

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

*In Re: Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability Litigation*

**Master File No. 1:00 – 1898  
MDL 1358  
M21-88**

---

**This Document Relates To:**

*Commonwealth of Pennsylvania, et al. v. Exxon  
Mobil Corp., et al.,*

**No. 1:14-CV-06228-VSB-DCF**

---

**DECLARATION OF STEPHEN WOLFE IN SUPPORT OF LUKOIL PAN AMERICAS  
LLC'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

I, Stephen Wolfe, on oath, do depose and say as follows:

1. My name is Stephen Wolfe and I submit this declaration in support of LUKOIL Pan Americas LLC's Motion to Dismiss for lack of personal jurisdiction. Unless otherwise stated, I make the following statements based upon my own personal knowledge and review of company records.
2. My office address is 3200 Kirby Drive, Suite 900, Houston, Texas 77098.
3. I have been employed by LUKOIL Pan Americas LLC ("LPA") since August 3, 2020 and I am a Managing Director.
4. LPA is a limited liability company organized under the laws of Delaware and has its headquarters in Houston, Texas. LPA was formed in 2002.

5. LPA is a trading company whose core business is buying and selling crude oil and petroleum products such as heating oil, naphtha, gasoline, and gasoline components, typically in large-volume or cargo-load transactions.

6. In conducting its business, LPA does not itself use the product it buys and sells. After LPA makes a sale, it does not control, and does not participate in, the buyer's disposition of the purchased crude oil or petroleum products. LPA typically does not know where the products it sells are ultimately delivered, used, or consumed.

7. I understand that the gasoline industry in the United States largely stopped using methyl tertiary butyl ether ("MTBE") in or around 2006.

8. LPA has never owned or operated a refinery in Pennsylvania.

9. To the best of my knowledge, at all relevant times, LPA did not own, operate, or lease a petroleum products terminal in Pennsylvania.

10. LPA has never owned, operated, leased, or branded any retail service stations in Pennsylvania or anywhere else in the United States.

11. LPA has never manufactured MTBE in Pennsylvania or anywhere in the United States.

12. To the best of my knowledge, at all relevant times, LPA did not buy or sell pure ("neat") MTBE in Pennsylvania, nor did LPA blend MTBE into gasoline in Pennsylvania.

13. LPA does not maintain offices, employees, or agents in Pennsylvania.


14. LPA does not own property in Pennsylvania.

15. LPA is a subsidiary of LITASCO SA. LPA has never held any interest in and does not control any other LUKOIL entity, including but not limited to PJSC LUKOIL (fka "OAO LUKOIL"), LUKOIL Americas Corporation ("LAC"), LUKOIL North America LLC ("LNA"),

and Getty Petroleum Marketing Inc. ("GPMI"). Nor is LPA involved in the operation of any other LUKOIL entity.

16. I am over the age of 18 and competent to make this declaration. I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge and belief, the foregoing is true and correct.

Executed on October 1, 2021

By:   
\_\_\_\_\_  
Stephen Wolfe