

*INTERNATIONAL CENTRE FOR SETTLEMENT  
OF INVESTMENT DISPUTES*

RIVERSIDE COFFEE, LLC

Claimant

v.

REPUBLIC OF NICARAGUA

Respondent

ICSID CASE NO. ARB/21/16

HEARING ON JURISDICTION AND MERITS

9 July 2024

Volume 7

Washington, DC

ARBITRAL TRIBUNAL

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1 9 July 2024

2 INDEX

3

4 RENALDY GUTIÉRREZ

5

6 Continued Cross-Examination by Ms. González ....1512

7 by Ms. Cortes .....1553

8 Redirect Examination by Ms. De Pena .....1618

9 by Mr. Appleton .....1643

10

11 **BYRON SEQUEIRA**

12 Expert Presentation .....1661

13 Cross-Examination by Ms. Cardenas .....1679

14

15

16

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09:02:07

1 PRESIDENT: Good morning, all. Good  
2 morning, Mr. Gutiérrez.

3 Housekeeping?

09:02:16

4 MR. APPLETON: Mr. President, two matters  
5 that are related just about a little bit of timing.

6 With respect to -- today's the deadline  
7 for filing the motion opposition. I thought I was going  
8 to be in a position to be able to file it this morning  
9 for you but to my surprise in the redaction -- remember

09:02:37

10 there was a discussion of redaction of some personal  
11 privacy information that we want to minimize -- I  
12 apparently have locked the document so that no one can  
13 open it. I have put such a password on it that we have  
14 to redo the documents from scratch because there are so  
15 many pieces in the password for security that we can't  
16 open it.

09:02:54

17 So at some point I'm hoping -- my  
18 intention was to try to get it early this morning, but  
19 it may be -- it will be today you'll have it, but I need  
20 to get that technical bit sorted out and it's hard to do  
21 it while we're inside the hearing. And we just

09:03:05

22 discovered this problem in the last ten minutes when we  
23 couldn't -- as we were doing our double-check we  
24 couldn't open it. We thought it was not beneficial to  
25 anyone to send supporting materials that you can't open.

09:03:20

09:03:26

1 Sorry, on the second matter --

2 PRESIDENT: On the first one, simply the  
3 deadline is today so --

09:03:33

4 MR. APPLETON: So it's coming. I just  
5 wanted to let you know because there are issues here.  
6 We think it would be beneficial to the extent that we  
7 can get a determination while we're still in session  
8 here, so to the extent that we can get things moving as  
9 quickly as possible. We just want you to know that we

09:03:50

10 are doing that but for the technical gremlins and the  
11 need to have an opportunity to speak to some technical  
12 people.

09:04:01

13 With respect to the second matter,  
14 yesterday, if you recall, you made some determinations  
15 about new evidence and the process that would need to be  
16 taken for that. We just wanted to let you know that we  
17 intend to make a motion under section -- paragraph 16.3  
18 of Procedural Order No.1 also today with respect to some  
19 new materials, and we wanted to make sure that you're  
20 aware of that.

09:04:21

21 We think that it's appropriate for  
22 parties, if they know they're going to bring a motion,  
23 to let the Tribunal and the other side know about that  
24 in the housekeeping session so it's not a surprise later  
25 on so everybody can address it and govern their time.

09:04:32

09:04:36 1 And it takes a considerable amount of time. I've been  
2 considerably occupied on being able to address the first  
3 motion, as you'll see, and so I just want to, as a  
4 courtesy, make sure that everyone's aware that the  
09:04:51 5 application under paragraph 16.3 is coming. It will be  
6 brief, by the way, but it's coming.

7 PRESIDENT: Okay. That is noted.

8 Anything on the Respondent's side?

9 MS. GONZÁLEZ: No. Yesterday,  
09:05:05 10 Mr. President, you asked for translation of one of the  
11 articles, of 144. We are sending the translation in the  
12 next few minutes to Mr. Appleton, and after we agree on  
13 the translation, we can submit it to the Tribunal.

14 I am not intending to use that article in  
09:05:25 15 the rest of the cross-examination.

16 PRESIDENT: Okay. Thank you.

17 MR. APPLETON: So, again, the problem is  
18 we'll need time. We thought we were going to get it  
19 yesterday.

09:05:34 20 Might I just ask, just for the benefit of  
21 the Tribunal and everyone in this room, is there an  
22 English translation generally of the Civil Code that the  
23 Tribunal could rely on? An English translation that  
24 you're aware of?

09:05:48 25 MS. GREENWOOD: There's portions of it



09:05:49 1 certainly.

2 MR. APPLETON: Yes, but I'm just wondering  
3 if there's something more general because we could all  
4 save time and effort if that were available. If it's  
09:05:57 5 not, then it is what it is.

6 MS. GONZÁLEZ: It's the civil procedural  
7 code, the one that we are sending a translation. I'm  
8 not aware -- are you talking in general if it exists a  
9 translation into English?

09:06:10 10 MR. APPLETON: Yes, my question is if  
11 there was already something, then we might agree that we  
12 could use that, and then that would save everybody some  
13 effort. If it's not, then we'll just deal with it as we  
14 deal with it.

09:06:22 15 MS. GONZÁLEZ: I'm not aware that a  
16 translation of the whole civil procedural code exists,  
17 but in any case, the article that the President of the  
18 Tribunal asked us to translate is five lines. So I  
19 think you will have ample opportunity to review it  
09:06:36 20 during the course of the day.

21 MR. APPLETON: Sure. I simply want to  
22 point out that every time we have to otherwise translate  
23 it, it takes time and effort. To the extent that we  
24 can, if we have something that is not translated, we're  
09:06:50 25 going to try to use the exceptionally talented

09:06:53 1 interpreters that we have here to assist us, assuming  
2 that the provision is relatively small.

3 PRESIDENT: Okay. Noted. Thank you for  
4 providing that.

09:07:04 5 There are a couple of issues that the  
6 Tribunal wanted to raise, and this would be in  
7 preparation of the last session on Friday. We will be  
8 discussing post hearing submissions, including cost  
9 submissions, so it would be good if the parties could  
09:07:27 10 confer in the course of this week and try to reach an  
11 agreement on that line on, first of all, on whether post  
12 hearing submissions are required. If yes, in what  
13 format, and issues such as page limit, number of rounds,  
14 as well as cost submissions, at least the preliminary  
09:07:54 15 discussions. So if there's an agreement, that would be  
16 helpful. If not, then we need to -- the Tribunal will  
17 need to take a view, but as you know, we would have a  
18 preference for the parties to try to agree on those  
19 deadlines.

09:08:09 20 On that note, the Tribunal will be issuing  
21 some questions to the parties. We have not yet reached  
22 a view on whether we issue them on Thursday evening  
23 after the completion of the hearing of the witnesses of  
24 fact and experts, so that you could try to address, at  
09:08:37 25 least to some extent, those questions during your

09:08:39 1 closing statements. But in any event, you can expand on  
2 your answers in your post hearing submissions.

3 This is simply to flag you that these  
4 questions are coming. There won't be many of them, but  
09:08:54 5 a few. So we would just invite the parties to confer.

6 MS. GONZÁLEZ: Thank you, Mr. President.  
7 Perhaps a suggestion. If the questions arrive on  
8 Thursday, if it could be possible to have a later start  
9 of the closing on Friday, that would help, I think, both  
09:09:15 10 teams to make sure we can address those questions.

11 MR. APPLETON: Mr. President, we do --

12 PRESIDENT: I will simply answer that  
13 first. I'm afraid it won't be possible because of  
14 commitments.

09:09:28 15 MR. APPLETON: Could I just say that that  
16 would present tremendous logistical problems. I should  
17 say that Ms. González has raised that issue with me  
18 several times. Each time I've told her it would create  
19 tremendous logistical problems for us. Since we're not  
09:09:42 20 based here, we have people who are planning to leave at  
21 the end of the day and that would not be possible if the  
22 hearing was to go late.

23 I know that Ms. González -- I don't know  
24 why, but she's asked repeatedly and each time I have to  
09:09:55 25 be the bearer of bad news, but it's a logistical issue

09:09:59 1 and, if anything, we would be prepared to even go  
2 earlier to be able to facilitate people's ability to  
3 move and travel rather than later.

4                   So I just want to flag that we will do  
09:10:08 5 everything we can to make the Friday as efficient as  
6 possible, but we're mindful that the Tribunal, the  
7 interpretation team, the transcription team, and counsel  
8 and witnesses have all made plans on the basis of being  
9 able to leave, some of them at least that day later, and  
09:10:30 10 it would be very prejudicial to those issues for them if  
11 we were to change that. I just want to flag that.

12                   PRESIDENT: As I already said,  
13 unfortunately it would not be possible -- I say  
14 unfortunately because it would have been better to give  
09:10:45 15 a bit more time for the parties to prepare for the  
16 closing statements and that is why I said that you may  
17 wish to make only preliminary comments on Friday on the  
18 questions. We are not expecting you to be able to fully  
19 answer the questions during your closing statements, and  
09:11:00 20 one option you may want to consider is focusing your  
21 post hearing submissions on the Tribunal's questions  
22 instead of coming up with a one more full-fledged brief,  
23 which may not be efficient. But that would be the  
24 Tribunal's preference. But we leave it for you to  
09:11:23 25 discuss and to try to reach an agreement.

09:11:28

1 So that is what we wanted to raise. If  
2 there's nothing else, we continue with the witness.

3 Apologies, Mr. Gutiérrez, you had to kind  
4 of get involved in housekeeping, but here we go.

09:11:45

5 So we continue the cross-examination.  
6 Ms. González.

7 MS. GONZÁLEZ: Thank you, Mr. President.

8 **CONTINUED CROSS-EXAMINATION**

9 BY MS. GONZÁLEZ:

09:12:02

10 Q. Dr. Gutiérrez, good morning.

11 A. Good morning.

12 Q. We're going to continue. We're going to ask  
13 you a few questions, and we're going to ask you that  
14 since we have limited time, please listen to my question  
15 and try to answer the question by saying yes or no and  
16 then of course during --

09:12:23

17 THE INTERPRETER: No microphone for  
18 whomever is speaking.

09:12:47

19 MR. APPLETON: I'm stopping the hearing  
20 because I can't get any interpretation. Are you getting  
21 interpretation?

22 MS. GREENWOOD: The interpretation is  
23 fine, yes. It is channel 1.

09:12:57

24 MR. APPLETON: Yes, I'm on channel 1. Oh,  
25 I think I've figured out the problem. I had a broken

09:13:00 1 one and we moved it. Could we just have a short test of  
2 any word?

3                   Sorry, thank you very much, my apologies.  
4 I'll just read the rest on the transcript. Thank you.

09:13:15 5           Q.     Dr. Gutiérrez, I was telling you that since our  
6 time is limited today and since we want to move ahead  
7 efficiently, I'm going to please ask you to try and  
8 answer my questions briefly. Most of my questions can  
9 be answered by saying yes or no so that we can move  
09:13:34 10 forward, otherwise, we're going to be here all day.

11                   In your report you said that INAGROSA  
12 should have been included as a party in the judicial  
13 order. Is that correct?

14           A.     Yes.

09:13:53 15           Q.     In August 2020, Riverside became a majority  
16 shareholder holding 95 percent of the corporate capital  
17 of the company, correct?

18           A.     I believe so, but I'm not quite personally  
19 aware of or informed of that fact. But in any event,  
09:14:15 20 this we're talking about two different entities,  
21 different personalities. Therefore, we cannot, by  
22 dealing with one, believe that we're dealing with the  
23 other.

24           Q.     In your report you say the Riverside  
09:14:37 25 association with Hacienda Santa Fé is still tangential

09:14:41 1 as a matter of Nicaraguan law, and you add INAGROSA was  
2 the owner and the administrator of the land. Even if  
3 Riverside controlled INAGROSA according to Nicaraguan  
4 law, INAGROSA had to make the decisions. Is that your  
09:14:58 5 testimony? You recognize that?

6 A. You need to rephrase your question. You talked  
7 about many things, and I don't know what I'm going to be  
8 responding to.

9 Q. Very well. I'm making reference to  
09:15:12 10 paragraph 47 of your report. I understand that your  
11 report is there with you. You have it before you. I'm  
12 going to wait until you get to that paragraph.

13 A. I'm here.

14 Q. Perfect. You indicate in your report that  
09:15:39 15 INAGROSA was the owner and the administrator of the  
16 land, and there you say that even if Riverside  
17 controlled INAGROSA, INAGROSA had to make the decisions.  
18 Is that correct?

19 A. INAGROSA had to make a decision?

09:16:02 20 Q. That is what you wrote in your report, sir, at  
21 paragraph 47.

22 A. Let me read it, Ms. González, please.

23 Q. Okay. *(Pause)*

24 A. Yes, I stand by that statement, yes.

09:17:04 25 Q. Your position, then, is that INAGROSA had to be

09:17:08 1 a necessary party because it was the owner and the party  
2 in charge of management and administration of the land,  
3 correct?

4 A. When you say the necessary party, where are you  
09:17:23 5 pointing to? The necessary party in the Nicaraguan  
6 proceeding or in this arbitration?

7 Q. The necessary party in the order and in the  
8 application for the protective measure. You indicate  
9 that INAGROSA should have been a necessary party in the  
09:17:49 10 application for the protective measure.

11 A. Obviously because INAGROSA was the owner of the  
12 property.

13 Q. Correct.

14 A. But let me explain. The government proceeded  
09:18:06 15 on a different basis. The Attorney General was  
16 premising -- was premising the action, founded the  
17 action on the existence of this arbitration. And they  
18 did that because the Civil Code of proceeding states  
19 that for the measure to be applied, the parties in the  
09:18:45 20 case -- the two parties in the case -- should be the  
21 owners of the property in which a measure is going to be  
22 imposed. I don't know if this is clear. To me, it is  
23 crucial to understand what happened in Nicaragua and  
24 what shouldn't have happened in Nicaragua.

09:19:12 25 Q. Dr. Gutiérrez, are you familiar with article



09:19:18 1 336 of the Code of Civil Procedure in connection with  
2 admissibility of protective measures?

3 A. I believe it's one of the articles we discussed  
4 yesterday.

09:19:32 5 Q. I'm going to show it on the screen. I'm going  
6 to ask that that article be put on the screen. This is  
7 RL-0001, which is the Code of Civil Procedure, article  
8 336.

9 I'm going to ask you to please read No.2.  
09:20:28 10 Please read it out loud, sir.

11 A. It's in Spanish.

12 Q. Okay. I'm going to read it then.

13 "In all cases, provisional relief shall be  
14 granted at the petitioner's request and under the  
09:20:48 15 petitioner's responsibility and may only affect the  
16 property or right of the parties to the proceeding."

17 A. And the question is?

18 Q. As the majority shareholder, Riverside has  
19 rights over INAGROSA. Is that correct?

09:21:09 20 A. No. It's a shareholder.

21 Q. That's exactly right. As a majority  
22 shareholder, it has rights over its investment, over  
23 INAGROSA. Is that correct?

24 A. It has the rights that the commercial code  
09:21:28 25 grants to any shareholder of any corporation. But this

09:21:35 1 isn't distinguished between one and the other. So if  
2 INAGROSA is liable for any reason, Riverside will not be  
3 liable unless it participated in the action.

4 But there is another point, if I may -- if  
09:21:51 5 you will allow me to explain.

6 Q. I'm sorry, sir. Your lawyers are going to ask  
7 you to perhaps expand on this matter. My apologies.

8 So protective measures -- I haven't asked  
9 you any question yet, sir. Excuse me. I'm asking the  
09:22:08 10 questions.

11 MR. APPLETON: I have an objection. So if  
12 the witness was an expert and experts are allowed --  
13 experts can have answers that are not just yes or no.  
14 If he says in order to understand my answer there's  
09:22:20 15 something, it's -- at least to find out if it's relevant  
16 or not, you have to give him that opportunity.

17 I'm not encouraging anybody to make a  
18 speech, but if he says there's something you need to  
19 understand my answer, and these are complicated issues,  
09:22:32 20 that's why we have an expert, I think it's fair to at  
21 least find out. And then if, in fact, he wants to give  
22 you a speech on something that's irrelevant, I  
23 understand, we for sure will all agree to shut it down.  
24 We're going to do the same thing with your witness, your  
09:22:46 25 expert. But if he says you need to have this

09:22:51 1 understanding, I don't think it's fair to say we're only  
2 going to listen to part of your answer. I don't think  
3 that's fair.

4 PRESIDENT: He didn't give a yes or no  
09:22:57 5 answer. He answered and provided an explanation. What  
6 he wanted to do was to expand on his explanation. That  
7 is then for you to pick up on redirect. What we don't  
8 want to have is lengthy explanations. That is not the  
9 purpose of this cross-examination.

09:23:13 10 MR. APPLETON: As long as we're not going  
11 to have an objection from the other side when we pick  
12 this up at 9:14 on the transcript because the last time  
13 we did this, it was exactly that point, and then the  
14 other side objected and said, no, you can't do that.  
09:23:26 15 Because he's entitled to clarify what he's saying.  
16 That's all.

17 PRESIDENT: He did clarify.

18 MR. APPLETON: Well, he says he didn't.  
19 That's the only reason I'm objecting. That's why. I  
09:23:35 20 don't want to belabor this; I'm simply saying that it  
21 appeared that that might not have been complete. And I  
22 don't know what it is, but I don't want to get into an  
23 argument about this. I simply want to say I just want  
24 to know if that was the answer or not, that's all.

09:23:52 25 PRESIDENT: Very good. Please proceed.

09:23:54 1 Q. Thank you very much. Please, I would like to  
2 remind everyone the instruction that the President gave  
3 us, and you specifically, sir. Please answer the  
4 question that I'm asking you, and then your lawyers are  
09:24:04 5 going to give you the opportunity to expand if they deem  
6 fit to do so.

7 According to 336, paragraph 2, provisional  
8 measures may impact either property or rights. It's on  
9 the screen. Can you see that?

09:24:28 10 A. Which paragraph do you say?

11 Q. I'm talking about paragraph 2. And it's also  
12 in English. It says here:

13 "Provisional measures shall be granted at  
14 the petitioner's request and may only affect the  
09:24:45 15 property or rights of the parties to the proceeding."

16 Is that correct?

17 A. Yes, as long as we understand that the parties  
18 to the proceedings are Riverside and the State of  
19 Nicaragua.

09:24:59 20 Q. Exactly. And the parties to the arbitration  
21 proceeding, this proceeding, are Riverside and  
22 Nicaragua, correct?

23 A. Correct. And this is the -- and this is the  
24 proceeding that allows the Nicaraguan court to impose  
09:25:14 25 the measure, because of the existence of this

09:25:19 1 proceeding.

2 Q. Riverside was included as a party. Is that  
3 right?

4 A. It is the Claimant, yes.

09:25:26 5 Q. Thank you. Let me continue.

6 Do you consider that INAGROSA and  
7 Riverside were impacted by the lack of notice of the  
8 measure? Is that correct?

9 A. Yes.

09:25:41 10 Q. The measure was issued for a two-year period,  
11 and it was to expire in February 2024, correct?

12 A. I believe so.

13 Q. Are you familiar with what happened in  
14 connection with this measure after you submitted your  
09:25:58 15 expert report?

16 A. Yes.

17 Q. When the measure was about to expire,  
18 Nicaraguan counsel notified Riverside counsel before  
19 renewing the measure, asking them whether they wanted it  
09:26:26 20 to expire or if they wanted to take the position up  
21 again. Is that correct?

22 A. I understand there were communications between  
23 the parties, but I'm not familiar with the full content  
24 of it.

09:26:40 25 Q. Let us assume for a moment that you are

09:26:43 1 Riverside's counsel and INAGROSA's counsel and that you  
2 feel, as an advisor, as a legal advisor, that your  
3 client has been deeply injured by the protective measure  
4 that you consider has brought about the expropriation.

09:27:10 5           When you, as a lawyer, are informed that  
6 the protective measure is about to expire, well, you now  
7 have the option to tell us we can renew the measure  
8 because, as the government, we need to protect the  
9 property to prevent other invasions; or you can come and  
09:27:33 10 take over the Hacienda and then there will be no renewal  
11 of the protective measure.

12           As a lawyer, after understanding that the  
13 rights of your clients have been deeply affected, as you  
14 indicated, wouldn't you advise your client to take over  
09:27:55 15 the property? This horrible situation has ended. The  
16 protective measure is to expire. Wouldn't you have  
17 advised your client to take over the property?

18       A.    No.

19       Q.    Okay, perfect.

09:28:17 20           You would have preferred to have a renewal  
21 of the protective measure, even though you considered  
22 that this protective measure had injured your client,  
23 you would have wanted it to be renewed?

24       A.    No.

09:28:34 25       Q.    Okay. So you didn't want it to be renewed

09:28:37 1 either. Is that what you're saying? So --

2 A. Excuse me, Counselor. Your question has  
3 separate, different questions. So maybe they can read  
4 it for us, and I will respond, each question at the  
09:28:51 5 time.

6 Q. I'm going to go slower then.

7 As a lawyer, you have two options: one, to  
8 let the protective measure expire and for you to take  
9 over the property. The other option is, okay, I'm not  
09:29:15 10 ready to take over the property, you can say, and then  
11 the protective measure is going to be renewed.

12 This was the situation that Nicaraguan  
13 counsel put to Riverside before the expiration of the  
14 protective measure. What would have been your advice to  
09:29:38 15 your client?

16 A. My advice to the client will be to leave the  
17 null and void proceeding that the Attorney General  
18 executed in Nicaragua regarding the measure because I  
19 would have a chance on another day to challenge that.

09:29:59 20 The article that we just read in the  
21 second sentence says that they only can -- the measure  
22 can only be applied to the assets -- to the assets of  
23 the party that are the party in this proceeding -- and  
24 the measure was applied to INAGROSA, which is not a  
09:30:21 25 party of this proceeding.

09:30:23 1                   That, in itself, makes the order, and all  
2 the proceedings that you follow in Nicaragua, null and  
3 void.

4           Q.    And you know that in a proceeding, the fact  
09:30:41 5 that you have to request -- you have to request for it  
6 to be null and void -- "will be to leave the null and  
7 void proceeding."

8                   Do you know whether INAGROSA requested  
9 that it be deemed null and void before the courts?

09:31:06 10           A.    Not yet.

11           Q.    Do you know if, after the measure was  
12 renewed -- well, after the measure was renewed, do you  
13 know whether INAGROSA, or Riverside, rather, asked for  
14 it to be deemed null and void before the Jinotega  
09:31:32 15 courts?

16           A.    No, because the second renewed order is also  
17 null and void. It was issued after the first one had  
18 expired, and the code is very clear that an order can be  
19 renewed as long as the other one has not expired.

09:31:55 20                   But if you go to court on February 9th,  
21 which I believe is the date to renew it, you were late.  
22 You should have gone two years, says the code, after the  
23 order was entered. And those two years expire, I  
24 believe, in February 2nd of 2024. Again, the petitioner  
09:32:19 25 for the renewal is allowed to renew the order, says the



09:32:26 1 code, as long as it is done before the expiration of the  
2 prior order.

3                   Why? Because the law says that the first  
4 order expires automatically on expiration of the term.

09:32:44 5           Q. Do you know that there is a new protective  
6 measure that was issued in February 2024, correct?

7           A. I was precisely talking about that measure.

8           Q. And this protective measure was notified to the  
9 INAGROSA offices in Managua, correct?

09:33:16 10          A. INAGROSA was notified into that proceeding. I  
11 don't know. I don't know if it was notified. I really  
12 don't know.

13          Q. We can review it. We can review so that I can  
14 ask you some questions regarding this topic. We are  
09:33:37 15 going to show R-199, page 55 of the pdf file. One page  
16 behind that one, before that one.

17                   This document is part of the file of the  
18 protective measure. The renewal of the protective  
19 measure. Do you see on the screen at the top where  
09:34:46 20 there is a reference to the address where this official  
21 communication document was sent and delivered?

22          A. Yes, I see it.

23          Q. This is the address that in the trade registry  
24 in Managua shows us INAGROSA's address, correct?

09:35:14 25          A. I see it, yes.

09:35:21 1 Q. Can we now zoom in the last paragraph? Here we  
2 read that for all the legal purposes, I hereby notify to  
3 you the aforementioned resolution being read in full in  
4 the City of Managua on the 22nd of February, 2024.

09:35:53 5 So copies are provided under the law, and  
6 this is the signature of the notifying party. Do you  
7 see that?

8 A. I see it. But INAGROSA was not a party to the  
9 case, and that notice to a non-party is totally  
09:36:07 10 irrelevant for the proceeding. Completely.

11 Q. Can we see whether INAGROSA was a party to this  
12 protective measure?

13 A. I can tell you that INAGROSA has never been  
14 summoned to the case or given opportunity to defend  
09:36:25 15 itself in Nicaragua. The parties to the case are  
16 Riverside and the State of Nicaragua. So let's make no  
17 confusion between the parties. The parties that are  
18 here and the parties that the code is asking to  
19 participate.

09:36:43 20 The mistake was that the measure fell on a  
21 non-party, which made that order void to begin with.  
22 And now you are trying to tell me that INAGROSA, which  
23 is not a party because it was notified -- you notify  
24 only parties. You don't notify if it's a guy in the  
09:37:08 25 street.

09:37:10 1 Q. Let me interrupt you because there is a  
2 confusion.

3 I'm talking about the renewal of that  
4 protective measure. If you were so kind, first, I would  
09:37:23 5 like to look at page --

6 A. Excuse me, Counsel. I was talking about that.  
7 We have been talking back and forth on the two --

8 Q. Yes, but you're saying that INAGROSA was not a  
9 party to this protective measure. I would like to  
09:37:37 10 review that because there may be a confusion as to the  
11 renewal of the measure.

12 I would like to review that with you.  
13 Please do not interrupt me.

14 Page 5. This is where this protective  
09:38:04 15 measure is sent for notification, to serve notice. So  
16 let us look at --

17 A. Please restate that, I didn't follow you.

18 PRESIDENT: Please wait for the question.

19 Q. Please do not interrupt me. You see at  
09:38:23 20 subparagraph 4, place for notifications -- or place for  
21 notices -- and if we can zoom in, this is subparagraph  
22 4, items 1, 2 and 3. 1 and 2.

23 So there you see that this protective  
24 measure, in connection with this protective measure, the  
09:38:50 25 office of the Attorney General is asking to serve notice

09:38:53 1 to Riverside and INAGROSA in the United States of  
2 America in addition to Appleton and Associates in  
3 Canada.

4 Do you see that?

09:39:07 5 A. I see that.

6 Q. Very well. Then my question is do you know --  
7 and again, let me go back. A couple of minutes ago I  
8 was showing you the notice to INAGROSA of this  
9 protective measure, which actually took place, correct,  
09:39:29 10 within the offices of Managua?

11 A. I saw the notice. But what I said is that that  
12 notice is null and void.

13 Q. I'm not asking you whether you thought this was  
14 null and void. I am asking you whether you saw that  
09:39:45 15 there was a notice served.

16 A. Yes, there was, to a non-party. Served on a  
17 non-party.

18 Q. You just saw here that in this renewal of the  
19 protective measure, INAGROSA was a party?

09:40:02 20 A. No. It was never summoned to be a party to the  
21 petition.

22 Q. This protective measure was indeed decided as  
23 an urgent protective measure under article 380, correct?

24 A. Correct. We are talking about the second  
09:40:18 25 renewal, as you said.

09:40:21 1 Q. Indeed.

2 A. You cannot make a party to a case, Counselor,  
3 without the court first summoning the party to the case.  
4 That's how the court gets jurisdiction over the person  
09:40:40 5 by giving, not a citation, not a notice, a summons,  
6 which means obviously notice of the case and an  
7 opportunity to counter to the case.

8 Q. I apologize, but based on what we reviewed  
9 yesterday in article 380 of the Civil Code, an urgent  
09:41:03 10 protective measure may be issued ex parte without the  
11 need to have a hearing with the other party?

12 A. I'm not contending that. Absolutely. What I'm  
13 contending is --

14 Q. I apologize. You already answered. You will  
09:41:15 15 have the opportunity with your attorney to expand on  
16 this. You answered my question. I am going to continue  
17 in the interest of time.

18 A. Please lower your voice. You don't need to  
19 shout. I'm hearing you loud and clear with the ears --  
09:41:34 20 on my ears. You're shouting at me.

21 PRESIDENT: It's the interpreter that has  
22 a very loud voice. So you can actually control the  
23 volume with your microphone. On the right you have a  
24 button you can use.

09:41:52 25 MS. GREENWOOD: Counsel, I have a

09:41:53 1 question, if I may.

2 Dr. Gutiérrez, if I may ask you a  
3 question?

4 MR. GUTIÉRREZ: Yes.

09:42:06 5 MS. GREENWOOD: Thank you. To help the  
6 Tribunal understand your position on this, we appreciate  
7 your position that INAGROSA was never a party to the  
8 judicial order, to the proceedings. And in relation to  
9 the renewal, even though it appears you accept that  
09:42:27 10 notice was given to INAGROSA, your position remains that  
11 because it was not a party to the proceedings, it could  
12 never be given valid notification.

13 Is that a fair summary of your position?

14 MR. GUTIÉRREZ: Yes, Madam Arbitrator.

09:42:46 15 MS. GREENWOOD: In that case, why -- help  
16 us understand why you make such -- you put such  
17 significant weight on the fact that the notice --  
18 alleged notice that was given in relation to the first  
19 order was defective. I think what I'm struggling with  
09:43:11 20 is to understand why you even make anything of the first  
21 order not being properly notified if your position is  
22 they never could be notified because they were not a  
23 party, in your view.

24 MR. GUTIÉRREZ: The State is proceeding, I  
09:43:29 25 believe, on the basis that, in the first order, they

09:43:34 1 were entitled to go ex parte.

2 MS. GREENWOOD: I'm not talking about what  
3 you think the status -- I would like to understand your  
4 position as to why it is even relevant whether they  
09:43:47 5 were -- whether INAGROSA was or was not notified in  
6 either of the proceedings if your position is they could  
7 never have valid notification.

8 MR. GUTIÉRREZ: Absolutely. What I'm  
9 saying is that the notice is valid because INAGROSA was  
09:44:06 10 not a party to the proceeding. And it was not a party  
11 to the proceeding because that measure is placed on the  
12 basis of an arbitration in which INAGROSA is not a party  
13 either. So by not being a party you cannot be affected  
14 by decisions of the court because you have not been  
09:44:27 15 summoned. And if you are given a notice, that notice is  
16 totally irrelevant. If you want to avoid the invalidity  
17 issue, it's irrelevant.

18 MS. GREENWOOD: Thank you. Then the  
19 second question. You mentioned that because it's your  
09:44:41 20 position that both the proceedings -- both the first  
21 judicial order and the second one are null and void, you  
22 would advise your client in that situation to do  
23 nothing, and I think you mentioned it yesterday and  
24 again today that at some point in the future you would  
09:45:03 25 advise your client to go to court and challenge that.

09:45:06 1 Is that a fair summary?

2 MR. GUTIÉRREZ: Yes, that's what I said  
3 because --

4 MS. GREENWOOD: I'm just asking you if  
09:45:16 5 that's a fair summary. First question on that. How  
6 long under Nicaraguan law does a party have to do that?  
7 You mentioned prescription periods. What would be the  
8 relevant period of time?

9 MR. GUTIÉRREZ: I was about to say that.  
09:45:30 10 Ten years.

11 MS. GREENWOOD: Ten years. Ten years from  
12 when?

13 MR. GUTIÉRREZ: Ten years from where the  
14 infraction occurred.

09:45:44 15 MS. GREENWOOD: And in relation to the  
16 first judicial order, the one that lasted two years,  
17 presumably it effectively falls away so there is nothing  
18 to challenge once that falls away and is replaced by the  
19 second order. Is that correct?

09:45:59 20 MR. GUTIÉRREZ: If the replacement was  
21 correct -- I don't think a replacement will cure a lack  
22 of judicial process, so we'll have to examine what  
23 happened, when, et cetera. But as we stand now, I'm  
24 also saying that the renewal is null and void.

09:46:21 25 MS. GREENWOOD: Yes. I think the Tribunal



09:46:22 1 has your position on that very clearly. Thank you.  
2 That's very helpful. And, Counsel, please do proceed.

3 Q. Before we continue, I wanted to ask you what  
4 was the legal foundation of what you just mentioned, of  
09:46:37 5 the ten years that you just mentioned? What are you  
6 basing that on?

7 A. If you read the absolute nullity principle in  
8 the code, it says that if an act or action or decision  
9 is null and void, then it cannot be corrected. The  
09:46:59 10 judge can apply it sua sponte, even if the parties do  
11 not raise the issue, and it will be -- if the provision  
12 ends again and the party -- the party will be able to  
13 raise it at any time before it is affected by the  
14 statute of limitations.

09:47:22 15 Q. But I'd like to know what is the article that  
16 refers to the ten years?

17 A. I don't have it. I can go to my brief and tell  
18 you. I wasn't allowed to bring anything here, but I  
19 have it in my brief.

09:47:35 20 MS. GREENWOOD: Counsel, we don't need to  
21 go down a rabbit hole on this one. We have what's  
22 sufficient for the Tribunal. Thank you.

23 Q. I'm going to move on to a different topic. You  
24 mentioned in your report that the protective measure was  
09:47:58 25 tantamount to an expropriation. Is that correct?

09:48:02

1 A. Yes.

2 Q. At paragraph 102 of your report, you mentioned  
3 that there are no signs that INAGROSA had resisted to  
4 returning Hacienda Santa Fé. Is that correct?

09:48:29

5 A. Which paragraph, I'm sorry --

6 Q. 102, sir.

7 A. 102. "There is no indication that INAGROSA  
8 ever resisted the return of Hacienda Santa Fé."

9 Yes, I stand by my statement.

09:49:07

10 Q. Did you review the record -- I haven't asked  
11 you the question, thank you.

12 Are you aware that there were several  
13 opportunities, starting on September 9, 2021, when the  
14 State of Nicaragua offered Riverside INAGROSA to retake  
15 the property, to retake possession of the property?

09:49:38

16 A. I'm not absolutely sure to say yes or no. I  
17 would rather say it may be the case that the State made  
18 an offer, but I don't -- I'm not 100 percent sure.

09:50:10

19 Q. We are now going to show Exhibit C-707. The  
20 second to last page.

21 This letter, sir, is one of the letters  
22 that Riverside, Mr. Appleton, sent to Nicaragua in  
23 response to one of the many offers to retake the  
24 Hacienda -- to repossess the Hacienda. So could you  
25 please read the conclusion where it reads "conclusion on

09:50:48 1 Nicaragua's proposals" -- first paragraph.

2 MR. APPLETON: Excuse me. Counsel, I  
3 think it would be fair to take him to the beginning so  
4 he knows the date and he can see that -- and you have  
09:51:02 5 that capability before we go there -- and he may want to  
6 see more. But, at a minimum, I think it would be fair  
7 to give him the letter and the date so he can see that.  
8 Can you take him to the first page, at least?

9 MS. GONZÁLEZ: I mentioned to him that  
09:51:15 10 this was a letter in response to the proposal -- I am  
11 sorry, just a second. Do not interrupt me.

12 MR. APPLETON: I think it's fair -- no, I  
13 can interrupt if you're doing something that may be  
14 misleading. I'm simply asking --

09:51:28 15 MS. GONZÁLEZ: But you cannot be  
16 disrespectful.

17 MR. APPLETON: Ma'am, this time it's a yes  
18 or no. Can you take him to the front --

19 PRESIDENT: Let's not debate. One at a  
09:51:32 20 time. Ms. González, you ask first, and then if you  
21 still have an objection, you raise the objection.

22 Q. Now, we are going to show page 1. Page 1 of  
23 this document. This is a letter sent --

24 PRESIDENT: Ms. González, there is another  
09:52:16 25 issue that you need to keep in mind. There is a list of

09:52:19 1 assumptions listed -- attached to Dr. Gutiérrez's expert  
2 report, and one of those assumptions is that there was  
3 no formal offer of return of Hacienda Santa Fé made to  
4 INAGROSA. INAGROSA never resisted a return of Hacienda  
09:52:39 5 Santa Fé. So his opinion is based on that assumption.  
6 You can -- I'm not sure it's useful for you to challenge  
7 the assumptions that have been given by counsel to the  
8 expert.

9 Q. Let me ask you a question. Did you devote any  
09:53:01 10 time in preparation for this hearing upon reading the  
11 record and confirming the assumptions that the attorneys  
12 gave you -- attorney gave you?

13 A. No, I never questioned the assumptions I was  
14 given because I was supposed to work on those  
09:53:20 15 assumptions, as Mr. President stated.

16 Q. Very well. Can we now move on to a different  
17 topic. We are going to discuss the certificates -- the  
18 literal certificates and also the related certificates.  
19 And I haven't read this, but you do not mention -- I  
09:53:50 20 didn't see this, but you do not mention any experience  
21 you may have advising clients to interpret literal  
22 certificates and related certificates, right?

23 A. No, but I worked in the public registry when I  
24 was a student, and I had a lot of practice. I worked  
09:54:09 25 with Dr. Iván Escobar, a well-known person in Nicaragua,

09:54:15 1 a professional dedicated to registry. Yes, I know what  
2 you're talking about.

3 Q. Very well. And that was when you worked in the  
4 public registry. That was more than 45 years ago before  
09:54:33 5 you moved to the US, correct?

6 A. Yes. And the registry exists as it is since  
7 the 1800s.

8 Q. But the registry has also updated itself in the  
9 way that it uploads information over the last 45 years,  
09:54:47 10 correct?

11 A. Yes. But it's the same system. So the system  
12 didn't change. The annotations, the column for titles.  
13 It's the same exactly. Thank God they didn't change the  
14 system.

09:55:04 15 Q. So you're saying that the related certificates  
16 and the literal certificates, as we have seen them in  
17 this arbitration, existed 45 years ago in the same way  
18 and they shared information with the public in the same  
19 way, correct?

09:55:30 20 A. No.

21 Q. Are you familiar with the SIICAR?

22 A. Not quite.

23 Q. That is the system for a user to request  
24 information of the public registry, and it is the  
09:55:42 25 integrated registry.

09:55:53 1 We are going to ask you some questions  
2 about the certificates, as I mentioned before. In this  
3 arbitration we have seen several certificates issued by  
4 the real estate registry, correct?

09:56:08 5 A. I cannot answer the question in that broad way.  
6 We have -- I don't know. I don't know what you have  
7 examined.

8 Q. I'm asking you what you have examined because  
9 in your report you refer to some of these literal and  
09:56:26 10 related certificates. So I'm asking you, in this  
11 arbitration several literal certificates have been  
12 presented as well as related certificates, correct?

13 A. Whatever I examined, I examined. And I can  
14 answer questions regarding those that I examined.

09:56:50 15 Q. And you can also answer questions about the  
16 ones that you have not reviewed because you appear here  
17 as an expert, and you say that you have the experience  
18 to interpret these certificates, correct?

19 A. Correct. If you show me the certificate, I'd  
09:57:03 20 be happy to analyze it.

21 Q. So in these certificates, we see that the owner  
22 of the property is 100 percent INAGROSA, correct?

23 A. In some of the certificates I've read, it said  
24 two things: one, that INAGROSA was the owner, but in  
09:57:26 25 addition to that, it listed the State of Nicaragua as

09:57:32 1 owner and it listed also Riverside as owner, which  
2 was -- which was wrong.

3 Q. We're going to review that then.

4 You will agree with me, and we saw it  
09:57:48 5 yesterday, that on June 6, 2022, INAGROSA requested the  
6 registry -- the issuance of a related certificate for  
7 the farm under the number 6145, Entry 6, correct?

8 A. Yes, we saw one yesterday. Yes.

9 Q. We're going to see C-259 in Spanish, and we  
09:58:22 10 also have the version in English.

11 In this request INAGROSA asked for a  
12 related certificate in connection with Hacienda  
13 Santa Fé. We're talking about 6145, correct?

14 A. Yes.

09:59:08 15 Q. And you would recall that yesterday we saw the  
16 certificate as issued. That is C-60.

17 A. We saw a certificate, yes.

18 Q. And you confirmed that this certificate showed  
19 that the property was 100 percent INAGROSA's. This was  
09:59:30 20 in June 2022, correct?

21 A. Yes. Certificate showing a different  
22 ownership.

23 Q. We'll get there.

24 We're now going to show on the screen file  
10:00:01 25 R-0006 in Spanish and English. Here, once again,

10:00:20 1 INAGROSA is asking the registrar for a photocopy of a  
2 literal certificate. In this case it's seeking a  
3 specific entry, which is Entry 2 of the preventive  
4 entries column, which has to do with the official notice  
10:00:38 5 of a provisional measure in respect of the farm. Do you  
6 see that?

7 A. It's asking for a certified photocopy of the  
8 official notice of provisional relief concerning  
9 property -- yeah, it's asking -- I think it's asking for  
10:01:00 10 a copy of the order, of the court order.

11 Q. It's asking for a photocopy certificate of the  
12 official notice of provisional relief, particularly  
13 Entry No.2 of the provisional filing column. Is that  
14 correct?

10:01:18 15 A. It's not notice. Is it asking for notice or  
16 for a copy of the order?

17 Q. It's asking for a literal certificate.

18 A. Let me read it in Spanish because in English it  
19 doesn't make sense to me. *(Pause)*

10:01:44 20 Yeah, it's asking a copy of the request  
21 for notation that the registrar received from the court.  
22 That's what it is asking. Of that -- of that order.

23 Q. So it's a literal certificate.

24 So if we can see what was the certificate  
10:02:04 25 that was issued in response to this request for a



10:02:07 1 literal certificate. Now, if we could please show file  
2 C-268 in Spanish and C-269, which has the English  
3 language version.

4 A. Can it be enlarged? Because that is too far  
10:02:36 5 for me.

6 Q. Yes, we'll get to that in a second. Indeed,  
7 then, let's show C-268 in Spanish. And this is the  
8 photocopy of literal certificate. Do you see that's  
9 what it says up at the top?

10:03:09 10 A. Yes.

11 Q. In the first category it says current owner,  
12 and it says "Inversiones Agropecuarias S.A., percentage  
13 of rights 100 percent." Do you see that?

14 A. Yes.

10:03:30 15 Q. Then under the second title it says  
16 "information on the entry requested", and there it says  
17 with respect to the preventive annotation, official  
18 notice of provisional measure. Do you see that?

19 A. Yes. What is it -- so the requested -- for the  
10:03:56 20 requested notation but it doesn't...

21 Q. It says data on the entry requested. That's  
22 what INAGROSA requested in a letter we just saw in which  
23 it was asking for -- excuse me, sir. I haven't finished  
24 -- in which it was requesting Entry 2, which  
10:04:15 25 corresponded to a preventive annotation of an official

10:04:20 1 notice of protective measure or provisional measure. Do  
2 you see that?

3 A. Yeah, what I don't see is what you are telling  
4 us.

10:04:27 5 Q. The entry requested belongs to Nicaragua, and  
6 it belongs to Riverside, which are the ones affected by  
7 this provisional measure. Do you see that?

8 A. Yes, but the problem is that it says it belongs  
9 to the State of Nicaragua. It shouldn't --

10:04:44 10 Q. The entry requested --

11 A. The State of Nicaragua doesn't own the  
12 Hacienda. The State of Nicaragua doesn't own the  
13 property, but this one says it belongs to the State of  
14 Nicaragua. And that is wrong.

10:04:59 15 Q. Sir, you told me that you had experience  
16 interpreting documents such as this. Do you see in the  
17 first category it says current owner, it belongs to  
18 Inversiones Agropecuarias S.A. 100 percent ownership?  
19 Do you see that?

10:05:14 20 A. I see and I -- yes, I see it. But then it  
21 confounds the title. It makes it difficult to discern  
22 who is the owner when the registry says it also belongs  
23 to the State of Nicaragua. That's a confusion.

24 Q. Where does it say that, excuse me?

10:05:34 25 A. It says here in the second -- where in the

10:05:35 1 second paragraph it says it belongs to the State of  
2 Nicaragua. It also says it belongs to Riverside Coffee.  
3 Those two statements are wrong.

4 PRESIDENT: Can we have the English  
10:05:54 5 version also on the side?

6 MS. GREENWOOD: I haven't been able to  
7 find the English version in the --

8 PRESIDENT: It's not C-269, as you said.  
9 It is something else.

10:06:02 10 MS. GREENWOOD: Yes, it's not.

11 MS. GONZÁLEZ: Okay. This is from  
12 24 August. We have one that was issued just the same as  
13 this but issued a few days later in November with the  
14 same information, which we could review. It's C-0263 in  
10:06:25 15 Spanish and C-0263 in English issued 15 November.

16 Q. And before you go on, it says current owner is  
17 INAGROSA S.A. 100 percent, correct? Before we review  
18 the one that was issued subsequently, do you see that  
19 under current owner?

10:06:46 20 A. If you are referring to the first line?

21 Q. Yes, do you see it?

22 A. Yes, that's what it says.

23 Q. Fine. So let's review one that was issued a  
24 few days later.

10:07:01 25 MR. GUTIÉRREZ: Mr. President, if I may,

10:07:03 1 you requested to see it in English, and I hope we will  
2 get it, but I think it's important for us to have a  
3 comparison between this certificate we are here watching  
4 and the other certificate she mentioned from June 6,  
10:07:17 5 2022, because they are -- there might be differences  
6 there.

7 PRESIDENT: They, in fact, seem to be  
8 different. If it's C-263, it's not identical.

9 MS. GONZÁLEZ: You're right. I'm going to  
10:07:38 10 put a different example up there. Excuse me. Yes, I'm  
11 sorry. It's C-263 in Spanish, 263 -- and C-263 in  
12 English.

13 PRESIDENT: I think we had the English  
14 version yesterday. It was an R exhibit.

10:08:25 15 MS. GREENWOOD: It was R-0005.

16 MS. GONZÁLEZ: Just a second, please.

17 PRESIDENT: I think it's R-5. The  
18 headings seem to be the same, but I leave it for counsel  
19 to find the right version.

10:09:55 20 MS. GONZÁLEZ: We have C-265 in Spanish.  
21 Can we check if we have -- okay. Ricky, you remember  
22 the -- I'm sorry. One minute, please.

23 PRESIDENT: R-5 has the same headings that  
24 we have in the document we have been looking at. So the  
10:10:52 25 contents are not the same. But what we were interested

10:10:55 1 in is simply to see the headings, how they were  
2 translated. "Requested entry data" and "belongs to" --  
3 those were the translations and those were the terms  
4 used by the witness.

10:11:09 5 MS. GONZÁLEZ: Yes. We also have 268, and  
6 we have a courtesy translation that we can provide.  
7 C-268 that we can use. We have the version in Spanish,  
8 and we can put on the screen a courtesy translation that  
9 we can use for these purposes.

10:11:30 10 PRESIDENT: Thank you.

11 MS. GONZÁLEZ: Yes. Ricky, please.  
12 Apologies for this delay.

13 MR. APPLETON: Just as long as you make  
14 sure you blow up on the date at some point so we know  
10:11:47 15 what date you're talking about.

16 MS. GONZÁLEZ: The date here is  
17 24 October 2022.

18 A. If I may, Mr. President, in this certificate I  
19 don't see the mention to the State or to Riverside at  
10:12:13 20 all. How did they do that?

21 Q. I am sorry, I still haven't put any question to  
22 you. I thank you very much if you could wait until I  
23 ask you a question.

24 So here we have a copy of the -- true copy  
10:12:32 25 of the literal certificate which was issued in

10:12:35 1 October 2022. This is issued four months after the one  
2 we had seen from June of 2022. Once again, this is an  
3 exact copy of the literal certificate which is an answer  
4 to a request by INAGROSA in October, which was to have a  
10:12:54 5 true copy of a literal certificate of Entry No.2 issued.  
6 We're going to review it. You see there it says current  
7 owner, and it indicates that it's Inversiones  
8 Agropecuarias 100 percent. Do you see that?

9 A. Yes.

10:13:14 10 Q. Okay. That's the first category, current  
11 owner. Then there is another category that says  
12 "Data/information of the requested entry." Do you see  
13 that? It says "Data/information of the requested  
14 entry"?

10:13:27 15 A. Yes. And I also see that it says owner --

16 Q. I still haven't asked you the next -- I've yet  
17 to ask you the next question.

18 "Data of the requested entry." The  
19 requested entry is the preventive -- contract action,  
10:13:43 20 preventive annotation, official notification of  
21 provisional relief. This corresponds to the letter in  
22 which Riverside requests exactly this entry and it  
23 identifies it as Entry No. 2. In the letter we saw that  
24 earlier. Do you see there it says: "Contract action,  
10:13:57 25 preventive annotation, official notice of provisional

10:14:01 1 relief?"

2 A. Contract action. I don't know what "contract  
3 action" means. Contract action? What's the meaning of  
4 that?

10:14:15 5 Q. "Action or contract, preventive action.  
6 Official notice of provisional relief." Do you see  
7 that? It's highlighted in yellow now up on the screen.

8 A. Yes. I see it.

9 Q. And under the category data of requested entry,  
10:14:44 10 it says "belongs to the State of the Republic of  
11 Nicaragua" and "belongs to Riverside". Do you see that?

12 A. That's very unclear. They are mixing two  
13 things. They are, on the one hand, talking about the  
14 annotation, and on the other hand, the certificate is  
10:15:07 15 talking about ownership. So at least this is like a  
16 cloud on the title. At least. At the very least.

17 Q. And this is how certificates are currently  
18 issued in Nicaragua beginning, first of all, with the  
19 most important, which is who is the owner. And after  
10:15:26 20 that, they go to the specific thing that is requested.  
21 In this case they asked that information to be provided  
22 about the provisional relief, correct?

23 A. I cannot agree with you. I cannot agree with  
24 you.

10:15:44 25 Q. Okay. Well, then we can continue.

10:16:17 1                   You indicate in your report that the  
2 effect of the judicial order was to deprive INAGROSA of  
3 its right to sale and mortgage for a two-year period,  
4 correct? This is in paragraph 99 of your report.

10:16:35 5           A.     Yes, because to me, possession is nine tenths  
6 of the law.

7           Q.     The general law of the public registries  
8 doesn't limit a mortgagor sale so long as if there is a  
9 preventive annotation, correct?

10:16:52 10          A.     I need the question repeated, please.

11          Q.     Okay. The general law of the public registries  
12 of Nicaragua does not limit the sale or encumbrance of  
13 property so long as there is a preventive annotation on  
14 provisional relief in respect of the property, correct?

10:17:16 15          A.     So long as what? No, I don't think that's --

16          Q.     If we could please put up article -- I'm sorry.  
17 Exhibit C-566, General Law on Public Registries, article  
18 112.

19                   This article, I'm going to read it so that  
10:18:13 20 you can hear the translation into English, and we're  
21 ready to send the Tribunal a courtesy translation.

22                   "Real property or real property rights in  
23 respect of which there has been a preventive annotation  
24 may be alienated or encumbered without prejudice to the  
10:18:36 25 right of the person in whose favor the annotation has



10:18:40 1 been made."

2 Do you see that, sir?

3 A. I see. But I need to add something. Who in  
4 his right mind is going to buy a property with --

10:18:49 5 Q. I'm sorry. I'm the one who asks you the  
6 question.

7 PRESIDENT: The questions are asked by  
8 counsel, so just answer the question. You can make a  
9 brief explanation, as we discussed yesterday, but the  
10:19:00 10 questions come from counsel.

