in the possession of propounding defendants or any of  
21 defendant's subsidiaries; to the extent that information, review and analysis of said information and  
22 sources is equally available to or feasible by propounding defendant, defendant ChevronTexaco  
23 Overseas Petroleum Inc., or any of defendants' subsidiaries; and to the extent that responsive  
24 information has already been disclosed or produced in this or the Federal action by any party. For these  
25 reasons, responding plaintiff objects generally to defendant's Requests for Admission on the ground that  
26 they are burdensome, oppressive, and seek and analysis and review by responding plaintiff's attorneys  
27 that invades the work product privilege.

28 Responding plaintiff objects to the extent that these Requests for Admission are overbroad in that

1 they seek information that is neither relevant to the subject matter of this litigation nor reasonably  
2 calculated to lead to the discovery of admissible evidence.

3 Responding plaintiff objects to these Requests for Admission to the extent they are duplicative of  
4 discovery already taken in the Federal case and therefore unduly burdensome. All references to  
5 interrogatory responses, depositions or documents pertain to responses or documents already produced  
6 or provided in the Federal case.

7 Responding plaintiff objects to these Requests for Admission to the extent that they seek  
8 information that is protected from disclosure by the attorney-client privilege and/or the attorney work-  
9 product doctrine. The inadvertent production of such information shall neither constitute a waiver of  
10 any privilege nor a waiver of any rights plaintiffs may have to object to the use of any of the information  
11 in any subsequent pretrial proceedings or at trial.

12 All of the above objections and the specific objections below are hereby expressly reserved and  
13 may be interposed at the time of trial or at any other time.

14 Subject to these qualifications and objections, responding plaintiff provides the following  
15 Responses.

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1 **REQUESTS FOR ADMISSION**

2 **Request for Admission No. 1:** Admit that Bripale Uroupa did not leave a WILL governing the  
3 disposition of his estate.

4 **Response to Request for Admission No. 1:** Responding plaintiff incorporates by this reference  
5 the Introductory Statement and General Objections set forth above, as though fully set forth herein.  
6 Responding plaintiff objects that this Request for Admission is neither relevant to the subject matter of  
7 this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Responding  
8 plaintiff objects to this Request for Admission on the ground that it is unduly burdensome and  
9 oppressive, particularly given defendants' refusal to agree to any extension of the response deadline.

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11 DATED: May 4, 2005

12 Respectfully submitted,

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15 PUBLIC INTEREST LAWYERS GROUP  
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23 Michael S. Sorgen

24 Attorneys for All Plaintiffs