11 MR. GUTIÉRREZ: Thank you.

12 Q. You also indicate that the judicial order for  
13 the provisional relief restricted the exclusive rights  
14 of INAGROSA in relation to the use of property,  
10:19:17 15 possession and control or ownership of the property. Is  
16 that correct?

17 A. Absolutely.

18 Q. And you indicated that the judicial order  
19 affected INAGROSA, given that financial institutions  
10:19:32 20 could not accept a pledge in respect of the Hacienda  
21 Santa Fé and that INAGROSA did not have the capacity to  
22 enter into said agreement due to the restrictions  
23 imposed by the judicial order, correct? This is  
24 paragraph 101 of your report.

10:19:54 25 A. Correct. And that is so because possession is

10:20:00 1 nine tenths of the law. And in addition to that, no  
2 bank, no lender will accept a mortgage as a guarantee on  
3 a property which has such a notation.

4 Q. Have you reviewed the record in -- you reviewed  
10:20:20 5 the record to prepare for this arbitration and this  
6 hearing, correct?

7 A. Which record, Ms. González? Which record?

8 Q. You indicated in your report that you had  
9 reviewed the main memorials, the Memorial, the  
10:20:38 10 Counter-Memorial, the Reply and the Rejoinder in  
11 preparing for this hearing, correct?

12 A. Yes.

13 MR. APPLETON: Sorry. Counsel is  
14 testifying. She added something that I think he needs  
10:20:50 15 to see that because she added something that would be  
16 highly unusual for him to have been able to see because  
17 it was done after he wrote his report. And you just  
18 testified on that. So I just need to make sure that  
19 we're very clear.

10:21:03 20 So the scope of review, why don't you just  
21 ask him based on that rather than -- in case we have an  
22 issue that he possibly may have misspoken and asked him  
23 something. I just don't think that's proper. Since  
24 it's there in his report and he specifies what he relied  
10:21:19 25 on.

10:21:20 1 MS. GONZÁLEZ: Excuse me, Mr. Appleton, I  
2 am conducting this cross-examination.

3 MR. APPLETON: I understand that.

4 MS. GONZÁLEZ: Please don't interrupt me.

10:21:26 5 MR. APPLETON: You have to let me finish.

6 Ms. González, I've been listening very  
7 carefully, but you need to let me finish my objection.

8 I believe that you said something that was a  
9 misstatement. I'm going to suggest it's an innocent

10:21:39 10 misstatement. I'm going to suggest that you have a very  
11 simple way to deal with that about what he relied upon,

12 and that would be the appropriate way to do it for a  
13 witness -- and so please let me finish -- that would be

14 the appropriate way, and so we don't want -- because  
15:21:51 15 you've given him a question, I've raised my objection.

16 He then answers a question which I believe is not  
17 appropriate and then you continue to then talk over me

18 again. And that -- I'm not being cross-examined. So  
19 you have to give me the courtesy to let me finish, as I

10:22:08 20 will do for you. And I'm finished with this.

21 PRESIDENT: If the objection is that there  
22 was no question, she did ask questions.

23 MR. APPLETON: The objection is that she  
24 testified about what he saw in a big list he has in the

10:22:29 25 report. I believe she did something that was

10:22:31 1 inaccurate, and that's why I'm asking.

2 MR. GUTIÉRREZ: Mr. President, would it be  
3 possible for the question to be restated or to be  
4 repeated?

10:22:41 5 PRESIDENT: That is exactly what I was  
6 going to say.

7 So, Ms. González, can you please repeat  
8 the question?

9 MS. GONZÁLEZ: Yes.

10:22:48 10 Q. Dr. Gutiérrez, did you review the Memorial and  
11 the Counter-Memorial as you indicate in your report,  
12 correct?

13 A. Yes, I did.

14 Q. Could you confirm whether, in addition, since  
10:23:08 15 this report was -- since this report was issued, have  
16 you reviewed the Rejoinder and the Reply? You attach  
17 the Reply -- or your report was attached to the Reply.  
18 Did you read it?

19 A. I read probably portions of the Reply but not  
10:23:36 20 all.

21 Q. The order was issued in December 2021, correct?

22 A. I believe so.

23 Q. Did you find any evidence in the memorials that  
24 you reviewed that INAGROSA has applied for loans,  
10:23:54 25 putting up Hacienda Santa Fé as collateral after

10:23:57 1 December 2021?

2 A. No, but we heard testimony from Mr. Rondón that  
3 they were trying to get funds for the expansion,  
4 et cetera. And obviously when the property was taken  
10:24:12 5 away, they were not doing that, and you won't find  
6 anything in the record because the property was gone.

7 Q. Did you find testimony in Mr. Rondón's  
8 testimony that, after December 2021, he had applied for  
9 a loan offering Hacienda Santa Fé as collateral?

10:24:36 10 PRESIDENT: These are questions of fact to  
11 a legal expert, so please move on.

12 MS. GONZÁLEZ: Okay.

13 Q. I'm going to put one final question to you,  
14 sir. You indicate that the provisional measure had the  
10:24:53 15 effect of depriving INAGROSA of its ownership?

16 A. Of what? The effect of what?

17 Q. Of a de facto and de jure expropriation having  
18 a negative effect on the property rights -- INAGROSA'S  
19 property rights over Hacienda Santa Fé, and I'd like to  
10:25:16 20 know what is your basis for saying this? Was it just  
21 because of the copy of the literal certificate that we  
22 just reviewed? Is that your basis for saying that there  
23 was a transfer of ownership or the effect of an  
24 expropriation in respect of the property right?

10:25:35 25 A. Sincerely, I don't understand your question.

10:25:39 1 MS. GONZÁLEZ: Okay. I will drop the  
2 question then. Thank you. We can go to our recess  
3 right now if you consider it appropriate, and then my  
4 colleague, Ms. Cortes, will continue with the  
10:25:52 5 cross-examination.

6 PRESIDENT: Yes, indeed. Let's break now  
7 for 15 minutes. We have been going on for almost an  
8 hour and a half. So we break until 10:40, and we  
9 continue with Ms. Cortes. Thank you.

10:26:20 10 Dr. Gutiérrez, the same reminder, that you  
11 cannot speak with anybody about your testimony during  
12 the break.

13 MR. GUTIÉRREZ: Thank you.

14 *(Brief Recess)*

10:46:35 15 PRESIDENT: You may proceed.

16 MS. CORTES: Thank you.

17 BY MS. CORTES:

18 Q. Dr. Gutiérrez, good morning. My name is Nahila  
19 Cortes, and I will be conducting your cross-examination.

10:47:00 20 A. I can't hear you.

21 *(Discussion off the record)*

22 Q. Mr. Gutiérrez, my name is Nahila Cortes, and I  
23 will be conducting your cross-examination on another  
24 section, on private wildlife reserve and permits.

10:47:23 25 A. Yes.

10:47:23 1 Q. I will do it in Spanish, but I just wanted to  
2 have this minute with you in English. So I'll switch to  
3 Spanish, and as Ms. González did, I will be asking the  
4 question. I am going to wait three seconds for the  
10:47:35 5 court reporters to translate, so we can move on.

6 The other thing, we're going to cover  
7 different things, so I really appreciate that we can  
8 have an understanding on the answer and questions so we  
9 can move forward.

10:47:53 10 A. Sure.

11 Q. Thank you so much. One last thing. Are you  
12 okay if I call you -- address you as Dr. Gutiérrez?

13 A. It's not necessary. You can call me Renaldy,  
14 which is my name. And I like it.

10:48:16 15 Q. Okay. That is good.

16 So I'm going to ask you, sir, a few  
17 questions about the private wildlife reserve. And in  
18 your report, you did not mention expressly any  
19 experience in connection with the processing of these  
10:48:43 20 reserves in Nicaragua, right?

21 A. Please repeat the question. I think I missed  
22 some of it.

23 Q. You did not mention expressly in your report  
24 that you have experience in the processing of these  
10:48:58 25 private wildlife reserves in Nicaragua, correct?

10:49:00 1 A. No, but now I do.

2 Q. Sir, under the law of Nicaragua, it is a  
3 protected area. These private wildlife reserves are  
4 protected areas. Is that right?

10:49:23 5 A. Yes, when it is consolidated and accomplished  
6 legally, it is a protected area.

7 Q. And these reserves are part of a national  
8 system of protected areas. Is that correct?

9 A. According to the law, that's what the law says,  
10:49:41 10 yes.

11 Q. Under the Nicaraguan law, one of the main  
12 purposes of a protected area is the preservation of  
13 natural ecosystems that represents a number of  
14 biographic and zoographic regions in the country, right?

10:50:02 15 A. I need you to go slowly because between the  
16 translation and what you're talking, it's difficult to  
17 grasp all you are saying. So if we can go slower, it  
18 will be easier for me to respond.

19 Q. Of course. One of the main purposes of a  
10:50:19 20 protected area is the conservation of natural ecosystems  
21 that represent different biographical and ecological  
22 regions of the country, yes?

23 A. Yes. I understand that's the fundamental  
24 purpose of that.

10:50:35 25 Q. Another fundamental purpose of a protected area



10:50:40 1 is the protection of water areas and hydrological  
2 cycles. Is that right?

3 A. I believe so.

4 Q. And another of the fundamental purposes of a  
10:50:55 5 protected area is to promote tourism and recreational  
6 activities in coexistence with nature. Is that right?

7 A. Yeah, not decidedly so, but that's an  
8 investor's decision, I think. That's a private decision  
9 what to do with the private reserve without perturbing  
10:51:18 10 the other fundamental principles, I think.

11 Q. Sir, in a protected area, there is a  
12 prohibition in connection with the use of the forest  
13 resources on a permanent basis, correct?

14 A. It is not -- I wouldn't say it is prohibited.  
10:51:43 15 I think it is regulated. And if it is going to be done,  
16 it will have to follow the regulations that applies to  
17 that business, let's say.

18 Q. In the environmental law, sir, isn't there a  
19 prohibition for forest resources on a full and permanent  
10:52:13 20 basis?

21 A. I believe it is extremely regulated, I will say  
22 that.

23 Q. Again, in Law 217, does it expressly provide  
24 that in a protected area, there is a prohibition for the  
10:52:32 25 use of the forest resources on a full and permanent

10:52:36 1 basis?

2 A. On a full and permanent basis, it cannot be.  
3 It would be illegal, I think.

4 MS. CORTES: RL-0017, Law 217, please, if  
10:52:53 5 we can show it on the screen, in Spanish and English.  
6 Article 17. Article 17, please.

7 Q. Second paragraph, please. Mr. Renaldy, this is  
8 just for the record and for us to be able to continue  
9 our conversation. This is article 17 of the  
10:53:50 10 Environmental Law, and it is protected area section 3.  
11 And I'm going to read in Spanish.

12 It says, "The protection of natural  
13 resources of the country is a matter of national  
14 security as well as the highest responsibility of the  
10:54:10 15 State."

16 MS. DE PENA: Objection. Sorry, excuse  
17 me.

18 MR. APPLETON: Excuse me. There's an  
19 objection. It's better for everybody if we stop. Give  
10:54:17 20 your objection.

21 MS. DE PENA: Thank you. The witness has  
22 expressed a preference to have English language shown to  
23 him, so could you please pull the English translation?

24 MS. CORTES: Sure.

10:54:30 25 MS. DE PENA: Thank you.

10:54:39 1 MS. CORTES: If we can show article 17 in  
2 English as well. Just for the record, there is a  
3 partial translation of Law 217. In Law 217, this  
4 article has not been translated. I'm not going to ask  
10:55:10 5 specific questions about this. We just need to agree on  
6 what the law says.

7 I'm going to read again this paragraph  
8 right here of article 17, Protected Areas. It says  
9 here, "The protection of natural resources of the  
10:55:29 10 country is a matter of national security and of the  
11 highest responsibility and priority for the State.  
12 Within the spirit of protected area, there is a  
13 prohibition for forest resources on a total and  
14 permanent basis."

10:55:47 15 In a protected area, there is a  
16 prohibition related to forest resources that is full and  
17 permanent under article 17 of Law 217, correct?

18 A. Yes, that's what the law says. However, in  
19 Nicaragua --

10:56:03 20 Q. Thank you so much. We have many things to  
21 cover, sir, so thank you for your answer.

22 A. I think I can give a brief observation, as the  
23 President has said.

24 PRESIDENT: Please, go ahead.

10:56:21 25 MR. GUTIÉRREZ: Thank you, Mr. President.

10:56:21 1 A. The situation I have seen in Nicaragua is that  
2 the president of the Republic, by decree, grants  
3 exemptions to that rule that you read, and the  
4 conclusion of a biologist's article in the papers  
10:56:42 5 recently was that if we continue deforesting the  
6 country, in 20 years Nicaragua will lose all its  
7 forests. Thank you.

8 Q. Thank you. In connection with the procedure to  
9 declare an area a private wildlife reserve under  
10:57:16 10 Nicaraguan law, a private wildlife reserve is declared  
11 at the request of the owner. Is that right?

12 A. Yes. Only the owner can do that, and my  
13 understanding is that it is a voluntary process.

14 Q. And the interested party must submit a letter  
10:57:38 15 and fill forms that it has to submit to the relevant  
16 authority. Is that correct?

17 A. That's correct, yes.

18 Q. It also has to evidence that it is the owner of  
19 the land, correct?

10:57:53 20 A. I believe so, yes.

21 Q. It must also submit the location of the area,  
22 the coordinates of the area, correct?

23 A. Yes.

24 Q. It should also submit an expeditious ecological  
10:58:16 25 study in its application, correct?

10:58:18

1 A. Yes.

2 Q. It should also submit an environmental  
3 management plan as well, correct?

4 A. Yes.

10:58:36

5 Q. In that application, once the information is  
6 submitted, a MARENA technical team, together with the  
7 commission, come and inspect the area, correct?

8 A. There is an inspection of the property by the  
9 government in the course of analyzing the feasibility of  
10 a reserve.

10:58:59

11 Q. And then they prepare a technical report,  
12 right?

13 A. I believe so.

14 Q. And, after that, MARENA issues a resolution  
15 either approving or rejecting the application of the  
16 area to declare it as a private wildlife reserve,  
17 correct?

10:59:14

18 A. Yes. If it's not approved, that's the end of  
19 the story.

10:59:39

20 Q. In that application procedure, private parties  
21 can ask for a declaration of a private wildlife reserve  
22 because the law offers some economic benefits, financial  
23 benefits to them, right?

24 A. Yes, well, they file the application within the  
10:59:59 25 rules and regulations of the process we are discussing.

11:00:08 1 Q. In this case, Dr. Gutiérrez, INAGROSA submitted  
2 to the environmental authorities an application to have  
3 this area declared a private wildlife reserve, correct?

4 A. Correct.

11:00:31 5 Q. They presented a request in 2015, correct?

6 A. That date, I cannot confirm. I don't know.  
7 But I do know they presented that.

8 Q. Let's assume they did. At any rate, your  
9 counsel may discuss this with you, but this is part of  
11:00:52 10 the record.

11 Later on INAGROSA presented a --

12 THE INTERPRETER: The interpreter was on  
13 the wrong channel. I apologize.

14 Q. Later on INAGROSA corrected this and they  
11:01:15 15 presented a new form. INAGROSA later on corrected this  
16 application and presented it again on May 26, 2016,  
17 correct?

18 A. I haven't seen it, and I don't know what the  
19 correction that you are talking about was, or is, so if  
11:01:37 20 you want to discuss about those things, we would like to  
21 see it.

22 Q. Briefly, we are going to show R-32 in English  
23 and Spanish. Dr. Gutiérrez, three simple questions  
24 about this document to be able to continue.

11:02:27 25 This is the form to request and recognize

11:02:31 1 the property as a private wildlife reserve. Do you see  
2 it?

3 A. Yes, I see it.

4 Q. The applicant is Inversiones Agropecuarias  
11:02:43 5 S.A., correct?

6 A. Correct.

7 Q. The legal representative is Carlos Rondón,  
8 correct?

9 A. Correct.

11:02:59 10 Q. Now we are going to move to the second page.

11 The objective, the purpose of this area,  
12 according to the applicant, is to preserve the forest  
13 area to protect water sources, to provide habitat for  
14 the flora, the fauna, and protect all of the animals  
11:03:23 15 that live in the forest, correct?

16 A. Yes, but the owner can retract from that  
17 position and do nothing. It's not required to do it,  
18 and it is not illegal. It is not -- nothing that can --  
19 the applicant be forced to do.

11:03:44 20 But what you are reading here is correct.

21 Q. With this that we have seen, it seems that this  
22 form complies with the purposes under the environmental  
23 law?

24 A. I understand, yes.

11:04:14 25 Q. INAGROSA also presented a quick environmental

11:04:21 1 study to MARENA in August 2015, correct?

2 A. I believe so, yes.

3 Q. And this is a study that is part of the  
4 application by the -- by the owner, correct?

11:04:35 5 A. Yes. I don't know how is it called in Spanish,  
6 it's the ES environmental --

7 Q. That is a fast -- a quick, fast environmental  
8 study.

9 A. Quick, fast. How many pages?

11:04:58 10 Q. In that study, INAGROSA submitted a management  
11 plan, correct?

12 A. I haven't seen it, so I cannot say yes or no.

13 Q. Let's assume that the answer is yes, and now we  
14 are going to look at this. I just want to go -- to  
11:05:17 15 follow this with you through relevant issues to continue  
16 our discussion.

17 MR. APPLETON: Excuse me. I'm sorry.

18 Objection. Objection. You want him to assume something  
19 that he hasn't seen is correct? I'm just trying to  
11:05:32 20 understand.

21 PRESIDENT: That is fine. He can ask the  
22 witness to assume a certain fact because he is a legal  
23 expert.

24 MR. APPLETON: I just want -- because

11:05:39 25 you're not going to let him see the document which he



11:05:42 1 says he hasn't seen. We'll come back. We will for sure  
2 come back here. I simply want to make sure that I  
3 understand your position. So you're not going to show  
4 it to him and just have him assume it. No problem.

11:05:57 5 We'll be back.

6 PRESIDENT: He is a legal expert so he can  
7 assume a certain fact and questions can be put on that  
8 basis.

9 MR. APPLETON: No problem. We will come  
11:06:07 10 back because there may be something that needs to be  
11 discussed.

12 Q. Dr. Gutiérrez, MARENA afterwards inspected the  
13 area in 2016, correct? That was December 13, 2016.

14 A. I don't know about the actual chronology that  
11:06:32 15 they followed, but as we said before, they had to make  
16 an inspection before any resolution was made.

17 But I really want to add just one thing,  
18 very briefly. You talk about a management plan, but the  
19 law requires an agreement on the management plan, which  
11:06:56 20 means a contract that the investor or the owner and the  
21 State will sign to crystallize the management plan.

22 Thank you.

23 Q. Dr. Gutiérrez, the law demands that for  
24 proceeding with the submission of this application, a  
11:07:35 25 management plan be presented, be submitted, correct?

11:07:40 1 A. Yes, but it also -- but the law also says that  
2 for a private reserve to be in place, an agreement on  
3 the management plan must exist.

4 Q. Afterwards, MARENA issued Resolution 20 of  
11:08:02 5 2018 -- for the record, that is R-12 -- dated  
6 February 27, 2018, declaring Hacienda Santa Fé a private  
7 wildlife reserve, correct?

8 A. Correct. It would be good to place the  
9 resolution here, if you are going to talk about the  
11:08:23 10 resolution, so that the arbitrators can see it and  
11 analyze it as well and for me to recall what it is that  
12 we're talking about.

13 Q. Then from what we saw, the steps provided for  
14 under the law were followed up to the declaration of the  
11:08:46 15 reserve by means of the ministerial resolution, correct?

16 A. I don't understand your question.

17 Q. These steps followed the requirements under the  
18 law to declare the farmland a private wildlife reserve,  
19 correct?

11:09:14 20 A. No, no.

21 Q. Let me reiterate my question.

22 INAGROSA complied with the steps  
23 established in the law to obtain the private wildlife  
24 reserve, yes or no?

11:09:35 25 A. No, not completely.

11:09:40 1 Q. Let me reiterate.

2 Did INAGROSA comply with the steps under  
3 the law until MARENA decided to identify the farmland as  
4 a private wildlife reserve, yes or no?

11:10:01 5 A. No, because they didn't get to sign the  
6 agreements that are part of the implementation of a  
7 wildlife reserve, private -- yeah, a private wildlife  
8 reserve.

9 Q. Dr. Gutiérrez, let me reiterate.

11:10:20 10 Out of the steps that we saw as provided  
11 for under the law to obtain MARENA's declaration,  
12 INAGROSA did fulfill -- did comply with the law, yes or  
13 no? I'm not asking you -- I'm not asking you about  
14 subsequent management plans.

11:10:46 15 A. I would say that INAGROSA should have complied  
16 with whatever it needed to comply for the government to  
17 approve the reserve, unless the government doesn't pay  
18 attention to what it is doing. So I assume they did  
19 what they have to do and the petitioner did also what it  
11:11:06 20 has to do.

21 Q. And you would understand that between 2015 and  
22 February 27, 2018, INAGROSA did not withdraw the  
23 application for a private wildlife reserve, correct?

24 A. It did not, and the government didn't either,  
11:11:33 25 as it did what it could have. Neither party withdraw

11:11:35 1 it --

2 Q. But INAGROSA did not withdraw it?

3 A. No, because remember this is a voluntary  
4 process. It's not mandated.

11:11:45 5 Q. Dr. Gutiérrez, do you know that in this case  
6 the parties have different positions as to the pendency,  
7 as to the efficacy of this 2018 ministerial resolution?  
8 And with this, I ask you to do the following exercise.

9 Let's assume -- and I want to work on this  
11:12:14 10 scenario with you to understand the application of the  
11 law under the Nicaraguan regulatory framework. Let us  
12 assume that, on June 16, 2018, this resolution is still  
13 in force, it is applicable, enforceable, and the parties  
14 are not disputing anything as to the enforceability of  
11:12:42 15 this resolution.

16 Given this assumption, Hacienda Santa Fé  
17 would be a protected area, correct?

18 A. No.

19 Q. This is an exercise.

11:13:03 20 A. I responded to your question. I said no.

21 Q. And in my exercise, in my scenario, I'm telling  
22 you that the parties are not disagreeing on the  
23 enforceability of the ministerial resolution. As part  
24 of my assumption, I am saying that this resolution is  
11:13:23 25 applicable and it is in force. And this is June 16,

11:13:27 1 2018.

2 My question is Hacienda Santa Fé would be  
3 a private wildlife reserve, correct?

4 A. No, Counselor. And the reason for that is that  
11:13:39 5 enforceability is not a thing that the parties may  
6 agree. Enforceability is a legal point, a legal  
7 question, that needs to be decided according to the law.  
8 Not by the will of the parties.

9 Q. In my assumption, I do not want to discuss  
11:14:02 10 about the efficacy and the enforceability.

11 A. You mentioned enforceability in your question.  
12 And we can read it again.

13 Q. Let me reiterate.

14 In my assumption, this resolution is  
11:14:20 15 current, it is in force, and there is no dispute around  
16 it.

17 My question is Hacienda Santa Fé would be  
18 a protected area, correct?

19 A. No, no.

11:14:39 20 Q. So your statement is that if there is a  
21 ministerial resolution, it is current, it is enforced,  
22 the purpose of the resolution is not valid. Is that  
23 your position?

24 A. No.

11:15:01 25 MR. APPLETON: We've been very patient.

11:15:05 1 That's the same question now four times with the same  
2 answer each time. There's a limit on how many times you  
3 can really ask the same question, especially in the same  
4 way. Perhaps if you went another way or something else,  
11:15:18 5 but I don't want to go -- we want you to do your  
6 cross-examination, but it has to be fair to the expert.

7 So perhaps you might move along on this or  
8 find another way to say it.

9 PRESIDENT: It wasn't exactly the same  
11:15:32 10 question, so she reformulated the question. But this  
11 may be the end of this line of questioning. It's up to  
12 you, if you want to reformulate one more time.

13 Keep in mind that the expert has been  
14 instructed to assume that there was no administrative  
11:15:50 15 agreement, no management plan or annual operative plan.  
16 That is the basis on which he has given his expert  
17 opinion.

18 You can, of course, ask him to assume that  
19 these agreements are in place and ask his view on that  
11:16:06 20 basis.

21 MS. CORTES: Thank you, Mr. President.

22 Q. I am going to change my hypothesis.

23 Let's assume that Hacienda Santa Fé is a  
24 protected area. In that case there would be a total ban  
11:16:31 25 on the forest resource, correct?

11:16:33 1 A. Not as long as it is permitted by the law as it  
2 is used in a neighboring area --

3 THE REPORTER: Sorry. Can you state the  
4 answer again. The beginning was not on audio.

11:17:06 5 A. I'm sorry. Can you repeat the question and I  
6 will answer?

7 Q. Let us go back at it. Let us assume that  
8 Hacienda Santa Fé is a protected area. In that case,  
9 the laws for protected areas should be enforced and  
10 complied with?

11 A. Yes.

12 Q. If Hacienda Santa Fé is a protected area, the  
13 principle that the total and permanent removal of the  
14 natural resources would be in force. The ban on the  
15 removal of the natural resources, correct?

11:17:47 16 A. Not in its totality, because we have seen the  
17 use of the unprotected areas. As I mentioned, the  
18 El Jaguar reservation is a mixed use of the area, and  
19 they have planting and they have tourism. So I wouldn't  
11:18:09 20 say, as you pose it, a total ban. Total ban. There  
21 might be exceptions. Maybe they fall into one of the  
22 president's decrees saying that you can deforest and  
23 there you will be able to deforest the whole thing. Who  
24 knows.

11:18:32 25 Q. So you're telling me that there could be

11:18:34 1 deforestation, you'd be authorized to remove forest in a  
2 protected area?

3 A. According to the regulations, I think you could  
4 do that. You would need a permit, and they have just to  
11:18:46 5 replace trees or plant new trees to use the others that  
6 exist. I don't think it is just an iron bar placed on  
7 the -- on the area, but there is some flexibility, as I  
8 read the thing.

9 Q. Dr. Gutiérrez, so you're also stating that in a  
11:19:16 10 protected area, one can destroy all of the existing  
11 flora and fauna?

12 A. I didn't say that.

13 Q. I'm asking you. Is that your opinion?

14 A. My response would be no, then.

11:19:40 15 Q. And under Nicaraguan law, in a protected area  
16 there is a need to preserve the area, correct?

17 A. Yes. But in this case there is no área  
18 protegida. There is no protected area. So we began  
19 with an assumption and now --

11:20:00 20 Q. We are still in my assumption.

21 A. We began with an assumption, and now you are  
22 carrying on to --

23 Q. I'm still -- I'm still in my assumption. When  
24 I finish my assumption, I will let you know.

11:20:14 25 Let me reiterate my question. In a



11:20:17 1 protected area, there is a need to preserve the  
2 environment, correct?

3 A. Yes, the law has these provisions to that  
4 effect.

11:20:30 5 Q. And under Nicaraguan law, to preserve the  
6 environment means to maintain the original condition in  
7 place. Yes or no?

8 A. I believe there are exceptions under which the  
9 government would authorize use of the property and even  
11:20:48 10 mixed uses as in El Jaguar reservation. And in other  
11 reservations, I believe.

12 Q. We are going to show Law 217, RL-0017. Let's  
13 start with the Spanish version, and this is RL-0017,  
14 article 3.25. 3.25. Rather, this is the regulation.  
11:21:48 15 RL-007. That is the regulation for protected areas, 1  
16 of 2017. 3.25.

17 Dr. Gutiérrez, this is a simple question.  
18 This is the regulation for protected areas, and where we  
19 see a definition of the word "preservation" so as to  
11:23:49 20 maintain the original condition of the area and also by  
21 reducing intervention by -- human intervention.

22 My question is in a protected area, there  
23 is the principle of preservation that prevails, correct?

24 A. As the article says, this is a principle. It  
11:24:12 25 is not an obligatory provision that would mandate to do

11:24:19 1 this regardless. It is just an aspiration of the law.  
2 And an aspiration of the law, it may be changed, soften,  
3 as it was in the area of El Jaguar or as it was in the  
4 decrees of the president authorizing logging in national  
11:24:42 5 property, et cetera.

6 So it is a principle, and I agree that it  
7 is a principle of the law, yes. It's not a mandatory  
8 provision.

9 Q. Then your position is that in a protected area,  
11:25:00 10 it would be possible to completely modify the  
11 environment, yes or no?

12 A. No. Completely modify the environment, no.

13 Q. Let us continue in the hypothetical situation.  
14 In the hypothetical situation we were saying that  
11:25:19 15 Hacienda Santa Fé is a protected area. In the  
16 hypothetical situation we are saying that there is the  
17 preservation principle that prevails, and you would  
18 understand that the Claimant explains that INAGROSA  
19 would develop a thousand hectares, correct?

11:25:56 20 A. Develop what?

21 Q. The Claimant is stating that INAGROSA would  
22 have an expansion plan of 1,000 hectares?

23 A. I believe that's part of the claim, yes.

24 Q. And the Claimant also alleges that they had an  
11:26:17 25 area of 44.75 hectares for avocado groves, correct?

11:26:25 1 A. That's what they have planted, I believe,  
2 already.

3 Q. That is what the Claimant alleges.  
4 Therefore, to be able to have this  
11:26:42 5 expansion, they would need to use 955.25 additional  
6 hectares, correct?

7 A. If they are going to plant in that direction,  
8 yes. If they are going to plant in another section of  
9 the farm, no. And the clear position of the Claimant  
11:27:04 10 is, regarding the reserve, is that it is not an  
11 enforceable wildlife reserve. So that gives the  
12 hypothesis, and I think we should accept the reality.

13 Q. I continue with my hypothesis, hypothetical  
14 situation, and I understand that in your report you  
11:27:28 15 received an instruction to consider that Hacienda  
16 Santa Fé had 140.31 hectares of forest, correct?

17 A. I can't answer that question. I don't have  
18 those papers.

19 Q. This is attachment A to your report. This is  
11:27:59 20 3.12.

21 A. Annex A? 3.12, you said?

22 Q. Yes.

23 A. Yes, that's what it says. That's what was  
24 given to me.

11:28:30 25 Q. Now, let us assume that the forest area in my

11:28:33 1 hypothesis encompasses 556.8 hectares. In my  
2 hypothesis, let us say that the forest area in Santa Fé  
3 is 556.8 hectares. Those 556.8 hectares in a protected  
4 area, in principle, could not be cut permanently and  
11:29:04 5 totally, correct?

6 A. We would have to see a plan to discuss this  
7 matter. I cannot discuss this in my mind.

8 Q. I'm not asking you to discuss this. I'm asking  
9 you a question. I'm asking you a question given certain  
11:29:19 10 hypotheses.

11 In my hypothesis, and let me reiterate,  
12 Hacienda Santa Fé is a protected area, and Hacienda  
13 Santa Fé has the principle of preservation and Hacienda  
14 Santa Fé has a forest area of 556.8 hectares. My  
11:29:42 15 question is as follows:

16 INAGROSA, in a potential expansion to  
17 1,000 hectares, should preserve 556.8 hectares of forest  
18 area. Is that correct?

19 A. It seems that the assumption is in that  
11:30:04 20 direction.

21 Q. Is it your understanding that in the  
22 Ministerial Resolution 21 of 2018, the MARENA  
23 resolution, it identifies over 600 hectares of the farm  
24 as forested area? Do you recall that?

11:30:44 25 A. No, I don't remember.

11:30:46 1 THE REPORTER: I didn't hear the answer.

2 PRESIDENT: We are not hearing the  
3 interpretation.

4 THE INTERPRETER: Sorry, the interpreter  
11:30:53 5 did not hear anything said into a microphone. So,  
6 sorry. Can you hear me, says the lawyer. Can you hear  
7 me? Yes, the interpreter hears the lawyer now. Hello,  
8 hello.

9 PRESIDENT: Did you hear the question?

11:31:18 10 MR. GUTIÉRREZ: Yes, well, I hear now. I  
11 can hear now.

12 PRESIDENT: You may want to repeat the  
13 question.

14 MS. CORTES: Could you please show R-12 in  
11:31:26 15 both English and Spanish? Article 4 -- no. Just a  
16 moment. Article 3 --

17 THE INTERPRETER: Interpreter notes it was  
18 partially cut off and then came on. I think it was  
19 article 3?

11:32:47 20 THE REPORTER: No interpretation.

21 THE INTERPRETER: Apologies.

22 Q. Let me repeat. This is article 3 of  
23 Ministerial Resolution 21 of 2018. At article 3 it  
24 describes land use. Here, MARENA identified a forested  
11:33:11 25 area of 795.43 manzanas?

11:33:23 1 Q. 795.43 manzanas is the forested area. A  
2 manzana is equivalent to 0.7 hectares, with which, to do  
3 the math, 795.43 manzanas are 556.8 hectares.

4 My question is whether Hacienda Santa Fé  
11:33:53 5 is a protected area -- if it's a protected area, if the  
6 principle of preservation governs, if on Hacienda  
7 Santa Fé there are 556.8 hectares of forested land, an  
8 expansion plan by INAGROSA should safeguard and not  
9 clear the forest area, correct?

11:34:19 10 A. If it was a protected area, which it's not, the  
11 answer is yes.

12 Q. Thank you very much.

13 You mentioned that you're familiar with  
14 the Rapid Ecological Study of 2015, correct?

11:34:46 15 A. I have -- I have heard about it. I have seen  
16 mention as part of the process that it existed.

17 Q. I will put it up on the screen in just a  
18 second. Could you please project R-228 in both English  
19 and Spanish, please.

11:35:27 20 We already saw that INAGROSA presented  
21 this Rapid Ecological Study as part of its application  
22 to MARENA, correct?

23 A. Yes, we have. Yes, is this a hypothesis again,  
24 or it's a reality now you're talking about?

11:35:46 25 Q. We've closed out on the hypothesis, and we're

11:35:49 1 now talking about this document. I'd like to present  
2 this document to you -- or show it to you, and then I'm  
3 going to ask you some questions.

4 MR. APPLETON: Excuse me. Sorry, I'm  
11:36:11 5 getting Spanish. Counsel, I was raising an objection  
6 because you had testified about where this was from.  
7 You testified that, not the witness, and I think that if  
8 he sees the document, he can come to his own conclusion  
9 where it's from. I think it's quite different from what  
11:36:29 10 you testified.

11 So I simply want to say that we want to be  
12 very careful. This is exactly -- this is the point I  
13 was trying to raise earlier. You've given some  
14 testimony yourself, perhaps inadvertently, and that it's  
11:36:43 15 very important that if you're going to ask the question  
16 that it's not hypothetical, that the witness is able to  
17 see it and verify for himself.

18 So in this case you've said where this  
19 came from, and I believe if you see the document  
11:36:56 20 yourself, you can see that that may not be the same as  
21 what you just said, if you look on the record. And I  
22 simply -- it's important that we're very precise. So if  
23 you're testifying, then you're the witness, not the  
24 expert.

11:37:09 25 PRESIDENT: She was not testifying. She

11:37:10 1 put a question to the witness.

2 MR. APPLETON: It was the part before,  
3 Mr. President. In fact, in particular, she said this  
4 came from INAGROSA.

11:37:18 5 PRESIDENT: At the end she said "correct?"  
6 It was a question to the witness. It was not --

7 MR. APPLETON: Yes, but the witness was  
8 relying on her characterization that this was from  
9 INAGROSA, and if you see the document, of course it is

11:37:30 10 not.

11 PRESIDENT: She asked a question,  
12 Mr. Appleton. Look at the transcript. Let's proceed.

13 Q. Dr. Gutiérrez, I am going to ask you some  
14 questions about this document. I'm going to show you  
15 the document, and then I will put some questions to you.

11:37:51

16 MS. CORTES: Could you please go to  
17 page 505 of the pdf. First, the pdf.

18 A. Can you explain to us what this document is  
19 first?

11:38:14

20 Q. This document, as the title says, is the  
21 proposal for a private wildlife reserve, and it's a  
22 rapid ecological study that was presented in  
23 September 2015. This document is part of INAGROSA'S  
24 application to MARENA to secure designation as a private  
11:38:43 25 wildlife reserve.



11:38:45 1 A. Why does it say "Reserva El Jaguar" on the  
2 first page? This is not a reserve --

3 Q. This is the ecological study that was presented  
4 by INAGROSA, and it's part of the record before MARENA  
11:39:07 5 to get that -- such a resolution. I'm going to ask you  
6 questions about the document that was submitted by  
7 INAGROSA, Inversiones Agropecuarias S.A. Okay?

8 On this page of the pdf, Spanish language  
9 version, in this Rapid Ecological Study a management  
11:39:47 10 plan was attached as required by law, correct?

11 A. Is this document signed by anybody representing  
12 INAGROSA?

13 Q. Yes.

14 MR. APPLETON: Can you show this to the  
11:40:07 15 witness? Rather than have him rely on you, can you show  
16 him that?

17 PRESIDENT: You can come back to this,  
18 Mr. Appleton.

19 MR. APPLETON: I understand, but I believe  
11:40:18 20 these are factually misrepresentations that would affect  
21 the ability of the expert -- if she wants an assumption,  
22 that's fine. She's asking for facts, and she's giving a  
23 fact which we do not believe to be correct. So, in  
24 fact -- well, I will say that, but she said that this is  
11:40:36 25 signed by INAGROSA, this study. I would like her to

11:40:38 1 show us that.

2 MS. CORTES: This document was submitted  
3 by Dania Hernández, and it is part of INAGROSA'S  
4 application to MARENA.

11:40:56 5 I rectify what I said. I'm clarifying  
6 that this was submitted as part of INAGROSA'S  
7 application to MARENA.

8 A. Who is Dania Hernández?

9 Q. Can I continue asking you some questions about  
11:41:10 10 this?

11 PRESIDENT: You can go ahead and ask  
12 questions, but please keep in mind he is a legal expert,  
13 not a witness of fact testifying about which documents  
14 were submitted or which were not submitted. You can ask  
11:41:22 15 him to assume that this was submitted and then put legal  
16 questions to him about it. But please keep in mind his  
17 area of expertise.

18 MS. CORTES: Thank you, Mr. President.

19 MR. GUTIÉRREZ: Thank you, Mr. President.

11:41:38 20 Q. Dr. Gutiérrez, let's assume that this was the  
21 management plan submitted by INAGROSA. I'd like to look  
22 at this document with you, the management plan, and put  
23 some questions to you about it. Okay?

24 A. Okay.

11:42:35 25 Q. As I mentioned -- well, we're going to look at

11:42:37 1 some parts of the document. In the first section, it  
2 says that the purpose of the management plan is to  
3 describe the actions to be carried out by the owners of  
4 a private wildlife reserve during the relevant period of  
11:42:52 5 time indicated, correct?

6 A. Yes, I think it is just following the law or  
7 the regulations in that statement. It's probably what  
8 it is.

9 Q. And it continues saying "to ensure the  
11:43:09 10 continuity of ecological processes by carrying out  
11 actions of restoration of degraded systems,  
12 implementation of sustainable production systems, the  
13 promotion of sustainable recreation and leisure  
14 activities, the encouragement of environmental  
11:43:28 15 education, research, and the monitoring of biological  
16 diversity, the assurance of forest conservation, and  
17 strengthening the environmental management capacities of  
18 everyone without exception."

19 That's what the document says, correct?

11:43:45 20 A. Yes.

21 Q. Now if we could remove the zoom, and in the  
22 document it begins to describe actions proposed by the  
23 owner to be carried out in the reserve. Do you see it?

24 A. Hardly, but I can take it that that's what it  
11:44:11 25 is.

11:44:19 1 MS. CORTES: For Dr. Gutiérrez, please  
2 blow up the first section where it says "managing  
3 biological diversity. Objective."

4 A. We saw already that paragraph, I think,  
11:44:52 5 before --

6 Q. In the document, certain objectives are  
7 mentioned that need to be pursued, and in the document  
8 mention is also made of actions for attaining those  
9 objectives. Can you see that?

11:45:08 10 A. Yes, we have seen that before, and I said yes.

11 MS. CORTES: I'd be grateful if -- okay,  
12 if you could remove the call-outs. And now zoom in on  
13 the first section that says "Conservation of natural  
14 resources including expected results and actions," all  
11:45:35 15 of that.

16 Q. This is one of the objectives that's under the  
17 title of "protecting and preserving natural resources."  
18 In this section --

19 MR. APPLETON: Excuse me. Is there an  
11:45:56 20 English version here?

21 MS. CORTES: Yes, there's an English  
22 version that you can see there, but Ricky is working to  
23 get you that version.

24 MR. APPLETON: Right, but the witness has  
11:46:05 25 said -- I know that you have been here through his

11:46:08 1 testimony, but he said he would like to see it in  
2 English and it's fair to give him the material in  
3 English if it's available.

4 MS. CORTES: Ricky, can you please put the  
11:46:18 5 translation so we can move forward. Yes, we can do it,  
6 but I just need to move forward.

7 MR. APPLETON: I understand, but you have  
8 to be fair. The process needs to be fair. The witness  
9 has said that.

11:46:27 10 PRESIDENT: Let's wait for the English  
11 version before you put the question.

12 MR. APPLETON: I understand. We're going  
13 to try and help you as much as possible.

14 PRESIDENT: You can have both side to  
11:47:12 15 side, if you prefer.

16 Q. Dr. Gutiérrez, here we're seeing one of the  
17 objectives which is put forward in this management plan.  
18 There are several.

19 In the third column, it indicates the  
11:49:26 20 expected result, and in the fourth column one indicates  
21 the actions that the owner is going to carry out in  
22 order to attain those objectives. And in the last  
23 column there is an indication of the cost of the  
24 measures to attain those objectives or the objective.

11:49:49 25 I'd ask if you could please read it -- it

11:49:52 1 doesn't have to be aloud -- so that you can familiarize  
2 yourself with these actions.

3 A. Yes, I can see what it requires, but I must  
4 tell you, I'm a lawyer. I'm not an agronomist or a  
11:50:44 5 forest guard to be able to comment on those things. If  
6 you want to give me a hypothetical pertaining to law  
7 provisions or applications, I'll be happy to do it, but  
8 I don't want to jump from a terrain which is not of my  
9 competence to answer questions.

11:51:07 10 Q. My question is in what you've just observed,  
11 does it expressly state that the owner would carry out a  
12 1,000-hectare expansion at Hacienda Santa Fé, based on  
13 what you just read?

14 A. It doesn't say any of -- it doesn't refer to  
11:51:32 15 any expansion there. Do you? Do you see it?

16 Q. No, I don't see it. So I guess you didn't see  
17 it either.

18 MS. CORTES: If we could please take down  
19 this document.

11:52:08 20 THE INTERPRETER: No microphone.

21 Q. Dr. Gutiérrez, if this is a document submitted  
22 in the context of a private wildlife reserve, if as you  
23 see, this is a management plan that is being submitted  
24 to the government authority, it shows that the owner of  
11:53:15 25 the area intended to carry out the actions they say

11:53:18 1 they're going to carry out, correct?

2 A. This document emanates from the owner, and it  
3 is what it says. I believe the intention of the owner  
4 as reflected in the document is what the document says.

11:53:42 5 Q. Thank you very much.

6 MS. CORTES: If we could please take down  
7 this document.

8 Q. Dr. Gutiérrez, changing topic, I'd like to take  
9 you to section 12.3 of your report to put some questions  
10 to you regarding it.

11 Specifically, I am referring to paragraphs  
12 148 to 152.

13 A. Which paragraph?

14 Q. From 148 to 152. In this section you analyze  
11:55:22 15 alleged environmental constraints affecting INAGROSA'S  
16 expansion, correct?

17 A. Yes.

18 Q. And you analyze four environmental regulations  
19 mentioned by Norma González, who is the person  
11:55:42 20 responsible for the MARENA division in RWS-09, correct?

21 A. Yes, I mention in the footnote Norma González  
22 several times.

23 Q. And in this section you present an analysis as  
24 to why this regulation mentioned by Norma González does  
11:56:12 25 not affect the expansion, correct?

11:56:17 1 A. Yes. I think she was talking about the use of  
2 soil. I think the change of use of soil. So that was  
3 my -- probably what I was referring to.

11:56:34 4 Q. In the first limitation you analyze, which is  
5 at paragraph 148(a), you are analyzing and making  
6 reference to article 108 of Law 217, which is the  
7 environmental law, correct?

8 A. Yes.

9 Q. Law 217 is a law that's in force, correct?

11:57:02 10 A. Yes.

11 Q. Article 108 is a valid and correct  
12 regulation -- let me pose the question once again.

13 Article 108 is also valid, correct?

14 A. Let me see it. I don't know what it is. And I  
11:57:18 15 ask you this because Norma González made arguments here  
16 in her statements on a decree that was repealed. And we  
17 never heard of the repeal of that piece of legislation  
18 she was relying on.

19 Q. I'm sorry. I'm not asking you about that.

11:57:38 20 A. No, but I am explaining. That's why I wanted  
21 to see what you are relying on.

22 MS. CORTES: If we could please project  
23 RL-0007, Law 217, article 108.

24 PRESIDENT: If it's RL-0007 -- I don't  
12:01:29 25 think we have article 108.



12:01:32 1 MS. CORTES: No, no. We found it. Sorry.  
2 It is RL-17. That is where we find Law 217. And what I  
3 wanted to talk to Dr. Gutiérrez about is article 108 and  
4 his report. Thank you, Ricky.

12:02:27 5 Q. Thank you, Dr. Gutiérrez, for your patience.  
6 Dr. Gutiérrez, in your report at  
7 paragraph 148(a), you examine one of the environmental  
8 restrictions that are mentioned by Ms. González in her  
9 report. In that section she makes reference to article  
10 108 of the environmental law.

12:02:54 11 In your report at paragraph 149, you  
12 provide an analysis of the reasons why this article does  
13 not restrict expansion or prevent expansion. You  
14 confirmed to me that this law, Law 217, is a current  
12:03:38 15 law. It is in force.

16 Under this article, a forest land area  
17 cannot be subject to changes in use. Is that correct?

18 A. That's correct, but in the practical life of  
19 the country, it does. There are exceptions that are  
12:04:02 20 created for that.

21 Q. Under the environmental regulations of  
22 Nicaragua, it is not possible to replace a forest with  
23 an agricultural area. Is that correct?

24 A. If logging is permitted, is allowed, obviously  
12:04:33 25 it can be used because the logging occurred, and as I

12:04:37 1 said, there is that tendency, that reality in the  
2 country.

3 Q. Article 108, it says that a land designated as  
4 forest or eligible for forestry shall be utilized on a  
12:04:53 5 sustainable basis and shall not be subject to changes in  
6 use.

7 A. That's what the law says. But I don't know  
8 what vocation for -- designated as forestlands or  
9 eligible, lands eligible for forestry.

12:05:15 10 The English has a more precise, I think,  
11 explanation. So it's an eligible forestry. So this is  
12 very broad, anything that is eligible.

13 Q. My question is, in article 108, forestland  
14 cannot be subject to changes in use. Yes or no?

12:05:47 15 A. That's what the law says. And also includes  
16 eligible for forestry. So it refers to land that could  
17 be forestry. It is not forestry yet, and yet, you  
18 cannot use it.

19 Q. In your report, sir, you conclude that this  
12:06:09 20 provision did not impair expansion, correct?

21 A. I don't know. I don't think I said that, did  
22 I?

23 Q. At paragraph 149 of your report, you provide an  
24 explanation in connection with the article and the  
12:06:28 25 position of Ms. González, yes or no?

12:06:32 1 A. No. I began my article saying that INAGROSA  
2 never ventured into exploiting forest terrain for  
3 avocado cultivation.

4 Q. We agree, but you conclude then, and you reach  
12:06:52 5 the following conclusion -- let me ask you the question,  
6 sir, and you can answer it.

7 You reach this conclusion based on an  
8 assumption in Annex A of your report. Is that correct?

9 A. Yes, yes.

12:07:08 10 Q. And this assumption is on footnote 108. Is  
11 that right?

12 A. Yes.

13 Q. And this is an assumption that Claimant's  
14 counsel provided to you, correct?

12:07:23 15 A. Yes.

16 Q. One of the assumptions is assumption 3.4. Is  
17 that correct?

18 A. Yes.

19 Q. And this assumption says that INAGROSA was not  
12:07:35 20 planning to use forest areas for its avocado business,  
21 yes or no?

22 A. That's what it says, yes.

23 Q. And assumption 4.4 says INAGROSA did not clear  
24 forest area for plantation of avocados, correct?

12:07:52 25 A. Correct.

12:07:55 1 Q. Consequently, you base your defense of what  
2 Ms. González says on the basis of assumptions, right?  
3 Yes or no?

4 A. In my opinion in paragraph 49, I conclude that  
12:08:21 5 land use remained consistently as it constituted  
6 agriculture use. That's my conclusion.

7 Q. Your conclusion is based on assumptions in  
8 Annex A, correct? Yes or no?

9 A. Yes, I was governed by the assumptions in my  
12:08:42 10 analysis.

11 Q. Let's assume -- and let me give a hypothetical  
12 to you -- that in Hacienda Santa Fé there was a forest  
13 of 556.8 hectares. Under article 108 of the  
14 Environmental Law, the forested area could not be  
15 subject to changes in use, yes or no?  
12:09:09

16 A. With some restrictions, I think it could.

17 Q. Your position is that article 108 says that a  
18 forest area can be subject to changes in use?

19 A. I think the rules expand the notion of use of  
12:09:40 20 forestry. And in my report I'm saying that there was no  
21 logging going on on the farm.

22 Q. Let me ask you again. If in Hacienda Santa Fé  
23 we have 556.8 hectares of forest, those 556.8 forested  
24 land cannot be subject to change of use. This under  
12:10:21 25 article 108 of the law. Yes or no?

12:10:23 1 A. Reading the law, it appears that there is a  
2 plain denial or prohibition, and it's been understood  
3 that it applies to protected areas. And INAGROSA is not  
4 a protected area.

12:10:47 5 Q. If in Hacienda Santa Fé you have 556 hectares,  
6 in accordance with the language of article 108 of the  
7 Environmental Law, the forested area cannot be subjected  
8 to changes in use. Yes or no?

9 A. Article 108 is clear that lands defined as  
12:11:15 10 forest, and it goes on to include eligible for forestry,  
11 shall be used on a sustainable basis, et cetera.

12 So the answer on that provision is yes,  
13 but it's an irony that we are discussing this when the  
14 country is being allowed to decimate forests. I wonder  
12:11:39 15 what provision is that that authorizes that action.

16 Q. Dr. Gutiérrez, there is another limitation that  
17 you also examined, which is at paragraph 148(b). And  
18 here, you also answer what Ms. González said in her  
19 witness statement, and this refers to article 96 of the  
12:12:22 20 Water Law. Is that correct?

21 A. Yes. I don't know what this word is, logging  
22 or tree felling.

23 Q. Article 96 includes a ban for felling of trees  
24 within an area of 200 meters from the -- from lakes or  
12:12:52 25 riverbanks.

12:12:53 1 A. I understand that that is the rule, but I  
2 believe the area we were talking about for the expansion  
3 was 7 kilometers from the river, according to  
4 Luis Gutiérrez's statement or testimony that was given  
12:13:10 5 here.

6 Q. Is the Water Law a regulation that is in force?

7 A. It is that -- yes. I think it's 620. If  
8 you're referring to Law 620 --

9 Q. Yes, it is Law 620 as amended.

12:13:29 10 A. I believe it is in effect, yes.

11 Q. You conclude in your report at paragraph 150  
12 that this regulation did not apply because the avocado  
13 plantation was strategically located outside of this  
14 radius of 200 meters, correct?

12:13:55 15 A. What I said regarding the application of the  
16 Water Law is that it didn't apply to INAGROSA for  
17 registration, because INAGROSA didn't have any  
18 infrastructure investment in the property regarding  
19 water. That was my --

12:14:19 20 Q. I'm not talking about -- I'm not talking about  
21 that assumption. I'm talking about your analysis of the  
22 matter in paragraph 148(b) and 150 of your report. This  
23 refers to article 96 of the Water Law. Yes or no?

24 A. What I'm saying, that it's located beyond the  
12:14:39 25 200 meters.

12:14:44 1 Q. And you reach that conclusion on the basis of  
2 an assumption under Annex A, right?

3 A. I'm saying here that there is no verifiable  
4 evidence suggesting the 20 meters proximity of the  
12:15:01 5 river.

6 Q. You're talking about assumption 3.6 in Annex A  
7 where it says INAGROSA was not planting within a radius  
8 of 200 meters. Is that correct?

9 A. Yes.

12:15:15 10 Q. And you understand that the parties have  
11 different positions as to where the plantation was  
12 located, right?

13 A. I'm not fully aware of that distinction, but I  
14 remember the statement from Luis Gutiérrez that was very  
12:15:31 15 clear to me of the distance of several kilometers. He  
16 wasn't saying we are even close to 200 meters.

17 PRESIDENT: Ms. Cortes, we have been going  
18 on for an hour and a half. How long do you think you  
19 still need?

12:15:48 20 MS. CORTES: One second.

21 No more than 30 minutes.

22 PRESIDENT: Let's break for lunch now.

23 MS. CORTES: Can I finish -- I have one  
24 last question, and I'm done with this.

12:16:21 25 PRESIDENT: Of course.

12:16:24 1 Q. Dr. Gutiérrez, let's assume --

2 MR. APPLETON: We couldn't hear you, so we  
3 don't know what your instruction is.

4 PRESIDENT: The instruction is she can  
12:16:35 5 finish this line of questioning, and then we break for  
6 lunch.

7 MR. APPLETON: I understand. Thank you.

8 Q. Dr. Gutiérrez, let's assume that the Tribunal  
9 concludes, on the basis of evidence submitted in this  
12:16:52 10 case, that the trees were located within this 200-meter  
11 radius. In that case, the ban of article 96 of the  
12 Water Law, does it apply or doesn't it apply?

13 A. Under that assumption, it would apply.

14 Q. Thank you.

12:17:17 15 A. But what I know, it will not.

16 MS. CORTES: I'm done, Mr. President. We  
17 can go to recess.

18 PRESIDENT: Very good. We break for an  
19 hour, until 20 past 1.

12:17:29 20 And, Dr. Gutiérrez, the same reminder:  
21 please don't speak with anybody about your testimony  
22 during the lunch break.

23 *(Lunch Recess)*

24 PRESIDENT: Good afternoon. Are the  
01:24:36 25 parties ready to resume the hearing?



01:24:41 1 MR. APPLETON: We are.

2 MS. GONZÁLEZ: Yes, Mr. President.

3 Before Ms. Cortes continues with the  
4 cross-examination, I would like to address a

01:24:49 5 housekeeping matter.

6 PRESIDENT: Yes. Please go on.

7 MS. GONZÁLEZ: Thank you. We have  
8 received, during the break, the response to the motion  
9 to strike Mr. Ferrufino's testimony, and we would like

01:25:00 10 to get an opportunity to respond -- we could do it

11 either in writing or tomorrow early -- respond to the  
12 allegations made on that letter.

13 PRESIDENT: Mr. Appleton, any comments?

14 MR. APPLETON: Mr. President, we're in  
01:25:14 15 your hands. I was not expecting to speak. If you could  
16 give me 30 seconds to swallow.

17 PRESIDENT: That's fine, of course.

18 MR. APPLETON: That's what you get for  
19 having the wonderful pastries here.

01:25:33 20 Mr. President, there's a motion that was  
21 brought that was quite detailed. We brought a response  
22 to address it. It may very well be that the Tribunal  
23 does not require a second round. The issue -- it would  
24 be a second round because if they're going to do it,

01:25:51 25 then we'll end up with a second round on this on a

01:25:55 1 procedural matter that you have to make a determination  
2 about and the goal was, and the reason why we were so  
3 quickly to try to deal with this is that it would be  
4 very helpful to the parties, and I think to the  
01:26:04 5 Tribunal, for this matter to be determined before we get  
6 to closings to understand whether or not that evidence  
7 stands and the extent of evidence. There's testimony,  
8 there's live testimony, there's written testimony, and  
9 the issues that go with it. I don't believe anything  
01:26:19 10 here deals with the live testimony. I think the only  
11 question here is about the written testimony. But  
12 you'll need to make a determination. And so to the  
13 extent that we end up with additional rounds, that will  
14 make it very difficult on a practical basis.

01:26:35 15 Now, if Ms. González is prepared to  
16 address the matter now perhaps, then that might work.  
17 But I'm concerned that what we'll end up with is a  
18 process that will put us deeply behind schedule and also  
19 the key factor, practically, is that it would be far  
01:26:55 20 more beneficial that we understand how to handle that  
21 testimony, that written testimony, before we get to  
22 closing. And so that's why we tried to move so  
23 expeditiously.

01:27:09 24 PRESIDENT: So just to clarify, your  
25 position is that if the Tribunal allows the Respondent

01:27:12 1 to make an additional submission, the Claimant doesn't  
2 require an opportunity to respond?

3 MR. APPLETON: No. Quite the opposite,  
4 Mr. President.

01:27:20 5 For certain, given the level of acrimony  
6 that may occur on such procedural matters in this case,  
7 we are seeking the ability -- reserving the ability to  
8 be treated with equality. So if you create a second  
9 round, there would now be a second round.

01:27:43 10 PRESIDENT: And to clarify the Respondent  
11 position, you say that you are prepared to submit a  
12 response by tomorrow morning?

13 MS. GONZÁLEZ: We would be prepared to  
14 submit a response by tomorrow morning.

01:28:03 15 (The Tribunal withdrew)

16 PRESIDENT: Okay. So the Tribunal will  
17 give the Respondent an opportunity to file a brief  
18 response, brief comments, by tomorrow morning, 9 a.m.,  
19 and then the Claimant may comment on that submission by  
01:32:08 20 Thursday morning, 9 a.m. And then we see where we are.

21 The Tribunal will communicate its position  
22 later on Thursday as to whether we are in a position to  
23 decide on the issue or whether we can provide any  
24 further guidance or whether any further clarifications  
01:32:25 25 are needed. We will then see where we are on Thursday.

01:32:31 1 MR. APPLETON: Thank you.

2 MS. GONZÁLEZ: Thank you, Mr. President.

3 We also received, during the break, the  
4 application that Mr. Appleton mentioned in the morning.

01:32:43 5 We would also like to have an opportunity to review it  
6 and respond to it.

7 PRESIDENT: Yeah, of course. As a matter  
8 of due process, the Respondent will be given an  
9 opportunity to respond. But let's see first when we

01:32:57 10 receive it.

11 MR. APPLETON: Mr. President, given that  
12 it's a very short application as the nature is and  
13 nothing's appended to it -- this is the application for  
14 the request for new documents -- do you intend to have a  
01:33:09 15 deadline for when you want to have that sent back to  
16 you?

17 PRESIDENT: Yes, of course.

18 MR. APPLETON: Given that it would be most  
19 unhelpful if we weren't able to deal with that  
01:33:19 20 relatively quickly and it's, as you can see, an  
21 exceptionally brief application setting out the context  
22 of the reasoning where it comes from.

23 PRESIDENT: Understood. But let's discuss  
24 that once we have the application.

01:33:32 25 MR. APPLETON: You have the application.

01:33:34 1 PRESIDENT: Did we receive it already?

2 MR. APPLETON: Yes, I filed the  
3 application at lunchtime. Perhaps it would be best for  
4 housekeeping, perhaps I just could give you a little  
01:33:43 5 update.

6 At lunchtime, just as we were leaving, I  
7 sent a document out that is the response on what we call  
8 the opposition to the motion. We then, by the end of  
9 lunchtime, realized there was a slight error, and we  
01:33:57 10 sent you a rectified version. There was an editing note  
11 that was left in.

12 PRESIDENT: It was just received. We  
13 haven't had a chance to look at it yet.

14 MR. APPLETON: I understand. So that's  
01:34:06 15 the first one.

16 In addition, we then sent -- so my first  
17 point is we'd ask that you look at our rectified  
18 version, which came at the email at the end of lunch  
19 rather than the email at the beginning of lunch.

01:34:19 20 PRESIDENT: Understood.

21 MR. APPLETON: In addition, we also sent  
22 the request to admit the new documents, and that is  
23 pursuant to paragraph 16.3 of Procedural Order No. 1, as  
24 you identified yesterday and said that was the process,  
01:34:34 25 so we filed that. It's a brief submission. And as

01:34:38 1 instructed in the procedural order, it does not attach  
2 the documents that we seek to admit.

3 PRESIDENT: Okay. Very good. Thank you.  
4 Noted. We will revert later today.

01:34:54 5 Anything else?

6 MR. APPLETON: Not from us.

7 MS. GONZÁLEZ: Nothing, Mr. President.

8 PRESIDENT: Then we go on with the  
9 examination of Dr. Gutiérrez. And, Ms. Cortes, the  
01:35:04 10 floor is yours.

11 MS. CORTES: Thank you very much.

12 BY MS. CORTES:

13 Q. Good afternoon, Dr. Gutiérrez. We continue  
14 with some questions. Can you hear us?

01:35:38 15 A. Okay.

16 Q. Dr. Gutiérrez, in Nicaragua there are different  
17 government agencies and bodies, right?

18 A. Yes, as in any other government in the world.

19 Q. And in Nicaragua, all of the State institutions  
01:36:00 20 are governed by the hierarchy established -- or by the  
21 competency established in the law, correct?

22 A. Supposedly so, yes.

23 Q. I understand that your answer is that, under  
24 Nicaraguan law, institutions of the State are governed  
01:36:30 25 by the competence that is mandated under the law?

01:36:35 1 A. Yes, they are subject to the law.

2 Q. This means that the public institutions can  
3 only do what the law allows them to do, correct?

4 A. That's a general principle. I think that I  
01:36:54 5 cannot adhere to that in general. The only addition I  
6 can say is that they are subject to the law. If the law  
7 established XYZ acts that they can do, well, they will  
8 be governed for that.

9 If the law gives more latitude to act,  
01:37:17 10 that's a different thing. And I have seen regulations  
11 one way or another.

12 Q. The government institutions in Nicaragua cannot  
13 do whatever is beyond their competence, correct?

14 A. If the competence has been defined, they are  
01:37:45 15 then confined to the provision that regulates the  
16 competence. So it depends what the law tells them to do  
17 or allows them to do or opens a door where they can go  
18 through and do other things.

19 Q. And in Nicaragua, therefore, to act beyond  
01:38:10 20 these attributions or these mandates would be a  
21 deviation of power, correct?

22 A. It sounds like it, yes.

23 Q. The legality principle is recognized in the  
24 Constitution of Nicaragua, correct?

01:38:31 25 A. Yes.

01:38:35 1 MS. CORTES: Can we now show RL-169, that  
2 is the Constitution of Nicaragua. Article 130.

3 Q. This document was presented by Claimant, and we  
4 do not have a translation into English.

01:39:05 5 MR. APPLETON: Excuse me. Can you just  
6 blow up -- the Constitution, there's many different  
7 versions. Can you just blow the top up so we know which  
8 version of the Constitution that you're referring to? I  
9 can see it, but it's very small. So that we can see and  
01:39:19 10 that the expert can see which edition, which version of  
11 the Constitution you're doing.

12 Q. You can see it on the screen --

13 MR. APPLETON: Does it say there at the  
14 top? Does it say -- I can't see if it's 67 or 87?  
01:39:33 15 Which version of the Constitution is that? Can you just  
16 blow it up, up at the top? There. You see, it's got  
17 multiple dates. Which is it?

18 MS. GREENWOOD: Apologies, Ms. Cortes,  
19 while you're doing that, you said it was presented by  
01:39:53 20 the Claimant.

21 MS. CORTES: I made a mistake. It was RL.  
22 It's ours.

23 MS. GREENWOOD: Yes, so what I was going  
24 to ask was, was it presented by the Claimant and then  
01:40:05 25 subsequently submitted by the Respondent. But, no, this



01:40:08 1 is a Respondent's submission.

2 MS. CORTES: It was presented, yes --

3 MR. APPLETON: But Arbitrator Greenwood,  
4 I'm pretty sure that the Claimant has submitted the  
01:40:16 5 Constitution. It may not be this year's, that's why I  
6 was asking, and it will be in English. So that's why I  
7 thought that might assist everyone.

8 MS. GREENWOOD: Thank you, Mr. Appleton.

9 PRESIDENT: I think what we need is the  
01:40:28 10 most recent consolidated version, and I see the Spanish  
11 version refers to a consolidated version. Can you  
12 explain that this is it? A consolidated version that  
13 incorporates the previous amendments.

14 MS. CORTES: We can show the version in  
01:41:00 15 English that was presented by Claimant. That is C-534,  
16 article 130.

17 MR. APPLETON: That's not the same  
18 version. That's why I was asking.

19 MS. CORTES: I want to ask something about  
01:41:26 20 article 130.

21 MR. APPLETON: Yes, but the question is,  
22 is it the same? That's all I'm asking.

23 MS. CORTES: To be able to make progress,  
24 the text is the same in both documents, and I would like  
01:42:15 25 to ask a question about the first paragraph of article

01:42:18 1 130. C-534 and RL-0175.

2 MS. GREENWOOD: I believe it's page 46 of  
3 the pdf for the English translation, if you're looking  
4 for article 130. Page 46.

01:43:16 5 MS. CORTES: May I proceed?

6 PRESIDENT: Yes.

7 Q. Dr. Gutiérrez, we had a conversation and you  
8 confirmed -- we had a discussion and you confirmed to me  
9 that the public institutions need to follow the  
10 provisions of the law.

01:43:35 11 Article 130 of the Nicaraguan Constitution  
12 provides -- and here I read it in Spanish:

13 "No office confers on its holder more  
14 functions than those provided for in the Constitution  
01:43:54 15 and the laws. Any public officeholder shall act in  
16 strict respect of the principles of constitutionality  
17 and legality."

18 This article recognizes the principle of  
19 legality, correct?

01:44:12 20 A. Yes. It is for the functionaries to comply  
21 with the law. We see here and there violations in  
22 practical life. Nicaragua is supposed to be a country  
23 of laws, and it has wonderful laws. I think if those  
24 laws were to be applied as they stand, always, Nicaragua  
01:44:41 25 would be a great country.

01:44:45 1 Q. Dr. Gutiérrez, this principle of legality is  
2 also enshrined in the law on the organization of the  
3 State, Law 290, correct?

4 A. Well, yeah, that's the law that distributes, I  
01:45:04 5 think, functions, departments, ministries and all that.  
6 And it also joins sectors that work in the same area and  
7 cooperate with each other to carry on the functions of  
8 the State.

9 Q. In Law 350, that is the law on the regulation  
01:45:30 10 of the contentious administrative procedure also  
11 recognizes the principle of legality, correct?

12 A. I didn't understand your question at the  
13 beginning.

14 Q. That Law 350, the law that regulates the  
01:45:46 15 contentious administrative procedure, also recognizes  
16 the principle of legality, correct?

17 A. Yes. As I said, Nicaragua is supposed to be a  
18 country of laws.

19 Q. And this same Law 350 also includes a  
01:46:07 20 definition for deviation of power, correct?

21 A. I do not recall exactly what you are referring  
22 to.

23 Q. Now we are going to show RL-0175. Article 2.6.  
24 Can you see there the definition for deviation of power?

01:47:26 25 A. Yes. I haven't studied them, though, so unless

01:47:29 1 you want me to sit and read all of them.

2 Q. For the record, I am going to read it.

3 "Abuse of power is the exercise of  
4 administrative powers for ends that are different from  
01:47:47 5 the ones established by the public order or those that  
6 do not agree with achieving public interest and common  
7 good."

8 Dr. Gutiérrez, the abuse of authority is  
9 also related to the principle of competence, correct?

01:48:09 10 A. Yes. I don't understand really what is the  
11 question.

12 Q. Let me reiterate.

13 A body that is acting beyond its  
14 jurisdiction or its competence under the law is acting  
01:48:26 15 under the concept of abuse of authority, correct?

16 A. You have to see the conduct in order to be able  
17 to judge on the conduct. It's just too broad.

18 Q. This is just a technical question.

19 A. I cannot agree with you because what you are  
01:48:43 20 stating is extremely broad. If you were asking or  
21 telling someone that has abuse of power, I would like to  
22 see what is the law that mandates the conduct to this  
23 functionary, how did he proceed and then how this falls  
24 into the constitutional provision.

01:49:09 25 But you don't use constitutional

01:49:12 1 provisions which are brought in the vacuum. It has to  
2 be brought down to what the functionary is doing, what  
3 are his powers and responsibilities, and only then we  
4 can give a judgment and you can give an opinion on that  
01:49:31 5 conduct.

6 Q. In Nicaragua, the State bodies need to follow  
7 the provisions of the law, correct?

8 A. "Need to follow." What does that mean? In  
9 Nicaragua?

01:49:47 10 Q. In Nicaragua, the bodies of the State, the  
11 State bodies, need to act in observance of the powers  
12 that are conferred upon them by law, correct?

13 A. Yes. Yes. And there might be others that are  
14 not in the law, but they are necessary to fulfill their  
01:50:10 15 positions.

16 Q. Mr. Renaldy, in your report, you mentioned that  
17 INAGROSA could have violated the water regulations that  
18 could have been identified by the environmental  
19 authority, correct?

01:50:41 20 A. If you can refer me to my document, I would say  
21 yes. But I will say --

22 Q. This is at paragraph 17(c)(ii).

23 A. I need to add that INAGROSA didn't use water  
24 from the river, and that's what -- I said before this  
01:51:00 25 Law 620 didn't apply. That's what Dr. Gutiérrez also

01:51:07 1 testified. But, again, give me the paragraph so we can  
2 answer or say what is it that we're saying. You say  
3 it's paragraph 24?

4 Q. Just a second. Paragraph 17(c)(ii). Page 7.

01:51:51 5 A. (c)(ii), right?

6 Q. Yes. Here you state that INAGROSA could have  
7 violated the water regulations that could have been  
8 identified by the environmental authority as part of an  
9 inspection conducted in 2016, correct?

01:52:25 10 A. Yes.

11 Q. And you referred to an inspection of  
12 December 13, 2016 that was carried out by MARENA  
13 conducted within the framework of the private wildlife  
14 reserve, correct?

01:52:48 15 A. Yes, but Hacienda Santa Fé was never subject to  
16 any condemnation or to any proceeding regarding a  
17 violation that you said it could have done but it never  
18 did.

19 And as I said, INAGROSA didn't need water.  
01:53:08 20 So if you don't need water, why do we need to request a  
21 permit for water? That's what Dr. Gutiérrez explained  
22 to the Tribunal in his testimony.

23 Q. Dr. Gutiérrez, in your report, you are saying  
24 that the environmental authority could have identified a  
01:53:34 25 violation in the water area. Yes or no?

01:53:40 1 A. Yes.

2 Q. Now we are going to show R-34. This is the  
3 Technical Report by MARENA dated December 31, 2016.

4 Dr. Gutiérrez, this is the inspection  
01:54:13 5 conducted by MARENA to assess, from a technical point of  
6 view, the Inversiones Agropecuarias farmland for their  
7 proposal for the private wildlife reserve in the  
8 San Rafael del Norte, Jinotega department, correct?

9 A. I haven't reviewed all. So if you're saying  
01:54:37 10 that, we may assume that that is what it is.

11 Q. We're going to now show the next page where we  
12 see the objectives. Next.

13 The general purpose -- rather than  
14 objective -- purposes. The general purpose was to  
01:55:03 15 assess technically and environmentally the area  
16 proposed?

17 A. I'm lost, I'm sorry. I'm lost between this --  
18 her statement and the translation. So maybe we can slow  
19 a little bit. That would be helpful.

01:55:25 20 Q. The general purpose in this inspection is to  
21 assess, from a technical and environmental point of  
22 view, the area proposed to be recognized and declared as  
23 a private wildlife reserve, correct?

24 A. Yes. The report was issued in connection with  
01:55:43 25 the application of the private wildlife reserve, that's

01:55:46 1 correct.

2 Q. Therefore, the environmental authority went to  
3 the Santa Fé Hacienda with this purpose, correct?

4 A. That's what it seems to say, the document. Or  
01:56:00 5 the document seems to say, yes.

6 Q. Now we are going to move to page 1. Page 2,  
7 please.

8 There, you can see the participants of the  
9 inspection, and this inspection had the participation of  
01:56:34 10 specialists in MARENA protected areas, correct?

11 A. I'm not aware of that. I don't know who they  
12 are.

13 Q. The participants that attended this inspection  
14 are MARENA officials. Do you see that?

01:57:02 15 A. I don't know what (Spanish) means, for  
16 instance. I don't know. I don't know.

17 THE REPORTER: I can't hear.

18 MR. APPLETON: Put the microphone closer.  
19 We can't hear you.

01:57:19 20 A. I'm saying that I cannot be sure who these  
21 people are. I don't know.

22 For instance, this is -- Marlon José  
23 Gutiérrez is a field supervisor of the State.

24 Q. Dr. Gutiérrez, do you see in that list any  
01:57:41 25 official with the National Water Authority?



01:57:46 1 A. I don't know who the officials of the water  
2 authority are. I don't know. I have no idea.

3 Q. That list of participants, in that list do you  
4 see any identification of an official as an agent or an  
01:58:03 5 official of the National Water Authority?

6 A. I don't know how the official of the water  
7 authority identifies themselves. I cannot answer that  
8 question.

9 Q. Dr. Gutiérrez, in your presentation this  
01:58:48 10 morning, you mentioned that there was a visit by MAGFOR  
11 and INTA to Hacienda Santa Fé, correct?

12 A. Yes. It was in the list of -- in a timeline of  
13 visits to the Hacienda by several government officials.

14 Q. Did you review or did you have available any  
01:59:13 15 report, technical report, confirming the existence of  
16 these visits?

17 A. Not exactly, they don't have it.

18 But I understand the visits were made, and  
19 that's the information I received from client, that  
01:59:32 20 those visits within that timeline occurred. Obviously I  
21 wasn't there. I don't know what they did except what I  
22 was told, and to reflect in the report.

23 Q. You didn't review any report or documents  
24 ratifying or indicating the existence of these visits.  
01:59:56 25 Is that correct?

01:59:57 1 A. No, only what I received from client. The  
2 information I received from client.

3 Q. Dr. Gutiérrez, I'm now going to ask you a  
4 different question, and I am referring to your legal  
02:00:26 5 analysis of INAGROSA'S export permits. In your report  
6 you state that the permits and future approvals that  
7 INAGROSA needed were routine, correct?

8 A. I got lost in the question. I'm sorry. I was  
9 lost.

02:00:49 10 Q. I want to put some questions to you regarding  
11 your legal views on INAGROSA'S export permits. In your  
12 report, you mentioned that the permits and future  
13 approvals that INAGROSA needed were routine, correct?

14 A. I don't remember having said that.

02:01:28 15 Q. I'm referring to paragraph 116 of your report.

16 A. I don't know what routine permits are. If I  
17 said that, I have to say something to you. 116?

18 Q. Dr. Gutiérrez, that is what you wrote. Yes,  
19 116.

02:02:23 20 A. I think what I meant to say here or what I say  
21 is that when INAGROSA were going to need a permit, they  
22 would apply for a permit and that perhaps we are not  
23 asking for an extraordinary matter but just a permit to  
24 carry on your business, which you characterize, I guess,  
02:02:43 25 as routine permits.

02:02:49 1 Q. And in this paragraph you understood that it  
2 was foreseeable that INAGROSA would obtain the  
3 phytosanitary certificates, correct?

4 A. I say that it is anticipated that INAGROSA  
02:03:02 5 would eventually ask for permits to export its Hass  
6 avocados. That's what I said.

7 Q. What you state in the last paragraph is that it  
8 is a misrepresentation, that it is false, that there was  
9 not certainty with regard to the inspections and permits  
02:03:39 10 that INAGROSA had to obtain. Is that so?

11 A. No, perhaps what I said or I wanted to say is  
12 that the contention raised here by Nicaragua is highly  
13 hypothetical in many respects, as INAGROSA, as I said  
14 this morning, I think, was never cited for any  
02:04:02 15 violation, there was never a hearing on any violation of  
16 anything and even if it was to quantify those things  
17 that never existed.

18 All I said is also that the inspection  
19 requirements that we were talking here about the export  
02:04:24 20 of Hass avocado was not science fiction matter but just  
21 in the course of a business that is going to export  
22 avocados, that's a process that needed to be handle both  
23 by -- obviously by the petitioner but the body and the  
24 government, because it is not an action against the  
02:04:47 25 government. It is not an action to defend itself from

02:04:51 1 any misdeed that the company had done, but it's just a  
2 permit or a step that is necessary for the export of the  
3 product.

4 So I think both the government and the  
02:05:07 5 individual, the petitioner, should be on the same page.

6 Q. Dr. Gutiérrez, would you agree that before  
7 exporting a Hass avocado, INAGROSA needed phytosanitary  
8 permits, correct?

9 A. We have to see one thing at a time. If you  
02:05:34 10 tell me what is it that you are thinking about that  
11 INAGROSA needed, well, let's look at it and let's reason  
12 as to what the necessity of that is, but we cannot  
13 discuss this in a blanket matter. I can't.

14 Q. So it's your testimony that INAGROSA could have  
02:05:54 15 exported without having a phytosanitary certificate?

16 A. I didn't say that, no.

17 Q. So you consider that INAGROSA needed a  
18 phytosanitary certificate to export, yes or no?

19 A. What I said is that I cannot give an opinion in  
02:06:15 20 the blanket. We need to see each action in itself, see  
21 where the company was, what is the requirement of the  
22 government, and then we can discuss it. But in a  
23 blanket, I cannot answer your question. All I can --

24 Q. Dr. Gutiérrez, in your expert report, nowhere  
02:06:35 25 do you mention that you are an expert in the processing

02:06:40 1 of phytosanitary permits in Nicaragua. Is that so?

2 A. That I am an expert?

3 Q. Yes.

4 A. I'm a lawyer, and when I'm entrusted with a  
02:06:49 5 case by my client, I will do the corresponding research,  
6 and I will give an opinion.

7 Q. Let me ask you once again. Do you establish  
8 expressly in your report that you are an expert in  
9 phytosanitary certificates or permits in Nicaragua, yes  
02:07:08 10 or no?

11 A. No. What I said is that I'm an expert in  
12 Nicaraguan law. I know how to read the law. I know how  
13 to interpret the law. I know about the system and how  
14 the system works. And as a lawyer, same as any other  
02:07:25 15 lawyer in your team, I'm capable of legally analyzing  
16 things and giving an opinion on those things.

17 MS. CORTES: Thank you very much for your  
18 time, Dr. Gutiérrez.

19 MR. GUTIÉRREZ: Thank you.

02:07:49 20 PRESIDENT: Thank you. Redirect?

21 MR. APPLETON: Mr. President, would it be  
22 possible to have five minutes -- sorry, is my microphone  
23 not on?

24 PRESIDENT: Now it's on.

02:08:05 25 MR. APPLETON: Might it be possible to

02:08:06 1 have five minutes to collect our thoughts. We've now  
2 had almost six hours of material. Even after the break,  
3 we've had a bit and I just want to --

4 PRESIDENT: That's fine.

02:08:14 5 MR. APPLETON: Thank you. But we won't  
6 leave.

7 *(Brief Recess)*

8 PRESIDENT: Let us know when you're ready,  
9 Mr. Appleton.

02:19:19 10 MR. APPLETON: Do we know that the other  
11 side is here? Ms. González, she is there now?

12 MR. MOLINA: She's here.

13 PRESIDENT: You will be doing this in  
14 English?

02:19:29 15 MR. APPLETON: We're going to be doing  
16 this in English. I'll turn it over here first to  
17 Ms. De Pena who will explain to you our game plan.

18 PRESIDENT: Please proceed.

19 MS. DE PENA: Perfect. Thank you very  
02:19:41 20 much, Mr. President. I will be conducting -- sure.

21 Thank you very much, Mr. President. I  
22 will be conducting the redirect for expert Renaldy  
23 Gutiérrez. Professor Appleton will be addressing some  
24 portions of the cross-examination done by Ms. Cortes.

02:20:05 25 MR. APPLETON: Just to be clear, that will

02:20:07 1 be in the process they did the other day at the end  
2 separately and on different topics.

3 PRESIDENT: Can you speak up a little bit,  
4 Ms. De Pena?

02:20:18 5 MS. DE PENA: Sure. Is this any better?

6 PRESIDENT: Yes.

7 MR. APPLETON: Might I ask that they  
8 actually increase the gain for her? She speaks a little  
9 quietly. I also have a wireless mic. If that doesn't  
02:20:32 10 work -- just so the President is aware, we can move to a  
11 wireless mic if that's going to be an issue here.

12 PRESIDENT: Yeah, if needed. But,  
13 Dr. Gutiérrez, you may want to move the mic to your left  
14 because you will be addressing counsel on the other  
02:20:47 15 side.

16 MR. GUTIÉRREZ: You are correct, sir.

17 THE INTERPRETER: The interpreter would  
18 ask that the witness speak directly into the microphone,  
19 please.

02:21:17 20 MS. DE PENA: Thank you very much,  
21 Mr. President.

22 **REDIRECT EXAMINATION**

23 BY MS. DE PENA:

24 Q. Good afternoon, Dr. Gutiérrez.

02:21:22 25 A. Good afternoon again.

02:21:24 1 Q. Yes. Dr. Gutiérrez, do you recall that during  
2 your presentation you were asked by Arbitrator Greenwood  
3 about the renewal of the judicial order in 2024?

4 A. Yes.

02:21:37 5 Q. Arbitrator Greenwood asked you how the judicial  
6 order could have been renewed if the judicial case file  
7 was closed.

8 MS. DE PENA: Could we just go to the  
9 judicial order so that we are on the same page, please?

02:21:48 10 It's document C-0251. Can you please highlight the last  
11 sentence of section 2. I would just like to read that  
12 last sentence. It says:

13 "The protective measure will have a  
14 duration of two years counted from the date of its  
02:22:25 15 execution in accordance with the second paragraph of  
16 article 387 of the Nicaraguan Civil Procedure Code."

17 A. May I ask you a question? Are you referring  
18 here to the first order or to the renewed order?

19 Q. This is the December 2021 judicial order.

02:22:42 20 A. Oh, okay. Thank you.

21 Q. Sure. Yes.

22 MS. DE PENA: Could you scroll down to the  
23 last page so that we could see the date?

24 Q. Yes, I believe it has the date as the 15th of  
02:23:11 25 December 2021. The last -- of section 5, last sentence.



02:23:17

1 A. Yes.

2 Q. So please scroll back up, please, to section 2,  
3 Bates 0054-55. This section here mentions article 387  
4 of the Nicaraguan Civil Procedure Code.

02:23:39

5 My question is what impact, if any, does  
6 article 387 of the Nicaraguan Civil Procedure Code has  
7 on the question that Arbitrator Greenwood asked on how  
8 the Nicaraguan government was able to renew the order?

9 A. Can I see the article?

02:23:57

10 Q. Yes, of course.

11 MS. DE PENA: Please show Nicaraguan Civil  
12 Procedure Code, which is Exhibit C-0254, article 387.  
13 Perhaps you -- oh, you have your headphones on. I will  
14 just read the Spanish for the record. Could you please  
15 make it bigger? Thank you.

02:25:16

16 Q. "Article 387, lifting and lapsing of the  
17 provisional measure. When the principal proceeding has  
18 terminated for any cause, the provisional measures  
19 adopted shall be lifted. A provisional measure shall  
20 not be maintained if the proceeding is suspended for  
21 more than six months due to a cause attributable to the  
22 person who has requested the measure."

02:25:36

23 "Any provisional measure shall lapse  
24 two years from the date of its implementation, which  
25 shall be decreed at the request of the party or sua

02:25:54

02:25:58 1 sponte or an official note shall be directed to whoever  
2 is appropriate for lifting the measure."

3 "In addition, if the principal process  
4 concluded in the time period referred to in the previous  
02:26:09 5 paragraph, at the request of a party the measure will be  
6 updated with no cost whatsoever."

7 I will just repeat my question. What  
8 impact, if any, does article 387 of the Nicaraguan Civil  
9 Procedure Code has on the question that  
02:26:21 10 Arbitrator Greenwood asked on how the Nicaraguan  
11 government was able to renew the order?

12 A. Well, first of all, this article provides that  
13 the order needs to be renewed two years after its  
14 execution. By execution means when the order was  
02:26:49 15 carried out by the judicial authority. In other words,  
16 it is not when it was signed by the court. It is not  
17 when it was entered into the registry but when the  
18 judicial authority went to the property, as it should  
19 have, and, once in the property, set up the deposit. We  
02:27:16 20 don't know what date that is exactly. The State has  
21 said that it was supposed to end on February 2nd of  
22 2024.

23 My estimation is that between the  
24 execution -- the signing of the -- the signing of the  
02:27:43 25 order by the judge and the recording of the order in the

02:27:49 1 registry, there went almost a month.

2           It means even if assuming that -- even if  
3 it is assuming that the execution of the order was  
4 February 2nd, it means that in February 2nd, the first  
02:28:09 5 order expired because the law says, as I've mentioned  
6 before in my testimony, that the expiration of the term  
7 occurs automatically.

8           Therefore, the consequence is that at that  
9 point, on February 2nd, the State was devoid of any  
02:28:36 10 right to renew the order because the order has lapsed.  
11 That's the main consequence that I see.

12           So the order that was eventually obtained,  
13 really, I don't know how they did to get it. I don't  
14 know if they reopened the case. I don't know when did  
02:29:02 15 they do that, because we got the final action, which is  
16 the new order. Be that as it may, in my opinion, the  
17 first order had expired, you cannot resuscitate it. And  
18 the second order that was obtained without the -- with  
19 the order expired means that this second order is  
02:29:32 20 absolutely null and void.

21           At that point in time, meaning after  
22 February 2nd of 2024, if the State wanted to get a new  
23 order, it was required to file a new case because the  
24 other one has lapsed.

02:29:53 25           They chose not to file a new case as they

02:29:56 1 should have, but they did this intricate maneuver, I  
2 don't know how did it happen. But even taking the date  
3 given by the State, which is February 2, they applied  
4 for the new order on February 9 when the other one had  
02:30:15 5 lapsed. They didn't file a new case obviously because  
6 it would have required to give notice to the party  
7 because now we are not going ex parte so there's no  
8 urgent -- maybe there was urgency, I don't know -- but  
9 definitely they would have required to file a new  
02:30:35 10 request for the measure. A different measure.

11 Q. Thank you very much. Dr. Gutiérrez, do you  
12 recall that you were asked whether relative nullity was  
13 available to INAGROSA and that counsel for Nicaragua  
14 showed you article 144 of the Nicaraguan Civil Procedure  
02:30:54 15 Code?

16 MS. DE PENA: The interpretation was lost.

17 MR. APPLETON: You want her to repeat it?  
18 Is that your - you want her to repeat this?

19 MS. DE PENA: No problem. I will repeat  
02:31:15 20 for the interpretation team.

21 Q. Dr. Gutiérrez, do you recall that you were  
22 asked whether relative nullity was available to INAGROSA  
23 and that counsel for Nicaragua showed you article 144 of  
24 the Nicaraguan Civil Procedure Code?

02:31:34 25 MS. DE PENA: Could you please show

02:31:35 1 article 144? Again, I will read in Spanish for the  
2 English translation. Okay. No problem at all. I'll  
3 read slowly.

4 "Article 144 relative nullity and curing  
02:32:09 5 of communication defects. Judicial decisions shall only  
6 have an effect under a notice made in accordance with  
7 this code. However, when the person notified and  
8 summoned or demanded would have gotten notice of the  
9 matter and would not indicate the nullity of the  
02:32:44 10 proceeding in the first appearance of the court, it will  
11 have all effects as it would have been made in  
12 accordance with the provisions of this code."

13 Q. Dr. Gutiérrez, you were trying to explain the  
14 relative nullity, the concept of relative nullity.  
02:33:02 15 Could you please explain for us again relative nullity?

16 A. Yes. For me to do that and for us to  
17 understand it, we would need to go to article 214, if  
18 I'm not incorrect --

19 Q. Of course.

02:33:18 20 A. -- of the code that talks about absolute  
21 nullity which, in general, is when there is an egregious  
22 violation of due process of the law. Absolute nullity  
23 exists in those circumstances, absolute violation of due  
24 process of law, or when the law specifically says if you  
02:33:44 25 don't do this, then you are punished with absolute

02:33:48 1 nullity.

2 Q. Yes. I would just -- sorry, not sure if I  
3 interrupted. I just wanted to read article 213 for the  
4 transcript.

02:34:00 5 A. Okay.

6 Q. One moment, please.

7 Article 213, causes for absolute nullity.  
8 Procedural actions shall be absolutely null and void in  
9 the following cases:

02:34:17 10 1) When they take place by a court or  
11 before a court without functional or objective  
12 jurisdiction;

13 When they take place without the court  
14 having territorial jurisdiction;

02:34:35 15 3) When they are conducted under violence  
16 or intimidation;

17 4) When there are no essential norms of  
18 procedure, if there is lack of defense because of that  
19 reason;

02:35:01 20 5) When they are conducted without the  
21 intervention of a lawyer in the cases in which such  
22 legal advice is deemed obligatory in this code;

23 6) When there is procedural fraud against  
24 the public official;

02:35:22 25 7) Whenever the provisions of this code

02:35:26 1 and other laws so determine.

2                   Please, can you continue with your  
3 response?

4           A.    Yes.  In our case, in my opinion, the first  
02:35:41 5 order was in violations of No. 1 and No. 4.  And that  
6 couldn't be cured, whether the party goes to court or  
7 doesn't go to court.

8                   As to No. 1 -- or maybe we don't need to  
9 get into -- I think I mentioned this morning that the  
02:36:11 10 jurisdiction of the court was premised, was based on the  
11 existence of this arbitration, and since this  
12 arbitration says in this arbitration INAGROSA was not a  
13 party, the judge had no authority to impose the measure  
14 on INAGROSA'S property, as simple as that.

02:36:39 15                   Why?  Because the court -- when the code  
16 was granting jurisdiction to the judge, the code says  
17 that as long as the property is one of the parties',  
18 then he has jurisdiction.

19                   And there's another article of the Civil  
02:36:58 20 Code of Nicaragua that provides that a judge cannot  
21 impose a measure on a property that belongs to a third  
22 party.  So that would make the order fall on article  
23 213(1).

24                   As to article No. 4, which is a simple  
02:37:21 25 notion, there was no notice of the order.  Once the

02:37:28 1 order was granted, there was no notice given, neither to  
2 INAGROSA nor to Riverside. We are talking of notice  
3 after the order was issued by the judge. It wasn't  
4 given to the parties.

02:37:46 5 And as a result of that, neither one had  
6 the opportunity given by the law to attack the order  
7 because they had only three days after the notice was  
8 given.

02:38:09 9 Since no notice was given and the  
10 procedure continued and deprived the parties of the  
11 right of defense, now Dr. Sequeira is telling us in his  
12 testimony that even though that happens, Nicaragua --  
13 INAGROSA was required to go to court, file a complaint  
14 on the lack of notice, and only then it would have the  
02:38:38 15 right to exercise its rights.

16 And he also says that that will happen  
17 when -- right after the party goes to court. He talks  
18 about 24 hours. Well, he is talking about relative  
19 nullity. That's what would have happened if No. 4 was  
02:39:00 20 violated but no notice, of course, but the party that  
21 didn't receive notice didn't have any harm, was not  
22 harmed by the lack of notice. It is the opposite. The  
23 party was harmed for the lack of a notice. Why?  
24 Because it lost the opportunity of defense.

02:39:19 25 So in my view, the order is absolutely



02:39:25 1 void and null for those reasons.

2 Q. Thank you very much, Dr. Gutiérrez. As a  
3 clarification, yesterday counsel for Nicaragua asked you  
4 a question several times. The question was when  
02:39:46 5 Riverside and INAGROSA received notice of the judicial  
6 order in June of 2022. I would just, for the record,  
7 like to read that portion of the transcript, if I may.  
8 It is page 1470, lines 20 to 23.

9 You were asked, "Would it be fair to say  
02:40:05 10 that Riverside and INAGROSA took notice or learned of  
11 the order in June 2022?"

12 You responded, "I'm not familiar with that  
13 date. I don't know."

14 And again you were asked -- on page 1478,  
02:40:22 15 lines 8 to 11, the question was, "Of course. Would you  
16 agree that around June of 2022, INAGROSA had knowledge  
17 of the existence of a protective measure?"

18 You answered, "Which protective measure?"

19 Nicaragua's counsel asked the question:

02:40:39 20 "The first one, which was issued in  
21 December of 2021 and which was entered in the registry  
22 for a duration of two years. Would you agree that this  
23 certificate is showing the existence of a protective  
24 measure?"

02:40:52 25 You responded, "Let me clarify. This

02:40:56 1 measure you are talking about now is the same measure  
2 that gave rise to the 2021 preliminary measure or if  
3 this pertains to the renewal of the order."

4 Counsel for Nicaragua asked, "Excuse me.  
02:41:14 5 This was issued in 2022. The renewal was signed in  
6 2024, and so it wasn't possible in 2022 to have any  
7 reflection in this document of a renewal that happened  
8 in 2024."

9 "And so here reference of 053603 being  
02:41:32 10 made to a protective measure that was entered in late  
11 2021-2022."

12 "So have you seen anything in the record  
13 where Riverside or INAGROSA, after having learned in  
14 June of 2022 of this, had made any effort to appear  
02:41:46 15 before the courts to complain about this protective  
16 measure?"

17 You answered, "Let me say something about  
18 the certificate because I've seen another certificate  
19 issued. Can you explain --"

02:42:00 20 Mr. President asked, "Can you explain the  
21 question?"

22 And then you answered, "I'm not aware of  
23 that."

24 I would like you to please clarify. What  
02:42:14 25 is your understanding of when Riverside or INAGROSA

02:42:16 1 learned of that protective measure?

2 I understand during the course of this  
3 arbitration there is a correspondence that might aid in  
4 this understanding. I believe it's C-0258, page 2, if  
02:42:29 5 you can please show it on the screen.

6 MS. GONZÁLEZ: I'm sorry. Counsel has  
7 already asked the question on whether -- if he can  
8 respond -- whether it's his understanding that Riverside  
9 and INAGROSA learned about the provisional measure.

02:42:53 10 MS. DE PENA: I will restate my question.

11 MS. GONZÁLEZ: Thank you.

12 Q. Dr. Gutiérrez, could you please clarify what is  
13 your understanding of when Riverside or INAGROSA learned  
14 of the protective measure?

02:43:07 15 A. There are several dates being referred to as  
16 the date when INAGROSA could have got knowledge --  
17 knowledge -- not notice -- knowledge of that event.

18 So I don't know. But it's absolutely  
19 irrelevant. Knowledge is absolutely irrelevant when we  
02:43:29 20 are dealing with absolute nullity. Because the law says  
21 that the party can attack the order for invalidity at  
22 any time, that the judge can do it on his own and the  
23 time to attack the order for absolute nullity is  
24 ten years. We discussed about that. And also when  
02:43:58 25 those ten years would start to play around.

02:44:03 1 And I would say it goes from the time when  
2 the order was issued, which is December of 1921. *(Sic)*  
3 But to me, knowledge is irrelevant, unless we are to  
4 believe, as Dr. Sequeira tells us, that this is a  
02:44:26 5 relative nullity. But this is a flagrant violation of  
6 the process of law in two of the clauses of article 214.  
7 There is no way that this is going to be a relative  
8 nullity.

9 Lack of notice harming one party is a  
02:44:48 10 cardinal principle of due process of law.

11 Q. Thank you very much.

12 Dr. Gutiérrez, do you recall that you were  
13 asked what was the basis for the de facto and the  
14 de jure effect of the judicial order? Can you please  
02:45:08 15 describe what was the de facto and de jure effect of the  
16 judicial order?

17 A. Yes. As to the de facto notion, I think I  
18 advanced the proposition or the statement that the order  
19 deprived INAGROSA of its rights of possession and  
02:45:33 20 disposition of that possession. It couldn't do anything  
21 for the party. It was actually factually impeded to get  
22 loans, to sell the property -- to get loans.

23 And as to the de jure, it created a  
24 confusion in the registry of the property by including  
02:46:08 25 the name of the State as one of the owners of the

02:46:09 1 property and including the name of Riverside as one of  
2 the owners of the property. So anyone looking at the  
3 registry would say, well, who owns this property?  
4 INAGROSA, the State, the other, the three. It's perhaps  
02:46:26 5 what we can say is a cloud on the title or a blemish in  
6 the title. That's, I believe, what I already said also.

7 Q. Thank you very much.

8 Dr. Gutiérrez, do you recall that you were  
9 asked by Nicaragua's counsel about whether INAGROSA  
02:46:44 10 received notice of the judicial order?

11 A. After the notice was granted, my understanding  
12 is that Nicaragua (sic) never received notice to this  
13 day.

14 MS. DE PENA: Could you please show  
02:47:02 15 document R-0199? Page 55, please. Can you zoom in,  
16 please?

17 Q. Dr. Gutiérrez, from this document, are you able  
18 to see who received notice on that document?

19 A. I think it's referring as INAGROSA, yeah.  
02:47:31 20 Which was delivered -- the notice was delivered to  
21 Mr. Miguel Velasquez, a security guard.

22 What is the date of this document so I can  
23 see it? I think this refers to the second notice, to  
24 the second.

02:48:13 25 Q. Yes. This is the 2024 order. I would just,

02:48:17 1 for the record, would like to read the second -- well,  
2 the last paragraph of point 1.

3                   It says: Having read this document in its  
4 entirety, the person who is over 16 years of age, he  
02:48:33 5 offered to deliver this document to the interested  
6 party, and I was told that he was not there at the time  
7 but he was there in the location. No signature.

8                   From this document -- Dr. Gutiérrez, this  
9 document, is this document signed by the person that  
02:49:22 10 says that he had received notice?

11           A. No, I don't see any signature here.

12           Q. Yes. I point to the words there "no firma."  
13 No signature.

14           A. There is no signature.

02:49:43 15           Q. Correct. Thank you. Dr. Gutiérrez, do you  
16 recall that you were asked several questions regarding  
17 INAGROSA'S application for a private wildlife reserve?

18           A. Yes, I do.

19                   MS. DE PENA: Could you please show  
02:50:06 20 document R-0032?

21           Q. Dr. Gutiérrez, do you recognize the email in  
22 that document?

23           A. Do I recognize what?

24           Q. The email address in that document.

02:50:31 25           A. No, I don't know whose that is. No, I don't

02:50:36 1 know whose email it is.

2 Q. Can you look at the signature line?

3 A. It says that the legal representative is  
4 signing. It says --

02:51:02 5 Q. Right. The name appears to start with an F.  
6 Does it look like it says Carlos Rondón to you?

7 A. I don't know. At least Carlos? It doesn't say  
8 Carlos.

9 Q. Thank you.

02:51:15 10 A. It ends in an S.

11 MS. DE PENA: Thank you. You can take the  
12 document down.

13 Q. Dr. Gutiérrez, you were also asked about the  
14 MARENA ministerial resolution.

02:51:27 15 MS. DE PENA: Could you please pull up  
16 document R-12? Thank you. Can you please scroll down  
17 to article 3 in the Spanish? Well, I'll have to come  
18 back to this document. A little bit -- scroll up?  
19 Okay, perfect. Thank you.

02:54:03 20 Q. Mr. Gutiérrez, how do you know that the  
21 information about the forest area in the MARENA  
22 resolution is correct?

23 A. I don't know.

24 Q. If this was incorrect, would you have a  
02:54:15 25 different view?

02:54:20 1 A. A different view of what?

2 Q. Earlier, counsel for Nicaragua discussed the  
3 regulations regarding to forestry, and I recall she  
4 asked whether a permit had been required for a forest  
02:54:39 5 area exceeding 500 hectares. I believe you answered in  
6 a hypothetical --

7 MS. CORTES: Sorry, Mr. President, I did  
8 not ask about any forestry permit.

9 MS. DE PENA: Right. Yes. Apologies. I  
02:54:57 10 recall that the question was about the expansion, about  
11 being more than 500 hectares. I believe that was the  
12 question.

13 PRESIDENT: Counsel for the Claimant has  
14 instructed the witness on the facts, so I think it's a  
02:55:18 15 bit too late to start discussing matters on which you  
16 have instructed him.

17 MS. DE PENA: Yes. Thank you very much.  
18 I will withdraw the question.

19 Q. On that same page, Dr. Gutiérrez, could you  
02:55:32 20 show me where on this page it says that the forest area  
21 was eligible for forestry?

22 A. In which area?

23 Q. In that section -- in section 3, it says  
24 "Forest area: 795.43 manzanas" in that line.

02:55:58 25 Could you show me where it says that



02:55:59 1 forest area specified there would be eligible for  
2 forestry?

3 A. I can see that it says that the forest area is  
4 795.43 manzanas. That's clear.

02:56:28 5 Q. Perfect. Thank you.

6 Dr. Gutiérrez, you were also asked a  
7 series of questions regarding the Rapid Ecological  
8 Study.

9 MS. DE PENA: It's document C-0081 and the  
02:56:44 10 English version R-228, if you can pull it up, please.  
11 Thank you.

12 Q. The first page of the Rapid Ecological Study  
13 says the word "proposal." You were asked a series of  
14 questions from counsel for Nicaragua regarding the  
02:57:52 15 management plan at the end of the document.

16 Having seen the first page with more  
17 clarity now, how does this affect your understanding as  
18 to whether the document Nicaragua's counsel referred to  
19 as the management plan as being a final document?

02:58:10 20 A. Well, to be a final document, it would need to  
21 have the approval by the State, and we don't see  
22 anywhere here that it was approved. It was proposed,  
23 yes, but it wasn't approved.

24 And it's also important to note, and I  
02:58:26 25 think I said that in my prior statement, that the party

02:58:32 1 was not obligated even to propose this if it didn't want  
2 to. But it made a proposal. What we don't have is an  
3 acceptance by the State or an approval by the State of  
4 this document.

02:58:47 5 In addition to that, there are other  
6 requirements in this resolution we're analyzing for the  
7 resolution to be in place, which were not discussed  
8 because they didn't ask me a question. Only I was asked  
9 a question regarding one of the requirements but not  
02:59:09 10 about the other requirements. I don't recall I was  
11 asked about that.

12 But the entire document, the entire  
13 resolutions need to be -- needs to be analyzed in its  
14 totality. We have seen other instances where we  
02:59:30 15 reviewed one section of the code and taking that to be  
16 everything in the code. We cannot do that, neither with  
17 the code, neither with a government resolution. We need  
18 to see if it has seven articles, we need to read them  
19 all and then give an opinion to that. Especially when  
02:59:49 20 we're asking about the validity and to impose  
21 liabilities on the parties or liabilities on the  
22 government. So it is important that we consider the  
23 document, the notice, or in this case the resolution in  
24 its totality.

03:00:08 25 Q. Thank you.

03:00:10 1 Do you recall that you were asked whether  
2 the Rapid Ecological Study was signed by anybody  
3 representing INAGROSA? You answered yes to that  
4 question, but you were not shown a signature page.

03:00:23 5 My question is have you been able to  
6 review the entire document to determine whether there is  
7 a signature by anybody representing INAGROSA?

8 A. I don't recall.

9 Q. Thank you. Mr. Gutiérrez, you were asked to  
03:00:51 10 assume that there was a private wildlife reserve in  
11 effect for Hacienda Santa Fé. The President has  
12 indicated that your expert assumptions include that  
13 there was no management plan, no administrative  
14 agreement and no annual operative plan.

03:01:08 15 I would just like to clarify precisely the  
16 assumptions that you made with regards to forestry in  
17 Hacienda Santa Fé.

18 MS. DE PENA: If you could please put on  
19 the screen CES-06, Annex A, page 49. Could you turn to  
03:01:39 20 page 50, please. Page 51.

21 Q. Point 5 indicates that you assume INAGROSA  
22 would have complied with the necessary permits and  
23 authorizations for its business operations after  
24 June 16, 2018.

03:02:23 25 You were asked a number of questions about

03:02:27 1 forestry operations at Hacienda Santa Fé. How does this  
2 assumption inform your answers to questions as to  
3 whether Hacienda Santa Fé would have been able to  
4 conduct forestry operations, even assuming that a  
03:02:41 5 private wildlife reserve designation came into effect?

6 A. If the private reserve went into effect, it  
7 changes the equation because the reserve restricts use  
8 of the property. The problem with this answer perhaps  
9 is that the private wildlife reserve never entered into  
03:03:13 10 effectiveness. This date and the applicant never, never  
11 complied with all the requisites for the validity and  
12 operation of the reserve. And this is not an  
13 assumption; it's a reality.

14 Q. Dr. Gutiérrez, based on the review of the  
03:04:26 15 materials in this case, have you seen any evidence of  
16 any infraction or warning given to INAGROSA?

17 A. No.

18 Q. Could you please look at assumption No. 6 on  
19 the page.

03:04:45 20 A. Yes, I see it.

21 Q. Dr. Gutiérrez, if you could dispense with this  
22 assumption, would you still keep your view?

23 A. If there is no notice of infraction, there's  
24 nothing to discuss about these issues because nothing  
03:05:06 25 has happened.

03:05:17 1 Q. Dr. Gutiérrez, in your review of the witness  
2 statements provided by Nicaragua, have you seen any  
3 evidence of any infraction?

4 A. No.

03:05:26 5 Q. Or notice of any infraction?

6 A. No.

7 MS. DE PENA: Yes, could you please go to  
8 the Rapid Ecological Study again. It's document C-0081  
9 and the English version, R-228.

03:06:46 10 Q. Dr. Gutiérrez, I will read a portion of this  
11 page, right above where it says section 4.1. It says:

12 "In addition, it has a clean environmental  
13 record and implements coffee wastewater treatment  
14 systems to mitigate pollution of natural water bodies."

03:07:07 15 MS. CORTES: Mr. President, I'm sorry, I  
16 didn't ask about this section of the management -- of  
17 this study. I did not discuss water resources.

18 MS. DE PENA: Mr. President, I believe the  
19 Rapid Ecological Study was discussed at length. I think  
03:07:23 20 the question relates to several of the questions posed  
21 by counsel for Nicaragua, just to clarify.

22 MS. CORTES: Mr. President, I only asked a  
23 question about the management plan.

24 PRESIDENT: That is true. The fact that  
03:07:36 25 there were questions about this document doesn't mean

03:07:37 1 that you can ask questions on any subject on the  
2 document. It has to be related to the  
3 cross-examination. And the other issue you should keep  
4 in mind is that he's a legal expert, not a witness of  
03:07:54 5 fact.

6 There was a series of questions from  
7 counsel for the Respondent, but those were put on the  
8 basis of assumptions. You're asking questions not on  
9 the basis of assumptions but as if the witness was a  
03:08:07 10 witness of fact. He's a legal expert.

11 MR. APPLETON: Mr. President, I will  
12 handle that when we get to the principle of legality  
13 later on. I don't want to break this up. So we'll just  
14 turn back to it in that. There were questions that go  
03:08:21 15 with that, and this is responsive on the principle of  
16 legality that was posed with a number of questions  
17 earlier, and I actually have the references here exactly  
18 in the record. So we'll just come back to this, no  
19 problem.

03:08:34 20 PRESIDENT: That's fine.

21 MR. APPLETON: In fact, I'm just going to  
22 switch. It seems that I'm actually ready to go, and  
23 I'll start with the principle of legality. But I'm  
24 going to switch to the wireless. So I just want to make  
03:08:49 25 sure that we don't have a problem.

03:08:53

1 MS. GONZÁLEZ: Mr. President, I just want  
2 to make sure that after Mr. Appleton is finished with  
3 the redirect, Ms. De Pena will not come back. That is  
4 exactly the same objection that he made yesterday about  
5 our cross-examination, that once one finished, the other  
6 one could not continue.

03:09:05

7 MR. APPLETON: I don't know what would  
8 give rise to Ms. González's concerns. We've already  
9 explained exactly how we're going to deal with this.

03:09:19

10 She can have as many anticipatory objections as she  
11 would like, but maybe you should see how it goes.

12 My job is to see if we can move this along  
13 as quickly as possible. Perhaps if we kept the  
14 objections to things that are relevant and are  
15 occurring, it would make life easier. Why don't we go  
16 from there. Does that sound like a good way to go?

03:09:34

17 PRESIDENT: Mr. Appleton indicated at the  
18 beginning of the redirect examination that they will  
19 have a division of subject matter.

03:09:49

20 MS. GONZÁLEZ: Yes, I have no problem with  
21 the division.

22 PRESIDENT: And that first Ms. De Pena  
23 will be asking questions, then Mr. Appleton and there  
24 will be no tag-teaming, and we expect that counsel for  
25 the Claimant will comply with that.

03:10:00

03:10:03 1 MS. GONZÁLEZ: Yes. I have no problem  
2 with that. It's just that after he finishes, then  
3 Ms. De Pena could not go back to ask questions.

4 MR. APPLETON: Why don't we wait to see if  
03:10:12 5 we're going to have a reason for an objection before  
6 bringing anticipatory objections. This is just  
7 spurious. I don't know, maybe she just wants to eat our  
8 time, I do not know. But this is a waste of all of our  
9 time.

03:10:26 10 Perhaps, Ms. González, you would wait to  
11 see where we go and then go from there.

12 PRESIDENT: Please proceed, Mr. Appleton.

13 MR. APPLETON: Thank you very much. I  
14 wasn't planning on starting with legality, but let's  
03:10:36 15 start with legality because we are right here.

16 BY MR. APPLETON:

17 Q. You recall being asked a number of questions  
18 about the principle of legality. I believe Ms. Cortes  
19 took you through the Constitution and a series of  
03:10:45 20 questions related to that?

21 A. Yes.

22 Q. Can you recall going through that?

23 A. Yes, sir.

24 Q. The first question I want to ask you in  
03:10:51 25 relation to that -- well, actually, let's just see if I



03:10:59 1 can actually see again.

2                   With respect to the principle of legality,  
3 are there -- in your expert opinion, as a matter of  
4 Nicaraguan law, are there principles in addition to the  
03:11:11 5 principle of legality that govern administrative process  
6 and fairness in Nicaragua?

7           A.    Yes.

8           Q.    Could you just explain some of those general  
9 principles, just briefly, but at a very high level?

03:11:25 10           A.    The principle of equality --

11                   PRESIDENT: Mr. Appleton, we are now  
12 beyond questions on a high level. The questions should  
13 be related to the questions raised by counsel for the  
14 Respondent.

03:11:38 15                   MR. APPLETON: I'll go specifically on the  
16 principle of legality.

17           Q.    Ms. De Pena took you to this document here that  
18 talked specifically about the clean environmental record  
19 and the implementing coffee wastewater treatment to  
03:11:52 20 mitigate pollution of natural water bodies.

21                   Would that be within or outside the  
22 concept of the principle of legality for an official  
23 from the Ministry of the Environment?

24           A.    Well, it says it doesn't have any crimes or  
03:12:15 25 arbitrariness. Is that what you're referring to? And

03:12:20 1 it implements systems of treatment.

2 Q. I'll clarify.

3 My question is within the principle of  
4 legality, would that statement be within or outside of  
03:12:35 5 the operation of the principle of legality for an  
6 official from the environment department? This is the  
7 Rapid Ecological Study.

8 A. Yes. I don't -- perhaps I'm not understanding  
9 your question or I don't see where it follows, your  
03:12:56 10 question in this paragraph.

11 Q. We'll just break it down, make it one step at a  
12 time.

13 This Rapid Ecological Study, you know that  
14 it was done by Dania Hernández, and you see that she's  
03:13:11 15 with the environment department, yes?

16 A. Yes.

17 Q. The question is about the principle of legality  
18 is you should act within the scope of your function  
19 basically. Yes?

03:13:25 20 A. Yes.

21 Q. To be sure, we're talking about this as a  
22 matter of Nicaraguan law, not of other law, right?

23 A. Yes, I understand.

24 Q. So as a matter of Nicaraguan law, based on this  
03:13:37 25 principle of legality that you were questioned on and

03:13:40 1 you've commented on, would a statement saying that  
2 there's a clean environmental record, for example, fit  
3 within the intra vires process of the principle of  
4 legality for an official from the environment

03:13:57 5 department?

6 A. I think it does.

7 Q. How about the second statement: "Implements  
8 coffee wastewater treatment systems to mitigate  
9 pollution of natural water bodies." Would that be

03:14:06 10 inside or outside, sir?

11 A. It seems to be inside, yes.

12 Q. I'm sorry, I'll go slower. I just got excited.  
13 I think we can take this down.

14 MS. GONZÁLEZ: Mr. President, if  
03:14:31 15 Mr. Appleton can avoid asking leading questions, that  
16 will be very helpful, I think, for everyone.

17 MR. APPLETON: Well, I started with  
18 completely non-leading questions but we had to break it  
19 down into pieces here and I think that we would like to  
03:14:41 20 try to get out of here. I'm doing my best to stay as  
21 open-ended as I can here, Mr. President.

22 PRESIDENT: It was fine because the  
23 witness got confused. But keep it on a narrow path.

24 MR. APPLETON: You can be assured I'm  
03:14:55 25 doing my best, and I have structured the questions as

03:14:58 1 carefully as I can.

2 Q. Now, let's turn to the topic of export rules  
3 and export/import issues. At 14:01 of the transcript  
4 and then we went from there, do you recall Ms. Cortes  
03:15:12 5 asked you about some export rules and the issues of some  
6 phytosanitary standards? Do you recall that?

7 A. Yes.

8 Q. So, first of all, in your commercial law  
9 practice or in your experience as a commercial law  
03:15:24 10 professor, do you have any knowledge about issues  
11 related to the international sale of goods?

12 A. Yes.

13 Q. Okay. And so are you able to describe any  
14 evidence, to your knowledge, of export restrictions in  
03:15:42 15 Nicaragua upon avocados?

16 A. I haven't seen those.

17 Q. Let's just be very specific. Did you see any  
18 in the pleadings that you reviewed in this case?

19 A. No.

03:15:56 20 MS. CORTES: Mr. President, I'm sorry, but  
21 not only these are leading questions, but I did not ask  
22 about any restriction on the export of --

23 MR. APPLETON: You did actually. You  
24 asked specifically about phytosanitary regulations and  
03:16:06 25 export. That was exactly the question. And you asked

03:16:09 1 him -- then you suggested --

2 MS. CORTES: Where did I ask about any  
3 restriction?

4 MR. APPLETON: You actually, in fact,  
03:16:14 5 first started this morning with Ms. González saying --  
6 okay, I'll stop.

7 PRESIDENT: There were questions on  
8 phytosanitary regulations, so please proceed, but no  
9 leading questions, please.

03:16:24 10 MR. APPLETON: Okay.

11 Q. Can you describe, to the best of your  
12 knowledge, the existence of any export restrictions on  
13 avocados under Nicaraguan law?

14 A. I know nothing about it.

03:16:40 15 Q. To the best of your knowledge, if there are  
16 no -- if there are no export restrictions from Nicaragua  
17 upon avocados because they're not a controlled  
18 substance, for example -- so assuming that, if that's  
19 the case, would the questions then be all related to the  
03:17:00 20 importing state's process rather than the exporting  
21 state?

22 A. You have always to take into account both  
23 states to determine what the restrictions are.

24 Q. So if there were none in Nicaragua, we would  
03:17:19 25 only look to the other states, right?

03:17:21 1 A. It would --

2 MS. GONZÁLEZ: I'm sorry. He's again  
3 asking leading questions.

4 MR. APPLETON: No, I'm clarifying the  
03:17:27 5 testimony he's just done. It's called looping. It's  
6 exactly based on his last question. I'm entirely  
7 allowed to do that. It's entirely appropriate for  
8 direct, and it is a non-leading question. It is based  
9 entirely on his statement. Ms. González, I'm sorry, it  
03:17:39 10 is not appropriate, and I know you don't like any of the  
11 testimony you're hearing, but it's not going to make it  
12 any easier to keep interrupting it on non-meritorious  
13 bases.

14 I'm simply repeating the point he made in  
03:17:51 15 the context in the next open-ended question. And the  
16 question here is are you aware of something based on  
17 your knowledge. He's already testified his expertise in  
18 import/export sale and his expertise as a professor in  
19 this area as within his expertise. It's a legal  
03:18:08 20 question. And if I understand the answer he gave, as  
21 you were interrupting it, I believe he said that it's an  
22 issue we'd have to look to for the other state. But I  
23 need to make sure that it's clear so I have to go back  
24 to that.

03:18:24 25 PRESIDENT: Mr. Appleton, these are

03:18:26 1 technically permissible questions, so please proceed.  
2 But keep in mind that if you are putting yes or no  
3 questions to a witness on redirect, they're not going to  
4 be very helpful for the Tribunal because we already know  
03:18:37 5 before the answer what the answer will be.

6 MR. APPLETON: Well, my question is --  
7 here is that -- I asked if he could ascribe the legal  
8 regime here.

9 Q. So perhaps can you tell us what are its --  
03:18:58 10 assume that there are no longer any other issues in  
11 Nicaragua with respect to that because -- assume that.  
12 Which type of country -- or what type of regulatory  
13 matters would be looked to?

14 A. Where there is activity in the other country  
03:19:15 15 where the product is going and if this product is  
16 capable of meeting those regulations.

17 Q. Okay. Exactly. Thank you. I can now move to  
18 the next topic.

19 So -- and I just wanted to go back on that  
03:19:36 20 issue of legal personality. Although actually I'll just  
21 turn to the issue of legal personality.

22 Ms. González this morning, at 9:14, asked  
23 you about the differences of legal personality between  
24 Riverside and INAGROSA, and you provided answers to her  
03:19:50 25 questions on that. Do you recall that?

03:19:52 1 A. Yes, sir.

2 Q. Can you just clarify whether your testimony was  
3 an opinion of Nicaraguan law or more than that?

4 A. It was an opinion on Nicaraguan law.

03:20:02 5 Q. Okay. Thank you. And just shortly thereafter,  
6 at 9:25, Ms. González asked you if Riverside or INAGROSA  
7 were impacted by the protected measures. Do you recall  
8 that conversation?

9 A. Yes, I do.

03:20:15 10 Q. We spent a considerable amount of time talking  
11 about that, if you recall?

12 A. Yes, sir.

13 Q. So her question was -- she said specifically:

14 "Do you consider that INAGROSA and Riverside were  
03:20:30 15 impacted by the lack of notice of the measure. Is that  
16 correct?" And your answer was "Yes." Do you recall  
17 that?

18 A. Yes.

19 Q. All right. Have you seen the -- since you  
03:20:43 20 filed your witness statement, did you see any of the  
21 witness statements at all in the second round that may  
22 have come from Riverside?

23 A. I saw them, yes.

24 Q. All right. I just want to bring to your  
03:20:56 25 attention the witness statement of Melva Jo Winger,



03:21:00 1 who -- when she talks specifically about  
2 collateralization and the issues that are here.

3 MS. GONZÁLEZ: I'm sorry, Mr. President.  
4 I object. I haven't shown the witness the witness  
03:21:10 5 statement of Ms. Melva Jo.

6 MR. APPLETON: With all due respect, you  
7 asked a question about the impact. The witness has said  
8 that he's now seen materials since he filed his witness  
9 statement, and it's directly on that issue, and I want  
03:21:24 10 to ask him to be able to clarify or interpret his  
11 earlier testimony.

12 I've cited the specific testimony answer.  
13 I would like to be able to put it on the screen, and  
14 then you can determine from his answer whether it was  
03:21:38 15 responsive or not to that particular thing. That  
16 particular question.

17 PRESIDENT: But you are putting a question  
18 of fact to a witness who is a legal expert.

19 MR. APPLETON: But he's testified that  
03:21:45 20 he's seen it. So I'm asking -- I'm putting it to him to  
21 see if that's going to be relevant in his consideration.

22 PRESIDENT: But it's still a question of  
23 fact. If you can formulate your question in terms of a  
24 question on the applicable law, that is fine.

03:21:59 25 MR. APPLETON: I will --

03:22:00 1 PRESIDENT: But it was precisely for that  
2 reason that the counsel for the Respondent's questions  
3 were cut short on that topic.

03:22:11 4 MR. APPLETON: So I will make it entirely  
5 a question of law. It's the wonderful thing of being an  
6 academic. We have no shortage of such matters.

7 So could you bring up, please,  
8 paragraph 38 of the witness statement of Mrs. Rondón,  
9 CWS-8. I'm going to ask that you make it large so we  
03:22:33 10 can see that 38.

11 Q. Okay. And I'm going to ask that the witness  
12 has an opportunity just to read it. Can you see it,  
13 sir?

14 A. Yes, I can see it.

03:22:46 15 Q. It's fairly long. I'm going to ask you to read  
16 it quietly to yourself for a moment.

17 You see the first part discusses the  
18 timing of a discovery. That's not what I'm going to ask  
19 you about.

03:23:22 20 A. Yes.

21 Q. You've had a chance to read it?

22 A. Yes, I have.

23 Q. Okay. So this morning in your testimony you  
24 gave an answer, a legal answer, about the impact of the  
03:23:32 25 protective order, and in that you gave a time period on

03:23:36 1 the impact as a legal determination. And your impact  
2 was on -- dealt with a period while INAGROSA was still  
3 operating its business; in other words, it was before  
4 this case began and the invasion.

03:23:52 5           Could you please tell us if those same  
6 legal considerations are relevant and if you have  
7 anything to comment on the period after -- so after this  
8 arbitration began -- and then I'm going to ask you  
9 another question in a moment, same thing, another time.

03:24:11 10       A. Well, the figures are different, not only in  
11 time, but in the circumstances of the party.

12           Prior to 2018, the Claimant and its  
13 subsidiary were in full control of the property. And  
14 after the measure was implemented, it lost possession of  
03:24:36 15 the property. So that is a big difference in this case.

16       Q. So can you just explain on a legal basis when  
17 was the protective order first -- do you recall when it  
18 first came into force?

19       A. December or January of 2022, I think.

03:25:00 20       Q. I believe it was 2021.

21       A. Yes, 2021.

22       Q. December 15 of 2021?

23       A. Yes, '21.

24       Q. So from the date of that order going forward --  
03:25:09 25 that's my question -- I want to understand it because

03:25:11 1 I'm unclear from your earlier testimony.

2 On a legal basis, can you just explain to  
3 us the impact of the protective order upon Riverside?

4 A. In the case looking from the Riverside  
03:25:30 5 perspective, it lost control of an asset of its  
6 subsidiary which could have been used for other  
7 commercial purposes.

8 Q. But those purposes -- and you identified some  
9 earlier today. Do you recall those purposes that you  
03:25:49 10 had identified?

11 A. I think I said loan, mortgages, pledges.

12 Q. And I think there was one more, I believe --

13 A. At that point the property was -- the title was  
14 really blemished by the -- I think that's the expression  
03:26:07 15 I used -- by the order, and so the company was unable to  
16 use it for any value or necessary commercial or  
17 financial purpose.

18 Q. I have one last area of questions I want to ask  
19 you about because I'd like to move everything along and  
03:26:26 20 we want to hear from Dr. Sequeira, of course, this  
21 afternoon. So you've talked a fair bit about  
22 notification and the administrative process.

23 A. Yes.

24 Q. For example, at 13:45, Ms. Cortes asked you  
03:26:44 25 questions about the underlying principle of legality,

03:26:47 1 that's what it was and things like that. But there were  
2 other questions as well. There were quite a few that  
3 have come over the day. You've talked about the  
4 requirement of notification, and due process has come up  
03:26:56 5 a number of times as well.

6 I wonder if you'd just help the Tribunal  
7 to understand the legal principles of Nicaraguan law  
8 about due process and what I call even-handedness. Are  
9 you able to comment on what those principles are in  
03:27:12 10 relation specifically to those questions that were posed  
11 to you?

12 A. Well, the commercial -- the Civil Code of Civil  
13 Procedure -- the Code of Civil Procedure, in its  
14 introductory paragraphs or chapter, makes reference,  
03:27:31 15 specific reference, to the due process of law, to  
16 equality of the parties, access to justice, which we  
17 have been talking here, as deviations occurred in the  
18 presentation of the different actions taken by the State  
19 in court, not decided perhaps by the court but --

03:27:57 20 THE REPORTER: You're fading, I'm sorry.

21 A. We have been arguing or presenting a case of  
22 violation of due process, in particular with respect to  
23 the first order as well as to the second order and how  
24 the implementation of both orders affected the parties.

03:28:26 25 So it is not a discussion about principles

03:28:37 1 but a discussion about the applicability of the  
2 principles to the concrete case. Because when those  
3 principles are violated, which is what the statute, the  
4 code, wants to prevent, but when those principles are  
03:28:52 5 violated, like lack of notice, and because you have a  
6 lack of notice you cannot go back and complain about the  
7 action, that is a severe violation of due process of  
8 law.

9 Q. I'd like you to clarify for us about that  
03:29:10 10 principle of its applicability. It goes beyond just the  
11 issue of the protective order, does it not? Does it not  
12 apply to other administrative processes of the State  
13 such as permissions and permits or things like that  
14 or --

03:29:25 15 A. Just --

16 Q. Are there limits on the legal idea?

17 A. There is no limit for the application of a  
18 principle which is an integral part of the process. So  
19 when we say due process, we'll have to apply to any  
03:29:43 20 administrative proceeding regarding the permits,  
21 regarding sanctions, regarding inspections, and it has  
22 to be fair. It has to be equally -- equally implemented  
23 in the population, not only to a foreign owner but  
24 everyone within Nicaragua should be treated equally.

03:30:10 25 Q. And does that apply just to proceedings, or

03:30:13 1 does it also apply to administrative actions?

2 A. Absolutely. The State and its officers and its  
3 agencies are absolutely subject to the principle of due  
4 process of law. In fact, it comes from the  
03:30:36 5 constitution, so it is not the principle that exists  
6 only in the Civil Code of Procedure. This is a  
7 principle that emanates from the constitution itself.

8 Q. So because it emanates from the constitution,  
9 as you say, does it apply, for example, to the conduct  
03:30:53 10 of the police?

11 A. To everyone.

12 MS. GONZÁLEZ: I'm sorry, Mr. President.  
13 This goes beyond the scope of our cross-examination, and  
14 also he has been asking leading questions.

03:31:03 15 Q. Well, I'll ask does it apply to other services?  
16 He's already said it does. I guess if that's clear  
17 enough. Are there any limitations on who it applies to  
18 within the State?

19 A. I think we should look at the article of the  
03:31:16 20 constitution. I think it's article 124 of the  
21 constitution, if I am correct.

22 Q. What article is that?

23 A. 124.

24 PRESIDENT: I think, Mr. Appleton, we are  
03:31:30 25 going into a direction that is not very helpful for the

03:31:33 1 Tribunal.

2 MR. APPLETON: I wasn't planning on going  
3 there either. So we're all just listening to the expert  
4 evidence. We don't need to go there. We're happy to  
03:31:40 5 take note of that. I simply wanted to understand and  
6 clarify whether the legal principles were restricted to  
7 a particular area or zone, and I think now we have a  
8 clear understanding of that.

9 Q. Yes?

03:31:50 10 A. Yes, sir.

11 MR. APPLETON: Then I believe we're done.  
12 I believe we have nothing further, and I just want to  
13 thank you for coming because you were here much longer  
14 than I expected and you've been very patient. Thank you  
03:32:03 15 very much.

16 MR. GUTIÉRREZ: Thank you, sir.

17 PRESIDENT: Thank you, Mr. Appleton. Any  
18 questions from my colleagues?

19 No questions from the Tribunal,  
03:32:13 20 Dr. Gutiérrez. So this concludes your examination.  
21 Thank you.

22 MR. GUTIÉRREZ: Thank you very much, sir.

23 PRESIDENT: Thank you very much for your  
24 time.

03:32:34 25 We need to have a break. We have been



03:32:36 1 going on for over two hours. So we break for 15 minutes  
2 until a quarter to 4.

3 (Brief Recess)

4 PRESIDENT: Let's proceed. And the next  
03:50:18 5 witness will be Mr. Sequeira.

6 MR BYRON SEQUEIRA

7 PRESIDENT: Welcome. You'll be  
8 testifying, I understand in Spanish?

9 MR. SEQUERIA: Yes, in Spanish.

03:50:32 10 PRESIDENT: You have been called as an  
11 expert witness, so for that purpose you need to make a  
12 declaration of an expert witness. You should have the  
13 text there, and I see you have it. Can you please make  
14 the declaration.

03:50:49 15 MR. SEQUEIRA: Expert declaration. I  
16 solemnly declare upon my honor and conscience that my  
17 statement shall be in accordance with my sincere belief.

18 PRESIDENT: Thank you very much. I  
19 understand you'll be making a presentation up to  
03:51:07 20 30 minutes in lieu of a direct examination. So please  
21 proceed.

22 MR. SEQUERIA: Thank you.

23 Mr. President, I don't know if it would be  
24 an issue for me to get up and move around?

03:51:24 25 MR. APPLETON: Sorry, we don't have the

03:51:26 1 demonstrative.

2 PRESIDENT: The issue will be the  
3 microphone.

4 *(Discussion off the record)*

03:52:28 5 PRESIDENT: Please, proceed, Mr. Sequeira.

6 MR. SEQUEIRA: Thank you very much.

7 Good afternoon to all those present this  
8 afternoon. My name is Byron Israel Sequeira Pérez, and  
9 I'm going to take this time to explain the results of my  
03:52:57 10 legal report as expert.

11 Here, you can see in the first overhead  
12 that I'm going to talk a little bit about my experience.  
13 My name is Byron Israel Sequeira Pérez. I'm an  
14 attorney-at-law and notary public, duly accredited.

03:53:12 15 MS. GREENWOOD: Mr. Sequeira, sorry to  
16 stop you. I'm listening to the translation of your  
17 Spanish, and it takes some time to come through and  
18 then, as it gets translated, it then gets transcribed by  
19 the court reporter. So if I could ask you just to slow  
03:53:28 20 down a little. Thank you.

21 MR. SEQUEIRA: Okay.

22 I am an attorney-at-law and notary public  
23 authorized by the Supreme Court of Justice of the  
24 Republic of Nicaragua. My registration number is  
03:53:42 25 20,887.

03:53:49 1                   Academically speaking, I have obtained  
2 three degrees -- undergraduate, master's and doctoral  
3 degree -- all at the same Universidad Politécnica in  
4 Nicaragua.

03:54:02 5                   In terms of my academic experience, I have  
6 been a professor in-house as well as an adjunct  
7 professor at various universities, including the  
8 Polytechnic University of Nicaragua as well as the  
9 Universidad Centroamericana and the University of  
03:54:18 10 Commercial Sciences. I've also given classes for the  
11 Institute of High Level Judicial Studies for the Supreme  
12 Court of Justice of Nicaragua, be it in the graduate and  
13 post-graduate programs.

14                   In academia I've been -- well, as you  
03:54:39 15 know, us academics must engage in research, and I have  
16 directed the Center of Legal Practices that is related  
17 to a people's law firm, which is the legal aid services  
18 for the population.

19                   I was also in charge of the academic  
03:55:00 20 secretariat at the School of Legal and Political  
21 Sciences, which technically speaking is No. 2 in charge  
22 of the law school.

23                   So in terms of my professional practice, I  
24 work as a legal consultant, I'm also a litigator,  
03:55:22 25 particularly in civil proceedings related to property,

03:55:25 1 as well as administrative litigation proceedings tied to  
2 administrative law, as well as in constitutional  
3 procedural law and family law. And so I've been able to  
4 acquire experience in analyzing cases related to  
03:55:43 5 procedural law and also, of course, administrative law,  
6 which is closely related to environmental law.

7 My report, as you can see -- and it's my  
8 understanding that you have -- I understand that you  
9 have it -- covers just two topics: the analysis of the  
03:56:02 10 case in connection with the urgent provisional measures  
11 requested by the Republic of Nicaragua and the analysis  
12 of the declaration of private wildlife reserve.

13 Now, in this regard, I'd like to mention  
14 briefly some background. As is well known, in  
03:56:22 15 November 2021, the Republic of Nicaragua asked the civil  
16 district judge to grant urgent provisional measures and  
17 this in order to protect the private property tied to or  
18 of the Hacienda Santa Fé.

19 And the main grounds alleged among the  
03:56:45 20 grounds expressed by the Republic of Nicaragua in its  
21 brief is to avoid damage to the property belonging to  
22 the Claimant, Riverside Coffee, investor, and prevent  
23 any potential harm that may occur due to the refusal by  
24 the Claimant to come to Nicaragua to receive the  
03:57:03 25 property and to prevent these damages or losses to be

03:57:10 1 subsequently claimed against the party I represent.

2 Now, in this regard, the result -- in this  
3 respect the outcome of that request for urgent  
4 provisional measures is addressed in two judicial orders  
03:57:31 5 as appears in the record. In the language of the legal  
6 system in Nicaragua, these are known as orders or  
7 mandamiento in Spanish.

8 The first was issued 15 December 2021, and  
9 in that court order it is decided to appoint as judicial  
03:57:48 10 custodian the Republic of Nicaragua represented by the  
11 Office of the Attorney General. That provisional  
12 measure, which was decreed on an urgent basis, sets a  
13 duration of two years, and it reserves the right of the  
14 opposing party to file an objection.

03:58:12 15 Another outcome of the other court order,  
16 which is from 25 January 2022. This court order ordered  
17 the preventive annotation of the first order, which is  
18 the one that goes to a judicial custodian appointment.

19 I'd like to emphasize this because there  
03:58:32 20 are certain postulates that have been affirmed or  
21 asserted and, in light of Nicaraguan legislation,  
22 they're completely incorrect. And these postulates --  
23 well, I will explain them one by one.

24 First, it is said that the designation of  
03:58:54 25 Nicaragua as judicial custodian and the preventive

03:58:56 1 annotation in this case do not constitute a transfer of  
2 ownership, nor do they undermine the right to property  
3 for the following reasons.

4           It suffices to indicate as a starting  
03:59:12 5 point article 617 of the Civil Code of the Republic of  
6 Nicaragua, and it is argued in summary that -- or which  
7 indicates in summary that no person may be deprived of  
8 ownership of their property. And there's an exception,  
9 except in the case of expropriation on grounds of public  
03:59:33 10 utility.

11           But in this case there has not been an  
12 administrative procedure that attests to there being an  
13 expropriation.

14           So how can the legal analysis of this  
03:59:45 15 assertion be made? Well, suffice it to turn to the  
16 results. This is the first order, what you have on the  
17 screen in front of you. It is the order of judicial  
18 custodian of 15 December 2021.

19           Now, in the judgment, which is the  
04:00:02 20 operative part, there's a designation or it is deemed  
21 appropriate to appoint a judicial custodian on an urgent  
22 basis, and it also names or appoints as the judicial  
23 custodian the State of Nicaragua represented by the  
24 Office of Attorney General.

04:00:23 25           Nowhere in the text of the order is the

04:00:29 1 Registrar of Property ordered to make any modification  
2 to the title or ownership of INAGROSA in this case, nor  
3 is it ordered that there be any conveyance, modification  
4 or extinction of any right. The order doesn't say so.

04:00:48 5 And the second judicial order has to do  
6 with the preventive annotation, only orders the  
7 preventive annotation in connection with the decision.  
8 But no order is given as to any change or modification  
9 of title, conveyance of the right or extension of the  
04:01:11 10 ownership right that the owner has in connection with  
11 that piece of property.

12 Now, a few words about these documents,  
13 and I think that I would like to explain legally how is  
14 it that these things are created or organized.

04:01:32 15 On the screen you can see the top section  
16 of one of the record books. This is the real property  
17 book. On the left you're going to see that it says  
18 preventive annotations, then records, and then it says  
19 cancellations. And there is a legal explanation for  
04:01:57 20 these terms.

21 Article 40 of the General Law on Public  
22 Records specifically indicates that you can enter  
23 information on the record. That is to say you enter the  
24 information as such. You record it. That entry under  
04:02:17 25 article 40 of the law can be for registration, for a

04:02:24 1 presentation, or it can be a preventive annotation.  
2 If you have a judicial order or if there  
3 is a preventive annotation that needs to be tendered,  
4 you enter it under preventive annotation, under that  
04:02:41 5 column. If you want to record a piece of property, what  
6 you do is you record it where it says "records."  
7 Here, you can see a related certificate.  
8 It says at the top "Related Certificate." The General  
9 Records Law makes reference to these types of  
04:03:09 10 certificates, but the regulations of the law explain to  
11 us what a literal certificate and a related certificate  
12 are.  
13 Article 138 of the regulation of the  
14 General Law on Records indicates that the literal  
04:03:26 15 certificate may be those providing exact information of  
16 the entry in question. What entry could it be? It  
17 could be a preventive annotation or it could be records.  
18 These are the literal certificates, but  
19 the related certificate technically provide more  
04:03:55 20 information of the entry, and you can see what the  
21 encumbrances are. You can see annotations. You can see  
22 the boundaries of the property.  
23 So here, you can also see that this  
24 certificate, this related certificate, says here  
04:04:19 25 "Current owner." The current owner is Inversiones



04:04:22 1 Agropecuarias S.A.

2 To the right, top right, you can see that  
3 it says "Ownership percentage, 100." This represents  
4 the interest that that titleholder has, that the owner  
04:04:42 5 has.

6 Article 41 of the General Law on Records  
7 provides that the information on the record shall show  
8 the percentage of the interest of ownership that the  
9 titleholder has. That is what it says here, "ownership  
04:05:02 10 percentage, 100 percent."

11 If you have a shared property, if you have  
12 co-ownership, then the percentage would be different.

13 For example, if we have two co-owners, it  
14 may say here person A, 50 percent, person B, 50 percent,  
04:05:22 15 and that would constitute 100 percent ownership.

16 This is not the case here. Inversiones  
17 Agropecuarias holds 100 percent of the title. Where it  
18 says here "Data of the Requested Entry," this is the  
19 information requested in connection with this entry,  
04:05:48 20 No. 6. Unfortunately, it's been reduced, but if you  
21 look at the second column and you look at this red  
22 circle, it says Entry and No. 6.

23 What does it mean? It means that this  
24 property was entered under this entry.

04:06:08 25 Now, if you would like to look at this

04:06:10 1 relationship, you're going to see a request for a  
2 literal certificate.

3           This literal certificate provides  
4 information of the entry that the requester has asked  
04:06:26 5 about. Here, it says that the requester is Inversiones  
6 INAGROSA, and it asked for Entry No. 2 on the column  
7 called "Preventive Annotations."

8           What kind of information are they going to  
9 receive after putting in this request?

04:06:46 10           Well, here we have the literal  
11 certificate. On the right, you're going to see the data  
12 of the entry requested. To clarify any confusion, I  
13 would like to clarify that.

14           Here you can see the record and the reason  
04:07:15 15 why the record was made. This is making reference to  
16 the protective measure.

17           So who are the participants in connection  
18 with this entry? When the registry receives an order,  
19 it identifies the parties, the participants, if you  
04:07:30 20 will, Riverside Coffee, LLC, and the State of Nicaragua.  
21 When a request is made for a literal certificate and you  
22 specify the entry you would like to find, this is the  
23 result. You see here the ownership data, it belongs to  
24 Inversiones Agropecuarias, and then it says "Data  
04:07:56 25 related to the entry requested."

04:07:59 1                   What information is shown here? Well,  
2 here you were asking about Entry 2 under the preventive  
3 annotations column, then you're going to get the  
4 information in that entry. It says here Riverside  
04:08:19 5 Coffee, owner, but it doesn't mean the ownership of the  
6 property. It refers to who participated in that entry.  
7 Participants: Riverside Coffee and the State of the  
8 Republic of Nicaragua. Because this second entry here  
9 is the entry that had been requested, and this is how an  
04:08:44 10 entry works. This is how a literal certificate works.  
11                   If you look at this, you're going to see  
12 two documents. You're going to see here that Hacienda  
13 Santa Fé has two registration accounts. You can  
14 identify here current owner, Inversiones Agropecuarias  
04:09:10 15 SA, and then ownership right, 100 percent. And here you  
16 can see the number of the farm and the NAP number, which  
17 is the ID number. It's called in Spanish número  
18 absoluto de propiedad, absolute property number.  
19                   So when we're talking about the data of  
04:09:32 20 the entry requested, and here it says Republic of  
21 Nicaragua and Riverside Coffee, here they're not making  
22 reference to the titleholder of the property. It refers  
23 to who is this entry made in favor of.  
24                   Now, the judicial custodian has to keep  
04:09:54 25 the property in the condition it received it. The

04:09:59 1 judicial order does not state the obligations of the  
2 judicial custodian, but the Code of Civil Procedure  
3 fills this gap because, in Nicaragua, it is understood  
4 that those provisions are to be found in the codes and  
04:10:17 5 in the laws.

6 Article 356 indicates the obligations of  
7 the custodian. It's not that the custodian has a blank  
8 check. No. The custodian has to meet these  
9 obligations. And you can see in yellow the obligations:

04:10:37 10 "Preserve the assets deposited or in  
11 custody as received following the judicial authority's  
12 order and at all times allowing the parties and the  
13 judicial officer appointed to such end to access the  
14 assets for inspection purposes."

04:10:52 15 Now, let us be clear, and let us say that  
16 the urgent protective measure has been based at all  
17 times on procedural law, in this case in the provisions  
18 of the Civil Procedure Code. But as a reference, you  
19 can resort to the Civil Code, and the Civil Code says  
04:11:16 20 the following:

21 "The depositary is obliged under Article  
22 3461 to provide custody of the deposited property with  
23 due diligence, that is, with due diligence."

24 And at 3480, it says:

04:11:32 25 "The depositories shall return the goods

04:11:35 1 deposited whenever depositors so claim."

2 At any time the property may be returned.

3 Now, the protective measures did not limit

4 INAGROSA'S property right and its prerogatives to sell

04:11:52 5 or establish liens on the property. Article 112 of the

6 General Law on Public Records provides that real

7 property or rights in rem on which a preventive

8 annotation has been made may be disposed of or

9 encumbered. The law provides that possibility to the

04:12:21 10 party having a preventive annotation, and that piece of

11 property may be encumbered and disposed of.

12 And, of course, the urgent measure can be

13 granted without any need of notice ex parte. So at

14 article 380, you can clearly see that you do not need to

04:12:47 15 hear the other party. There's no need to hear the

16 opposing party. This in connection with processing

17 hearing of urgent provisional protective measures. Now,

18 they said this is against due process of law.

19 That's false because the article indicates

04:13:05 20 here that it is not necessary to hear the other party

21 for the urgent protective measure to be granted.

22 Now, the lack of notice of the order

23 granting the urgent provisional measure did not preclude

24 the filing of an objection against it. This is clear.

04:13:27 25 But a discussion ensued as to whether the action was

04:13:33 1 voidable or null and void. The affected party always  
2 had the opportunity to appeal or to challenge if the  
3 party understands that the action is voidable or it is  
4 null and void.

04:13:51 5 I think, according to my analysis, that  
6 you are addressing this act of communication. And my  
7 legal basis is article 144. In this case it was a lack  
8 of communication, relative nullity and rectification  
9 notices. If one of the parties considers that nullity  
04:14:16 10 has come against it, then it can challenge the action  
11 because the action is null, it considers.

12 What happens if it doesn't do it in its  
13 first appearance before the court? If you look at  
14 article 144, here we can see that the nullity will be  
04:14:49 15 valid if it's not presented in the first appearance.  
16 But since no report was made, this is validated.

17 This is important because there was a  
18 debate here as to whether the action was voidable or  
19 null and void. One of the tenets was that Riverside or  
04:15:15 20 INAGROSA, under Nicaraguan law, well, they said that  
21 there was no mechanism to challenge. But there is a  
22 mechanism to challenge, and the parties can resort to  
23 this legal analysis, whether under a voidable situation  
24 or a null and void situation.

04:15:34 25 There's something important as well that

04:15:36 1 needs to be looked at. This protective measure was not  
2 forever. It had a two-year term. So, legally speaking,  
3 if you allege a certain damage, then the term would have  
4 expired after two years. But there was a renewal of the  
04:16:05 5 protective measure. Notice was given, but the thing  
6 that was questioned was that there was a signature there  
7 from a security guard. Article 149 of the Code of Civil  
8 Procedure makes that possible, if a party is not to be  
9 found, the notice giver says this person refused to  
04:16:36 10 sign, and this is article 149 of the Civil Code.

11 Now, because of issues of time, I'm going  
12 to talk about the private wildlife reserve, and there  
13 are three points that I addressed in my expert report.

14 First, I defined what a private wildlife  
04:17:03 15 reserve is. Then I said that the PWR is incompatible  
16 with an expansion project of an agricultural plantation.  
17 And also I assessed the administrative act declaring the  
18 area as a PWR.

19 Now, the legal basis of a PWR, this is  
04:17:29 20 important for us to look at this incompatibility. The  
21 private wildlife reserve is very specific purpose-wise  
22 and is based on certain principles. If we look at  
23 Decree 01-2017 on protected areas, well, we see there a  
24 number of definitions. And a private wildlife reserve  
04:17:55 25 is a private area dedicated to the conservation,

04:18:02 1 preservation and care of flora and fauna and of areas  
2 that are recognized as such by MARENA.

3           What is conservation, and what is  
4 preservation? Article 3, section 6 defines that  
04:18:21 5 conservation is a series of acts of maintenance, care  
6 and preservation. This idea of preservation is defined  
7 by the law in subparagraph 25. "To preserve," it says,  
8 "is to ensure the original status of the protected area  
9 with a minimum human intervention." So the idea is to  
04:18:51 10 preserve it, not to modify it, to change it. And then  
11 the reserve may be constituted.

12           The General Law on the Environment and  
13 Natural Resources, in articles 17 and 18, says something  
14 that is quite important, that private wildlife reserves  
04:19:14 15 are included in the national system of protected areas.  
16 Article 18 provides for the purpose of the private  
17 wildlife reserve. Article 17 emphasizes the fact that  
18 there is a permanent and full ban on forest resources.

19           Natural resources are the asset of the  
04:19:45 20 State. They don't belong to one person. And this is  
21 defined by article 64 of the General Law on Environment.

22           The right to property is also limited  
23 because article 4 of Law 217 creates this principle.  
24 The purpose of property is social and environmental, and  
04:20:16 25 absolute exercise of property rights is limited by the



04:20:20 1 provisions of this law, which is to say the protection  
2 of the environment.

3           So the use of land and everything else is  
4 governed by these provisions. If you transport or fell  
04:20:38 5 or market forest resources without a permit issued by a  
6 competent authority, that constitutes an offense. I  
7 cannot go out there and fell trees to try to get some  
8 kind of benefit. I need a prior permit for that because  
9 this is penalized by article 386 of the Criminal Code of  
04:21:08 10 Nicaragua.

11           In order to examine this from a legal  
12 viewpoint, it is important to look at this contrast.  
13 First, we have a series of actions that, based on the  
14 documents I've seen, are part of this arbitration case  
04:21:27 15 file.

16           There is an application from INAGROSA to  
17 create a private wildlife reserve. There are letters  
18 asking for support and for the proceedings to be made  
19 more expeditious. There is also a Rapid Ecological  
04:21:51 20 Study. This ecological study is a requirement that one  
21 needs for the land to be declared a private wildlife  
22 reserve.

23           So you can have a clear characterization  
24 of the area that is to be established as a private  
04:22:09 25 wildlife reserve and also how the requester of the

04:22:15 1 private wildlife reserve -- well, how is that person  
2 going to manage things, what is the commitment it has  
3 vis-à-vis the nation and what actions it is going to  
4 take. That is why a management plan is necessary.

04:22:29 5 So there's a previous commitment: If you  
6 want an area declared as a private wildlife reserve, you  
7 have to make commitments. And that is why we need to  
8 have these initial intentions.

04:22:46 9 In 2016, the application for a wildlife  
10 reserve was reestablished, and then MARENA provides in  
11 2016 a report. MARENA had clear objectives: To visit  
12 and verify that the information --

13 PRESIDENT: Now you are at your 30-minute  
14 limit, so you should wrap up in the next two minutes.

04:23:05 15 MR. SEQUEIRA: Excuse me, how many?

16 PRESIDENT: You have spoken for  
17 30 minutes, which is your allocation. You should wrap  
18 up in the next two minutes. You are now at 30 minutes,  
19 so please wrap up.

04:23:19 20 MR. SEQUEIRA: Very well. So if we  
21 compare these actions versus the actions that wanted to  
22 be taken to exploit this area, this forest area, well,  
23 they were seeking to obtain about 1,000 hectares to  
24 exploit the forest.

04:23:43 25 Here we see a request and the obligation

04:23:47 1 was to preserve the habitat, the forest area, and to  
2 protect the environment. But also they wanted to  
3 exploit the forest resources. They wanted to fell  
4 trees. They wanted to have a wood business.

04:24:06 5 Under Nicaraguan law, if we apply article  
6 24 and 25 of the Civil Code of Procedure, these are  
7 supplementary provisions, we could look at this from the  
8 viewpoint of legal scholastic opinion that talks about  
9 the theory of venire contra factum proprium.

04:24:27 10 If somebody wants to do something but at  
11 the same time that person does acts to the contrary,  
12 there is bad faith. Legally speaking, that individual  
13 would be lying.

04:24:44 14 INAGROSA indicated that it wanted to  
15 acquire a private wildlife reserve, but it had the  
16 intention of running a business. So under this theory  
17 of venire contra factum proprium, that would be bad  
18 faith. This is a legal assessment that the law allows  
19 me to do.

04:25:02 20 Legally speaking, one cannot have a  
21 private wildlife reserve declared and at the same time  
22 to exploit the forest resources and also to have a  
23 plantation of Hass avocados. Under articles 4 and 64,  
24 well, INAGROSA always had to ask for permits beforehand.

04:25:33 25 MARENA acted within the principle of legality when it

04:25:38 1 conducted its on-site visit.

2 Why am I making this statement? The law  
3 on the organization, jurisdiction and distribution of  
4 the executive branch of government includes a series  
04:25:55 5 of --

6 MR. APPLETON: For the record, we now have  
7 to object. I'll leave it to you, but we simply have to  
8 object. That's all. You understand why.

9 PRESIDENT: It's now well beyond  
04:26:05 10 30 minutes, so you need to stop, please.

11 MR. SEQUEIRA: Thank you.

12 PRESIDENT: It's over to Claimant for  
13 cross-examination, please.

14 **CROSS-EXAMINATION**

04:26:22 15 BY MS. CARDENAS:

16 Q. Good afternoon, Mr. Sequeira. Can you hear me  
17 well?

18 A. Yes, I can hear you well.

19 Q. My name is Cristina Cardenas, and I am one of  
04:26:32 20 the lawyers representing Claimant in these proceedings.

21 You understand, as a lawyer yourself, how  
22 a cross-examination works, right?

23 A. Correct.

24 Q. Today I'm going to ask you a few questions, and  
04:26:48 25 I'm going to ask you to please let me finish my question

04:26:53 1 before you provide your answer. Okay? You agree?

2 A. Okay.

3 Q. Okay. Thank you very much. You understand  
4 that an expert witness does not represent one of the  
04:27:09 5 parties in these proceedings?

6 A. Yes, I agree with that.

7 Q. You have stated in your report that, as an  
8 expert, you explained the legal logic and the way in  
9 which provisions work within the legal framework of  
04:27:29 10 Nicaragua, correct?

11 A. Correct.

12 MS. GONZÁLEZ: I thought that he didn't  
13 have his microphone on, but I think he just did. Thank  
14 you.

04:27:58 15 Q. As I was saying, you have told us that your  
16 role as an expert is limited to explaining the legal  
17 logic behind things, correct?

18 A. Correct.

19 Q. During your presentation you just said that you  
04:28:11 20 represent the State of Nicaragua?

21 A. No, I have never said that.

22 Q. In particular, you said -- I have the English  
23 transcript -- in English you apparently said that:

24 "The role of the depository is to prevent  
04:28:38 25 a potential harm that may occur to the refusal by the

04:28:42 1 Claimant to come to Nicaragua to receive the property  
2 and to prevent these damages or losses to be  
3 subsequently claimed against the party that I  
4 represent."

04:28:59 5 You remember saying this, that you  
6 represent Nicaragua?

7 A. That was just a citation, ma'am. What you are  
8 saying, that is in quotes, this is not a statement by  
9 me.

04:29:11 10 Q. You have just said here in your presentation  
11 today when you were explaining to the Tribunal, you said  
12 in particular, that you represent Nicaragua?

13 A. No, I have not said that. If you allow me,  
14 ma'am.

04:29:24 15 Q. Yes, of course.

16 A. When you read that, I don't know, perhaps if  
17 the transcript is okay in English. But I read a  
18 citation. It was a quote. This is a portion of the  
19 application for a provisional measure. The requester of  
04:29:43 20 the provisional measure, well, the representative was  
21 the Republic of Nicaragua. But I had nothing to do with  
22 that.

23 Q. But the transcript says what it says. The  
24 transcript says that you said that you represent  
04:29:55 25 Nicaragua.

04:29:57 1 A. But I would like to state that I do not  
2 represent Nicaragua. That is what the citation says.

3 Q. Very well. When did you obtain your degree in  
4 law?

04:30:13 5 A. 2011.

6 Q. 2011. And since your graduation as a lawyer,  
7 you have mainly been an academic, working in the  
8 academic sector, correct?

9 A. Yes, I have been able to balance my  
04:30:30 10 professional life with the academic life. In the school  
11 where I worked, we had the obligation to work, not just  
12 to be a professor. We were not just desk professors,  
13 but we had the obligation to work, to practice the  
14 profession. So I led the conflict area. I was training  
04:31:01 15 the people that were providing service to the community.

16 Q. Very well. Now, one of the universities where  
17 you have worked is the polytechnic university known as  
18 UPOLI from Nicaragua, correct?

19 A. Yes.

04:31:25 20 Q. And are you still working for UPOLI?

21 A. No.

22 Q. And you also mentioned that you were a  
23 professor there, correct?

24 A. Yes.

04:31:33 25 Q. And are you still a professor at UPOLI?

04:31:37

1 A. No.

2

PRESIDENT: Please wait for a moment before you answer the question because there is court reporting going on and interpretation. So otherwise you

04:31:48

5 overlap and we are not going to have a proper  
6 transcript. So wait a moment before you answer the  
7 question.

8

Q. I will also try to slow down for the purpose of the transcript and also to facilitate the work of our interpreters.

04:32:05

10

11 Now, you also mentioned that you worked at  
12 the National Polytechnic University, correct?

13

A. The National Polytechnic University.

14

Q. UNP Managua?

04:32:27

15

A. Yes.

16

Q. How long did you work there?

17

A. That would be UPOLI. UPOLI was a private university. Later on it became public, and I worked about a month there.

04:32:49

20

Q. So between March 2022 and May 2022?

21

A. Yes, about that time.

22

Q. So that would be more than a month?

23

A. Yes.

24

Q. And during the time you were working for UNP,  
25 you mentioned that the State managed UNP. Is that the

04:33:03



04:33:09 1 Nicaraguan State?

2 A. Yes. UNP is a government-run university.

3 Q. It used to be private, but now it's public  
4 because the State took control of UNP -- UPOLI rather?

04:33:23 5 A. Yes. It was declared a public university.

6 Q. Yes, because the government took control of  
7 what used to be a private university, correct?

8 A. Technically.

9 Q. During the time that you worked for UNP, your  
04:34:02 10 salary was being paid by the Nicaraguan State, correct?

11 A. Out of the budget.

12 Q. Okay. But it was being paid by the State of  
13 Nicaragua, yes or no?

14 A. Yes.

04:34:24 15 Q. In your report -- in your opinion you also said  
16 that you advised the Supreme Court of Nicaragua,  
17 correct?

18 A. Could you please tell me where I say that?

19 Q. Page 119 of your statement where you mention  
04:34:46 20 that you have been a consultant to the Supreme Court of  
21 Justice 2022 for the creation of the new mediation  
22 model. Do you remember adding that to your opinion?

23 A. Yes. I'm a legal consultant, and we did that  
24 as part of a bidding process. People compete.

04:35:10 25 Q. So you were part of a bidding process to be a

04:35:13 1 consultant for the Supreme Court?

2 A. I wouldn't say that I work for them. This is a  
3 professional service that I provided; that is, it was a  
4 contract.

04:35:27 5 Q. So you provided services, professional services  
6 for the Supreme Court of Justice?

7 A. As a consultant.

8 Q. And who paid for your salary for the services  
9 that you provided?

04:35:41 10 A. Just to clarify, when you're saying salary,  
11 that would mean a work relationship. But there was  
12 none.

13 Q. That is the answer. Yes, I understand your  
14 answer. But you received money for the work that you  
04:35:57 15 provided?

16 A. For the services provided.

17 Q. And who paid that money to you?

18 PRESIDENT: Please slow down. Put  
19 something on your finger.

04:36:10 20 MS. CARDENAS: I have my co-counsel, yes.

21 PRESIDENT: Somebody has to -- you have to  
22 develop a reflex. When there is a question, wait for a  
23 second before you answer. The same thing with the  
24 question. It's not difficult.

04:36:27 25 Q. Now, at some point in your professional career,

04:36:32 1 have you been a consultant for the Office of the  
2 Attorney General of Nicaragua?

3 A. Yes.

4 Q. Could you please tell us the type of work that  
04:36:42 5 you have developed for the Office of the Attorney  
6 General of Nicaragua?

7 A. For the representation --

8 PRESIDENT: Mr. Sequeira. Remember? You  
9 answered immediately. I will keep reminding you until  
04:36:57 10 you learn.

11 Q. You told us that you represented the Republic  
12 of Nicaragua as part of a proceeding. Could you please  
13 tell us a little bit more the type of proceeding whereby  
14 you represented Nicaragua?

04:37:22 15 A. It was an arbitration related to construction.

16 Q. And when did that arbitration take place?

17 A. In the early part of the second half of last  
18 year.

19 Q. How long did that process last?

04:37:58 20 A. Not too long. It was something quick because  
21 the other party just withdrew.

22 Q. Would you agree with me that anywhere in your  
23 report you mentioned having represented Nicaragua last  
24 year?

04:38:17 25 A. I believe that I mentioned that I provided the

04:38:20 1 service.

2 Q. On behalf of the State of Nicaragua?

3 A. To the institution in particular.

4 Q. What institution?

04:38:32 5 A. The Office of the Attorney General. Let me  
6 restate. The Ministry of Transportation and  
7 Infrastructure.

8 Q. Just a second. We're going to review because I  
9 do not think that this is included in your report.

04:38:49 10 Now, after graduating from the school of  
11 law, you got a Master's degree in Labor Law?

12 A. Labor Business Law.

13 Q. But labor?

14 A. I understand that when you hear labor, it is  
04:39:11 15 just Labor Law. But it is Labor Business Law. So that  
16 expands the scope of the work and the curricula that I  
17 attended. So it's not just Labor. Labor/Business.

18 Q. Now, you also mentioned that you got a Ph.D. in  
19 Law on New Trends of Law in the 21st Century, correct?

04:40:02 20 A. Correct.

21 Q. You have not identified having obtained any  
22 specialization in administrative law or commercial law,  
23 correct?

24 A. No. The Ph.D. was on the New Trends in Law,  
04:40:22 25 and the law is broad, as you would know, and the

04:40:28 1 Ph.D. -- as part of the Ph.D., we analyzed procedural  
2 law, substantive law, and also the new trends in the  
3 21st century.

04:40:47 4 Q. I have reviewed Annex A-001 that you have  
5 attached to your report where you identified several  
6 articles that you have authored, and I see that, in  
7 addition to an article on Virtual Education and another  
8 article on the Crisis of Development, all of the  
9 articles that you mentioned are related to conflict  
04:41:18 10 resolution, correct?

11 A. That is correct.

12 Q. You never worked for a bank, correct?

13 A. For a bank? No.

14 Q. You never worked in the finance area?

04:41:34 15 A. No.

16 Q. And you also mentioned in your opinion that  
17 you -- do you ever mention that you're an expert in  
18 Administrative Law in your report?

04:41:49 19 A. I do not mention it, but I mention that I work  
20 in the academic sector. So in particular with the  
21 Polytechnic University of Nicaragua, I taught  
22 Administrative and Constitutional Law as well as the  
23 introduction to the General Process and Jurisdictional  
24 Law, and I also taught the theory of Procedural Law.

04:42:17 25 Q. In your report you do not mention being an

04:42:20 1 expert in Nicaraguan Environmental Law, correct?

2 A. No, but if you allow me, in my resumé, as part  
3 of the articles, I include a book that is called  
4 Ecologic Transformation, Green Transformation. I worked  
04:42:42 5 with German cooperation and we were looking into the  
6 green social transformation, and since I am an attorney,  
7 I worked on the legal aspect of this green  
8 transformation and this also analyzes the environmental  
9 regulations in Nicaragua.

04:43:05 10 Q. Mr. Sequeira, I also see in your report you  
11 have not included a list of cases that are  
12 representative of the work that you have done, correct?

13 A. Yes. I assumed that because of the principle  
14 of confidentiality, I couldn't mention that. That's my  
04:43:22 15 assumption.

16 Q. But in particular, you do not refer to the fact  
17 that you previously worked for transportation and  
18 infrastructure ministry in Nicaragua?

19 A. Correct.

04:43:35 20 Q. Don't you think that that would be information  
21 that could be of interest to the Tribunal since you are  
22 here as an independent expert?

23 A. As you may understand, lawyers are subject to  
24 confidentiality and the principle of ethics. So I  
04:43:56 25 didn't deem it was a good idea to mention who my clients

04:44:00 1 are because if I mention my private clients, because of  
2 confidentiality, I thought I couldn't include it.

3 Q. The transcript says whatever it says, but I  
4 recall that when I first asked you details about this  
04:44:14 5 case, you said that you thought that you included it in  
6 your opinion, but now you're telling me you didn't  
7 include it in the opinion because it was confidential?

8 A. In that specific case you asked me, but now  
9 you're asking me about other cases and I did not include  
04:44:30 10 other cases.

11 Q. The transcript speaks for itself. We are now  
12 going to refer to the protective measure that was  
13 requested by the Office of the Attorney General in  
14 connection with Hacienda Santa Fé. As you mentioned in  
04:44:49 15 your presentation, in your opening, that measure was  
16 requested on an urgent basis, correct?

17 A. Yes.

18 Q. Therefore, I understand that that order was  
19 issued without the presence of Riverside, correct?

04:45:03 20 A. That was the procedure.

21 Q. And that measure was requested against  
22 Riverside, correct?

23 A. That's right. But not against INAGROSA.

24 Q. Well, from a legal -- yes or no, was it  
04:45:19 25 requested against INAGROSA or not?

04:45:21 1 A. Yes.

2 Q. Let us look at it.

3 A. You asked me first if it was against Riverside.

4 Q. Was the measure requested against Riverside,

04:45:30 5 yes or no?

6 A. Yes. The right of the other party was

7 identified to be able to relay the protective measure.

8 Q. Just a second. But the measure was not

9 requested against INAGROSA?

04:45:47 10 A. No.

11 Q. INAGROSA is the entity that owns Hacienda

12 Santa Fé, correct?

13 A. Correct.

14 Q. And we have seen that that measure was issued

04:46:04 15 by the court on December 15, 2021, correct?

16 A. Correct.

17 Q. We're going to look at article 380 of the civil

18 procedural code. You are going to see the document on

19 the screen, and if you need me to zoom in so that you

04:46:25 20 can properly review it, please let me know.

21 This is RL-191. Very well. And you will

22 see that it reads that when the applicant requests

23 that --

24 A. I can only see the English version.

04:48:19 25 Q. You have the Spanish above. You have it in



04:48:23 1 English and Spanish.

2 A. Okay, thank you. Yes, I see it.

3 Q. And this article indicates that whenever the  
4 applicant requests that urgent protective measures be  
04:48:35 5 adopted without a hearing, the opposing party shall  
6 state the relevant reasons -- the applicant shall state  
7 the relevant reasons alleged that a hearing may  
8 jeopardize the success of the provisional protective  
9 measure.

04:48:50 10 I am going to stop here because I heard  
11 you say that this order was issued because Riverside  
12 attorneys had indicated that they could not travel to  
13 Nicaragua to receive the property.

14 Do you recall saying that?

04:49:04 15 A. No, I did not say that. I only read the  
16 citation. But that is not what the citation says. So  
17 if you allow me, can I elaborate?

18 Q. Yes.

19 A. So for the party to come to Nicaragua to  
04:49:33 20 receive the real estate.

21 Q. So you told us that Riverside attorneys had  
22 said that they couldn't travel to receive the property,  
23 and that is the reason given to the court to issue the  
24 order?

04:49:42 25 A. I cited what we see in the application.

04:49:47 1 Q. Yes, but I'm going there. At some point in  
2 time have you seen any evidence that indicates that  
3 Riverside attorneys said that they could not travel to  
4 Nicaragua?

04:50:04 5 A. There was an exchange of communications whereby  
6 the property was offered, and as we would say, there was  
7 an offer and there were some letters that were presented  
8 that show that they do not agree. But at the end of the  
9 day, the last one that had to do with the renewal of the  
04:50:29 10 measure, there was a complete rejection.

11 Q. Would you agree with me that the letters that  
12 you referred to are dated after the issuance of the  
13 order of December 2021?

14 A. I do not recall the dates. If you want -- I  
04:50:56 15 would appreciate if we could look at them.

16 Q. Let me tell you that those letters were issued  
17 after December 2021, and I'm asking you whether you have  
18 seen anything that proves that, before December 2021,  
19 Riverside counsel stated [to] Nicaragua's counsel that  
04:51:18 20 they could not travel to Nicaragua to accept the  
21 property?

22 MS. GONZÁLEZ: I apologize, Mr. President.  
23 I would like to object. She is characterizing something  
24 when we know that on the record there are letters prior  
04:51:34 25 to December 2021. At any rate, she is asking factual

04:51:39 1 questions to the expert.

2 MS. CARDENAS: I will move on, but I will  
3 note that during his opening he said that the order was  
4 granted because the lawyers for Riverside had said that  
04:51:50 5 they could not travel to Nicaragua. That is the only  
6 reason I stopped here. But I'm happy to move on, sir.

7 PRESIDENT: Please move on.

8 MS. CARDENAS: I will.

9 Q. Now, article 380 continues by indicating that  
04:52:16 10 in this case, the judicial authority will resolve its  
11 adoption within three days as of the presentation of the  
12 application and also reasoning on the measure and also  
13 the reasons to accept it without hearing the other  
14 party, the opposing party. Do you see that?

04:52:38 15 A. Yes.

16 Q. And it also adds that there is no appeal  
17 against the order. Do you see that?

18 A. Correct.

19 Q. Yes. And then it says, in the next paragraph,  
04:52:51 20 that at the time of executing the protective measure,  
21 the affected person shall be notified of the order  
22 providing a copy of the application so that they may  
23 exercise their right to oppose if they so wish. Do you  
24 see that?

04:53:10 25 A. Yes.

04:53:12 1 Q. Now, let us look at the order of December 15,  
2 2021, C-251. In particular, I am going to refer to item  
3 5, page 5 of 5. And you will see there in the last  
4 line, you see the declaration that indicates that:

04:54:09 5 "No appeal may be filed against this order  
6 in accordance with article 380 of the procedural code."

7 A. Yes, I see that.

8 Q. Let us look at the previous paragraph, No. 4,  
9 as for the notice to be served in connection with the  
04:54:36 10 order. In particular, it mentions that when the  
11 protective measure is enforced, a copy of the request  
12 letter is to be given to the person impacted by the  
13 measure so that the person may exercise their right of  
14 opposition or may challenge it on the third day as of  
04:54:55 15 the notice that was served and the party that was  
16 impacted by this order -- the affected party -- may  
17 propose the evidence that it intends to use to  
18 substantiate his opposition.

19 So article 380 provides, as we see in the  
04:55:17 20 order, that there is a need to serve notice and also  
21 once the notice has been served, the party that has  
22 received the notice can challenge the order within  
23 three days of the notice, correct?

24 A. Yes.

04:55:37 25 Q. And those three days are counted as of the day

04:55:40 1 that the notice is served, correct?

2 A. Correct.

3 Q. As we have seen, and I have also read your  
4 report in detail, you are not disputing that Riverside

04:56:00 5 was served notice. I am going to also add that you may  
6 mention that in 2024 you were served notice, but just to  
7 confirm that the questions I am going to ask you now are  
8 in connection with what happened in 2022, correct?

9 A. Yes.

04:56:18 10 Q. In your report you did not mention, or you did  
11 not object to the fact that Riverside was not served  
12 notice in 2022, correct?

13 A. I didn't have evidence to refer to that.

14 Q. Not even in 2023, correct?

04:56:38 15 A. We're talking about the preventive annotation?

16 Q. I'm asking about the request of the protective  
17 measure and also the order issued on December 15, 2021.

18 A. So December 15, 2021 and January.

19 Q. Well, I'm talking about the order.

04:57:05 20 You have not seen any evidence that those  
21 documents were notified to Riverside?

22 A. No, I have not seen any written evidence.

23 Q. Do you know if at any point in time the Office  
24 of the Attorney General attempted to serve notice to

04:57:26 25 Riverside to include those documents?

04:57:36 1 A. Yes, a reference is made to that on the record,  
2 yes.

3 Q. Where?

4 A. I don't know whether we could review the  
04:57:49 5 notices that were reported. I apologize. I do not know  
6 the numbers of your documents as you number them.

7 Q. If you could please describe the document, we  
8 can look for it. And, again, I am talking about what  
9 happened in 2022 and 2023.

04:58:10 10 A. That was a notification document.

11 Q. We will look for it.

12 We will look for it, and if attorneys for  
13 Nicaragua know of a document showing that there was an  
14 attempt to notify Riverside in 2022/2023, clearly they  
04:58:40 15 will show it to us.

16 Now, you asked -- did you ask Nicaragua's  
17 lawyers whether they had attempted to serve notice to  
18 Riverside in 2022 or 2023?

19 A. No, I did not ask that question. I only  
04:59:04 20 reviewed the documents, revised the documents that are  
21 mentioned in my expert report.

22 Q. Didn't you think that that was a relevant  
23 question, given the content of your report?

24 A. Not in my opinion. Only the documents that I  
04:59:21 25 reviewed.

04:59:24 1 Q. Do you know that the fact that Riverside was  
2 not served notice was due to the fact that the  
3 government of Nicaragua did not want Riverside to  
4 challenge the order issued on December 15, 2021?

04:59:42 5 MS. GONZÁLEZ: I apologize. I am going to  
6 object. Mr. President, she's asking the expert to  
7 speculate as to what the Office of the Attorney General  
8 may have thought at the time of serving the notice.

04:59:59 9 MS. CARDENAS: What questions he asked in  
10 preparing this report as to what efforts were made to  
11 notify Riverside. It's a critical point to his report.  
12 I think it's a very valid question, sir.

13 PRESIDENT: If you put the question in  
14 those terms, that's fine. Proceed.

05:00:17 15 Q. You have indicated to us -- you've told us that  
16 you know what efforts were made by the Republic of  
17 Nicaragua to notify Riverside in 2022 or 2023. Do you  
18 know?

05:00:45 19 A. No, as I said, I have only seen the documents  
20 that I list in my expert report.

21 THE INTERPRETER: The interpreter requests  
22 that the expert approach the microphone more. Very  
23 difficult to hear him, and I did not translate the last  
24 piece, so sorry.

05:01:02 25 PRESIDENT: Professor Sequeira, you need

05:01:03 1 to be closer to the microphone. The interpreter doesn't  
2 hear you.

3 MR. APPLETON: Can we ask (no microphone).

4 PRESIDENT: Please repeat.

05:01:29 5 Q. Do you have any knowledge of what effort was  
6 made by the Attorney General's office to notify  
7 Riverside in 2022 or 2023?

8 A. The Attorney General's office notify?

9 Q. Anyone in the State of Nicaragua, in Nicaragua,  
05:01:48 10 the country, on behalf of Nicaragua?

11 A. At this time, I don't recall.

12 Q. You don't recall. Okay.

13 You mentioned the 2022 mandate, the 2022  
14 order requiring that a preventive annotation be included  
05:02:19 15 in the public registry. Let's look at that document --

16 No. No need to look at the document, but  
17 you do tell us in your report that all of the  
18 information contained in the certificates is presumed to  
19 be precise and true, correct?

05:02:43 20 A. Correct.

21 THE INTERPRETER: Accurate and true.

22 Q. And you mentioned that the purpose of  
23 preventive annotations is for someone who has a  
24 legitimate interest to be able to identify the burdens  
05:02:57 25 or encumbrances therein?



05:02:59 1 A. Yes, in order to publicize it.

2 Q. But to show a legitimate interest, one must  
3 show it, correct?

4 A. Yes.

05:03:09 5 Q. And normally that is done through a special  
6 Power of Attorney, for example, correct?

7 A. Correct.

8 Q. In other words, a person cannot go -- your  
9 neighbor, say, who has no interest in the property,  
05:03:23 10 cannot go and request information from the public  
11 registry, correct?

12 A. One can consult it electronically.

13 Q. But they cannot obtain the documents from the  
14 registry, correct?

05:03:35 15 A. In that case, one would have to make the  
16 showing.

17 Q. One would have to make the showing. Thank you  
18 very much.

19 A. Question: am I speaking at an adequate volume?  
05:03:46 20 I'm not sure if I'm being heard.

21 THE INTERPRETER: Interpreter indicates  
22 that, yes, it's fine.

23 Q. I can hear you very well.

24 Now, I'd like to understand your opinion  
05:04:01 25 regarding the commercial impact that preventive

05:04:06 1 annotations may have on the title of a property. We're  
2 going to look at the document C-269, which you've  
3 already mentioned.

4 PRESIDENT: Ms. Cardenas, you think you  
05:04:22 5 will go until 6:00?

6 MS. CARDENAS: No. I think we can get it  
7 done, sir. It's not my intention.

8 PRESIDENT: That's fine. Because if we go  
9 on until 6:00, we should have a brief break for the  
05:04:37 10 benefit of the court reporter and the interpreter.

11 MR. APPLETON: May I? Mr. President, we  
12 believe that we'll be able to finish this and perhaps  
13 even be able to finish his redirect this evening, too.  
14 But perhaps it would be good wherever you want a little  
05:04:58 15 break. I'm sure that the interpreters and the  
16 transcriptionists could use a little break soon. So  
17 we're in your hands, but we're intending to get this  
18 through and caught up.

19 PRESIDENT: I simply asked if you were  
05:05:17 20 going to 6:00.

21 MS. CARDENAS: I believe I can get it  
22 done.

23 Q. And in the section toward the bottom of the  
24 page where it says "annotations and liens," I see there  
05:05:46 25 that there's a section that refers to the act or

05:05:54 1 contract/modality. Then below that it says preventive  
2 annotations and official communication of protective  
3 measure. Do you see that?

4 A. Yes, that's what it says.

05:06:02 5 Q. Nonetheless, as we've already seen, up above  
6 where it says "data on the entry requested," it also  
7 says "belongs to Nicaragua," correct?

8 A. Under "data on entry requested."

9 Q. And it is your opinion that the reference  
05:06:21 10 "belongs to" has no meaning whatsoever, correct?

11 A. That's not what I said. What I say is that in  
12 this case, if you look at the end of where it says "data  
13 on entry requested," it speaks of the folio number of  
14 the entry and the entry requested is page or folio 2 of  
05:06:47 15 the preventive annotations.

16 When a person is going to request this  
17 document, they explain the entry to which it pertains.  
18 So in the -- what I indicate is what one requests, Entry  
19 2, preventive annotations, and that's why it's in the  
05:07:06 20 column under "Preventive annotations, registries and  
21 cancellations."

22 So if a person wants information on the  
23 column under "Preventive annotations," there's an entry  
24 that one includes. It has a number in the request. And  
05:07:23 25 in that case they ask for the information on Entry 2

05:07:27 1 under the column "preventive annotations." So the  
2 information reflected there is on the entry requested,  
3 and what entry was requested? The one on preventive  
4 annotation.

05:07:38 5 When it says "Pertenece A" it doesn't talk  
6 about the ownership but, rather, the relationship of the  
7 information requested "pertains to." Because the owner  
8 is indicated up above.

9 Q. But would you agree with me that "Pertenece A"  
05:07:54 10 is a very clear term that means "owner"? Yes or no?

11 A. I don't agree. You're misinterpreting it  
12 because it talks about the entry that is requested.

13 Q. But you would agree with me that it says  
14 "Pertenece A" and nothing else?

05:08:31 15 A. Yes. It's a reference to the entry requested.  
16 Excuse me. That is to say, in the eyes of a Nicaraguan  
17 lawyer, when we analyze this, looking at it in the  
18 context of the Nicaraguan system, this is  
19 understandable, because we're talking about the entry  
05:08:50 20 requested, not who does the property belong to.

21 It's clear that the information pertains  
22 to the entry requested, who it related to, of whom is  
23 the entry. And that's why it says State of the Republic  
24 of Nicaragua and Riverside because they are the ones who  
05:09:07 25 participated in this preventive annotation. That is the

05:09:10 1 information that is reflected in this certificate.

2 Q. But if I understand your testimony, then,  
3 Riverside and the State of the Republic of Nicaragua  
4 were both included because they are the parties to the  
05:09:30 5 protective measure proceeding. Is that your testimony?

6 A. The registration identifies them. The  
7 registrar -- the registry received the information. The  
8 person who entered the data interpreted that. That's  
9 why it is reflected as you see it.

05:09:43 10 Q. But wouldn't it have been clearer, then, to  
11 have said claimant and respondent?

12 A. This information answers to a computerized  
13 system. In other words, the use of terms is  
14 standardized. That's why under the column the  
05:10:05 15 reference -- the immediate guide is the title "Data on  
16 the entry requested." These are standardized language  
17 for these kinds of certificates. If you ask for other  
18 information, it would also say Pertenece A.  
19 Pertenece A.

05:10:26 20 Q. But you're not answering my question. I  
21 understand that it's a computerized system. My question  
22 is wouldn't it have been clearer had it indicated  
23 claimant, respondent or investor? Something that  
24 reflects that an effort is being made there to identify  
05:10:52 25 the parties to the protective measures proceeding?

05:10:56 1 A. Excuse me. As I see it, it's clear, so I can't  
2 agree with what you say. For me, it's clear because I  
3 understand what was requested was Entry No. 2 of the  
4 preventive annotations column.

05:11:12 5 So, for me, it's like an x-ray of what's  
6 been requested. If I am given a literal certificate,  
7 then I could read it because these are standardized  
8 terms, the results or output of a system. So the person  
9 who types in or enters the information, they can't  
05:11:31 10 change it because it's already set.

11 Q. You've told us that as a Nicaraguan lawyer,  
12 it's clear for you. But a person who has a legitimate  
13 interest in identifying the encumbrances and such that  
14 may be on the title for Santa Fé would see at least that  
05:11:54 15 the State of the Republic of Nicaragua has been included  
16 as a party that has some ownership interest?

17 A. Normally what people do in Nicaragua is turn to  
18 a lawyer, and the lawyer would give you the answer that  
19 I'm giving you.

05:12:12 20 Q. So one would have to consult a lawyer in order  
21 to get a response regarding the viability of this  
22 document, correct?

23 A. In the registry there are assistants who  
24 undertake to explain to the population -- well, because  
05:12:25 25 of this, because the population, when they come to the

05:12:28 1 registry, need help. And there are assistants who help  
2 them out, tell them which window to go to, which  
3 procedure to follow up, how to -- on what they need to  
4 write up. In other words, they're assisted when they  
05:12:42 5 seek information at the registry. They're not just all  
6 alone when they do so.

7 Q. Now, we have seen testimony and discussion  
8 regarding when Riverside found out about the protective  
9 measure, and in your report you tell us that it was 11  
05:13:10 10 November 2022 that Riverside was able to get a copy of  
11 the order of December from the judicial record. Is that  
12 correct?

13 A. As a matter of courtesy, could you please  
14 indicate to me?

05:13:23 15 Q. No problem.

16 This is paragraph 16.3 of your statement.  
17 I'll tell you the exact page in just a moment. That's  
18 on page 30, where you indicate in the last sentence of  
19 that paragraph -- the last two sentences of that  
05:14:02 20 paragraph -- you indicate that:

21 "Likewise, it became aware of the  
22 existence of a provisional measure through literal  
23 certificate that was received by Arias on November 1,  
24 2022, with the complete file number. Further, it also  
05:14:23 25 learned of the provisional measure on November 11, 2022,

05:14:26 1 after obtaining a complete and true copy of the case  
2 file."

3 Okay?

4 A. Yes.

05:14:37 5 Q. So we understand clearly that, as of  
6 11 November 2022, Riverside had obtained a copy of the  
7 order, correct?

8 A. Okay.

9 Q. But if I understand your report, you are of the  
05:14:56 10 opinion that Riverside, on learning of the order and  
11 knowing that there was a protective measure, and having  
12 obtained a copy of the judicial file, did not undertake  
13 a legal attack, correct?

14 A. Yes, it did not.

05:15:17 15 Q. And it should have done so?

16 A. Personally, if I were their lawyer, from a  
17 legal standpoint, yes, I would have done so.

18 Q. So let's look at this.

19 In particular, you have told us that  
05:15:42 20 Riverside should have presented a motion for annulment,  
21 correct?

22 A. Correct.

23 Q. And that is because Riverside could not file an  
24 opposition because it had not been formally notified of  
05:15:58 25 the order, correct?



05:16:04 1 A. Well, those are the facts that are set out in  
2 the documents.

3 Q. So the only appeal or remedy that Riverside had  
4 was the motion for annulment and not a motion to oppose,  
05:16:19 5 correct?

6 A. Yes, because as they say, they allege that they  
7 did not receive notice, and the only way to attack that  
8 would have been a motion for annulment.

9 Q. Okay. So now I have a couple of questions  
05:16:34 10 about nullity under Nicaraguan law.

11 I understand that nullity may be relative  
12 or absolute, correct?

13 A. Correct.

14 Q. And if there's absolute nullity, the vice  
05:16:52 15 cannot be cured, correct?

16 A. Yes, that's correct.

17 Q. In particular, the civil code, article 2204,  
18 stipulates that absolute nullity cannot be cured by a  
19 confirmation or ratification of the parties, correct?

05:17:20 20 A. Could you show me the article, please?

21 Q. Yes, no problem. Article 2204. RL-168, page  
22 205.

23 Okay. Absolute nullity may be alleged by  
24 anyone who has an interest in it and should, when it is  
05:18:08 25 in the record, be declared sua sponte, although the

05:18:12 1 parties -- even if the parties don't allege it -- and it  
2 cannot be cured by confirmation or ratification of the  
3 parties, not even due to a minor lapse that required --  
4 in which ordinary prescription is required.

05:18:26 5 A. This is the substantive provision that you're  
6 reading, right?

7 Q. I'm asking whether article 2204 says what I  
8 said it said?

9 A. Yes, for the rules -- for contract situations  
05:18:39 10 governed by the civil code, yes.

11 PRESIDENT: For the record, this is  
12 RL-168.

13 MS. CARDENAS: I'm sorry?

14 PRESIDENT: I was simply saying that for  
05:18:48 15 the record, this is RL-168.

16 MS. CARDENAS: Yes.

17 MS. GONZÁLEZ: And if it's possible to put  
18 the title of this section up so that the expert can  
19 situate himself?

05:19:05 20 Q. Now, the grounds for absolute nullity are  
21 established at article 213 of the Civil Procedural Code,  
22 correct?

23 A. I'm sorry. Now you're showing me something  
24 else.

05:19:34 25 Q. I'm going to show you article 213 of the Code

05:19:37 1 of Civil Procedure. Just a moment, please.

2 Okay. We see that the causes of absolute  
3 nullity -- well, there are several that are spelled out  
4 there -- but in particular I'm going to draw your  
05:20:15 5 attention to two of them: one, when they occur before a  
6 court that lacks objective or functional jurisdiction.  
7 Do you see that?

8 A. Yes.

9 Q. So when a procedural act occurs by or before a  
05:20:45 10 court that lacks objective or functional jurisdiction,  
11 it can result in absolute nullity, correct?

12 A. Correct.

13 Q. Okay. Now let us look at article 336 of the  
14 same Code of Civil Procedure.

05:21:34 15 PRESIDENT: For the record, this is  
16 C-0254.

17 MS. CARDENAS: I failed to mention that.  
18 I will do better moving forward.

19 Q. In the second paragraph, you see where it says  
05:22:32 20 that, "protective measures shall be decreed always at  
21 the request of a party and under its responsibility and  
22 may only affect property or rights of the parties to the  
23 proceeding," correct?

24 A. That is what it says.

05:22:48 25 Q. And as we've seen --

05:22:52 1 PRESIDENT: Do we have the provision on  
2 the record? You mentioned article 263 but we are not --

3 MS. CARDENAS: I'm sorry. To be clear,  
4 it's article 336 of the Code of Procedure, and it's  
05:23:02 5 document C-254.

6 Q. And this clause stipulates that a protective  
7 measure may not affect property or rights of parties  
8 that are not parties to the proceeding, right?

9 A. That is what the article says.

05:23:31 10 Q. And you have told us that only Riverside was a  
11 party to the proceeding, not INAGROSA, correct?

12 A. I have to explain this. Riverside was  
13 identified by the Republic of Nicaragua as an investor  
14 with interests in investment tied to Hacienda Santa Fé  
05:23:56 15 and INAGROSA, which would constitute a right, such that  
16 the judge interprets that the right to the investment  
17 that Riverside has, the investment affected by the  
18 measure is governed by this article. The article is  
19 clear when it says it may only affect property and  
05:24:15 20 rights. And one right is one that is being considered  
21 violated, which is the whole question of the investment  
22 that Riverside had with respect to the subject covered  
23 by the protective measures. So that's there in the  
24 article.

05:24:31 25 Q. My only point is that you have confirmed that

05:24:34 1 INAGROSA was not party to the process around the  
2 protective measure, correct?

3 A. I confirm how the relationship was from  
4 procedural subject to the protective measure.

05:24:50 5 Q. We can look at the document, no problem.

6 A. Okay.

7 Q. Fine. Let's look at the document.

8 Now, in the document up above, where it  
9 identifies the parties, mention is made only of

05:25:55 10 Riverside and the State of the Republic of Nicaragua,  
11 yes or no?

12 A. Yes.

13 Q. Okay. We're going to scroll down. And it  
14 identifies the Claimant as Riverside Coffee, LLC, and it  
05:26:33 15 makes no mention of INAGROSA. Yes or no?

16 A. Yes, it says that, Claimant.

17 Q. And the notification for Riverside, the only  
18 mention there is that Riverside is located at INAGROSA  
19 for purposes of receiving notice, correct?

05:26:58 20 A. That is what the request says.

21 Q. And apart from making reference to the title of  
22 Hacienda Santa Fé belonging to INAGROSA, no other  
23 reference is made to INAGROSA in this document. Do we  
24 agree on that?

05:27:13 25 A. I'm glad that you cite this document because

05:27:16 1 the -- how the relationship of Riverside's direct  
2 connection with INAGROSA and, therefore, Hacienda  
3 Santa Fé is spelled out because the document identifies  
4 Riverside as the one holding the right. And the keyword  
05:27:33 5 "right" enables the party requesting the measure to be  
6 identified as a party.

7           You yourself have read the article that  
8 says that it only affects the property and rights. So  
9 my view of the identification of the subject under that  
05:27:54 10 line was duly identified because it speaks of the  
11 existence of a right.

12           Now, furthermore, if you notice, it makes  
13 reference to Claimant and Respondent because this  
14 protective measure makes reference to the existence of  
05:28:12 15 this arbitration. In this arbitration the Claimant is  
16 Riverside, and the Respondent is Nicaragua.

17           Now, in the upper part of this document  
18 one situates -- I don't know if for purposes of the  
19 explanation you could scroll up -- it's very good to  
05:28:34 20 touch on this topic in order to explain how this  
21 structure of these kinds of briefs works in Nicaragua.  
22 Up at the top.

23           Now, what is indicated -- it's indicated  
24 briefly there because of the provisions that have to do  
05:28:56 25 with the office for the reception and distribution of

05:29:01 1 cases and memorials, which indicates to all litigating  
2 attorneys, those who are engaged in litigation, that  
3 when they file a brief, they should briefly identify the  
4 Claimant and the Respondent without explaining why they  
05:29:18 5 consider them to be Claimant or Respondent because it's  
6 in the document where the parties are spelled out more.

7           So it spells out -- it makes reference to  
8 the arbitration process. It talks about how Riverside  
9 is talking about a violation of a right, which is its  
05:29:39 10 investment, and in this case the requesting party has  
11 identified that -- well, as Riverside alleges the  
12 existence of a right, then it is immediately tied to  
13 article 336, which you showed me, and which says that it  
14 only affects property and rights of a party and a  
05:29:55 15 process. And so the question here, who are the parties  
16 in the arbitration proceeding, Riverside and Nicaragua.  
17 And the request is tied to this arbitration. So it's  
18 not a request that is disconnected from or divorced from  
19 this process, and that is why you'll see this structure.

05:30:17 20           This structure is widely used -- well, not  
21 widely used -- I'd say it's normally used in memorials  
22 in judicial proceedings in Nicaragua. So if you look --  
23 it's very brief up above. This is how it has to be in  
24 order to prevent the memorial.

05:30:35 25           Q. So just to understand what you've just tried to

05:30:37 1 explain to us, is it your opinion, then, that Riverside  
2 controls INAGROSA?

3 A. According to what is stated in the documents  
4 that Riverside has rights over INAGROSA. It is its  
05:30:52 5 investment. This is what the documents say.

6 Q. So if you harm INAGROSA, you harm Riverside,  
7 correct?

8 A. But this is disconnected from the fact. You're  
9 giving me a different context.

05:31:12 10 Q. If a harm is caused to Riverside, you cause a  
11 harm to INAGROSA. If you harm Riverside, you harm  
12 INAGROSA?

13 A. Riverside states that it has shareholdings over  
14 INAGROSA, if memory serves. It is identified as its  
05:31:32 15 investment in Nicaragua. A right that it has.

16 Q. So your opinion is that Riverside and INAGROSA  
17 are essentially the same?

18 A. They're different entities. They have  
19 different legal personalities. This protective measure  
05:31:53 20 is related to this arbitration. The person who wrote  
21 this document identifies the party to the proceeding,  
22 and the party to the proceeding in the arbitration  
23 alleges it has a right.

24 If we look at article 336, it says that  
05:32:09 25 the measure affects titles or rights that the parties



05:32:13 1 have in the proceedings.

2 In this arbitration one of the parties has  
3 stated that it holds an investment right. So, according  
4 to my legal analysis, it is clear why is it that  
05:32:28 5 Riverside has been identified here as a procedural party  
6 and not INAGROSA.

7 You also asked me, and I think we spoke  
8 about this, if there was a violation of a right, then  
9 they could appeal and say that nullity is here in  
05:32:46 10 question.

11 Q. I have questions about that, sir, so we're  
12 going to go and deal with that.

13 If these were different legal parties, why  
14 are we not including one into the other?

05:33:04 15 A. This in connection with the first application,  
16 right?

17 Q. Correct.

18 A. In this case the person preparing this pleading  
19 identifies the party to the proceeding. First, the  
05:33:23 20 protective measure is created because of this  
21 arbitration proceeding.

22 The intent here is to protect the right  
23 that Riverside states was violated. Riverside says that  
24 its investment right was violated. The Attorney General  
05:33:47 25 in this case under 336 identified correctly the parties.

05:33:56 1 If Riverside says that the investment it has entails a  
2 right, the investment it has in Hacienda Santa Fé, then  
3 Riverside can be identified as a party to the  
4 proceedings, and this is what they have stated in this  
05:34:16 5 document.

6 Q. You said that Riverside is a shareholder of  
7 INAGROSA, the owner of INAGROSA. What legal rights does  
8 Riverside have over INAGROSA?

9 A. I would have to look about the documents  
05:34:39 10 creating the company and the shareholding rights that  
11 they have. I cannot conduct this analysis.

12 MS. GONZÁLEZ: Mr. President, the  
13 shareholding or the percentage of the shareholding that  
14 Riverside has over INAGROSA, that's nothing that the  
05:34:57 15 expert talks about in his report.

16 MS. CARDENAS: (microphone off) a  
17 conclusion, a legal conclusion that by naming Riverside  
18 they're somehow including INAGROSA. So it is just, more  
19 than anything, trying to explore the outer limits of his  
05:35:11 20 opinion, given that this document is very clear that it  
21 only names Riverside.

22 PRESIDENT: I think the question was asked  
23 and answered, but if you want to follow up on that,  
24 that's fine.

05:35:24 25 MS. CARDENAS: That's fine.

05:35:31 1 Q. Let us look at article 213 of this Code of  
2 Civil Procedure. I'm going to finish this line of  
3 questions, and then we can take a break.

4 So article 213 of the Code of Civil  
05:35:56 5 Procedure -- this is C-254 -- and we were talking about  
6 the causes for an action becoming null and void. I'm  
7 going to refer you to 213, paragraph 4:

8 "Procedural actions will be null and void  
9 if there are no essential rules of procedure and if,  
05:36:35 10 because of that reason, the party became defenseless,"  
11 correct?

12 A. That's what the article says.

13 Q. In accordance with this article, a procedural  
14 act may be null and void -- okay, I'm sorry, let's  
05:36:57 15 see -- if there is a lack of defense, if the party  
16 cannot defend itself?

17 A. That is what the article provides.

18 Q. As you have explained, Riverside did not have  
19 the opportunity to challenge, to lodge a challenge,  
05:37:18 20 because no notice was given to it, and it didn't have  
21 the three days to lodge the challenge.

22 A. The judicial order gave life to the notice, to  
23 the term for the notice. That is why I am saying that  
24 this is voidable, not null and void.

05:37:40 25 Q. The fact that Riverside never got notice, this

05:37:43 1 meant that Riverside did not have an opportunity to  
2 lodge a challenge?

3 A. Yes, challenge. Yes.

4 Q. Thank you very much. We're being asked for a  
05:37:54 5 short break.

6 PRESIDENT: Okay. So we were slightly  
7 optimistic about the timing then.

8 MS. CARDENAS: There really is not that  
9 much left and I was very enthusiastic and optimistic.

05:38:10 10 PRESIDENT: No blame. Let's break for  
11 ten minutes only, not 15 minutes.

12 MR. APPLETON: Do you think we might get  
13 an indication from the other side whether they think we  
14 can finish the witness tonight? That would make a big  
05:38:23 15 difference.

16 PRESIDENT: It all depends how long you  
17 need. After the break we'll have 15 minutes left.

18 MR. APPLETON: So the question is do you  
19 think -- if we had an indication roughly, if they think  
05:38:33 20 they're going to be here for an hour and a half, then  
21 maybe that means the witness has to come back anyways,  
22 that might affect --

23 PRESIDENT: Well, let's first ask how long  
24 do you think you still need?

05:38:44 25 MR. APPLETON: We'll have to look at the

05:38:46 1 break. So we'll come back.

2 PRESIDENT: So it looks like we are not  
3 able to finish today. Let's break for ten minutes until  
4 17:50, and we will not go beyond 6:15.

05:38:59 5 MR. APPLETON: We will try to get this  
6 finished. That's why we were -- we were really hoping.

7 *(Brief Recess)*

8 PRESIDENT: Ms. Cardenas, please proceed.

9 BY MS. CARDENAS:

05:49:39 10 Q. We've been talking about voidable acts, and I'm  
11 going to ask you about that now, because before we  
12 talked about acts being null and void.

13 Let us look at article 215 of the Code of  
14 Civil Procedure, C-254, page 55. In particular, I'm  
05:50:06 15 going to refer you to the second paragraph where it  
16 says:

17 "In the cases of voidability, the parties  
18 at the first time possible, and before a decision ending  
19 the proceedings, may bring, in accordance with the  
05:50:35 20 provisions of this code, the voidability of the acts or  
21 some act in particular."

22 Do you see that?

23 A. Yes, I do.

24 Q. Let us look at R-152, page 242 on the pdf. And  
05:51:10 25 this is a decision issued by Judge Julio Cesar Blandón

05:51:20 1 dated 19 May 2022. Do you see that?

2 A. Yes.

3 Q. And here -- this is R-152. Is this the one  
4 that issued the protective measure? Is that the court  
05:51:46 5 that approved this protective measure?

6 A. Well, I'm looking at the title here, and it  
7 says Second Civil District.

8 Q. But in this decision, Judge Blandón indicated  
9 that, after looking at the finality of this decision, of  
05:52:13 10 this action requested by the Attorney General's office,  
11 of precautionary measure of deposit of real property and  
12 the registral annotation of the order, the definitive  
13 filing of the proceedings shall be ordered?

14 A. That's what it says.

05:52:32 15 Q. So he's closing the case file. Is that right?

16 A. Each judicial body holds a number of case  
17 files, and they have to send that to another office.  
18 That is what this is making reference to.

19 Q. It says here that the final archive of the  
05:52:57 20 proceeding shall be ordered, and it says here that no  
21 remedy may be brought against this decision, right?

22 A. Yes, that's what it says.

23 Q. We see here that, in May 2022, the definitive  
24 archive of the proceedings was ordered, correct?

05:53:21 25 A. Yes.

05:53:24 1 Q. This is before you told us that Riverside  
2 obtained a copy of the protective measure in  
3 November 2022, correct?

4 A. In the documents it says that they had access  
05:53:39 5 to the files.

6 Q. But these dates are after May 2022, correct?

7 A. Yes. That is why it had access to the file in  
8 the office.

9 Q. My point is that all actions were after  
05:53:58 10 May 2022, right?

11 A. Yes.

12 Q. As we've seen, Riverside did not obtain a copy  
13 of the protective measure until November. That is a  
14 date after May 2022?

05:54:18 15 A. I cannot agree with your statement. There are  
16 two different points in time here, and I think this is  
17 clear in my report.

18 First, they realized that the protective  
19 measure existed because they received a certificate from  
05:54:33 20 the registry. And a second point in time is when they  
21 had access to the file. You have to separate these two  
22 points in time.

23 First, lawyers for Nicaragua communicated  
24 to them that there is a preventive annotation related to  
05:54:54 25 the INAGROSA farm, and then, later on, they did

05:55:01 1 everything related to having access to the case file.  
2 Two different points in time.

3 Q. I understand, but the dates that you mentioned  
4 at point 16.3 of your report, all of these dates are  
05:55:15 5 after May 2022, correct?

6 A. Yes.

7 Q. This notwithstanding, you indicate to us that  
8 when they took the action of trying to obtain the file  
9 at Riverside, according to article 144, if I understand  
05:55:43 10 correctly your argument or your expert opinion,  
11 Riverside waived the right to challenge the procedural  
12 defects because it did not allege those defects in its  
13 first appearance?

14 A. I wouldn't use the word "waive." Article 144,  
05:56:06 15 in connection with article 20 of the procedural  
16 validation, well, this means that the act is validated  
17 if the person does not allege nullity in its first  
18 appearance.

19 Q. Okay. Let's look at article 144. It's in the  
05:56:27 20 same document, C-254. It's also in RL-191. There's an  
21 English translation there. So let us look at the  
22 Spanish here. And I understand that the provision  
23 you're making reference to, the second paragraph of this  
24 article 144:

05:56:51 25 "Notwithstanding the above, if the person



05:56:53 1 notified or served with a summons, order of appearance  
2 or demand has become aware of the relevant matter and  
3 does not seek the nullity of service at the first  
4 appearance in court, such service shall thereafter take  
05:57:08 5 effect as if it had been given in accordance with this  
6 code."

7                   Is this the provision you were making  
8 reference to?

9           A. Yes, that's right. But I'm talking about the  
05:57:21 10 full language of 144.

11           Q. This provision requires the person to have been  
12 given notice, served with a summons, order of appearance  
13 or demand, right?

14           A. That is a matter of interpretation. When the  
05:57:41 15 court issues the notice, this means that notice will be  
16 served on the person because, in theory, the person is  
17 being notified. Here it is very clear. It says "if the  
18 person notified." It says here "has become aware of the  
19 relevant matter."

05:58:00 20                   Riverside became aware of the relevant  
21 matter when Riverside was told, okay, you have a  
22 preventive annotation in this case according to the  
23 certificate. So this means that indirectly notice was  
24 served on Riverside.

05:58:19 25                   The code doesn't really talk about how the

05:58:23 1 person finds out. It only says here that "has become  
2 aware of the matter." So Riverside became aware of the  
3 matter. And, according to the evidence, there were  
4 other investigative acts that they undertook to find out  
05:58:41 5 about this issue and they even went to the case file.

6 Q. But you'd agree with me that before reference  
7 was made to the fact that the person has become aware,  
8 this provision requires that the person be notified,  
9 served with a summons, order of appearance or demand?

05:59:03 10 A. I do not agree. You're adding words there.  
11 You have added the words "when the person has been  
12 notified." No. It says here "if the person notified."  
13 It doesn't say "when the person has been notified."

14 So, in my opinion, you are misinterpreting  
05:59:22 15 this provision, or you're adding words to this article.  
16 It doesn't say it has been notified.

17 Q. Okay. Let me ask a question, sir, and then you  
18 can answer.

19 It says here "if the person notified or  
05:59:34 20 served with a summons, order of appearance or demand."  
21 When that person that has been notified or served with a  
22 summons or order of appearance or demand, when that  
23 person becomes aware of the matter and does not seek to  
24 nullify the service, then you see the consequences of  
05:59:54 25 this provision, correct?

05:59:55 1 A. That is not correct. You're adding a word to  
2 this article. After "when," you're saying "when it has  
3 been notified," so that changes the intent of this  
4 article. So the article says here "if the person  
06:00:11 5 notified." So what happens here is that the court says  
6 I order service to be given. So for all legal effects,  
7 service is given. The article here does not say "when  
8 the person has been notified." I think you're adding  
9 words to this language, to the language of the article  
06:00:29 10 and this changes the interpretation of the article.

11 Q. If the interpretation that I understand you're  
12 proposing or your interpretation was correct, this  
13 clause would read "when the person that has been  
14 informed, notified, served with a summons, order for  
06:00:55 15 appearance or that has learned of the subject matter."

16 A. I don't understand what you mean. You just  
17 added a comma that is not there.

18 Q. I understand your interpretation. If I  
19 understand correctly, this applies even when one person  
06:01:10 20 has learned of the matter but has not been notified or  
21 served with a summons, order for appearance or demand?

22 A. Yes, but we need to be clear that the article  
23 does not include those words, "that has already been."  
24 So when you add "already", you're changing the meaning  
06:01:38 25 of the article. When the jurisdictional body is saying

06:01:43 1 it's ordering notification, then it is the person. But  
2 it is not when it has already been notified.

3           So in this case, who was the person that  
4 had to be notified? Is it clear? So if the person  
06:02:00 5 understands, that knows of the issue but does not claim  
6 nullity, so if he or she fails to do so, the article --  
7 and there you see the comma -- will then take effect.

8           And this article, as I mentioned before,  
9 is related to one of the principles of the Procedural  
06:02:25 10 Civil Code, and the principles are regulatory horizons.  
11 They are not aspirations, but they are a regulatory  
12 horizon that we should comply with.

13           Article 20 refers to the principle of  
14 procedural validation because it is right after  
06:02:46 15 principle and it is a principle. But article 20 -- I  
16 don't know if you can put it on the screen. Article 20?

17           MR. APPLETON: Give us a moment. I will  
18 note for the Tribunal that we're mindful of our time.

19           A. Thank you very much.

06:03:32 20           So at article 20 it is referring to the  
21 procedural recognition. So for the purposes of  
22 clarifying, if you look at the beginning of those  
23 articles, for example, article 1. We'll go back to  
24 No. 20.

06:03:52 25           Q. What article?

06:03:53 1 A. The first one. Right there.

2 So it is saying chapter so -- Sole  
3 Chapter, principles, and we have the principles. So  
4 article 20 is a principle. Now we go back to article  
06:04:07 5 20. Very well.

6 And the principle of procedural  
7 recognition, the relative procedural nullities, the ones  
8 that we mentioned at 144 that are not duly appealed by  
9 the parties, shall be recognized by means of subsequent  
06:04:32 10 acts and the judicial authorities are not allowed to  
11 declare relative procedural nullity.

12 On the contrary, the absolute procedural  
13 nullities that impact public order or the right of  
14 defense of the parties are not recognized due to lack of  
06:04:52 15 appeal.

16 MS. CARDENAS: Mr. President. I'm  
17 cognizant of the time and I know it's been a long day  
18 for a lot of people and I certainly appreciate the labor  
19 and the work that the court reporters and the  
06:05:04 20 interpreters are doing. I think we might need to break  
21 overnight. Of course, if that is acceptable to the  
22 Tribunal.

23 MR. APPLETON: I note that we had  
24 three hours booked, and we're way ahead of that  
06:05:21 25 schedule.

06:05:22 1 PRESIDENT: So you want to break now and  
2 continue tomorrow morning?

3 MR. APPLETON: Yes, sir.

4 PRESIDENT: Just for planning purposes,  
06:05:27 5 can you estimate how long you still need, roughly?

6 MS. CARDENAS: I would say 30 -- you know,  
7 hopefully 30 minutes. Maybe a little bit more.

8 PRESIDENT: And can we have an indication  
9 on the redirect, if you can?

06:05:41 10 MS. GONZÁLEZ: Approximately 15 minutes.

11 PRESIDENT: Okay. So I think we are still  
12 fine. There will be a report coming on the remaining  
13 time for both parties so we all know where we are.

14 MR. APPLETON: Will we be able to get a  
06:05:59 15 report this evening, yes?

16 PRESIDENT: It's usually sent right  
17 after --

18 MR. APPLETON: We have what we call a  
19 substitute hitter, they say in baseball. I wanted to  
06:06:10 20 make sure it was all right, and we're not putting her on  
21 the spot.

22 PRESIDENT: But a very experienced one.  
23 So you will have the report and then we all know where  
24 we are. Again, there is no intention to put pressure on  
06:06:23 25 the parties. The time budget is for to you manage.

06:06:29

1

MR. APPLETON: We're doing our best, and  
of course, if you will give the usual statement to the  
witness.

4

PRESIDENT: Yes, of course. Very good.

06:06:38

5

So we break until tomorrow morning, until 9:00.

6

And, Professor Sequeira, you are still  
under examination, so you cannot discuss your testimony  
with anybody tonight. So it will be a solitary evening,  
but try to enjoy it nonetheless. Thank you very much.

06:07:09

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(Hearing adjourned at 6:07 p.m.)

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<p><b>MR. APPLETON:</b>  <b>[96]</b> 1505/4 1506/4  1507/17 1508/2  1508/10 1508/21  1510/11 1510/15  1512/19 1512/24  1517/11 1518/10  1518/18 1534/2  1534/12 1534/17  1544/13 1549/13  1550/3 1550/5  1550/23 1557/18  1563/17 1563/24  1564/9 1568/25  1578/4 1579/2 1579/7  1580/14 1580/19  1583/19 1583/24  1584/7 1584/12  1595/2 1595/7 1596/1  1596/14 1596/18  1598/3 1599/1  1599/11 1599/18  1599/25 1600/2  1600/14 1600/21  1601/6 1603/5  1603/13 1604/3  1604/17 1604/21  1611/18 1616/21  1616/25 1617/5  1617/10 1617/15  1617/25 1618/7  1623/17 1641/11  1641/21 1642/7  1643/4 1643/13  1644/15 1646/17  1646/24 1647/23  1648/4 1648/10  1649/4 1650/6 1652/6  1652/19 1652/25  1653/4 1659/2  1659/11 1660/25  1679/6 1699/3  1701/11 1719/12  1719/18 1719/25  1720/5 1727/17  1728/23 1729/3  1729/14 1729/18  1730/1</p> <p><b>MR. GUTIÉRREZ:</b>  <b>[19]</b> 1529/4 1529/14  1529/24 1530/8  1531/2 1531/9  1531/13 1531/20  1542/25 1548/11  1551/2 1553/13  1558/25 1576/10  1581/19 1616/19  1618/16 1659/16  1659/22</p> <p><b>MR. MOLINA: [1]</b>  1617/12</p> <p><b>MR. SEQUEIRA: [6]</b></p>	<p>1660/15 1661/6  1661/21 1677/15  1677/20 1679/11</p> <p><b>MR. SEQUERIA: [2]</b>  1660/9 1660/22</p> <p><b>MS. CARDENAS:</b>  <b>[15]</b> 1685/20 1694/2  1694/8 1698/9 1701/6  1701/21 1709/13  1709/16 1710/17  1711/3 1717/16  1717/25 1719/8  1728/16 1729/6</p> <p><b>MS. CORTES: [34]</b>  1553/16 1557/4  1557/24 1558/1  1569/21 1576/14  1579/16 1581/2  1581/18 1583/1  1583/11 1583/21  1584/4 1585/18  1586/6 1587/22  1588/1 1594/20  1594/23 1595/16  1601/11 1603/1  1603/21 1604/2  1604/14 1604/19  1604/23 1605/5  1616/17 1635/7  1640/15 1640/22  1647/20 1648/2</p> <p><b>MS. DE PENA: [23]</b>  1557/16 1557/21  1557/25 1617/19  1618/5 1618/20  1619/8 1619/22  1620/11 1623/16  1623/19 1623/25  1630/10 1632/14  1633/19 1634/11  1634/15 1635/9  1635/17 1636/9  1638/18 1640/7  1640/18</p> <p><b>MS. GONZÁLEZ:</b>  <b>[39]</b> 1507/9 1508/6  1508/15 1510/6  1512/7 1534/9  1534/15 1542/11  1543/9 1543/16  1543/20 1544/5  1544/11 1544/16  1550/1 1550/4 1551/9  1552/12 1553/1  1596/2 1596/7  1598/13 1599/2  1601/7 1630/6  1630/11 1642/1  1642/20 1643/1  1646/14 1649/2  1652/3 1658/12  1680/12 1693/22  1698/5 1709/17</p>	<p>1717/12 1729/10</p> <p><b>MS. GREENWOOD:</b>  <b>[20]</b> 1507/25 1512/22  1528/25 1529/5  1529/15 1530/2  1530/18 1531/4  1531/11 1531/15  1531/25 1532/20  1542/6 1542/10  1543/15 1603/18  1603/23 1604/8  1605/2 1661/15</p> <p><b>PRESIDENT: [128]</b>  1504/15 1506/2  1507/7 1507/16  1509/3 1510/12  1511/12 1518/4  1518/17 1518/25  1526/18 1528/21  1534/19 1534/24  1542/4 1542/8 1543/7  1543/13 1543/17  1543/23 1544/10  1548/7 1550/21  1551/5 1552/10  1553/6 1553/15  1558/24 1563/21  1564/6 1569/9 1576/2  1576/9 1576/12  1578/25 1579/5  1579/11 1580/17  1581/11 1584/10  1584/14 1587/24  1594/17 1594/22  1594/25 1595/4  1595/18 1595/24  1596/6 1596/13  1596/17 1597/24  1598/10 1598/16  1599/7 1599/17  1599/23 1600/1  1600/12 1600/20  1601/3 1601/8 1604/9  1605/6 1616/20  1616/24 1617/4  1617/8 1617/13  1617/18 1618/3  1618/6 1618/12  1635/13 1640/24  1641/20 1642/17  1642/22 1643/12  1644/11 1646/22  1648/7 1649/25  1652/17 1652/22  1653/1 1658/24  1659/17 1659/23  1660/4 1660/7  1660/10 1660/18  1661/2 1661/5  1677/13 1677/16  1679/9 1679/12  1683/2 1685/18  1685/21 1686/8</p>	<p>1694/7 1698/13  1698/25 1699/4  1701/4 1701/8  1701/19 1709/11  1709/14 1710/15  1711/1 1717/22  1719/6 1719/10  1719/16 1719/23  1720/2 1720/8 1729/1  1729/4 1729/8  1729/11 1729/16  1729/22 1730/4</p> <p><b>THE INTERPRETER:</b>  <b>[10]</b> 1512/17 1561/12  1576/4 1576/17  1576/21 1585/20  1618/17 1698/21  1699/21 1700/21</p> <p><b>THE REPORTER: [5]</b>  1570/3 1576/1  1576/20 1611/17  1656/20</p> <hr/> <p>'21 [1] 1654/23</p> <hr/> <p><b>0</b></p> <p><b>0.7 hectares [1]</b>  1577/2</p> <p><b>0001 [1]</b> 1516/7  <b>0005 [1]</b> 1543/15  <b>0006 [1]</b> 1538/25  <b>0007 [2]</b> 1587/23  1587/24</p> <p><b>001 [1]</b> 1688/4  <b>0017 [3]</b> 1557/4  1572/12 1572/13  <b>0032 [1]</b> 1633/20  <b>0054-55 [1]</b> 1620/3  <b>007 [1]</b> 1572/15  <b>0081 [2]</b> 1636/9  1640/8</p> <p><b>01-2017 [1]</b> 1674/23  <b>0175 [2]</b> 1605/1  1606/23  <b>0199 [1]</b> 1632/15  <b>0251 [1]</b> 1619/10  <b>0254 [2]</b> 1620/12  1710/16  <b>0258 [1]</b> 1630/4  <b>0263 [2]</b> 1542/14  1542/15  <b>053603 [1]</b> 1629/9  <b>06 [1]</b> 1638/19  <b>09 [1]</b> 1586/20</p> <hr/> <p><b>1</b></p> <p><b>1,000 hectares [3]</b>  1573/22 1575/17  1677/23  <b>1,000-hectare [1]</b>  1585/12  <b>100 [1]</b> 1668/3</p>	<p><b>100 percent [11]</b>  1533/18 1537/22  1538/19 1540/13  1541/18 1542/17  1545/8 1668/10  1668/15 1668/17  1670/15</p> <p><b>101 [1]</b> 1548/24  <b>102 [3]</b> 1533/2  1533/6 1533/7  <b>108 [15]</b> 1587/6  1587/11 1587/13  1587/23 1587/25  1588/3 1588/10  1589/3 1589/13  1590/10 1591/13  1591/17 1591/25  1592/6 1592/9</p> <p><b>10:40 [1]</b> 1553/8  <b>11 [3]</b> 1628/15  1706/9 1706/25</p> <p><b>11 November 2022</b>  <b>[1]</b> 1707/6  <b>112 [2]</b> 1547/18  1672/5  <b>116 [3]</b> 1613/15  1613/17 1613/19  <b>119 [1]</b> 1684/19  <b>12 [3]</b> 1565/5  1576/14 1634/16  <b>12.3 [1]</b> 1586/9  <b>124 [2]</b> 1658/20  1658/23  <b>13 [2]</b> 1564/13  1609/12  <b>130 [6]</b> 1603/2  1604/16 1604/20  1605/1 1605/4  1605/11  <b>138 [1]</b> 1667/13  <b>13:45 [1]</b> 1655/24  <b>140.31 hectares [1]</b>  1574/16  <b>144 [13]</b> 1507/11  1623/14 1623/23  1624/1 1624/4 1673/7  1673/14 1723/9  1723/14 1723/19  1723/24 1724/10  1728/8  <b>1470 [1]</b> 1628/8  <b>1478 [1]</b> 1628/14  <b>148 [6]</b> 1586/12  1586/14 1587/5  1588/7 1592/17  1593/22  <b>149 [4]</b> 1588/11  1589/23 1674/7  1674/10  <b>14:01 [1]</b> 1647/3  <b>15 [14]</b> 1542/15  1553/7 1654/22  1660/1 1664/8</p>
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<p><b>1</b></p> <p><b>15...</b> [9] 1665/18 1691/15 1695/1 1696/17 1696/18 1698/4 1719/11 1719/17 1729/10 <b>150</b> [2] 1593/11 1593/22 <b>152</b> [4] 1586/12 1586/14 1720/24 1721/3 <b>15th</b> [1] 1619/24 <b>16</b> [5] 1500/11 1567/12 1567/25 1633/4 1638/24 <b>16.3</b> [5] 1506/17 1507/5 1600/23 1706/16 1723/4 <b>168</b> [3] 1708/21 1709/12 1709/15 <b>169</b> [1] 1603/1 <b>17</b> [11] 1557/6 1557/6 1557/9 1558/1 1558/8 1558/17 1588/2 1608/22 1609/4 1675/13 1675/17 <b>17:50</b> [1] 1720/4 <b>18</b> [2] 1675/13 1675/16 <b>1800s</b> [1] 1536/7 <b>19</b> [1] 1721/1 <b>191</b> [2] 1691/21 1723/20 <b>1921</b> [1] 1631/2 <b>199</b> [1] 1524/15</p> <hr/> <p><b>2</b></p> <p><b>2.6</b> [1] 1606/23 <b>20</b> [11] 1565/4 1595/19 1628/8 1723/15 1727/13 1727/15 1727/16 1727/20 1727/24 1728/4 1728/5 <b>20 meters</b> [1] 1594/4 <b>20 years</b> [1] 1559/6 <b>20,887</b> [1] 1661/25 <b>200</b> [1] 1594/16 <b>200 meters</b> [4] 1592/24 1593/14 1593/25 1594/8 <b>200-meter</b> [1] 1595/10 <b>2011</b> [2] 1682/5 1682/6 <b>2015</b> [5] 1561/5 1563/1 1566/21 1577/14 1579/23 <b>2016</b> [8] 1561/16 1564/13 1564/13 1609/9 1609/12</p>	<p>1610/3 1677/9 1677/11 <b>2017</b> [2] 1572/16 1674/23 <b>2018</b> [10] 1565/5 1565/6 1566/22 1567/7 1567/12 1568/1 1575/22 1576/23 1638/24 1654/12 <b>2020</b> [1] 1513/15 <b>2021</b> [23] 1533/13 1551/21 1552/1 1552/8 1619/19 1619/25 1628/21 1629/2 1654/20 1654/21 1654/22 1663/15 1664/8 1665/18 1691/15 1693/13 1693/17 1693/18 1693/25 1695/2 1696/17 1696/18 1698/4 <b>2021-2022</b> [1] 1629/11 <b>2022</b> [37] 1538/5 1538/20 1543/5 1544/17 1545/1 1545/2 1628/6 1628/11 1628/16 1629/5 1629/6 1629/11 1629/14 1654/19 1664/16 1683/20 1683/20 1684/21 1696/8 1696/12 1697/9 1697/18 1698/17 1699/7 1699/13 1699/13 1706/10 1706/24 1706/25 1707/6 1721/1 1721/23 1722/3 1722/6 1722/10 1722/14 1723/5 <b>2022/2023</b> [1] 1697/14 <b>2023</b> [6] 1696/14 1697/9 1697/14 1697/18 1698/17 1699/7 <b>2024</b> [13] 1500/15 1504/1 1520/11 1523/24 1524/6 1525/4 1619/3 1621/22 1622/22 1629/6 1629/8 1632/25 1696/6 <b>205</b> [1] 1708/22 <b>21</b> [2] 1575/22 1576/23 <b>213</b> [8] 1625/3 1625/7 1626/23 1709/21 1709/25</p>	<p>1718/1 1718/4 1718/7 <b>214</b> [2] 1624/17 1631/6 <b>215</b> [1] 1720/13 <b>217</b> [12] 1556/23 1557/4 1558/3 1558/3 1558/17 1572/12 1587/6 1587/9 1587/23 1588/2 1588/14 1675/23 <b>21st</b> [2] 1687/19 1688/3 <b>2204</b> [3] 1708/17 1708/21 1709/7 <b>228</b> [3] 1577/18 1636/10 1640/9 <b>22nd</b> [1] 1525/4 <b>23</b> [1] 1628/8 <b>24</b> [2] 1609/3 1678/6 <b>24 August</b> [1] 1542/12 <b>24 hours</b> [1] 1627/18 <b>24 October 2022</b> [1] 1544/17 <b>242</b> [1] 1720/24 <b>25</b> [3] 1664/16 1675/7 1678/6 <b>251</b> [1] 1695/2 <b>254</b> [4] 1711/5 1718/5 1720/14 1723/20 <b>259</b> [1] 1538/9 <b>26</b> [1] 1561/16 <b>263</b> [5] 1543/8 1543/11 1543/11 1543/11 1711/2 <b>265</b> [1] 1543/20 <b>268</b> [4] 1540/2 1540/7 1544/5 1544/7 <b>269</b> [3] 1540/2 1542/8 1701/2 <b>27</b> [2] 1565/6 1566/22 <b>290</b> [1] 1606/3 <b>2nd</b> [6] 1523/24 1621/21 1622/4 1622/4 1622/9 1622/22</p> <hr/> <p><b>3</b></p> <p><b>3.12</b> [2] 1574/20 1574/21 <b>3.25</b> [3] 1572/14 1572/14 1572/16 <b>3.4</b> [1] 1590/16 <b>3.6</b> [1] 1594/6 <b>30</b> [3] 1596/16 1706/18 1729/6 <b>30 minutes</b> [6] 1594/21 1660/20 1677/17 1677/18 1679/10 1729/7</p>	<p><b>30-minute</b> [1] 1677/13 <b>31</b> [1] 1610/3 <b>32</b> [1] 1561/22 <b>336</b> [8] 1516/1 1516/8 1519/7 1710/13 1711/4 1714/13 1715/24 1716/25 <b>34</b> [1] 1610/2 <b>3461</b> [1] 1671/22 <b>3480</b> [1] 1671/24 <b>350</b> [3] 1606/9 1606/14 1606/19 <b>356</b> [1] 1671/6 <b>38</b> [2] 1653/8 1653/10 <b>380</b> [7] 1527/23 1528/9 1672/14 1691/17 1694/9 1695/6 1695/19 <b>386</b> [1] 1676/9 <b>387</b> [6] 1619/16 1620/3 1620/6 1620/12 1620/16 1621/8</p> <hr/> <p><b>4</b></p> <p><b>4.1</b> [1] 1640/11 <b>4.4</b> [1] 1590/23 <b>40</b> [2] 1666/21 1666/25 <b>41</b> [1] 1668/6 <b>44.75 hectares</b> [1] 1573/25 <b>45</b> [3] 1536/4 1536/9 1536/17 <b>46</b> [2] 1605/2 1605/4 <b>47</b> [2] 1514/10 1514/21 <b>49</b> [2] 1591/4 1638/19</p> <hr/> <p><b>5</b></p> <p><b>50</b> [1] 1638/20 <b>50 percent</b> [2] 1668/14 1668/14 <b>500 hectares</b> [2] 1635/5 1635/11 <b>505</b> [1] 1579/17 <b>51</b> [1] 1638/20 <b>534</b> [2] 1604/15 1605/1 <b>55</b> [4] 1524/15 1620/3 1632/15 1720/14 <b>556 hectares</b> [1] 1592/5 <b>556.8</b> [2] 1577/3 1591/23 <b>556.8 hectares</b> [8] 1575/1 1575/3 1575/3 1575/14 1575/17</p>	<p>1577/7 1591/13 1591/23 <b>566</b> [1] 1547/17</p> <hr/> <p><b>6</b></p> <p><b>60</b> [1] 1538/16 <b>600 hectares</b> [1] 1575/23 <b>6145</b> [2] 1538/7 1538/13 <b>617</b> [1] 1665/5 <b>620</b> [4] 1593/7 1593/8 1593/9 1608/25 <b>64</b> [2] 1675/21 1678/23 <b>67</b> [1] 1603/14 <b>6:00</b> [3] 1701/5 1701/9 1701/20 <b>6:07 p.m</b> [1] 1730/10 <b>6:15</b> [1] 1720/4</p> <hr/> <p><b>7</b></p> <p><b>7 kilometers</b> [1] 1593/3 <b>707</b> [1] 1533/19 <b>795.43</b> [5] 1576/25 1577/1 1577/3 1635/24 1636/4</p> <hr/> <p><b>8</b></p> <p><b>87</b> [1] 1603/14</p> <hr/> <p><b>9</b></p> <p><b>9 a.m</b> [2] 1598/18 1598/20 <b>95 percent</b> [1] 1513/16 <b>955.25</b> [1] 1574/5 <b>96</b> [4] 1592/19 1592/23 1593/23 1595/11 <b>99</b> [1] 1547/4 <b>9:00</b> [1] 1730/5 <b>9:14</b> [2] 1518/12 1650/22 <b>9:25</b> [1] 1651/6 <b>9th</b> [1] 1523/20</p> <hr/> <p><b>A</b></p> <p><b>a.m</b> [2] 1598/18 1598/20 <b>ability</b> [4] 1511/2 1580/21 1598/7 1598/7 <b>able</b> [35] 1505/8 1507/2 1511/2 1511/9 1511/18 1532/12 1542/6 1549/16 1557/8 1561/24 1570/23 1574/4 1578/16 1585/5 1599/19 1604/23</p>
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<p><b>A</b></p> <p><b>able... [19]</b> 1607/16 1620/8 1621/11 1632/17 1638/5 1639/3 1647/13 1652/10 1652/13 1656/9 1663/3 1682/9 1691/7 1699/24 1701/12 1701/13 1706/10 1720/3 1729/14</p> <p><b>about [149]</b> 1505/5 1506/15 1506/23 1513/20 1514/7 1518/23 1519/11 1520/17 1521/4 1521/6 1524/7 1526/3 1526/6 1527/24 1530/2 1531/9 1536/2 1537/2 1537/15 1538/13 1544/15 1546/13 1546/15 1546/22 1550/11 1550/24 1553/11 1554/17 1558/5 1561/19 1561/20 1561/24 1564/14 1564/18 1565/9 1565/12 1566/13 1568/10 1577/15 1577/24 1578/1 1578/6 1579/14 1580/6 1581/9 1581/13 1581/16 1581/23 1587/1 1587/19 1588/3 1593/2 1593/20 1593/20 1593/21 1594/6 1595/21 1597/2 1597/11 1604/19 1604/25 1614/19 1615/10 1616/13 1619/3 1624/20 1627/18 1627/18 1629/1 1629/15 1629/17 1630/9 1630/24 1632/9 1634/13 1634/21 1635/8 1635/10 1635/10 1637/10 1637/11 1637/20 1638/25 1639/24 1640/16 1640/23 1640/25 1642/4 1643/18 1644/18 1645/17 1645/21 1646/7 1647/5 1647/10 1647/22 1647/24 1648/2 1648/14 1650/23 1651/11 1652/1 1652/7 1653/19 1653/24</p>	<p>1655/19 1655/21 1655/25 1656/3 1656/8 1656/25 1657/1 1657/6 1657/9 1661/12 1666/12 1669/5 1670/2 1670/19 1674/12 1677/23 1678/8 1683/19 1683/21 1690/4 1690/9 1696/15 1696/16 1696/19 1697/8 1703/6 1703/12 1703/19 1706/8 1708/10 1714/8 1714/9 1716/8 1716/11 1717/9 1717/15 1718/5 1719/7 1720/10 1720/11 1720/12 1724/9 1724/25 1725/5</p> <p><b>above [7]</b> 1640/11 1691/25 1702/5 1703/8 1712/8 1714/23 1723/25</p> <p><b>absolute [18]</b> 1532/7 1624/20 1624/22 1624/23 1624/25 1625/7 1630/20 1630/23 1670/18 1675/25 1708/12 1708/14 1708/18 1708/23 1709/20 1710/2 1710/11 1728/12</p> <p><b>absolutely [11]</b> 1528/12 1530/8 1533/16 1548/17 1622/20 1625/8 1627/25 1630/18 1630/19 1658/2 1658/3</p> <p><b>absoluto [1]</b> 1670/18</p> <p><b>abuse [4]</b> 1607/3 1607/8 1607/15 1607/21</p> <p><b>academia [1]</b> 1662/14</p> <p><b>academic [7]</b> 1653/6 1662/5 1662/19 1682/7 1682/8 1682/10 1688/20</p> <p><b>Academically [1]</b> 1662/1</p> <p><b>academics [1]</b> 1662/15</p> <p><b>accept [6]</b> 1529/9 1548/20 1549/2 1574/12 1693/20 1694/13</p> <p><b>acceptable [1]</b> 1728/21</p>	<p><b>acceptance [1]</b> 1637/3</p> <p><b>access [6]</b> 1656/16 1671/13 1722/4 1722/7 1722/21 1723/1</p> <p><b>accomplished [1]</b> 1555/5</p> <p><b>accordance [9]</b> 1592/6 1619/15 1624/6 1624/12 1660/17 1695/6 1718/13 1720/19 1724/5</p> <p><b>according [13]</b> 1514/3 1519/7 1555/9 1562/12 1568/7 1571/3 1593/3 1673/5 1715/3 1716/3 1723/9 1724/22 1725/3</p> <p><b>account [1]</b> 1648/22</p> <p><b>accounts [1]</b> 1670/13</p> <p><b>accredited [1]</b> 1661/14</p> <p><b>Accurate [1]</b> 1699/21</p> <p><b>achieving [1]</b> 1607/6</p> <p><b>acquire [2]</b> 1663/4 1678/15</p> <p><b>acrimony [1]</b> 1598/5</p> <p><b>act [13]</b> 1532/8 1602/9 1602/19 1605/15 1608/11 1645/18 1673/6 1674/17 1701/25 1710/9 1718/14 1720/21 1723/16</p> <p><b>acted [1]</b> 1678/25</p> <p><b>acting [2]</b> 1607/13 1607/14</p> <p><b>action [25]</b> 1515/16 1515/17 1517/3 1532/8 1545/19 1545/24 1546/2 1546/3 1546/3 1546/5 1546/5 1592/15 1614/24 1614/25 1615/20 1622/15 1657/7 1672/25 1673/3 1673/10 1673/11 1673/18 1718/6 1721/10 1723/8</p> <p><b>actions [17]</b> 1582/3 1582/11 1582/22 1583/8 1583/14 1584/21 1585/2 1585/25 1625/8 1656/18 1658/1 1676/13 1677/3 1677/21 1677/21 1718/8 1722/9</p>	<p><b>activities [2]</b> 1556/6 1582/14</p> <p><b>activity [1]</b> 1650/14</p> <p><b>acts [8]</b> 1602/7 1675/5 1678/11 1720/10 1720/12 1720/20 1725/4 1728/10</p> <p><b>actual [1]</b> 1564/14</p> <p><b>actually [11]</b> 1527/9 1528/22 1618/8 1631/21 1641/17 1641/22 1643/25 1644/1 1647/23 1648/4 1650/20</p> <p><b>add [6]</b> 1514/1 1548/3 1564/17 1608/23 1696/5 1726/24</p> <p><b>added [4]</b> 1549/14 1549/15 1725/11 1726/17</p> <p><b>adding [5]</b> 1684/22 1725/10 1725/15 1726/1 1726/8</p> <p><b>addition [12]</b> 1527/2 1537/25 1549/1 1551/14 1600/16 1600/21 1602/5 1621/3 1637/5 1640/12 1644/4 1688/7</p> <p><b>additional [3]</b> 1574/5 1597/13 1598/1</p> <p><b>address [12]</b> 1506/25 1507/2 1509/24 1510/10 1524/20 1524/23 1524/24 1554/12 1596/4 1596/22 1597/16 1633/24</p> <p><b>addressed [2]</b> 1664/4 1674/13</p> <p><b>addressing [3]</b> 1617/23 1618/14 1673/6</p> <p><b>adds [1]</b> 1694/16</p> <p><b>adequate [1]</b> 1700/19</p> <p><b>adhere [1]</b> 1602/5</p> <p><b>adjourned [1]</b> 1730/10</p> <p><b>adjunct [1]</b> 1662/6</p> <p><b>administration [1]</b> 1515/2</p> <p><b>administrative [18]</b> 1569/14 1606/10 1606/15 1607/4 1638/13 1644/5 1655/22 1657/12 1657/20 1658/1 1663/1 1663/2 1663/5</p>	<p>1665/12 1674/17 1687/22 1688/18 1688/22</p> <p><b>administrator [2]</b> 1514/2 1514/15</p> <p><b>admissibility [1]</b> 1516/2</p> <p><b>admit [2]</b> 1600/22 1601/2</p> <p><b>adopted [2]</b> 1620/19 1692/5</p> <p><b>adoption [1]</b> 1694/11</p> <p><b>advanced [1]</b> 1631/18</p> <p><b>advice [3]</b> 1522/14 1522/16 1625/22</p> <p><b>advise [3]</b> 1521/14 1530/22 1530/25</p> <p><b>advised [2]</b> 1521/17 1684/16</p> <p><b>advising [1]</b> 1535/21</p> <p><b>advisor [2]</b> 1521/2 1521/2</p> <p><b>affect [9]</b> 1516/15 1519/14 1580/20 1586/25 1636/17 1710/22 1711/7 1711/19 1719/22</p> <p><b>affected [10]</b> 1521/13 1530/13 1532/13 1541/6 1548/19 1656/24 1673/1 1694/21 1695/16 1711/17</p> <p><b>affecting [1]</b> 1586/15</p> <p><b>affects [3]</b> 1713/8 1714/14 1715/25</p> <p><b>affirmed [1]</b> 1664/20</p> <p><b>aftermentioned [1]</b> 1525/3</p> <p><b>afraid [1]</b> 1510/13</p> <p><b>after [43]</b> 1507/12 1509/23 1520/14 1521/12 1523/11 1523/12 1523/17 1523/22 1545/1 1546/19 1549/17 1551/25 1552/8 1560/14 1617/2 1621/13 1622/21 1627/3 1627/7 1627/17 1629/13 1632/11 1638/23 1642/2 1643/2 1654/7 1654/7 1654/14 1669/9 1674/4 1687/10 1693/12 1693/17 1707/1 1719/17 1721/9 1722/6 1722/9 1722/14 1723/5</p>
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[3]</b> 1726/2 1727/14 1729/17</p> <p><b>afternoon [8]</b> 1595/24 1601/13 1618/24 1618/25 1655/21 1661/7 1661/8 1679/16</p> <p><b>afterwards [2]</b> 1564/12 1565/4</p> <p><b>again [28]</b> 1507/17 1520/21 1523/24 1527/7 1530/24 1532/12 1538/25 1545/2 1550/18 1556/23 1558/7 1561/16 1568/12 1570/4 1577/23 1587/12 1591/22 1609/1 1616/7 1618/25 1624/1 1624/15 1628/14 1640/8 1644/1 1649/2 1697/8 1729/24</p> <p><b>against [16]</b> 1614/24 1625/23 1664/1 1672/18 1672/24 1673/10 1681/3 1690/21 1690/23 1690/25 1691/3 1691/4 1691/9 1694/17 1695/5 1721/21</p> <p><b>age [1]</b> 1633/4</p> <p><b>agencies [2]</b> 1601/17 1658/3</p> <p><b>agent [1]</b> 1612/4</p> <p><b>ago [3]</b> 1527/7 1536/4 1536/17</p> <p><b>agree [29]</b> 1507/12 1508/11 1509/18 1517/23 1538/4 1546/23 1546/23 1558/5 1568/6 1573/6 1590/4 1607/6 1607/19 1615/6 1628/16 1628/22 1680/1 1680/6 1686/22 1693/8 1693/11 1703/9 1703/11 1703/13 1705/2 1712/24 1722/15 1725/6 1725/10</p> <p><b>agreement [8]</b> 1509/11 1509/15 1511/25 1548/22 1564/19 1565/2 1569/15 1638/14</p> <p><b>agreements [2]</b> 1566/6 1569/19</p> <p><b>agricultural [2]</b> 1588/23 1674/16</p>	<p><b>agriculture [1]</b> 1591/6</p> <p><b>agronomist [1]</b> 1585/4</p> <p><b>Agropecuarias [10]</b> 1540/12 1541/18 1545/8 1562/4 1580/7 1610/6 1668/1 1668/17 1669/24 1670/14</p> <p><b>ahead [4]</b> 1513/6 1558/24 1581/11 1728/24</p> <p><b>aid [2]</b> 1630/3 1662/17</p> <p><b>Alan [1]</b> 1502/12</p> <p><b>alienated [1]</b> 1547/24</p> <p><b>all [55]</b> 1505/1 1508/3 1509/11 1511/8 1513/10 1516/13 1517/23 1518/16 1518/24 1523/1 1525/2 1544/20 1546/18 1551/20 1555/17 1559/6 1562/14 1571/10 1583/14 1601/19 1604/22 1606/5 1607/1 1610/9 1614/18 1615/23 1621/12 1624/2 1624/11 1637/19 1639/11 1643/8 1647/8 1648/19 1651/19 1651/21 1651/24 1652/6 1659/3 1661/7 1662/3 1671/12 1671/16 1679/8 1688/8 1699/17 1706/5 1714/1 1719/16 1722/9 1723/4 1726/6 1729/13 1729/20 1729/23</p> <p><b>allegations [1]</b> 1596/12</p> <p><b>allege [5]</b> 1674/3 1708/6 1709/1 1723/12 1723/17</p> <p><b>alleged [5]</b> 1529/18 1586/15 1663/19 1692/7 1708/23</p> <p><b>alleges [4]</b> 1573/24 1574/3 1714/11 1715/23</p> <p><b>allocation [1]</b> 1677/17</p> <p><b>allow [4]</b> 1517/5 1681/13 1689/2 1692/17</p> <p><b>allowed [7]</b> 1517/12 1523/25 1532/18</p>	<p>1588/24 1592/14 1649/7 1728/10</p> <p><b>allowing [1]</b> 1671/12</p> <p><b>allows [5]</b> 1519/24 1597/25 1602/3 1602/17 1678/18</p> <p><b>almost [3]</b> 1553/7 1617/2 1622/1</p> <p><b>alone [1]</b> 1706/6</p> <p><b>along [3]</b> 1569/7 1642/12 1655/19</p> <p><b>aloud [1]</b> 1585/1</p> <p><b>already [19]</b> 1508/11 1511/12 1528/14 1574/2 1577/20 1583/4 1600/1 1630/7 1632/6 1642/8 1649/17 1650/4 1658/16 1701/3 1702/5 1705/10 1726/23 1726/24 1727/2</p> <p><b>also [87]</b> 1506/18 1519/11 1523/16 1531/24 1535/18 1536/8 1537/15 1538/1 1538/10 1541/22 1542/2 1542/5 1544/5 1545/15 1548/12 1559/18 1559/21 1559/24 1560/2 1562/25 1565/1 1565/1 1566/19 1571/9 1572/20 1573/24 1583/8 1587/13 1589/15 1592/17 1592/18 1597/18 1599/3 1599/5 1600/21 1606/2 1606/6 1606/10 1606/15 1606/19 1607/9 1608/25 1614/18 1618/9 1627/16 1630/24 1632/6 1634/13 1636/6 1636/24 1658/1 1658/14 1662/10 1662/19 1662/24 1663/5 1665/22 1667/23 1674/17 1675/22 1676/19 1676/25 1678/2 1678/22 1682/22 1683/8 1683/9 1683/11 1684/15 1687/18 1688/2 1688/16 1688/24 1689/8 1689/10 1694/12 1694/12 1694/16 1695/20 1696/3 1696/5</p>	<p>1696/17 1702/6 1704/18 1706/24 1716/7 1723/20</p> <p><b>although [2]</b> 1650/20 1708/25</p> <p><b>always [5]</b> 1605/24 1648/22 1673/1 1678/24 1710/20</p> <p><b>am [29]</b> 1507/14 1527/14 1528/16 1534/10 1544/21 1550/2 1554/4 1567/24 1569/22 1579/13 1586/11 1587/20 1607/2 1613/4 1616/2 1658/21 1661/22 1679/2 1679/19 1689/6 1692/10 1695/2 1696/5 1696/7 1697/8 1698/5 1700/19 1705/6 1718/23</p> <p><b>amended [1]</b> 1593/9</p> <p><b>amendments [1]</b> 1604/13</p> <p><b>America [1]</b> 1527/2</p> <p><b>among [1]</b> 1663/19</p> <p><b>amount [2]</b> 1507/1 1651/10</p> <p><b>ample [1]</b> 1508/19</p> <p><b>Ana [1]</b> 1501/13</p> <p><b>Analia [1]</b> 1503/6</p> <p><b>analysis [12]</b> 1586/23 1588/12 1591/10 1593/21 1613/5 1663/9 1663/11 1665/14 1673/5 1673/23 1716/4 1717/11</p> <p><b>analyze [6]</b> 1537/20 1565/11 1586/14 1586/18 1587/4 1703/17</p> <p><b>analyzed [2]</b> 1637/13 1688/1</p> <p><b>analyzes [1]</b> 1689/8</p> <p><b>analyzing [5]</b> 1560/9 1587/5 1616/15 1637/6 1663/4</p> <p><b>animals [1]</b> 1562/14</p> <p><b>Annex [7]</b> 1574/21 1590/8 1591/8 1594/2 1594/6 1638/19 1688/4</p> <p><b>annotation [26]</b> 1540/17 1540/25 1545/20 1545/25 1546/14 1547/9 1547/13 1547/23 1547/25 1664/17 1665/1 1666/6 1666/7 1667/1 1667/3 1667/4</p>	<p>1667/17 1672/8 1672/10 1696/15 1699/14 1703/4 1703/25 1721/12 1722/24 1724/22</p> <p><b>annotations [15]</b> 1536/12 1666/18 1667/21 1669/7 1670/3 1699/23 1701/1 1701/24 1702/2 1702/15 1702/19 1702/20 1702/23 1703/1 1705/4</p> <p><b>annual [2]</b> 1569/15 1638/14</p> <p><b>annulment [3]</b> 1707/20 1708/4 1708/8</p> <p><b>another [19]</b> 1517/4 1522/19 1534/24 1545/11 1553/23 1555/25 1556/4 1569/4 1569/8 1574/8 1592/16 1602/11 1626/19 1629/18 1654/9 1654/9 1664/15 1688/7 1721/17</p> <p><b>answer [49]</b> 1510/12 1511/19 1512/15 1513/8 1517/14 1517/19 1518/2 1518/5 1518/24 1519/3 1537/5 1537/14 1537/15 1545/3 1548/8 1554/8 1558/21 1563/13 1569/2 1570/4 1570/6 1574/17 1576/1 1577/11 1585/9 1590/6 1592/12 1592/18 1601/23 1609/2 1612/7 1615/23 1639/8 1649/20 1650/5 1650/5 1651/16 1652/12 1652/14 1653/24 1653/24 1680/1 1683/3 1683/6 1685/13 1685/14 1685/23 1705/18 1725/18</p> <p><b>answered [11]</b> 1513/9 1518/5 1528/14 1528/16 1628/18 1629/17 1629/22 1635/5 1638/3 1686/9 1717/23</p> <p><b>answering [1]</b> 1704/20</p> <p><b>answers [6]</b> 1510/2</p>
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<p><b>A</b></p> <p><b>answers... [5]</b> 1517/13 1550/16 1639/2 1650/24 1704/12</p> <p><b>anticipated [1]</b> 1614/4</p> <p><b>anticipatory [2]</b> 1642/10 1643/6</p> <p><b>any [83]</b> 1508/17 1510/1 1512/20 1513/2 1513/19 1516/25 1516/25 1517/2 1517/9 1532/13 1535/9 1535/20 1544/21 1551/23 1554/18 1561/8 1564/16 1585/14 1585/15 1593/17 1596/13 1598/23 1598/24 1601/18 1605/15 1609/16 1609/16 1611/24 1612/4 1612/14 1612/23 1614/14 1614/15 1615/1 1616/14 1618/5 1620/5 1620/18 1620/23 1621/8 1622/9 1627/21 1629/6 1629/14 1630/22 1633/11 1635/8 1639/15 1639/16 1640/2 1640/3 1640/5 1641/1 1644/24 1647/10 1647/13 1647/17 1647/22 1648/2 1648/12 1649/10 1649/12 1650/10 1651/20 1655/16 1657/19 1658/17 1659/17 1663/23 1666/1 1666/3 1666/4 1666/8 1669/12 1672/2 1672/13 1687/21 1693/2 1693/25 1696/20 1696/22 1696/23 1699/5</p> <p><b>anybody [7]</b> 1517/17 1553/11 1580/11 1595/21 1638/2 1638/7 1730/8</p> <p><b>anyone [4]</b> 1505/25 1632/2 1699/9 1708/24</p> <p><b>anything [16]</b> 1507/8 1511/1 1529/20 1532/18 1552/6 1567/14 1576/5 1589/12 1597/9 1601/5</p>	<p>1614/16 1629/12 1631/20 1654/7 1693/18 1717/19</p> <p><b>anyways [1]</b> 1719/21</p> <p><b>anywhere [2]</b> 1636/22 1686/22</p> <p><b>apart [1]</b> 1712/21</p> <p><b>apologies [7]</b> 1512/3 1513/3 1517/7 1544/12 1576/21 1603/18 1635/9</p> <p><b>apologize [6]</b> 1528/8 1528/14 1561/13 1693/22 1697/5 1698/5</p> <p><b>apparently [2]</b> 1505/12 1680/23</p> <p><b>appeal [6]</b> 1673/2 1694/16 1695/5 1708/3 1716/9 1728/15</p> <p><b>appealed [1]</b> 1728/8</p> <p><b>appear [2]</b> 1537/16 1629/14</p> <p><b>appearance [13]</b> 1624/10 1673/13 1673/15 1723/13 1723/18 1724/1 1724/4 1724/12 1725/9 1725/20 1725/22 1726/15 1726/21</p> <p><b>appeared [1]</b> 1518/21</p> <p><b>appears [4]</b> 1529/9 1592/1 1634/5 1664/5</p> <p><b>appended [1]</b> 1599/13</p> <p><b>APPLETON [22]</b> 1502/5 1502/6 1507/12 1527/2 1533/22 1550/1 1579/12 1580/18 1596/13 1599/4 1604/8 1617/9 1617/23 1642/2 1642/17 1642/23 1643/12 1644/11 1646/15 1649/25 1658/24 1659/17</p> <p><b>applicability [2]</b> 1657/1 1657/10</p> <p><b>applicable [3]</b> 1567/13 1567/25 1652/24</p> <p><b>applicant [7]</b> 1562/4 1562/12 1562/19 1639/10 1691/22 1692/4 1692/6</p> <p><b>application [36]</b> 1507/5 1515/8 1515/10 1559/25</p>	<p>1560/5 1560/15 1560/20 1560/24 1561/2 1561/16 1563/4 1564/24 1566/23 1567/10 1577/21 1579/24 1581/4 1581/7 1593/15 1599/4 1599/12 1599/13 1599/21 1599/24 1599/25 1600/3 1610/25 1633/17 1657/17 1676/16 1677/9 1681/19 1692/25 1694/12 1694/22 1716/15</p> <p><b>applications [1]</b> 1585/7</p> <p><b>applied [7]</b> 1515/19 1522/22 1522/24 1551/24 1552/8 1605/24 1623/3</p> <p><b>applies [4]</b> 1556/16 1592/3 1658/17 1726/19</p> <p><b>apply [15]</b> 1532/10 1593/12 1593/16 1595/12 1595/12 1595/13 1608/25 1613/22 1657/12 1657/19 1657/25 1658/1 1658/9 1658/15 1678/5</p> <p><b>appoint [2]</b> 1664/9 1665/21</p> <p><b>appointed [1]</b> 1671/13</p> <p><b>appointment [1]</b> 1664/18</p> <p><b>appoints [1]</b> 1665/22</p> <p><b>appreciate [4]</b> 1529/6 1554/7 1693/15 1728/18</p> <p><b>approach [1]</b> 1698/22</p> <p><b>appropriate [9]</b> 1506/21 1550/12 1550/14 1550/17 1553/3 1621/2 1649/7 1649/10 1665/21</p> <p><b>approval [2]</b> 1636/21 1637/3</p> <p><b>approvals [2]</b> 1613/6 1613/13</p> <p><b>approve [1]</b> 1566/17</p> <p><b>approved [4]</b> 1560/18 1636/22 1636/23 1721/5</p> <p><b>approving [1]</b> 1560/15</p> <p><b>Approximately [1]</b> 1729/10</p> <p><b>ARB [1]</b> 1500/11</p>	<p><b>ARB/21/16 [1]</b> 1500/11</p> <p><b>ARBITRAL [1]</b> 1500/20</p> <p><b>arbitrariness [1]</b> 1644/25</p> <p><b>arbitration [25]</b> 1515/6 1515/17 1519/20 1530/12 1536/17 1537/3 1537/11 1549/5 1626/11 1626/12 1626/12 1630/3 1654/8 1676/14 1686/15 1686/16 1713/15 1713/15 1714/8 1714/16 1714/17 1715/20 1715/22 1716/2 1716/21</p> <p><b>Arbitrator [6]</b> 1529/14 1604/3 1619/2 1619/5 1620/7 1621/10</p> <p><b>Arbitrator Greenwood [2]</b> 1620/7 1621/10</p> <p><b>arbitrators [1]</b> 1565/10</p> <p><b>archive [2]</b> 1721/19 1721/24</p> <p><b>are [239]</b></p> <p><b>area [88]</b> 1555/3 1555/6 1555/12 1555/20 1555/25 1556/5 1556/11 1556/24 1557/10 1558/12 1558/15 1559/9 1559/21 1559/22 1560/7 1560/16 1561/3 1562/11 1562/13 1564/13 1567/17 1568/18 1569/24 1570/2 1570/8 1570/12 1570/18 1571/2 1571/7 1571/10 1571/15 1571/16 1571/18 1572/1 1572/20 1572/22 1573/3 1573/9 1573/15 1573/25 1574/25 1575/2 1575/4 1575/12 1575/14 1575/18 1575/24 1576/25 1577/1 1577/5 1577/5 1577/9 1577/10 1581/17 1585/25 1588/16 1588/23 1590/24 1591/14 1591/18 1592/4 1592/7</p>	<p>1592/24 1593/2 1606/6 1609/25 1610/15 1610/22 1634/21 1635/5 1635/20 1635/22 1635/24 1636/1 1636/3 1649/19 1655/18 1659/7 1674/18 1674/25 1675/8 1676/24 1677/6 1677/22 1677/22 1678/1 1682/14 1688/14</p> <p><b>areas [14]</b> 1555/4 1555/8 1556/1 1558/8 1570/9 1570/17 1572/15 1572/18 1590/20 1592/3 1611/10 1674/23 1675/1 1675/15</p> <p><b>argued [1]</b> 1665/6</p> <p><b>arguing [1]</b> 1656/21</p> <p><b>argument [2]</b> 1518/23 1723/10</p> <p><b>arguments [1]</b> 1587/15</p> <p><b>Arias [1]</b> 1706/23</p> <p><b>around [5]</b> 1568/15 1628/16 1630/25 1660/24 1712/1</p> <p><b>arrive [1]</b> 1510/7</p> <p><b>article [154]</b> 1507/14 1508/17 1515/25 1516/6 1516/7 1522/20 1527/23 1528/9 1532/15 1547/16 1547/17 1547/19 1557/6 1557/6 1557/9 1558/1 1558/4 1558/8 1558/17 1559/4 1572/14 1572/24 1576/15 1576/16 1576/19 1576/22 1576/23 1587/6 1587/11 1587/13 1587/23 1587/25 1588/3 1588/9 1588/12 1588/16 1589/3 1589/13 1589/24 1590/1 1591/13 1591/17 1591/25 1592/6 1592/9 1592/19 1592/23 1593/23 1595/11 1603/2 1604/16 1604/20 1604/25 1605/4 1605/11 1605/18 1606/23 1619/16 1620/3 1620/6 1620/9 1620/12 1620/16 1621/8 1621/12</p>
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<p><b>A</b></p> <p><b>article... [89]</b>  1623/14 1623/23  1624/1 1624/4  1624/17 1625/3  1625/7 1626/19  1626/22 1626/24  1631/6 1634/17  1658/19 1658/20  1658/22 1665/5  1666/21 1666/25  1667/13 1668/6  1671/6 1671/21  1672/5 1672/14  1672/19 1673/7  1673/14 1674/7  1674/10 1675/4  1675/16 1675/17  1675/21 1675/23  1676/9 1678/5 1688/7  1688/8 1691/17  1692/3 1694/9 1695/6  1695/19 1708/17  1708/20 1708/21  1709/7 1709/21  1709/25 1710/13  1711/2 1711/4 1711/9  1711/18 1711/18  1711/24 1713/7  1714/13 1715/24  1718/1 1718/4  1718/12 1718/13  1718/17 1720/13  1723/9 1723/14  1723/15 1723/19  1723/24 1725/15  1726/2 1726/4 1726/4  1726/7 1726/9  1726/10 1726/22  1726/25 1727/6  1727/8 1727/13  1727/15 1727/16  1727/20 1727/23  1727/25 1728/4  1728/4</p> <p><b>articles [9]</b> 1507/11  1516/3 1637/18  1675/13 1678/23  1688/6 1688/9 1689/3  1727/23</p> <p><b>as [264]</b>  <b>ascribe [1]</b> 1650/7  <b>ask [74]</b> 1507/20  1512/12 1512/13  1513/7 1516/6 1516/9  1517/6 1524/14  1529/2 1532/3  1534/20 1535/9  1537/1 1544/23  1545/17 1549/21  1550/22 1554/16  1558/4 1560/21  1563/21 1567/8</p>	1569/3 1569/18 1569/19 1578/3 1578/15 1579/13 1580/5 1581/11 1581/14 1584/25 1587/15 1590/5 1591/22 1600/17 1603/24 1604/19 1604/25 1613/3 1614/5 1616/7 1618/7 1618/18 1619/17 1635/8 1637/8 1640/16 1641/1 1643/3 1643/24 1647/21 1648/2 1652/10 1653/9 1653/11 1653/15 1653/18 1654/8 1655/18 1658/15 1661/19 1678/24 1679/24 1679/25 1696/7 1697/16 1697/19 1699/3 1702/25 1704/17 1719/23 1720/11 1725/17 <p><b>asked [59]</b> 1507/10  1508/18 1510/24  1517/8 1523/13  1533/10 1538/11  1545/16 1546/21  1548/7 1549/22  1579/11 1619/2  1619/5 1620/7  1621/10 1623/12  1623/22 1628/3  1628/9 1628/14  1628/19 1629/4  1629/20 1630/7  1631/13 1632/9  1633/16 1634/13  1635/4 1636/6  1636/13 1637/8  1637/11 1638/1  1638/9 1638/25  1640/22 1643/17  1647/5 1647/24  1647/25 1650/7  1650/22 1651/6  1652/7 1655/24  1663/15 1669/4  1669/6 1690/4 1690/8  1691/3 1697/16  1698/9 1701/19  1716/7 1717/22  1719/4</p> <p><b>asking [52]</b> 1517/9  1519/4 1520/19  1525/18 1526/25  1527/13 1527/14  1531/4 1534/14  1537/8 1537/10  1539/1 1539/7 1539/9</p>	1539/9 1539/11 1539/15 1539/17 1539/20 1539/22 1540/23 1551/1 1554/3 1566/13 1566/13 1571/13 1575/8 1575/8 1575/9 1580/22 1581/9 1587/19 1604/6 1604/18 1604/22 1607/20 1613/23 1637/20 1641/8 1642/23 1646/15 1649/3 1652/20 1658/14 1670/2 1676/18 1690/9 1693/17 1693/25 1696/16 1698/6 1709/7 <p><b>asks [1]</b> 1548/5  <b>aspect [1]</b> 1689/7  <b>aspiration [2]</b>  1573/1 1573/2  <b>aspirations [1]</b>  1727/11  <b>asserted [1]</b> 1664/21  <b>assertion [1]</b>  1665/15  <b>assess [3]</b> 1610/5  1610/15 1610/21  <b>assessed [1]</b>  1674/17  <b>assessment [1]</b>  1678/18  <b>asset [2]</b> 1655/5  1675/19  <b>assets [4]</b> 1522/22  1522/22 1671/10  1671/14  <b>assist [2]</b> 1509/1  1604/7  <b>assistants [2]</b>  1705/23 1706/1  <b>assisted [1]</b> 1706/4  <b>ASSOCIATES [2]</b>  1502/5 1527/2  <b>association [1]</b>  1513/25  <b>assume [25]</b>  1520/25 1561/8  1563/13 1563/18  1563/22 1564/4  1564/7 1566/18  1567/9 1567/12  1569/14 1569/18  1569/23 1570/7  1574/25 1581/15  1581/20 1591/11  1595/1 1595/8  1610/10 1638/10  1638/21 1650/10  1650/11</p> <p><b>assumed [1]</b></p>	1689/13 <b>assuming [5]</b> 1509/1 1622/2 1622/3 1639/4 1648/18 <b>assumption [27]</b> 1535/5 1567/16 1567/24 1568/9 1568/14 1571/19 1571/20 1571/21 1571/23 1571/24 1575/19 1580/21 1590/8 1590/10 1590/13 1590/16 1590/19 1590/23 1593/21 1594/2 1594/6 1595/13 1639/2 1639/13 1639/18 1639/22 1689/15 <b>assumptions [14]</b> 1535/1 1535/2 1535/7 1535/11 1535/13 1535/15 1590/16 1591/2 1591/7 1591/9 1638/12 1638/16 1641/8 1641/9 <b>assurance [1]</b> 1582/16 <b>assured [1]</b> 1646/24 <b>attach [2]</b> 1551/16 1601/1 <b>attached [4]</b> 1535/1 1551/17 1580/10 1688/5 <b>attachment [1]</b> 1574/19 <b>attack [5]</b> 1627/6 1630/21 1630/23 1707/13 1708/7 <b>attain [2]</b> 1584/22 1584/24 <b>attaining [1]</b> 1583/8 <b>attempt [1]</b> 1697/14 <b>attempted [2]</b> 1696/24 1697/17 <b>attended [2]</b> 1611/13 1687/17 <b>attention [3]</b> 1566/18 1651/25 1710/5 <b>attests [1]</b> 1665/12 <b>attorney [21]</b> 1515/15 1522/17 1526/25 1528/15 1535/12 1661/14 1661/22 1664/11 1665/24 1686/2 1686/5 1687/5 1689/6 1690/13 1696/24 1698/7 1699/6 1699/8 1700/6 1716/24 1721/10 <b>attorneys [6]</b>	1535/11 1692/12 1692/21 1693/3 1697/12 1714/2 <b>attributable [1]</b> 1620/21 <b>attributions [1]</b> 1602/20 <b>audio [1]</b> 1570/4 <b>August [3]</b> 1513/15 1542/12 1563/1 <b>August 2015 [1]</b> 1563/1 <b>August 2020 [1]</b> 1513/15 <b>authored [1]</b> 1688/6 <b>authorities [2]</b> 1561/2 1728/10 <b>authority [17]</b> 1559/16 1585/24 1607/8 1607/15 1608/19 1609/8 1609/24 1611/2 1611/25 1612/2 1612/5 1612/7 1621/15 1621/18 1626/13 1676/6 1694/10 <b>authority's [1]</b> 1671/11 <b>authorizations [1]</b> 1638/23 <b>authorize [1]</b> 1572/9 <b>authorized [2]</b> 1571/1 1661/23 <b>authorizes [1]</b> 1592/15 <b>authorizing [1]</b> 1573/4 <b>automatically [2]</b> 1524/4 1622/7 <b>available [5]</b> 1508/4 1584/3 1612/14 1623/13 1623/22 <b>avocado [6]</b> 1573/25 1590/3 1590/20 1593/12 1614/20 1615/7 <b>avocados [7]</b> 1590/24 1614/6 1614/22 1647/15 1648/13 1648/17 1678/23 <b>avoid [3]</b> 1530/16 1646/15 1663/21 <b>aware [20]</b> 1506/20 1507/4 1507/24 1508/8 1508/15 1513/19 1533/12 1594/13 1611/11 1618/10 1629/22 1649/16 1706/21 1724/2 1724/18 1724/20 1725/2
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<p><b>A</b></p> <p><b>aware... [3]</b> 1725/2 1725/7 1725/23</p> <p><b>away [3]</b> 1531/17 1531/18 1552/5</p> <hr/> <p><b>B</b></p> <p><b>back [22]</b> 1526/7 1527/7 1564/1 1564/2 1564/5 1564/10 1570/7 1580/17 1599/15 1620/2 1634/18 1641/14 1641/18 1642/3 1643/3 1649/23 1650/19 1657/6 1719/21 1720/1 1727/23 1728/4</p> <p><b>background [1]</b> 1663/14</p> <p><b>bad [3]</b> 1510/25 1678/12 1678/17</p> <p><b>BAKER [1]</b> 1503/5</p> <p><b>balance [1]</b> 1682/9</p> <p><b>ban [7]</b> 1569/24 1570/14 1570/20 1570/20 1592/23 1595/11 1675/18</p> <p><b>bank [3]</b> 1549/2 1688/12 1688/13</p> <p><b>bar [1]</b> 1571/6</p> <p><b>Barry [1]</b> 1502/6</p> <p><b>Bart [1]</b> 1502/12</p> <p><b>base [1]</b> 1591/1</p> <p><b>baseball [1]</b> 1729/19</p> <p><b>based [16]</b> 1510/20 1528/8 1535/5 1549/21 1585/12 1590/7 1591/7 1626/10 1639/14 1645/24 1649/6 1649/8 1649/16 1671/16 1674/22 1676/13</p> <p><b>bases [1]</b> 1649/13</p> <p><b>basically [1]</b> 1645/19</p> <p><b>basing [1]</b> 1532/6</p> <p><b>basis [30]</b> 1511/8 1515/15 1529/25 1530/12 1552/20 1552/22 1556/13 1556/20 1557/1 1557/2 1558/14 1564/8 1569/16 1569/20 1589/5 1591/2 1592/11 1594/1 1595/9 1597/14 1631/13 1641/8 1641/9 1654/16 1655/2 1664/12 1665/22 1673/7 1674/19</p>	<p>1690/16</p> <p><b>Bates [1]</b> 1620/3</p> <p><b>be [297]</b></p> <p><b>bearer [1]</b> 1510/25</p> <p><b>became [6]</b> 1513/15 1683/18 1706/21 1718/10 1724/20 1725/2</p> <p><b>because [131]</b> 1505/14 1506/5 1508/3 1510/13 1511/14 1512/20 1515/1 1515/11 1515/18 1518/12 1518/15 1519/25 1521/8 1522/18 1523/16 1524/3 1525/23 1526/1 1526/10 1529/11 1529/22 1530/9 1530/11 1530/14 1530/19 1531/3 1535/14 1537/8 1537/16 1539/18 1540/4 1543/5 1547/5 1548/25 1549/15 1549/16 1550/14 1552/6 1552/21 1555/15 1560/22 1563/22 1563/24 1564/10 1566/5 1567/3 1570/16 1578/6 1587/15 1588/25 1593/12 1593/17 1596/24 1607/19 1614/24 1618/14 1622/5 1622/10 1622/15 1622/23 1623/5 1623/7 1625/18 1626/15 1627/7 1627/24 1629/18 1630/20 1637/8 1639/7 1639/24 1643/15 1646/22 1648/17 1650/4 1650/11 1654/25 1655/19 1657/2 1657/5 1658/8 1659/13 1664/19 1670/8 1671/3 1672/19 1673/11 1673/17 1674/11 1675/23 1676/8 1683/3 1684/4 1684/6 1686/20 1687/8 1689/13 1690/1 1690/1 1690/7 1692/10 1692/11 1694/4 1701/8 1703/7 1703/12 1703/19 1703/24 1704/4 1705/2 1705/7</p>	<p>1705/10 1705/24 1705/25 1707/23 1707/24 1708/6 1712/25 1713/3 1713/10 1713/13 1713/24 1714/5 1716/20 1718/10 1718/20 1720/11 1722/19 1723/12 1724/16 1727/14</p> <p><b>become [4]</b> 1724/2 1724/18 1725/1 1725/7</p> <p><b>becomes [1]</b> 1725/23</p> <p><b>becoming [1]</b> 1718/6</p> <p><b>been [76]</b> 1507/1 1511/14 1513/12 1515/9 1518/21 1521/3 1521/13 1522/14 1525/13 1526/7 1530/14 1535/7 1537/11 1542/6 1543/24 1547/23 1548/1 1549/16 1550/6 1553/7 1558/4 1568/25 1569/13 1583/25 1592/2 1594/17 1602/14 1608/18 1609/7 1619/6 1624/11 1635/4 1638/5 1639/3 1655/6 1656/17 1656/21 1658/14 1659/14 1659/25 1660/10 1662/6 1662/14 1663/3 1664/20 1665/11 1668/20 1670/9 1671/16 1672/8 1682/7 1682/9 1684/20 1686/1 1695/21 1704/10 1704/22 1705/6 1705/15 1707/24 1708/8 1716/5 1720/10 1724/5 1724/11 1725/11 1725/13 1725/16 1725/21 1726/3 1726/8 1726/13 1726/20 1726/23 1727/2 1728/17</p> <p><b>before [45]</b> 1514/11 1520/18 1522/13 1523/9 1523/14 1524/1 1524/16 1532/3 1532/13 1534/5 1536/4 1537/2 1542/16 1542/17 1564/15 1564/16 1579/2 1580/4 1583/5</p>	<p>1583/10 1584/11 1596/3 1597/5 1597/21 1608/24 1615/6 1622/6 1625/11 1629/15 1643/5 1650/5 1654/3 1673/13 1680/1 1683/3 1683/6 1685/23 1693/18 1710/5 1710/9 1720/11 1720/18 1722/1 1725/6 1727/8</p> <p><b>beforehand [1]</b> 1678/24</p> <p><b>began [5]</b> 1571/18 1571/21 1590/1 1654/4 1654/8</p> <p><b>begin [1]</b> 1525/21</p> <p><b>beginning [7]</b> 1534/3 1546/18 1570/4 1600/19 1606/13 1642/18 1727/22</p> <p><b>begins [1]</b> 1582/22</p> <p><b>behalf [4]</b> 1502/3 1503/3 1687/2 1699/10</p> <p><b>behind [3]</b> 1524/16 1597/18 1680/17</p> <p><b>being [24]</b> 1507/2 1511/8 1525/3 1529/21 1530/13 1550/18 1585/23 1592/14 1629/9 1630/15 1635/11 1636/19 1643/17 1653/5 1665/12 1684/10 1684/12 1688/25 1700/20 1704/24 1711/20 1719/4 1720/12 1724/17</p> <p><b>belabor [1]</b> 1518/20</p> <p><b>belief [1]</b> 1660/17</p> <p><b>believe [44]</b> 1513/18 1513/22 1516/3 1520/12 1523/21 1523/24 1529/25 1550/8 1550/16 1550/25 1551/22 1556/3 1556/21 1559/20 1560/13 1563/2 1572/8 1572/11 1573/23 1574/1 1578/19 1580/19 1580/23 1586/3 1593/2 1593/10 1597/9 1605/2 1619/24 1630/4 1631/4 1632/6 1635/5 1635/11 1640/18 1643/18 1649/21 1654/20</p>	<p>1655/12 1659/11 1659/12 1686/25 1701/12 1701/21</p> <p><b>belong [2]</b> 1675/20 1703/20</p> <p><b>belonging [2]</b> 1663/21 1712/22</p> <p><b>belongs [15]</b> 1541/5 1541/6 1541/8 1541/13 1541/17 1541/22 1542/1 1542/2 1544/2 1546/10 1546/11 1626/21 1669/23 1702/7 1702/10</p> <p><b>below [1]</b> 1702/1</p> <p><b>beneficial [3]</b> 1505/24 1506/6 1597/20</p> <p><b>benefit [3]</b> 1507/20 1676/8 1701/10</p> <p><b>benefits [2]</b> 1560/22 1560/23</p> <p><b>best [6]</b> 1600/3 1646/20 1646/25 1648/11 1648/15 1730/1</p> <p><b>better [4]</b> 1511/14 1557/19 1618/5 1710/18</p> <p><b>between [10]</b> 1517/1 1520/22 1525/17 1543/3 1555/15 1566/21 1610/17 1621/23 1650/23 1683/20</p> <p><b>beyond [9]</b> 1593/24 1602/13 1602/19 1607/13 1644/12 1657/10 1658/13 1679/9 1720/4</p> <p><b>bidding [2]</b> 1684/24 1684/25</p> <p><b>big [3]</b> 1550/24 1654/15 1719/14</p> <p><b>bigger [1]</b> 1620/15</p> <p><b>biographic [1]</b> 1555/14</p> <p><b>biographical [1]</b> 1555/21</p> <p><b>biological [2]</b> 1582/15 1583/3</p> <p><b>biologist's [1]</b> 1559/4</p> <p><b>bit [12]</b> 1505/5 1505/20 1511/15 1610/19 1617/3 1618/3 1634/18 1635/15 1655/21 1661/12 1686/13 1729/7</p> <p><b>blame [1]</b> 1719/10</p> <p><b>Blancas [1]</b> 1501/13</p>
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<p><b>B</b></p> <p><b>Blandón [2]</b> 1720/25 1721/8</p> <p><b>blank [1]</b> 1671/7</p> <p><b>blanket [3]</b> 1615/13 1615/20 1615/23</p> <p><b>blemish [1]</b> 1632/5</p> <p><b>blemished [1]</b> 1655/14</p> <p><b>blow [5]</b> 1544/14 1583/2 1603/6 1603/7 1603/16</p> <p><b>bodies [7]</b> 1601/17 1608/6 1608/10 1608/11 1640/14 1644/20 1646/9</p> <p><b>body [4]</b> 1607/13 1614/23 1721/16 1726/25</p> <p><b>book [2]</b> 1666/17 1689/3</p> <p><b>booked [1]</b> 1728/24</p> <p><b>books [1]</b> 1666/16</p> <p><b>both [13]</b> 1510/9 1530/20 1530/20 1576/15 1577/18 1584/14 1604/24 1614/22 1615/4 1648/22 1656/24 1704/4 1729/13</p> <p><b>bottom [1]</b> 1701/23</p> <p><b>boundaries [1]</b> 1667/22</p> <p><b>branch [1]</b> 1679/4</p> <p><b>break [27]</b> 1553/6 1553/8 1553/12 1594/22 1595/5 1595/18 1595/22 1596/8 1599/3 1617/2 1641/13 1645/11 1646/18 1659/25 1660/1 1701/9 1701/15 1701/16 1718/3 1719/5 1719/10 1719/17 1720/1 1720/3 1728/20 1729/1 1730/5</p> <p><b>brief [18]</b> 1507/6 1511/22 1532/17 1532/19 1548/9 1553/14 1558/22 1598/17 1598/18 1599/21 1600/25 1617/7 1660/3 1663/21 1701/9 1714/3 1714/23 1720/7</p> <p><b>briefly [7]</b> 1513/8 1561/22 1564/18 1644/9 1663/14 1713/24 1714/3</p> <p><b>briefs [1]</b> 1713/21</p>	<p><b>bring [5]</b> 1506/22 1532/18 1651/24 1653/7 1720/19</p> <p><b>bringing [1]</b> 1643/6</p> <p><b>broad [5]</b> 1537/5 1589/12 1607/17 1607/20 1687/25</p> <p><b>broken [1]</b> 1512/25</p> <p><b>brought [6]</b> 1521/4 1596/21 1596/21 1608/1 1608/2 1721/21</p> <p><b>budget [2]</b> 1684/11 1729/25</p> <p><b>burdens [1]</b> 1699/24</p> <p><b>business [11]</b> 1556/17 1590/20 1613/24 1614/21 1638/23 1654/3 1678/4 1678/16 1687/12 1687/15 1687/17</p> <p><b>button [1]</b> 1528/24</p> <p><b>buy [1]</b> 1548/4</p> <p><b>Byron [4]</b> 1503/18 1660/6 1661/8 1661/13</p> <p><b>C</b></p> <p><b>C-0081 [2]</b> 1636/9 1640/8</p> <p><b>C-0251 [1]</b> 1619/10</p> <p><b>C-0254 [1]</b> 1710/16</p> <p><b>C-0258 [1]</b> 1630/4</p> <p><b>C-0263 [2]</b> 1542/14 1542/15</p> <p><b>C-251 [1]</b> 1695/2</p> <p><b>C-254 [4]</b> 1711/5 1718/5 1720/14 1723/20</p> <p><b>C-259 [1]</b> 1538/9</p> <p><b>C-263 [3]</b> 1543/8 1543/11 1543/11</p> <p><b>C-265 [1]</b> 1543/20</p> <p><b>C-268 [3]</b> 1540/2 1540/7 1544/7</p> <p><b>C-269 [3]</b> 1540/2 1542/8 1701/2</p> <p><b>C-534 [2]</b> 1604/15 1605/1</p> <p><b>C-566 [1]</b> 1547/17</p> <p><b>C-60 [1]</b> 1538/16</p> <p><b>call [6]</b> 1554/12 1554/13 1583/12 1600/7 1656/8 1729/18</p> <p><b>call-outs [1]</b> 1583/12</p> <p><b>called [6]</b> 1563/5 1649/5 1660/10 1669/7 1670/17 1689/3</p> <p><b>came [6]</b> 1576/18 1578/19 1579/4</p>	<p>1600/18 1639/5 1654/18</p> <p><b>can [218]</b> 1505/12 1506/7 1506/8 1506/25 1507/13 1508/24 1510/1 1510/10 1511/5 1513/8 1513/9 1517/13 1519/9 1521/7 1521/9 1522/3 1522/10 1522/21 1522/22 1523/18 1524/13 1524/13 1524/13 1525/1 1525/11 1525/13 1526/21 1528/22 1528/24 1532/10 1532/17 1534/4 1534/7 1534/8 1534/13 1534/18 1535/6 1535/16 1537/13 1537/15 1539/24 1540/4 1542/4 1543/21 1544/6 1544/7 1544/8 1544/9 1546/25 1547/20 1548/8 1551/7 1553/2 1554/5 1554/7 1554/9 1554/13 1555/17 1557/5 1558/1 1558/22 1559/12 1560/21 1562/16 1562/18 1563/21 1564/6 1564/7 1565/10 1568/12 1569/3 1569/18 1570/3 1570/5 1570/22 1571/10 1576/6 1576/6 1576/11 1578/8 1578/20 1579/18 1580/14 1580/15 1580/17 1581/9 1581/11 1581/14 1582/24 1583/9 1583/22 1584/4 1584/5 1584/5 1584/14 1585/1 1585/3 1588/25 1590/6 1591/18 1594/23 1595/4 1595/17 1598/23 1599/20 1601/14 1602/2 1602/6 1602/7 1602/17 1603/1 1603/5 1603/7 1603/9 1603/9 1603/10 1603/12 1603/15 1604/11 1604/14 1606/24 1608/4 1608/4 1608/20 1609/1 1610/18</p>	<p>1611/8 1615/22 1615/23 1618/3 1618/10 1619/10 1620/9 1626/2 1629/19 1629/20 1630/5 1630/7 1630/21 1630/22 1631/14 1632/5 1632/15 1632/22 1634/2 1634/11 1634/16 1636/3 1636/10 1641/1 1642/10 1642/12 1643/22 1644/1 1646/13 1646/15 1646/21 1646/24 1647/1 1648/11 1650/9 1650/17 1651/2 1652/14 1652/23 1653/10 1653/12 1653/14 1654/16 1655/2 1660/13 1661/11 1663/7 1665/14 1666/15 1666/22 1666/25 1667/1 1667/7 1667/20 1667/21 1667/21 1667/23 1668/2 1669/14 1670/13 1670/16 1671/9 1671/19 1672/12 1672/14 1673/10 1673/14 1673/22 1676/23 1679/16 1679/18 1691/20 1691/24 1692/17 1695/22 1697/8 1699/3 1700/12 1700/23 1701/6 1701/21 1709/18 1710/11 1712/5 1717/3 1718/3 1719/14 1725/18 1727/16 1729/5 1729/8 1729/9</p> <p><b>can't [12]</b> 1505/15 1505/25 1512/20 1518/14 1553/20 1574/17 1603/14 1611/17 1611/19 1615/13 1705/1 1705/9</p> <p><b>Canada [1]</b> 1527/3</p> <p><b>cancellations [2]</b> 1666/19 1702/21</p> <p><b>cannot [42]</b> 1513/21 1528/2 1530/13 1532/9 1534/15 1537/5 1546/23 1546/23 1553/11 1557/2 1561/6 1563/12 1575/7</p>	<p>1588/17 1589/14 1589/18 1591/24 1592/7 1602/5 1602/12 1607/19 1611/20 1612/7 1615/12 1615/19 1615/23 1622/17 1626/20 1637/16 1657/6 1676/7 1678/20 1700/8 1700/10 1700/13 1708/15 1708/18 1709/2 1717/11 1718/16 1722/15 1730/7</p> <p><b>capability [1]</b> 1534/5</p> <p><b>capable [2]</b> 1616/15 1650/16</p> <p><b>capacities [1]</b> 1582/17</p> <p><b>capacity [1]</b> 1548/21</p> <p><b>capital [1]</b> 1513/16</p> <p><b>Cardenas [4]</b> 1502/7 1679/19 1701/4 1720/8</p> <p><b>cardinal [1]</b> 1631/10</p> <p><b>care [2]</b> 1675/1 1675/5</p> <p><b>career [1]</b> 1685/25</p> <p><b>careful [1]</b> 1578/12</p> <p><b>carefully [2]</b> 1550/7 1647/1</p> <p><b>Carlisle [1]</b> 1501/16</p> <p><b>Carlos [5]</b> 1502/19 1562/7 1634/6 1634/7 1634/8</p> <p><b>carried [4]</b> 1582/3 1582/23 1609/12 1621/15</p> <p><b>carry [6]</b> 1584/21 1585/11 1585/25 1586/1 1606/7 1613/24</p> <p><b>carrying [2]</b> 1571/22 1582/10</p> <p><b>case [66]</b> 1500/11 1508/17 1515/20 1515/20 1525/9 1525/14 1525/15 1528/2 1528/3 1528/6 1528/7 1529/15 1533/17 1539/2 1546/21 1549/21 1561/1 1567/5 1569/24 1570/8 1571/17 1578/18 1595/10 1595/11 1598/6 1616/5 1619/6 1622/14 1622/23 1622/25 1623/5 1626/4 1637/23 1639/15 1647/18 1648/19 1654/4</p>
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[29]</b> 1654/15 1655/4 1656/21 1657/2 1663/10 1665/1 1665/9 1665/11 1666/2 1668/16 1671/17 1673/7 1676/14 1690/5 1690/8 1694/10 1700/15 1702/12 1702/25 1707/1 1714/10 1716/18 1716/25 1721/15 1721/16 1723/1 1724/22 1725/5 1727/3</p> <p><b>cases [9]</b> 1516/13 1625/9 1625/21 1663/4 1689/11 1690/9 1690/10 1714/1 1720/17</p> <p><b>category [5]</b> 1540/11 1541/17 1545/10 1545/11 1546/9</p> <p><b>caught [1]</b> 1701/18</p> <p><b>cause [3]</b> 1620/18 1620/21 1715/10</p> <p><b>caused [1]</b> 1715/10</p> <p><b>causes [3]</b> 1625/7 1710/2 1718/6</p> <p><b>Center [1]</b> 1662/16</p> <p><b>CENTRE [1]</b> 1500/2</p> <p><b>Centroamericana [1]</b> 1662/9</p> <p><b>century [2]</b> 1687/19 1688/3</p> <p><b>certain [8]</b> 1563/22 1564/7 1575/9 1583/6 1598/5 1664/20 1674/3 1674/22</p> <p><b>certainly [2]</b> 1508/1 1728/18</p> <p><b>certainty [1]</b> 1614/9</p> <p><b>certificate [45]</b> 1537/19 1538/6 1538/12 1538/16 1538/17 1538/18 1538/21 1539/2 1539/11 1539/17 1539/23 1539/24 1540/1 1540/8 1543/3 1543/4 1544/18 1544/25 1545/3 1545/5 1546/14 1552/21 1615/15 1615/18 1628/23 1629/18 1629/18 1667/7 1667/8 1667/11 1667/11 1667/15 1667/19 1667/24 1667/24 1669/2 1669/3</p>	<p>1669/11 1669/21 1670/10 1704/1 1705/6 1706/23 1722/19 1724/23</p> <p><b>certificates [22]</b> 1535/17 1535/18 1535/18 1535/22 1535/22 1536/15 1536/16 1537/2 1537/3 1537/10 1537/11 1537/12 1537/18 1537/21 1537/23 1546/17 1614/3 1616/9 1667/10 1667/18 1699/18 1704/17</p> <p><b>certified [1]</b> 1539/7</p> <p><b>CES [1]</b> 1638/19</p> <p><b>CES-06 [1]</b> 1638/19</p> <p><b>Cesar [1]</b> 1720/25</p> <p><b>cetera [4]</b> 1531/23 1552/4 1573/5 1592/11</p> <p><b>challenge [17]</b> 1522/19 1530/25 1531/18 1535/6 1673/2 1673/10 1673/21 1673/22 1695/14 1695/22 1698/4 1718/19 1718/19 1718/21 1719/2 1719/3 1723/11</p> <p><b>Chamorro [1]</b> 1503/15</p> <p><b>chance [3]</b> 1522/19 1600/13 1653/21</p> <p><b>change [9]</b> 1511/11 1536/12 1536/13 1569/22 1587/2 1591/24 1666/8 1675/10 1705/10</p> <p><b>changed [1]</b> 1573/2</p> <p><b>changes [9]</b> 1588/17 1589/5 1589/14 1591/15 1591/18 1592/8 1639/7 1726/3 1726/10</p> <p><b>changing [2]</b> 1586/8 1726/24</p> <p><b>channel [3]</b> 1512/23 1512/24 1561/13</p> <p><b>chapter [3]</b> 1656/14 1728/2 1728/3</p> <p><b>characterization [2]</b> 1579/8 1676/23</p> <p><b>characterize [1]</b> 1613/24</p> <p><b>characterizing [1]</b> 1693/23</p> <p><b>charge [3]</b> 1515/2 1662/19 1662/21</p> <p><b>Charles [1]</b> 1501/21</p>	<p><b>check [3]</b> 1505/23 1543/21 1671/8</p> <p><b>chose [1]</b> 1622/25</p> <p><b>chronology [1]</b> 1564/14</p> <p><b>cij.org [1]</b> 1501/7</p> <p><b>circle [1]</b> 1668/22</p> <p><b>circumstances [2]</b> 1624/23 1654/11</p> <p><b>citation [6]</b> 1528/5 1681/7 1681/18 1682/2 1692/16 1692/16</p> <p><b>cite [1]</b> 1712/25</p> <p><b>cited [3]</b> 1614/14 1652/12 1692/25</p> <p><b>City [1]</b> 1525/4</p> <p><b>civil [40]</b> 1507/22 1508/6 1508/16 1515/18 1516/1 1516/7 1528/9 1619/16 1620/4 1620/6 1620/11 1621/8 1623/14 1623/24 1626/19 1656/12 1656/12 1656/13 1658/6 1662/25 1663/15 1665/5 1671/2 1671/18 1671/19 1671/19 1674/7 1674/10 1678/6 1691/17 1708/17 1709/10 1709/21 1710/1 1710/14 1718/2 1718/4 1720/14 1721/7 1727/10</p> <p><b>claim [3]</b> 1573/23 1672/1 1727/5</p> <p><b>claimant [31]</b> 1500/6 1502/3 1520/4 1573/18 1573/21 1573/24 1574/3 1574/9 1598/1 1598/19 1603/3 1603/20 1603/24 1604/4 1604/15 1635/13 1642/25 1654/12 1663/22 1663/24 1679/12 1679/20 1681/1 1704/11 1704/23 1712/14 1712/16 1713/13 1713/15 1714/4 1714/5</p> <p><b>Claimant's [1]</b> 1590/13</p> <p><b>claimed [2]</b> 1664/1 1681/3</p> <p><b>clarification [1]</b> 1628/3</p> <p><b>clarifications [1]</b></p>	<p>1598/24</p> <p><b>clarify [17]</b> 1518/15 1518/17 1597/24 1598/10 1628/25 1629/24 1630/12 1638/15 1640/21 1645/2 1651/2 1652/10 1657/9 1659/6 1669/12 1669/13 1685/10</p> <p><b>clarifying [3]</b> 1581/5 1649/4 1727/22</p> <p><b>clarity [1]</b> 1636/17</p> <p><b>classes [1]</b> 1662/10</p> <p><b>clause [2]</b> 1711/6 1726/13</p> <p><b>clauses [1]</b> 1631/6</p> <p><b>clean [3]</b> 1640/12 1644/18 1646/2</p> <p><b>clear [31]</b> 1515/22 1523/18 1528/19 1549/19 1574/9 1577/9 1590/23 1592/9 1594/15 1617/25 1636/4 1649/23 1658/16 1659/8 1671/15 1672/24 1676/23 1677/11 1703/10 1703/21 1705/1 1705/2 1705/12 1711/3 1711/19 1716/4 1717/20 1722/17 1724/17 1726/22 1727/4</p> <p><b>clearer [2]</b> 1704/10 1704/22</p> <p><b>clearly [4]</b> 1532/1 1672/14 1697/14 1707/5</p> <p><b>client [12]</b> 1521/3 1521/14 1521/17 1521/22 1522/15 1522/16 1530/22 1530/25 1612/19 1613/1 1613/2 1616/5</p> <p><b>clients [4]</b> 1521/13 1535/21 1689/25 1690/1</p> <p><b>close [1]</b> 1594/16</p> <p><b>closed [2]</b> 1577/25 1619/7</p> <p><b>closely [1]</b> 1663/6</p> <p><b>closer [2]</b> 1611/18 1699/1</p> <p><b>closing [6]</b> 1510/1 1510/9 1511/16 1511/19 1597/22 1721/15</p> <p><b>closings [1]</b> 1597/6</p> <p><b>cloud [2]</b> 1546/16 1632/5</p> <p><b>co [3]</b> 1668/12</p>	<p>1668/13 1685/20</p> <p><b>co-counsel [1]</b> 1685/20</p> <p><b>co-owners [1]</b> 1668/13</p> <p><b>co-ownership [1]</b> 1668/12</p> <p><b>code [59]</b> 1507/22 1508/7 1508/16 1515/18 1516/1 1516/7 1516/24 1523/18 1523/22 1524/1 1525/18 1528/9 1532/8 1619/16 1620/4 1620/6 1620/12 1621/9 1623/15 1623/24 1624/7 1624/12 1624/20 1625/22 1625/25 1626/15 1626/16 1626/20 1637/15 1637/16 1637/17 1656/12 1656/13 1657/4 1658/6 1665/5 1671/2 1671/18 1671/19 1671/19 1674/7 1674/10 1676/9 1678/6 1691/18 1695/6 1708/17 1709/10 1709/21 1709/25 1710/14 1711/4 1718/1 1718/4 1720/13 1720/20 1724/6 1724/25 1727/10</p> <p><b>codes [1]</b> 1671/4</p> <p><b>coexistence [1]</b> 1556/6</p> <p><b>coffee [11]</b> 1500/5 1542/2 1640/13 1644/19 1646/8 1663/22 1669/20 1670/5 1670/7 1670/21 1712/14</p> <p><b>cognizant [1]</b> 1728/17</p> <p><b>Colla [1]</b> 1501/20</p> <p><b>collateral [2]</b> 1551/25 1552/9</p> <p><b>collateralization [1]</b> 1652/2</p> <p><b>colleague [1]</b> 1553/4</p> <p><b>colleagues [1]</b> 1659/18</p> <p><b>collect [1]</b> 1617/1</p> <p><b>column [15]</b> 1536/12 1539/4 1539/13 1584/19 1584/20 1584/23 1667/5 1668/21 1669/6 1670/3 1702/20</p>
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1693/5</p> <p><b>community</b> [1] 1682/15</p> <p><b>company</b> [5] 1513/17 1615/1 1615/21 1655/15 1717/10</p> <p><b>compare</b> [1] 1677/21</p> <p><b>comparison</b> [1] 1543/3</p> <p><b>compete</b> [1] 1684/24</p>	<p><b>competence</b> [7] 1585/9 1601/25 1602/13 1602/14 1602/16 1607/9 1607/14</p> <p><b>competency</b> [1] 1601/21</p> <p><b>competent</b> [1] 1676/6</p> <p><b>complain</b> [2] 1629/15 1657/6</p> <p><b>complaint</b> [1] 1627/13</p> <p><b>complete</b> [4] 1518/21 1693/10 1706/24 1707/1</p> <p><b>completely</b> [6] 1525/10 1565/25 1573/10 1573/12 1646/18 1664/22</p> <p><b>completion</b> [1] 1509/23</p> <p><b>complicated</b> [1] 1517/19</p> <p><b>complied</b> [5] 1565/22 1566/15 1570/10 1638/22 1639/11</p> <p><b>complies</b> [1] 1562/22</p> <p><b>comply</b> [6] 1566/2 1566/12 1566/16 1605/20 1642/25 1727/12</p> <p><b>computerized</b> [2] 1704/12 1704/21</p> <p><b>concept</b> [3] 1607/15 1624/14 1644/22</p> <p><b>concerned</b> [1] 1597/17</p> <p><b>concerning</b> [1] 1539/8</p> <p><b>concerns</b> [1] 1642/8</p> <p><b>conclude</b> [4] 1589/19 1590/4 1591/4 1593/11</p> <p><b>concluded</b> [1] 1621/4</p> <p><b>concludes</b> [2] 1595/9 1659/20</p> <p><b>conclusion</b> [11] 1533/25 1533/25 1559/4 1578/8 1590/5 1590/7 1591/6 1591/7 1594/1 1717/17 1717/17</p> <p><b>concrete</b> [1] 1657/2</p> <p><b>condemnation</b> [1] 1609/16</p> <p><b>condition</b> [3] 1572/6 1572/20 1670/25</p> <p><b>conduct</b> [7] 1607/16 1607/17 1607/22</p>	<p>1608/5 1639/4 1658/9 1717/11</p> <p><b>conducted</b> [6] 1609/9 1609/13 1610/5 1625/15 1625/20 1679/1</p> <p><b>conducting</b> [5] 1550/2 1553/19 1553/23 1617/20 1617/22</p> <p><b>confer</b> [2] 1509/10 1510/5</p> <p><b>conferred</b> [1] 1608/12</p> <p><b>confers</b> [1] 1605/13</p> <p><b>confidential</b> [1] 1690/7</p> <p><b>confidentiality</b> [3] 1689/14 1689/24 1690/2</p> <p><b>confined</b> [1] 1602/15</p> <p><b>confirm</b> [4] 1551/14 1561/6 1696/7 1712/3</p> <p><b>confirmation</b> [2] 1708/19 1709/2</p> <p><b>confirmed</b> [5] 1538/18 1588/14 1605/8 1605/8 1711/25</p> <p><b>confirming</b> [2] 1535/11 1612/15</p> <p><b>conflict</b> [2] 1682/14 1688/9</p> <p><b>confounds</b> [1] 1541/21</p> <p><b>confused</b> [1] 1646/23</p> <p><b>confusion</b> [6] 1525/17 1526/2 1526/10 1541/23 1631/24 1669/12</p> <p><b>connection</b> [21] 1516/1 1520/14 1526/24 1538/12 1554/19 1556/12 1559/8 1589/24 1610/24 1663/10 1666/7 1666/10 1668/19 1669/17 1672/16 1690/14 1695/9 1696/8 1713/2 1716/15 1723/15</p> <p><b>Conover</b> [1] 1501/13</p> <p><b>conscience</b> [1] 1660/16</p> <p><b>consequence</b> [2] 1622/8 1622/11</p> <p><b>consequences</b> [1] 1725/24</p> <p><b>Consequently</b> [1] 1591/1</p> <p><b>conservation</b> [6] 1555/20 1582/16</p>	<p>1583/13 1674/25 1675/3 1675/5</p> <p><b>consider</b> [9] 1511/20 1520/6 1521/4 1553/3 1574/15 1615/17 1637/22 1651/14 1714/5</p> <p><b>considerable</b> [2] 1507/1 1651/10</p> <p><b>considerably</b> [1] 1507/2</p> <p><b>consideration</b> [1] 1652/21</p> <p><b>considerations</b> [1] 1654/6</p> <p><b>considered</b> [2] 1521/21 1711/20</p> <p><b>considers</b> [2] 1673/9 1673/11</p> <p><b>consistently</b> [1] 1591/5</p> <p><b>consolidated</b> [4] 1555/5 1604/10 1604/11 1604/12</p> <p><b>Constanza</b> [1] 1501/13</p> <p><b>constitute</b> [3] 1665/1 1668/15 1711/15</p> <p><b>constituted</b> [2] 1591/5 1675/11</p> <p><b>constitutes</b> [1] 1676/6</p> <p><b>constitution</b> [15] 1602/24 1603/2 1603/6 1603/8 1603/11 1603/15 1604/5 1605/11 1605/14 1643/19 1658/5 1658/7 1658/8 1658/20 1658/21</p> <p><b>constitutional</b> [4] 1607/24 1607/25 1663/2 1688/22</p> <p><b>constitutionality</b> [1] 1605/16</p> <p><b>constraints</b> [1] 1586/15</p> <p><b>construction</b> [1] 1686/15</p> <p><b>consult</b> [2] 1700/12 1705/20</p> <p><b>consultant</b> [6] 1662/24 1684/20 1684/23 1685/1 1685/7 1686/1</p> <p><b>contained</b> [1] 1699/18</p> <p><b>contending</b> [2] 1528/12 1528/13</p> <p><b>content</b> [2] 1520/23 1697/23</p> <p><b>contention</b> [1]</p>	<p>1614/12</p> <p><b>contentious</b> [2] 1606/10 1606/15</p> <p><b>contents</b> [1] 1543/25</p> <p><b>context</b> [5] 1585/22 1599/21 1649/15 1703/18 1715/9</p> <p><b>continue</b> [21] 1512/2 1512/5 1512/12 1520/5 1528/16 1532/3 1546/25 1550/17 1553/4 1553/9 1557/8 1559/5 1561/24 1563/15 1573/13 1574/13 1581/9 1601/13 1626/2 1642/6 1729/2</p> <p><b>continued</b> [2] 1512/8 1627/10</p> <p><b>continues</b> [3] 1582/9 1596/3 1694/9</p> <p><b>continuity</b> [1] 1582/10</p> <p><b>contra</b> [2] 1678/9 1678/17</p> <p><b>contract</b> [10] 1545/19 1545/24 1546/2 1546/2 1546/3 1546/5 1564/20 1685/4 1702/1 1709/9</p> <p><b>contract/modality</b> [1] 1702/1</p> <p><b>contrary</b> [2] 1678/11 1728/12</p> <p><b>contrast</b> [1] 1676/12</p> <p><b>control</b> [6] 1528/22 1548/15 1654/13 1655/5 1684/4 1684/6</p> <p><b>controlled</b> [3] 1514/3 1514/17 1648/17</p> <p><b>controls</b> [1] 1715/2</p> <p><b>conversation</b> [3] 1557/9 1605/7 1651/8</p> <p><b>conveyance</b> [2] 1666/3 1666/9</p> <p><b>cooperate</b> [1] 1606/7</p> <p><b>cooperation</b> [1] 1689/5</p> <p><b>coordinates</b> [1] 1559/22</p> <p><b>copies</b> [1] 1525/5</p> <p><b>copy</b> [16] 1539/10 1539/16 1539/20 1544/24 1544/24 1545/3 1545/5 1552/21 1694/22 1695/11 1706/10 1707/1 1707/6 1707/12 1722/2 1722/12</p>
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<p><b>C</b></p> <p><b>corporate [1]</b> 1513/16</p> <p><b>corporation [1]</b> 1516/25</p> <p><b>correct [230]</b> 1513/13 1513/17 1514/18 1515/3 1515/13 1516/19 1516/23 1519/16 1519/22 1519/23 1520/8 1520/11 1520/21 1524/6 1524/9 1524/24 1527/9 1527/23 1527/24 1531/19 1531/21 1532/25 1533/4 1536/5 1536/10 1536/19 1537/4 1537/12 1537/18 1537/19 1537/22 1538/7 1538/13 1538/20 1539/14 1542/17 1546/22 1547/4 1547/9 1547/14 1548/16 1548/23 1548/25 1549/6 1549/11 1551/12 1551/21 1554/25 1555/8 1556/13 1558/17 1559/16 1559/17 1559/19 1559/22 1559/25 1560/3 1560/7 1560/17 1561/3 1561/4 1561/5 1561/17 1562/5 1562/6 1562/8 1562/9 1562/15 1562/20 1563/1 1563/4 1563/11 1563/19 1564/13 1564/25 1565/7 1565/8 1565/15 1565/19 1566/23 1567/17 1568/3 1568/18 1569/25 1570/15 1571/16 1572/2 1572/23 1573/19 1573/25 1574/6 1574/16 1575/5 1575/18 1577/9 1577/14 1577/22 1579/5 1580/10 1580/23 1582/5 1582/19 1586/1 1586/16 1586/20 1586/25 1587/7 1587/9 1587/11 1587/13 1588/17 1588/18 1588/23 1589/20 1590/8</p>	<p>1590/14 1590/17 1590/24 1590/25 1591/8 1592/20 1593/14 1594/8 1601/21 1602/3 1602/13 1602/21 1602/24 1605/19 1606/3 1606/11 1606/16 1606/20 1607/9 1607/15 1608/7 1608/12 1608/19 1609/9 1609/14 1610/8 1610/23 1611/1 1611/3 1611/10 1612/11 1612/25 1613/7 1613/13 1614/3 1615/8 1618/16 1633/15 1634/22 1651/16 1658/21 1679/23 1680/10 1680/11 1680/17 1680/18 1682/8 1682/18 1682/23 1683/12 1684/7 1684/10 1684/17 1687/19 1687/20 1687/23 1688/10 1688/11 1688/12 1689/1 1689/12 1689/19 1690/16 1690/19 1690/22 1691/12 1691/13 1691/15 1691/16 1694/18 1695/23 1696/1 1696/2 1696/8 1696/12 1696/14 1699/19 1699/20 1700/3 1700/6 1700/7 1700/11 1700/14 1702/7 1702/10 1705/22 1706/12 1707/7 1707/13 1707/21 1707/22 1707/25 1708/5 1708/12 1708/13 1708/15 1708/16 1708/19 1709/22 1710/11 1710/12 1710/23 1711/11 1712/2 1712/19 1715/7 1716/17 1718/11 1721/24 1722/3 1722/6 1723/5 1725/25 1726/1 1726/12</p> <p><b>corrected [3]</b> 1532/9 1561/14 1561/15</p> <p><b>correction [1]</b> 1561/19</p> <p><b>correctly [3]</b> 1716/25 1723/10</p>	<p>1726/19</p> <p><b>corresponded [1]</b> 1540/25</p> <p><b>correspondence [1]</b> 1630/3</p> <p><b>corresponding [1]</b> 1616/5</p> <p><b>corresponds [1]</b> 1545/21</p> <p><b>Cortes [13]</b> 1503/9 1553/4 1553/9 1553/19 1553/22 1594/17 1596/3 1601/9 1603/18 1617/24 1643/18 1647/4 1655/24</p> <p><b>cost [4]</b> 1509/8 1509/14 1584/23 1621/6</p> <p><b>could [94]</b> 1507/23 1508/3 1508/12 1509/9 1509/24 1510/8 1510/15 1513/1 1529/11 1529/22 1530/6 1533/24 1540/1 1542/14 1544/22 1547/16 1548/20 1551/14 1557/23 1566/25 1570/25 1571/3 1575/4 1576/14 1577/18 1579/16 1582/21 1583/12 1584/25 1585/18 1586/6 1587/22 1589/16 1591/14 1591/16 1596/10 1596/15 1600/4 1608/17 1608/18 1609/6 1609/7 1609/17 1609/24 1615/14 1619/6 1619/8 1619/22 1619/23 1620/14 1623/25 1624/15 1630/12 1630/16 1632/14 1633/19 1634/15 1635/19 1635/25 1638/18 1638/19 1639/18 1639/21 1640/7 1642/6 1643/3 1644/8 1650/7 1653/7 1654/5 1655/6 1661/19 1667/16 1667/17 1667/17 1678/7 1684/18 1686/4 1686/12 1689/21 1692/12 1693/3 1693/15 1693/20 1694/5 1697/4 1697/7 1701/16 1705/7</p>	<p>1706/13 1707/23 1708/20 1713/19 1716/9</p> <p><b>couldn't [8]</b> 1505/23 1505/24 1595/2 1626/6 1631/20 1689/14 1690/2 1692/22</p> <p><b>counsel [39]</b> 1511/7 1520/18 1520/18 1521/1 1521/1 1522/13 1526/6 1528/25 1532/2 1532/20 1534/2 1535/7 1543/18 1548/8 1548/10 1549/13 1561/9 1578/5 1590/14 1618/14 1623/13 1623/23 1628/3 1628/19 1629/4 1630/6 1632/9 1635/2 1635/13 1636/14 1636/18 1640/21 1641/7 1642/24 1644/13 1653/2 1685/20 1693/19 1693/19</p> <p><b>Counselor [3]</b> 1522/2 1528/2 1568/4</p> <p><b>counted [2]</b> 1619/14 1695/25</p> <p><b>counter [3]</b> 1528/7 1549/10 1551/11</p> <p><b>Counter-Memorial [2]</b> 1549/10 1551/11</p> <p><b>country [14]</b> 1555/14 1555/22 1557/13 1558/10 1559/6 1588/19 1589/2 1592/14 1605/22 1605/25 1606/18 1650/12 1650/14 1699/10</p> <p><b>couple [3]</b> 1509/5 1527/7 1708/9</p> <p><b>course [24]</b> 1508/20 1509/10 1512/16 1555/19 1560/9 1569/18 1579/9 1594/25 1596/17 1599/7 1599/17 1614/21 1620/10 1624/19 1627/20 1628/15 1630/2 1655/20 1663/5 1672/12 1681/15 1728/21 1730/2 1730/4</p> <p><b>court [45]</b> 1501/15 1519/24 1523/20 1528/3 1528/4 1530/14 1530/25</p>	<p>1539/10 1539/21 1554/5 1621/16 1624/10 1625/10 1625/11 1625/13 1626/6 1626/7 1626/10 1626/15 1627/13 1627/17 1656/19 1656/19 1661/19 1661/23 1662/12 1664/9 1664/15 1664/16 1673/13 1683/3 1684/16 1684/20 1685/1 1685/6 1691/15 1692/23 1701/10 1710/6 1710/10 1721/4 1724/4 1724/15 1726/5 1728/19</p> <p><b>courtesy [6]</b> 1507/4 1544/6 1544/8 1547/21 1550/19 1706/13</p> <p><b>courts [3]</b> 1523/9 1523/15 1629/15</p> <p><b>Couvreur [2]</b> 1500/22 1501/7</p> <p><b>cover [2]</b> 1554/6 1558/21</p> <p><b>covered [1]</b> 1711/22</p> <p><b>covers [1]</b> 1663/9</p> <p><b>create [3]</b> 1510/18 1598/8 1676/17</p> <p><b>created [4]</b> 1588/20 1631/23 1666/14 1716/20</p> <p><b>creates [1]</b> 1675/23</p> <p><b>creating [1]</b> 1717/10</p> <p><b>creation [1]</b> 1684/21</p> <p><b>crimes [1]</b> 1644/24</p> <p><b>Criminal [1]</b> 1676/9</p> <p><b>Crisis [1]</b> 1688/8</p> <p><b>Cristina [2]</b> 1502/7 1679/19</p> <p><b>critical [1]</b> 1698/11</p> <p><b>cross [18]</b> 1507/15 1512/5 1512/8 1518/9 1550/2 1550/18 1553/5 1553/19 1553/23 1569/6 1596/4 1617/24 1641/3 1642/5 1658/13 1679/13 1679/14 1679/22</p> <p><b>cross-examination [17]</b> 1507/15 1512/5 1512/8 1518/9 1550/2 1553/5 1553/19 1553/23 1569/6 1596/4 1617/24 1641/3 1642/5 1658/13 1679/13 1679/14 1679/22</p>
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<p><b>C</b></p> <p><b>cross-examined [1]</b> 1550/18</p> <p><b>crucial [1]</b> 1515/23</p> <p><b>crystallize [1]</b> 1564/21</p> <p><b>cultivation [1]</b> 1590/3</p> <p><b>cure [1]</b> 1531/21</p> <p><b>cured [4]</b> 1626/6 1708/15 1708/18 1709/2</p> <p><b>curing [1]</b> 1624/4</p> <p><b>current [12]</b> 1540/11 1541/17 1542/16 1542/19 1545/6 1545/10 1568/15 1568/21 1588/14 1667/25 1667/25 1670/14</p> <p><b>currently [1]</b> 1546/17</p> <p><b>curricula [1]</b> 1687/16</p> <p><b>custodian [11]</b> 1664/10 1664/18 1664/25 1665/18 1665/21 1665/23 1670/24 1671/2 1671/7 1671/7 1671/8</p> <p><b>custody [2]</b> 1671/11 1671/22</p> <p><b>cut [3]</b> 1575/4 1576/18 1653/3</p> <p><b>CWS [1]</b> 1653/9</p> <p><b>CWS-8 [1]</b> 1653/9</p> <p><b>cycles [1]</b> 1556/2</p>	<p>1621/20 1623/2 1628/13 1630/16 1632/22 1639/10 1654/24 1722/14</p> <p><b>dated [4]</b> 1565/5 1610/3 1693/12 1721/1</p> <p><b>dates [6]</b> 1603/17 1630/15 1693/14 1722/6 1723/3 1723/4</p> <p><b>day [12]</b> 1508/20 1510/21 1511/9 1513/10 1522/19 1618/1 1632/13 1656/3 1693/9 1695/14 1695/25 1728/17</p> <p><b>days [7]</b> 1542/13 1542/24 1627/7 1694/11 1695/23 1695/25 1718/21</p> <p><b>DC [1]</b> 1500/17</p> <p><b>de [17]</b> 1502/8 1502/18 1552/17 1552/17 1617/17 1618/4 1631/13 1631/14 1631/15 1631/15 1631/17 1631/23 1642/3 1642/22 1643/3 1644/17 1670/18</p> <p><b>de jure [4]</b> 1552/17 1631/14 1631/15 1631/23</p> <p><b>deadline [3]</b> 1505/6 1506/3 1599/15</p> <p><b>deadlines [1]</b> 1509/19</p> <p><b>deal [7]</b> 1508/13 1508/14 1550/11 1597/3 1599/19 1642/9 1716/12</p> <p><b>dealing [3]</b> 1513/22 1513/22 1630/20</p> <p><b>deals [1]</b> 1597/10</p> <p><b>dealt [1]</b> 1654/2</p> <p><b>debate [2]</b> 1534/19 1673/18</p> <p><b>December [24]</b> 1551/21 1552/1 1552/8 1564/13 1609/12 1610/3 1619/19 1619/25 1628/21 1631/2 1654/19 1654/22 1664/8 1665/18 1691/15 1693/13 1693/17 1693/18 1693/25 1695/1 1696/17 1696/18 1698/4 1706/11</p> <p><b>December 13 [2]</b> 1564/13 1609/12</p>	<p><b>December 15 [6]</b> 1654/22 1691/15 1695/1 1696/17 1696/18 1698/4</p> <p><b>December 2021 [11]</b> 1551/21 1552/1 1552/8 1619/19 1619/25 1664/8 1665/18 1693/13 1693/17 1693/18 1693/25</p> <p><b>December 31 [1]</b> 1610/3</p> <p><b>decide [1]</b> 1598/23</p> <p><b>decided [5]</b> 1527/22 1566/3 1568/7 1656/19 1664/9</p> <p><b>decidedly [1]</b> 1556/7</p> <p><b>decimate [1]</b> 1592/14</p> <p><b>decision [10]</b> 1514/19 1532/8 1556/8 1556/8 1666/7 1720/18 1720/25 1721/8 1721/9 1721/21</p> <p><b>decisions [4]</b> 1514/4 1514/17 1530/14 1624/5</p> <p><b>declaration [8]</b> 1560/21 1565/14 1566/11 1660/12 1660/14 1660/15 1663/12 1695/4</p> <p><b>declare [5]</b> 1559/9 1560/16 1565/18 1660/16 1728/11</p> <p><b>declared [8]</b> 1559/10 1561/3 1610/22 1676/21 1677/6 1678/21 1684/5 1708/25</p> <p><b>declaring [2]</b> 1565/6 1674/17</p> <p><b>decree [3]</b> 1559/2 1587/16 1674/23</p> <p><b>decreed [3]</b> 1620/25 1664/12 1710/20</p> <p><b>decrees [2]</b> 1570/22 1573/4</p> <p><b>dedicated [2]</b> 1536/1 1674/25</p> <p><b>deem [2]</b> 1519/5 1689/25</p> <p><b>deemed [4]</b> 1523/9 1523/14 1625/22 1665/20</p> <p><b>deeply [3]</b> 1521/3 1521/13 1597/18</p> <p><b>defective [1]</b> 1529/19</p> <p><b>defects [3]</b> 1624/5 1723/12 1723/12</p>	<p><b>defend [3]</b> 1525/14 1614/25 1718/16</p> <p><b>defense [6]</b> 1591/1 1625/18 1627/11 1627/24 1718/15 1728/14</p> <p><b>defenseless [1]</b> 1718/10</p> <p><b>defined [5]</b> 1592/9 1602/14 1674/14 1675/6 1675/21</p> <p><b>defines [1]</b> 1675/4</p> <p><b>definitely [1]</b> 1623/9</p> <p><b>definition [3]</b> 1572/19 1606/20 1606/24</p> <p><b>definitions [1]</b> 1674/24</p> <p><b>definitive [2]</b> 1721/12 1721/23</p> <p><b>deforest [2]</b> 1570/22 1570/23</p> <p><b>deforestation [1]</b> 1571/1</p> <p><b>deforesting [1]</b> 1559/5</p> <p><b>degraded [1]</b> 1582/11</p> <p><b>degree [3]</b> 1662/3 1682/3 1687/11</p> <p><b>degrees [1]</b> 1662/2</p> <p><b>del [1]</b> 1610/8</p> <p><b>del Norte [1]</b> 1610/8</p> <p><b>delay [1]</b> 1544/12</p> <p><b>deliver [1]</b> 1633/5</p> <p><b>delivered [3]</b> 1524/21 1632/20 1632/20</p> <p><b>demand [6]</b> 1724/2 1724/13 1725/9 1725/20 1725/22 1726/21</p> <p><b>demanded [1]</b> 1624/8</p> <p><b>demands [1]</b> 1564/23</p> <p><b>demonstrative [1]</b> 1661/1</p> <p><b>denial [1]</b> 1592/2</p> <p><b>department [4]</b> 1610/8 1645/6 1645/15 1646/5</p> <p><b>departments [1]</b> 1606/5</p> <p><b>depends [2]</b> 1602/16 1719/16</p> <p><b>deposit [2]</b> 1621/19 1721/11</p> <p><b>depository [1]</b> 1671/21</p> <p><b>deposited [3]</b> 1671/10 1671/22 1672/1</p>	<p><b>depositories [1]</b> 1671/25</p> <p><b>depositors [1]</b> 1672/1</p> <p><b>depository [1]</b> 1680/24</p> <p><b>deprive [1]</b> 1547/2</p> <p><b>deprived [3]</b> 1627/10 1631/19 1665/7</p> <p><b>depriving [1]</b> 1552/15</p> <p><b>describe [6]</b> 1582/3 1582/22 1631/15 1647/13 1648/11 1697/7</p> <p><b>describes [1]</b> 1576/24</p> <p><b>designated [2]</b> 1589/3 1589/8</p> <p><b>designation [4]</b> 1579/24 1639/5 1664/24 1665/20</p> <p><b>desk [1]</b> 1682/12</p> <p><b>destroy [1]</b> 1571/10</p> <p><b>detail [1]</b> 1696/4</p> <p><b>detailed [1]</b> 1596/21</p> <p><b>details [1]</b> 1690/4</p> <p><b>determination [4]</b> 1506/7 1597/1 1597/12 1654/1</p> <p><b>determinations [1]</b> 1506/14</p> <p><b>determine [4]</b> 1626/1 1638/6 1648/23 1652/14</p> <p><b>determined [1]</b> 1597/5</p> <p><b>develop [3]</b> 1573/19 1573/20 1685/22</p> <p><b>developed [1]</b> 1686/5</p> <p><b>Development [1]</b> 1688/8</p> <p><b>deviation [3]</b> 1602/21 1606/20 1606/24</p> <p><b>deviations [1]</b> 1656/17</p> <p><b>devoid [1]</b> 1622/9</p> <p><b>devote [1]</b> 1535/9</p> <p><b>did [75]</b> 1515/18 1518/13 1518/17 1533/10 1535/9 1544/20 1548/21 1550/22 1550/25 1551/10 1551/13 1551/18 1551/23 1552/7 1554/3 1554/18 1554/23 1561/8 1566/2 1566/12 1566/12 1566/18 1566/19</p>
<p><b>D</b></p> <p><b>damage [2]</b> 1663/21 1674/3</p> <p><b>damages [2]</b> 1663/25 1681/2</p> <p><b>Dania [3]</b> 1581/3 1581/8 1645/14</p> <p><b>Daniel [1]</b> 1501/22</p> <p><b>data [16]</b> 1540/21 1544/2 1545/12 1545/13 1545/18 1546/9 1668/18 1669/11 1669/23 1669/24 1670/19 1702/6 1702/8 1702/12 1704/8 1704/15</p> <p><b>Data/information [2]</b> 1545/12 1545/13</p> <p><b>date [19]</b> 1523/21 1534/4 1534/7 1544/14 1544/15 1544/16 1561/6 1619/14 1619/23 1619/24 1620/24</p>	<p><b>deal [7]</b> 1508/13 1508/14 1550/11 1597/3 1599/19 1642/9 1716/12</p> <p><b>dealing [3]</b> 1513/22 1513/22 1630/20</p> <p><b>deals [1]</b> 1597/10</p> <p><b>dealt [1]</b> 1654/2</p> <p><b>debate [2]</b> 1534/19 1673/18</p> <p><b>December [24]</b> 1551/21 1552/1 1552/8 1564/13 1609/12 1610/3 1619/19 1619/25 1628/21 1631/2 1654/19 1654/22 1664/8 1665/18 1691/15 1693/13 1693/17 1693/18 1693/25 1695/1 1696/17 1696/18 1698/4 1706/11</p> <p><b>December 13 [2]</b> 1564/13 1609/12</p>	<p><b>declared [8]</b> 1559/10 1561/3 1610/22 1676/21 1677/6 1678/21 1684/5 1708/25</p> <p><b>declaring [2]</b> 1565/6 1674/17</p> <p><b>decree [3]</b> 1559/2 1587/16 1674/23</p> <p><b>decreed [3]</b> 1620/25 1664/12 1710/20</p> <p><b>decrees [2]</b> 1570/22 1573/4</p> <p><b>dedicated [2]</b> 1536/1 1674/25</p> <p><b>deem [2]</b> 1519/5 1689/25</p> <p><b>deemed [4]</b> 1523/9 1523/14 1625/22 1665/20</p> <p><b>deeply [3]</b> 1521/3 1521/13 1597/18</p> <p><b>defective [1]</b> 1529/19</p> <p><b>defects [3]</b> 1624/5 1723/12 1723/12</p>	<p><b>demand [6]</b> 1724/2 1724/13 1725/9 1725/20 1725/22 1726/21</p> <p><b>demanded [1]</b> 1624/8</p> <p><b>demands [1]</b> 1564/23</p> <p><b>demonstrative [1]</b> 1661/1</p> <p><b>denial [1]</b> 1592/2</p> <p><b>department [4]</b> 1610/8 1645/6 1645/15 1646/5</p> <p><b>departments [1]</b> 1606/5</p> <p><b>depends [2]</b> 1602/16 1719/16</p> <p><b>deposit [2]</b> 1621/19 1721/11</p> <p><b>depository [1]</b> 1671/21</p> <p><b>deposited [3]</b> 1671/10 1671/22 1672/1</p>	<p><b>develop [3]</b> 1573/19 1573/20 1685/22</p> <p><b>developed [1]</b> 1686/5</p> <p><b>Development [1]</b> 1688/8</p> <p><b>deviation [3]</b> 1602/21 1606/20 1606/24</p> <p><b>deviations [1]</b> 1656/17</p> <p><b>devoid [1]</b> 1622/9</p> <p><b>devote [1]</b> 1535/9</p> <p><b>did [75]</b> 1515/18 1518/13 1518/17 1533/10 1535/9 1544/20 1548/21 1550/22 1550/25 1551/10 1551/13 1551/18 1551/23 1552/7 1554/3 1554/18 1554/23 1561/8 1566/2 1566/12 1566/12 1566/18 1566/19</p>

<b>D</b>	1715/18 1715/19 1716/13 1722/16 1723/2	<b>distinction [1]</b> 1594/13	1623/21 1624/16 1624/25 1630/22	1636/15 1636/18 1636/19 1636/20
<b>did... [52]</b> 1566/22 1566/24 1566/25 1567/2 1576/5 1576/9 1589/20 1589/21 1590/23 1593/12 1600/1 1607/23 1609/18 1612/14 1612/14 1612/21 1618/1 1622/13 1622/14 1623/1 1623/2 1635/7 1640/17 1647/17 1647/21 1647/23 1648/2 1651/20 1672/3 1672/23 1680/13 1682/3 1683/16 1684/23 1686/16 1686/19 1690/9 1692/15 1696/10 1696/10 1697/16 1697/19 1698/3 1698/23 1707/12 1707/14 1708/7 1718/18 1719/1 1722/12 1722/25 1723/12	<b>difficult [5]</b> 1541/21 1555/16 1597/14 1685/24 1698/23	<b>distinguished [1]</b> 1517/1	1631/12 1631/20 1632/8 1633/15 1633/18 1633/21 1633/23 1634/20 1637/16 1638/1 1643/8 1647/4 1647/6 1647/10 1649/7 1650/25 1651/7 1651/9 1651/14 1651/16 1654/17 1655/9 1665/1 1665/2 1666/5 1667/6 1672/14 1673/12 1678/10 1678/19 1681/21 1682/1 1684/22 1687/9 1688/17 1688/19 1688/25 1689/16 1692/14 1693/8 1693/9 1693/14 1694/14 1694/17 1694/23 1696/23 1697/5 1698/1 1698/17 1699/5 1699/17 1702/3 1705/17 1706/6 1710/7 1710/18 1711/1 1712/23 1713/24 1719/12 1719/18 1719/24 1720/22 1720/23 1721/1 1725/10 1727/6	1637/4 1637/12 1637/23 1638/6 1640/8 1640/25 1641/2 1644/17 1691/18 1697/7 1697/10 1697/13 1699/15 1699/16 1701/2 1702/17 1705/22 1711/5 1712/5 1712/7 1712/8 1712/23 1712/25 1713/3 1713/17 1714/6 1715/21 1717/5 1717/20 1723/20
<b>didn't [32]</b> 1518/4 1518/18 1521/25 1526/17 1535/20 1536/12 1536/13 1566/5 1566/24 1571/12 1576/1 1585/16 1593/16 1593/17 1606/12 1608/23 1608/25 1609/19 1612/23 1615/16 1623/5 1627/21 1627/21 1637/1 1637/8 1640/16 1680/12 1689/25 1690/6 1696/13 1697/22 1718/20	<b>diligence [2]</b> 1671/23 1671/23	<b>distribution [2]</b> 1679/3 1713/25	1651/9 1651/14 1651/16 1654/17 1655/9 1665/1 1665/2 1666/5 1667/6 1672/14 1673/12 1678/10 1678/19 1681/21 1682/1 1684/22 1687/9 1688/17 1688/19 1688/25 1689/16 1692/14 1693/8 1693/9 1693/14 1694/14 1694/17 1694/23 1696/23 1697/5 1698/1 1698/17 1699/5 1699/17 1702/3 1705/17 1706/6 1710/7 1710/18 1711/1 1712/23 1713/24 1719/12 1719/18 1719/24 1720/22 1720/23 1721/1 1725/10 1727/6	<b>documents [24]</b> 1505/14 1541/16 1581/13 1599/14 1600/22 1601/2 1604/24 1612/23 1666/12 1670/12 1676/14 1696/21 1696/25 1697/6 1697/20 1697/20 1697/24 1698/19 1700/13 1708/2 1715/3 1715/5 1717/9 1722/4
<b>Diego [1]</b> 1503/10	<b>direct [3]</b> 1649/8 1660/20 1713/1	<b>district [2]</b> 1663/16 1721/7	1711/1 1712/23 1713/24 1719/12 1719/18 1719/24 1720/22 1720/23 1721/1 1725/10 1727/6	<b>does [41]</b> 1531/6 1541/24 1547/12 1556/23 1580/1 1585/11 1586/24 1588/12 1588/19 1595/12 1596/23 1601/1 1603/13 1603/14 1608/8 1620/5 1621/8 1634/6 1636/17 1639/1 1642/16 1646/6 1657/11 1657/11 1657/25 1658/1 1658/9 1658/15 1658/16 1668/23 1671/1 1678/11 1680/4 1703/20 1717/7 1723/17 1724/3 1725/23 1726/7 1726/23 1727/5
<b>difference [2]</b> 1654/15 1719/15	<b>directed [2]</b> 1621/1 1662/16	<b>diversity [2]</b> 1582/16 1583/3	<b>document [89]</b> 1505/12 1524/17 1524/21 1534/23 1543/24 1561/24 1563/25 1578/1 1578/2 1578/8 1578/19 1579/9 1579/14 1579/15 1579/18 1579/20 1579/23 1580/6 1580/11 1581/2 1581/22 1582/1 1582/19 1582/22 1583/6 1583/7 1585/19 1585/21 1586/2 1586/4 1586/4 1586/7 1600/7 1603/3 1608/20 1611/4 1611/5 1619/10 1629/7 1632/15 1632/17 1632/18 1632/22 1633/3 1633/5 1633/8 1633/9 1633/9 1633/20 1633/22 1633/24 1634/12 1634/16 1634/18 1636/9	<b>doesn't [24]</b> 1539/19 1540/20 1541/11 1541/12 1547/8 1566/17 1585/1 1585/14 1585/14 1595/12 1598/1 1618/9 1626/7 1634/7 1640/25 1644/24 1666/4 1670/5 1673/12 1699/1 1703/5 1724/25 1725/13 1725/16
<b>differences [2]</b> 1543/5 1650/23	<b>direction [3]</b> 1574/7 1575/20 1658/25	<b>division [3]</b> 1586/20 1642/19 1642/21	1634/12 1634/16 1634/18 1636/9	
<b>different [32]</b> 1513/20 1513/21 1515/15 1522/3 1532/23 1535/16 1538/21 1543/8 1543/10 1554/7 1555/21 1567/6 1578/9 1594/11 1601/16 1602/10 1603/6 1607/4 1613/4 1618/2 1623/10 1634/25 1635/1 1654/10 1656/18 1668/12 1715/9	<b>directly [2]</b> 1618/18 1652/9	<b>divorced [1]</b> 1714/18		
<b>disagreeing [1]</b> 1567/22	<b>discovered [1]</b> 1505/22	<b>do [167]</b> 1505/20		
<b>discern [1]</b> 1541/21	<b>disconnected [2]</b> 1714/18 1715/8	1510/11 1511/4 1517/24 1518/6 1518/14 1519/6 1519/10 1520/6 1523/8 1523/11 1523/12 1524/5 1524/19 1525/6 1526/13 1526/19 1527/4 1527/6 1530/22 1531/6 1532/2 1532/10 1534/11 1535/19 1535/20 1539/4 1539/5 1540/8 1540/13 1540/18 1541/1 1541/7 1541/16 1541/19 1542/18 1542/21 1544/20 1545/8 1545/12 1545/24 1546/6 1546/11 1548/2 1550/12 1550/20 1554/1 1555/1 1556/9 1559/12 1561/7 1562/1 1562/17 1562/17 1562/19 1566/19 1566/20 1567/5 1567/8 1568/9 1569/5 1571/4 1572/25 1575/24 1577/2 1580/23 1582/23 1584/5 1585/7 1585/15 1585/15 1594/18 1596/10 1596/24 1599/14 1602/3 1602/3 1602/7 1602/13 1602/16 1602/17 1602/18 1603/4 1606/21 1607/6 1609/20 1611/14 1611/24 1612/3 1615/25 1616/5 1616/7 1617/10 1619/1 1622/15 1623/11		
<b>discuss [14]</b> 1511/25 1535/17 1561/9 1561/20 1568/9 1575/6 1575/7 1575/8 1599/23 1615/13 1615/22 1639/24 1640/17 1730/7	<b>discusses [1]</b> 1653/17			
<b>discussed [7]</b> 1516/3 1548/9 1564/11 1630/24 1635/2 1637/7 1640/19	<b>discussing [4]</b> 1509/8 1560/25 1592/13 1635/15			
<b>discussion [9]</b> 1505/10 1553/21 1563/16 1605/8 1656/25 1657/1 1661/4 1672/25 1706/7	<b>discussion [9]</b> 1505/10 1553/21 1563/16 1605/8 1656/25 1657/1 1661/4 1672/25 1706/7			
<b>discussions [1]</b> 1509/15	<b>dispense [1]</b> 1639/21			
<b>disposed [2]</b> 1672/8 1672/11	<b>disputes [1]</b> 1500/2			
<b>disposition [1]</b> 1631/20	<b>disputing [2]</b> 1567/14 1696/4			
<b>dispute [1]</b> 1568/15	<b>disrespectful [1]</b> 1534/16			
<b>DISPUTES [1]</b> 1500/2	<b>distance [1]</b> 1594/15			

<p><b>D</b></p> <p><b>doing [14]</b> 1505/23 1506/10 1534/13 1552/5 1566/18 1603/11 1603/19 1608/2 1617/13 1617/15 1646/20 1646/25 1728/20 1730/1</p> <p><b>don't [106]</b> 1510/23 1514/7 1515/22 1518/1 1518/2 1518/7 1518/20 1518/22 1518/22 1524/11 1524/11 1524/12 1525/24 1528/18 1531/21 1532/17 1532/20 1533/18 1537/6 1537/6 1541/3 1544/19 1546/2 1547/15 1549/20 1549/23 1550/4 1550/14 1552/25 1561/6 1561/18 1563/5 1564/14 1565/16 1569/5 1571/6 1574/17 1575/25 1585/8 1585/16 1587/14 1587/24 1589/7 1589/21 1589/21 1592/21 1595/3 1595/21 1597/9 1607/10 1607/25 1609/20 1611/11 1611/15 1611/16 1611/16 1611/21 1612/1 1612/2 1612/6 1612/17 1612/21 1613/14 1613/16 1621/20 1622/13 1622/13 1622/14 1623/2 1623/8 1624/25 1626/8 1628/13 1630/18 1633/11 1633/25 1633/25 1634/7 1634/23 1636/21 1637/2 1637/10 1638/8 1641/13 1641/25 1642/7 1642/15 1643/4 1643/7 1645/8 1645/9 1649/10 1659/4 1660/23 1660/25 1675/20 1681/16 1689/20 1697/4 1699/11 1699/12 1703/11 1709/1 1713/18 1726/16 1727/16</p> <p><b>done [17]</b> 1524/1 1549/17 1556/15</p>	<p>1594/24 1595/16 1609/17 1615/1 1617/24 1645/14 1649/5 1659/11 1689/12 1700/5 1701/7 1701/22 1707/15 1707/17</p> <p><b>door [1]</b> 1602/17</p> <p><b>double [1]</b> 1505/23</p> <p><b>double-check [1]</b> 1505/23</p> <p><b>down [15]</b> 1517/23 1532/21 1585/18 1586/6 1608/2 1619/22 1634/12 1634/16 1645/11 1646/13 1646/19 1661/20 1683/8 1685/18 1712/13</p> <p><b>Dr [2]</b> 1500/21 1501/5</p> <p><b>Dr. [73]</b> 1512/10 1513/5 1515/25 1529/2 1535/1 1535/25 1551/10 1553/10 1553/18 1554/12 1561/1 1561/23 1564/12 1564/23 1566/9 1567/5 1571/9 1572/17 1579/13 1581/20 1583/1 1584/16 1585/21 1586/8 1588/3 1588/5 1588/6 1592/16 1595/1 1595/8 1595/20 1601/9 1601/13 1601/16 1605/7 1606/1 1607/8 1608/25 1609/21 1608/25 1609/21 1609/23 1610/4 1611/24 1612/9 1613/3 1613/18 1615/6 1615/24 1616/18 1618/13 1618/24 1619/1 1623/11 1623/21 1624/13 1627/11 1628/2 1630/12 1631/4 1631/12 1632/8 1632/17 1633/8 1633/15 1633/21 1634/13 1635/21 1634/13 1635/19 1636/6 1639/14 1639/21 1640/1 1640/10 1655/20 1659/20</p> <p><b>Dr. Gutiérrez [68]</b> 1512/10 1513/5 1515/25 1529/2 1551/10 1553/10 1553/18 1554/12 1561/1 1561/23</p>	<p>1564/12 1564/23 1566/9 1567/5 1571/9 1572/17 1579/13 1581/20 1583/1 1584/16 1585/21 1586/8 1588/3 1588/5 1588/6 1592/16 1595/1 1595/8 1595/20 1601/9 1601/13 1601/16 1605/7 1606/1 1607/8 1608/25 1609/21 1609/23 1610/4 1611/24 1612/9 1613/3 1613/18 1615/6 1615/24 1616/18 1618/13 1618/24 1619/1 1623/11 1623/21 1624/13 1628/2 1630/12 1631/12 1632/8 1632/17 1633/8 1633/15 1633/21 1634/13 1635/19 1636/6 1639/14 1639/21 1640/1 1640/10 1659/20</p> <p><b>Dr. Gutiérrez's [1]</b> 1535/1</p> <p><b>Dr. Iván [1]</b> 1535/25</p> <p><b>Dr. Sequeira [3]</b> 1627/11 1631/4 1655/20</p> <p><b>draw [1]</b> 1710/4</p> <p><b>drop [1]</b> 1553/1</p> <p><b>due [21]</b> 1548/22 1599/8 1620/21 1624/22 1624/23 1631/10 1652/6 1656/4 1656/8 1656/15 1656/22 1657/7 1657/19 1658/3 1663/23 1671/23 1671/23 1672/18 1698/2 1709/3 1728/14</p> <p><b>duly [3]</b> 1661/14 1713/10 1728/8</p> <p><b>duration [3]</b> 1619/14 1628/22 1664/13</p> <p><b>during [15]</b> 1508/20 1509/25 1511/19 1512/16 1553/11 1582/4 1595/22 1596/8 1599/3 1619/1 1630/2 1680/19 1683/24 1684/9 1694/3</p> <p><b>Dyer [1]</b> 1503/12</p> <hr/> <p><b>E</b></p> <p><b>each [7]</b> 1510/18</p>	<p>1510/24 1522/4 1569/2 1606/7 1615/20 1721/16</p> <p><b>earlier [8]</b> 1511/2 1545/24 1578/13 1635/2 1641/17 1652/11 1655/1 1655/9</p> <p><b>early [3]</b> 1505/18 1596/11 1686/17</p> <p><b>ears [2]</b> 1528/19 1528/20</p> <p><b>easier [3]</b> 1555/18 1642/15 1649/12</p> <p><b>eat [1]</b> 1643/7</p> <p><b>Ecologic [1]</b> 1689/4</p> <p><b>ecological [17]</b> 1555/21 1559/24 1577/14 1577/21 1579/22 1580/3 1580/9 1582/10 1636/7 1636/12 1638/2 1640/8 1640/19 1645/7 1645/13 1676/19 1676/20</p> <p><b>economic [1]</b> 1560/22</p> <p><b>ecosystems [2]</b> 1555/13 1555/20</p> <p><b>editing [1]</b> 1600/10</p> <p><b>edition [1]</b> 1603/10</p> <p><b>education [2]</b> 1582/15 1688/7</p> <p><b>Edward [1]</b> 1502/11</p> <p><b>effect [15]</b> 1547/2 1552/15 1552/16 1552/18 1552/23 1572/4 1593/10 1624/6 1631/14 1631/15 1638/11 1639/5 1639/6 1724/5 1727/7</p> <p><b>effectively [1]</b> 1531/17</p> <p><b>effectiveness [1]</b> 1639/10</p> <p><b>effects [2]</b> 1624/11 1726/6</p> <p><b>efficacy [2]</b> 1567/7 1568/10</p> <p><b>efficient [2]</b> 1511/5 1511/23</p> <p><b>efficiently [1]</b> 1513/7</p> <p><b>effort [6]</b> 1508/4 1508/13 1508/23 1629/14 1699/5 1704/24</p> <p><b>efforts [2]</b> 1698/10 1698/16</p> <p><b>egregious [1]</b> 1624/21</p>	<p><b>either [9]</b> 1519/8 1522/1 1530/6 1530/13 1560/15 1566/24 1585/17 1596/11 1659/3</p> <p><b>EI [4]</b> 1570/18 1572/10 1573/3 1580/1</p> <p><b>EI Jaguar [3]</b> 1570/18 1572/10 1573/3</p> <p><b>elaborate [1]</b> 1692/17</p> <p><b>electronically [1]</b> 1700/12</p> <p><b>eligible [9]</b> 1589/4 1589/9 1589/9 1589/11 1589/12 1589/16 1592/10 1635/21 1636/1</p> <p><b>else [7]</b> 1512/2 1542/9 1569/4 1601/5 1676/3 1703/14 1709/24</p> <p><b>email [5]</b> 1600/18 1600/19 1633/21 1633/24 1634/1</p> <p><b>emanates [3]</b> 1586/2 1658/7 1658/8</p> <p><b>emphasize [1]</b> 1664/19</p> <p><b>emphasizes [1]</b> 1675/17</p> <p><b>enables [1]</b> 1713/5</p> <p><b>encompasses [1]</b> 1575/1</p> <p><b>encouragement [1]</b> 1582/14</p> <p><b>encouraging [1]</b> 1517/17</p> <p><b>encumbered [3]</b> 1547/24 1672/9 1672/11</p> <p><b>encumbrance [1]</b> 1547/12</p> <p><b>encumbrances [3]</b> 1667/21 1699/25 1705/13</p> <p><b>end [15]</b> 1510/21 1560/18 1569/11 1579/5 1596/25 1597/13 1597/17 1600/8 1600/18 1618/1 1621/21 1636/15 1671/13 1693/8 1702/12</p> <p><b>ended [3]</b> 1521/15 1646/21 1649/15</p> <p><b>ending [1]</b> 1720/18</p> <p><b>ends [3]</b> 1532/12 1607/4 1634/10</p> <p><b>enforceability [6]</b> 1567/14 1567/23</p>
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<p><b>enters</b> [1] 1705/9</p> <p><b>enthusiastic</b> [1] 1719/9</p> <p><b>entire</b> [3] 1637/12 1637/12 1638/6</p> <p><b>entirely</b> [4] 1649/6 1649/7 1649/9 1653/4</p> <p><b>entirety</b> [1] 1633/4</p> <p><b>entities</b> [2] 1513/20 1715/18</p> <p><b>entitled</b> [2] 1518/15 1530/1</p> <p><b>entity</b> [1] 1691/11</p>	<p><b>entries</b> [1] 1539/4</p> <p><b>entrusted</b> [1] 1616/4</p> <p><b>entry</b> [58] 1538/7 1539/3 1539/3 1539/13 1540/16 1540/21 1540/24 1541/5 1541/10 1544/2 1545/5 1545/12 1545/14 1545/18 1545/19 1545/22 1545/23 1546/9 1666/24 1667/16 1667/16 1667/20 1668/18 1668/19 1668/22 1668/24 1669/4 1669/6 1669/12 1669/18 1669/22 1669/25 1670/2 1670/4 1670/6 1670/8 1670/9 1670/10 1670/20 1670/23 1702/6 1702/8 1702/13 1702/14 1702/14 1702/17 1702/18 1702/23 1702/25 1703/2 1703/3 1703/12 1703/15 1703/19 1703/22 1703/23 1704/16 1705/3</p> <p><b>environment</b> [12] 1572/2 1572/6 1573/11 1573/12 1644/23 1645/6 1645/15 1646/4 1675/12 1675/21 1676/2 1678/2</p> <p><b>environmental</b> [30] 1556/18 1557/10 1560/2 1561/2 1562/22 1562/25 1563/6 1563/7 1582/14 1582/17 1586/15 1586/18 1587/7 1588/7 1588/10 1588/21 1591/14 1592/7 1608/18 1609/8 1609/24 1610/21 1611/2 1640/12 1644/18 1646/2 1663/6 1675/24 1689/1 1689/8</p> <p><b>environmentally</b> [1] 1610/15</p> <p><b>equality</b> [3] 1598/8 1644/10 1656/16</p> <p><b>equally</b> [3] 1657/22 1657/22 1657/24</p> <p><b>equation</b> [1] 1639/7</p> <p><b>equivalent</b> [1] 1577/2</p>	<p><b>error</b> [1] 1600/9</p> <p><b>ES</b> [1] 1563/6</p> <p><b>Escobar</b> [1] 1535/25</p> <p><b>especially</b> [2] 1569/3 1637/19</p> <p><b>essential</b> [2] 1625/17 1718/9</p> <p><b>essentially</b> [1] 1715/17</p> <p><b>establish</b> [2] 1616/7 1672/5</p> <p><b>established</b> [7] 1565/23 1601/20 1601/21 1602/7 1607/5 1676/24 1709/21</p> <p><b>estate</b> [2] 1537/4 1692/20</p> <p><b>estimate</b> [1] 1729/5</p> <p><b>estimation</b> [1] 1621/23</p> <p><b>et</b> [4] 1531/23 1552/4 1573/5 1592/11</p> <p><b>et cetera</b> [4] 1531/23 1552/4 1573/5 1592/11</p> <p><b>ethics</b> [1] 1689/24</p> <p><b>even</b> [25] 1511/1 1514/2 1514/16 1521/21 1529/9 1529/20 1530/4 1532/10 1572/9 1594/16 1614/16 1617/2 1622/2 1622/2 1623/2 1627/12 1637/1 1639/4 1656/8 1696/14 1701/13 1709/1 1709/3 1725/5 1726/19</p> <p><b>even-handedness</b> [1] 1656/8</p> <p><b>evening</b> [4] 1509/22 1701/13 1729/15 1730/8</p> <p><b>event</b> [3] 1510/1 1513/19 1630/17</p> <p><b>eventually</b> [2] 1614/5 1622/12</p> <p><b>ever</b> [2] 1533/8 1688/17</p> <p><b>every</b> [1] 1508/22</p> <p><b>everybody</b> [3] 1506/25 1508/12 1557/19</p> <p><b>everyone</b> [7] 1507/21 1519/2 1582/18 1604/7 1646/16 1657/24 1658/11</p> <p><b>everyone's</b> [1] 1507/4</p> <p><b>everything</b> [5]</p>	<p>1511/5 1637/16 1655/19 1676/3 1723/1</p> <p><b>evidence</b> [17] 1506/15 1551/23 1559/18 1594/4 1595/9 1597/6 1597/7 1639/15 1640/3 1647/14 1659/4 1693/2 1695/17 1696/13 1696/20 1696/22 1725/3</p> <p><b>ex</b> [4] 1528/10 1530/1 1623/7 1672/13</p> <p><b>ex parte</b> [4] 1528/10 1530/1 1623/7 1672/13</p> <p><b>exact</b> [3] 1545/3 1667/15 1706/17</p> <p><b>exactly</b> [17] 1516/21 1518/13 1519/20 1536/13 1545/22 1551/5 1569/9 1578/12 1606/21 1612/17 1621/20 1641/17 1642/4 1642/9 1647/25 1649/6 1650/17</p> <p><b>examination</b> [23] 1507/15 1512/5 1512/8 1518/9 1550/2 1553/5 1553/19 1553/23 1569/6 1596/4 1601/9 1617/24 1618/22 1641/3 1642/5 1642/18 1658/13 1659/20 1660/20 1679/13 1679/14 1679/22 1730/7</p> <p><b>examine</b> [3] 1531/22 1588/7 1676/11</p> <p><b>examined</b> [7] 1537/7 1537/8 1537/13 1537/13 1537/14 1550/18 1592/17</p> <p><b>example</b> [8] 1543/10 1646/2 1648/18 1655/24 1658/9 1668/13 1700/6 1727/23</p> <p><b>exceeding</b> [1] 1635/5</p> <p><b>except</b> [2] 1612/21 1665/9</p> <p><b>exception</b> [2] 1582/18 1665/8</p> <p><b>exceptionally</b> [2] 1508/25 1599/21</p> <p><b>exceptions</b> [3] 1570/21 1572/8</p>	<p>1588/19</p> <p><b>exchange</b> [1] 1693/5</p> <p><b>excited</b> [1] 1646/12</p> <p><b>exclusive</b> [1] 1548/13</p> <p><b>excuse</b> [18] 1517/9 1522/2 1526/6 1534/2 1540/23 1541/24 1543/10 1550/1 1557/16 1557/18 1563/17 1578/4 1583/19 1603/5 1629/4 1677/15 1703/16 1705/1</p> <p><b>executed</b> [1] 1522/18</p> <p><b>executing</b> [1] 1694/20</p> <p><b>execution</b> [5] 1619/15 1621/14 1621/14 1621/24 1622/3</p> <p><b>executive</b> [1] 1679/4</p> <p><b>exemptions</b> [1] 1559/3</p> <p><b>exercise</b> [8] 1567/8 1567/19 1567/21 1607/3 1627/15 1675/25 1694/23 1695/13</p> <p><b>exhibit</b> [4] 1533/19 1543/14 1547/17 1620/12</p> <p><b>Exhibit C-0254</b> [1] 1620/12</p> <p><b>Exhibit C-707</b> [1] 1533/19</p> <p><b>exist</b> [2] 1565/3 1571/6</p> <p><b>existed</b> [4] 1536/17 1577/16 1614/17 1722/19</p> <p><b>existence</b> [12] 1515/17 1519/25 1612/15 1612/24 1626/11 1628/17 1628/23 1648/12 1706/22 1713/11 1713/14 1714/12</p> <p><b>existing</b> [1] 1571/10</p> <p><b>exists</b> [5] 1508/8 1508/16 1536/6 1624/23 1658/5</p> <p><b>expand</b> [6] 1510/1 1517/7 1518/6 1519/5 1528/15 1591/19</p> <p><b>expands</b> [1] 1687/16</p> <p><b>expansion</b> [15] 1552/3 1573/22 1574/5 1575/16 1577/8 1585/12 1585/15 1586/16 1586/25 1588/13</p>
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[5]</b> 1588/13 1589/20 1593/2 1635/10 1674/16</p> <p><b>expect [1]</b> 1642/24</p> <p><b>expected [3]</b> 1583/14 1584/20 1659/14</p> <p><b>expecting [2]</b> 1511/18 1596/15</p> <p><b>expeditious [2]</b> 1559/24 1676/19</p> <p><b>expeditiously [1]</b> 1597/23</p> <p><b>experience [9]</b> 1535/20 1537/17 1541/15 1554/19 1554/24 1647/9 1661/12 1662/5 1663/4</p> <p><b>experienced [1]</b> 1729/22</p> <p><b>expert [49]</b> 1503/17 1517/12 1517/20 1517/25 1520/15 1535/1 1535/8 1537/17 1552/11 1563/23 1564/6 1569/6 1569/13 1569/16 1578/24 1580/21 1581/12 1603/10 1615/24 1615/25 1616/2 1616/8 1616/11 1617/22 1638/12 1641/4 1641/10 1644/3 1652/18 1659/3 1660/11 1660/12 1660/15 1661/10 1674/13 1680/4 1680/8 1680/16 1688/17 1689/1 1689/22 1694/1 1697/21 1698/6 1698/20 1698/22 1709/18 1717/15 1723/10</p> <p><b>expertise [4]</b> 1581/17 1649/17 1649/18 1649/19</p> <p><b>experts [3]</b> 1509/24 1517/12 1517/13</p> <p><b>expiration [4]</b> 1522/13 1524/1 1524/4 1622/6</p> <p><b>expire [7]</b> 1520/11 1520/17 1520/20 1521/6 1521/16 1522/8 1523/23</p> <p><b>expired [6]</b> 1523/18 1523/19 1622/5 1622/17 1622/19</p>	<p>1674/4</p> <p><b>expires [1]</b> 1524/4</p> <p><b>explain [21]</b> 1515/14 1517/5 1579/18 1604/12 1617/17 1624/13 1624/15 1629/19 1629/20 1644/8 1654/16 1655/2 1661/9 1664/23 1666/13 1667/10 1702/17 1705/24 1711/12 1713/20 1715/1</p> <p><b>explained [4]</b> 1609/21 1642/9 1680/8 1718/18</p> <p><b>explaining [4]</b> 1587/20 1680/16 1681/11 1714/4</p> <p><b>explains [1]</b> 1573/18</p> <p><b>explanation [7]</b> 1518/5 1518/6 1548/9 1589/11 1589/24 1666/19 1713/19</p> <p><b>explanations [1]</b> 1518/8</p> <p><b>exploit [4]</b> 1677/22 1677/24 1678/3 1678/22</p> <p><b>exploiting [1]</b> 1590/2</p> <p><b>explore [1]</b> 1717/19</p> <p><b>export [16]</b> 1613/5 1613/11 1614/5 1614/19 1614/21 1615/2 1615/18 1647/2 1647/3 1647/5 1647/14 1647/22 1647/25 1648/12 1648/16 1649/18</p> <p><b>export of [1]</b> 1647/22</p> <p><b>export/import [1]</b> 1647/3</p> <p><b>exported [1]</b> 1615/15</p> <p><b>exporting [2]</b> 1615/7 1648/20</p> <p><b>expressed [2]</b> 1557/22 1663/20</p> <p><b>expression [1]</b> 1655/14</p> <p><b>expressly [5]</b> 1554/18 1554/23 1556/23 1585/11 1616/8</p> <p><b>expropriation [6]</b> 1521/4 1532/25 1552/17 1552/24 1665/9 1665/13</p> <p><b>extension [1]</b> 1666/9</p> <p><b>extent [6]</b> 1506/6</p>	<p>1506/8 1508/23 1509/25 1597/7 1597/13</p> <p><b>extinction [1]</b> 1666/4</p> <p><b>extraordinary [1]</b> 1613/23</p> <p><b>extremely [2]</b> 1556/21 1607/20</p> <p><b>eyes [1]</b> 1703/16</p> <p><b>F</b></p> <p><b>Fabian [1]</b> 1503/8</p> <p><b>facilitate [2]</b> 1511/2 1683/9</p> <p><b>fact [29]</b> 1509/24 1513/19 1517/21 1523/4 1529/17 1543/7 1552/10 1563/22 1564/7 1579/3 1580/23 1580/24 1581/13 1640/24 1641/5 1641/10 1641/21 1648/4 1652/18 1652/23 1658/4 1675/17 1689/16 1696/11 1698/1 1698/2 1715/8 1718/25 1725/7</p> <p><b>facto [4]</b> 1552/17 1631/13 1631/15 1631/17</p> <p><b>factor [1]</b> 1597/19</p> <p><b>facts [3]</b> 1580/22 1635/14 1708/1</p> <p><b>factual [1]</b> 1693/25</p> <p><b>factually [2]</b> 1580/20 1631/21</p> <p><b>factum [2]</b> 1678/9 1678/17</p> <p><b>fading [1]</b> 1656/20</p> <p><b>failed [1]</b> 1710/17</p> <p><b>fails [1]</b> 1727/6</p> <p><b>fair [16]</b> 1517/20 1518/1 1518/3 1529/13 1531/1 1531/5 1534/3 1534/6 1534/12 1569/6 1584/2 1584/8 1584/8 1628/9 1655/21 1657/22</p> <p><b>fairly [1]</b> 1653/15</p> <p><b>fairness [1]</b> 1644/6</p> <p><b>faith [2]</b> 1678/12 1678/18</p> <p><b>fall [2]</b> 1570/21 1626/22</p> <p><b>falls [3]</b> 1531/17 1531/18 1607/23</p> <p><b>false [2]</b> 1614/8 1672/19</p> <p><b>familiar [6]</b> 1515/25</p>	<p>1520/13 1520/23 1536/21 1577/13 1628/12</p> <p><b>familiarize [1]</b> 1585/1</p> <p><b>family [1]</b> 1663/3</p> <p><b>far [2]</b> 1540/4 1597/19</p> <p><b>farm [7]</b> 1538/7 1539/5 1574/9 1575/23 1591/21 1670/16 1722/25</p> <p><b>farmland [3]</b> 1565/18 1566/3 1610/6</p> <p><b>fast [3]</b> 1563/7 1563/7 1563/9</p> <p><b>fauna [3]</b> 1562/14 1571/11 1675/1</p> <p><b>favor [2]</b> 1547/25 1670/23</p> <p><b>feasibility [1]</b> 1560/9</p> <p><b>February [14]</b> 1520/11 1523/20 1523/24 1524/6 1525/4 1565/6 1566/22 1621/21 1622/4 1622/4 1622/9 1622/22 1623/3 1623/4</p> <p><b>February 2 [1]</b> 1623/3</p> <p><b>February 2024 [2]</b> 1520/11 1524/6</p> <p><b>February 27 [2]</b> 1565/6 1566/22</p> <p><b>February 2nd [5]</b> 1523/24 1622/4 1622/4 1622/9 1622/22</p> <p><b>February 9 [1]</b> 1623/4</p> <p><b>February 9th [1]</b> 1523/20</p> <p><b>feel [1]</b> 1521/2</p> <p><b>fell [4]</b> 1525/20 1676/4 1676/7 1678/3</p> <p><b>felling [2]</b> 1592/22 1592/23</p> <p><b>Ferrufino's [1]</b> 1596/9</p> <p><b>few [9]</b> 1507/12 1510/5 1512/13 1542/13 1542/24 1554/16 1656/2 1666/12 1679/24</p> <p><b>fiction [1]</b> 1614/20</p> <p><b>field [1]</b> 1611/23</p> <p><b>figured [1]</b> 1512/25</p> <p><b>figures [1]</b> 1654/10</p> <p><b>file [26]</b> 1505/8 1524/15 1524/17</p>	<p>1538/24 1540/1 1560/24 1598/17 1619/6 1622/23 1622/25 1623/5 1623/9 1627/13 1664/14 1676/15 1706/24 1707/2 1707/12 1707/23 1714/3 1721/15 1722/7 1722/21 1723/1 1723/8 1725/5</p> <p><b>filed [5]</b> 1600/2 1600/25 1651/20 1652/8 1695/5</p> <p><b>files [2]</b> 1721/17 1722/5</p> <p><b>filing [4]</b> 1505/7 1539/13 1672/24 1721/13</p> <p><b>fill [1]</b> 1559/15</p> <p><b>fills [1]</b> 1671/3</p> <p><b>final [5]</b> 1552/13 1622/15 1636/19 1636/20 1721/19</p> <p><b>finality [1]</b> 1721/9</p> <p><b>finance [1]</b> 1688/14</p> <p><b>financial [3]</b> 1548/19 1560/22 1655/17</p> <p><b>find [11]</b> 1517/15 1517/21 1542/7 1543/19 1551/23 1552/5 1552/7 1569/8 1588/2 1669/22 1725/4</p> <p><b>finds [1]</b> 1725/1</p> <p><b>fine [16]</b> 1512/23 1542/23 1563/21 1580/22 1596/17 1617/4 1641/20 1646/22 1652/24 1698/14 1700/22 1701/8 1712/7 1717/24 1717/25 1729/12</p> <p><b>finger [1]</b> 1685/19</p> <p><b>finish [13]</b> 1550/5 1550/7 1550/13 1550/19 1571/24 1594/23 1595/5 1679/25 1701/12 1701/13 1718/2 1719/14 1720/3</p> <p><b>finished [5]</b> 1540/23 1550/20 1642/2 1642/5 1720/6</p> <p><b>finishes [1]</b> 1643/2</p> <p><b>firm [1]</b> 1662/17</p> <p><b>firma [1]</b> 1633/12</p> <p><b>first [72]</b> 1506/2 1507/2 1509/11 1510/13 1523/17 1524/3 1526/4 1528/3 1529/18 1529/20</p>
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<b>first... [62]</b> 1529/25 1530/20 1531/5 1531/16 1534/1 1534/8 1534/20 1540/11 1541/17 1542/20 1545/10 1546/18 1579/17 1579/19 1580/2 1582/1 1583/2 1583/13 1587/4 1599/9 1600/15 1600/16 1604/25 1617/16 1619/18 1621/12 1622/4 1622/17 1624/10 1626/4 1628/20 1636/12 1636/16 1642/22 1643/24 1647/8 1648/5 1653/17 1654/17 1654/18 1656/23 1661/11 1664/8 1664/17 1664/24 1665/16 1673/13 1673/15 1674/14 1676/13 1690/4 1691/3 1716/15 1716/19 1719/23 1720/18 1722/18 1722/23 1723/13 1723/17 1724/3 1728/1 <b>fit [2]</b> 1519/6 1646/2 <b>five [3]</b> 1508/18 1616/22 1617/1 <b>five minutes [2]</b> 1616/22 1617/1 <b>flag [3]</b> 1510/3 1511/4 1511/11 <b>flagrant [1]</b> 1631/5 <b>fledged [1]</b> 1511/22 <b>flexibility [1]</b> 1571/7 <b>floor [1]</b> 1601/10 <b>flora [3]</b> 1562/14 1571/11 1675/1 <b>focusing [1]</b> 1511/20 <b>folio [2]</b> 1702/13 1702/14 <b>follow [9]</b> 1523/2 1526/17 1556/16 1563/15 1605/9 1608/6 1608/8 1706/3 1717/23 <b>followed [3]</b> 1564/15 1565/14 1565/17 <b>following [7]</b> 1567/8 1582/6 1590/5 1625/9 1665/3 1671/11 1671/20 <b>follows [2]</b> 1575/15 1645/9 <b>footnote [2]</b> 1586/21	<b>force [8]</b> 1567/13 1567/25 1568/15 1570/14 1587/9 1588/15 1593/6 1654/18 <b>forced [1]</b> 1562/19 <b>foreign [1]</b> 1657/23 <b>foreseeable [1]</b> 1614/2 <b>forest [40]</b> 1556/12 1556/19 1556/25 1558/13 1558/16 1562/12 1562/15 1569/25 1571/1 1574/16 1574/25 1575/2 1575/14 1575/17 1577/9 1582/16 1585/5 1588/16 1588/22 1589/4 1590/2 1590/20 1590/24 1591/12 1591/18 1591/23 1592/10 1634/21 1635/4 1635/20 1635/24 1636/1 1636/3 1675/18 1676/5 1677/22 1677/24 1678/1 1678/3 1678/22 <b>forested [7]</b> 1575/24 1576/24 1577/1 1577/7 1591/14 1591/23 1592/7 <b>forestland [1]</b> 1589/13 <b>forestlands [1]</b> 1589/8 <b>forestry [15]</b> 1589/4 1589/9 1589/11 1589/16 1589/17 1589/17 1591/20 1592/10 1635/3 1635/8 1635/21 1636/2 1638/16 1639/1 1639/4 <b>forests [2]</b> 1559/7 1592/14 <b>forever [1]</b> 1674/2 <b>form [3]</b> 1561/15 1561/25 1562/22 <b>formal [1]</b> 1535/3 <b>formally [1]</b> 1707/24 <b>format [1]</b> 1509/13 <b>forms [1]</b> 1559/15 <b>formulate [1]</b> 1652/23 <b>forth [1]</b> 1526/7 <b>forward [7]</b> 1513/10 1554/9 1584/5 1584/6 1584/17 1654/24 1710/18	<b>function [1]</b> 1645/18 <b>functional [3]</b> 1625/11 1710/6 1710/10 <b>functionaries [1]</b> 1605/20 <b>functionary [2]</b> 1607/23 1608/2 <b>functions [3]</b> 1605/14 1606/5 1606/7 <b>fundamental [4]</b> 1555/23 1555/25 1556/4 1556/10 <b>funds [1]</b> 1552/3 <b>further [4]</b> 1598/24 1598/24 1659/12 1706/24 <b>furthermore [1]</b> 1713/12 <b>future [3]</b> 1530/24 1613/6 1613/12 <b>Fé [45]</b> 1513/25 1533/4 1533/8 1535/3 1535/5 1538/13 1548/21 1551/25 1552/9 1552/19 1565/6 1567/16 1568/2 1568/17 1569/23 1570/8 1570/12 1573/15 1574/16 1575/2	<b>General's [3]</b> 1699/6 1699/8 1721/10 <b>generally [1]</b> 1507/22 <b>German [1]</b> 1689/5 <b>get [38]</b> 1505/18 1505/20 1506/7 1506/8 1507/18 1512/4 1512/20 1514/12 1518/22 1538/23 1540/6 1543/2 1552/3 1566/5 1580/5 1583/23 1596/10 1596/18 1597/5 1597/21 1622/13 1622/22 1626/9 1631/21 1631/22 1641/12 1646/20 1660/24 1670/3 1676/7 1701/6 1701/17 1701/21 1705/21 1706/10 1719/12 1720/5	
<b>G</b>				



<p><b>G</b></p> <p><b>go... [19]</b> 1643/3 1643/11 1643/11 1644/15 1646/12 1649/23 1650/19 1657/6 1659/4 1676/7 1700/8 1700/10 1701/5 1701/8 1706/2 1716/12 1720/4 1727/23 1728/4</p> <p><b>goal [1]</b> 1597/2</p> <p><b>God [1]</b> 1536/13</p> <p><b>goes [8]</b> 1592/10 1626/6 1627/17 1631/1 1642/11 1657/10 1658/13 1664/18</p> <p><b>going [140]</b> 1505/7 1506/22 1507/18 1508/25 1512/12 1512/12 1512/13 1513/7 1513/10 1514/7 1514/12 1515/21 1516/5 1516/5 1516/9 1516/12 1517/6 1517/24 1518/2 1518/10 1519/5 1522/6 1522/11 1524/15 1528/16 1532/23 1533/19 1534/22 1535/17 1537/1 1538/3 1538/9 1538/24 1543/9 1545/6 1547/19 1548/4 1550/9 1550/10 1551/6 1552/13 1553/7 1554/4 1554/6 1554/16 1556/15 1557/11 1558/4 1558/7 1561/22 1562/10 1563/14 1563/25 1564/3 1565/9 1569/22 1572/12 1574/7 1574/8 1578/3 1578/15 1579/13 1579/14 1580/5 1581/25 1584/12 1584/21 1586/1 1591/21 1594/17 1596/24 1603/23 1606/23 1607/2 1610/2 1610/11 1611/6 1613/3 1613/21 1614/21 1617/15 1618/11 1623/7 1631/7 1641/21 1641/24 1642/9 1643/5 1643/22 1649/11 1650/3 1650/15</p>	<p>1652/21 1653/9 1653/11 1653/15 1653/18 1654/8 1654/24 1658/25 1659/2 1660/1 1661/9 1661/12 1666/17 1669/1 1669/8 1669/11 1670/3 1670/11 1670/12 1674/11 1677/2 1677/3 1679/24 1679/25 1683/4 1683/5 1687/8 1690/12 1691/17 1691/18 1692/10 1693/1 1695/2 1696/5 1696/7 1698/5 1701/2 1701/20 1702/16 1709/25 1710/4 1712/13 1716/12 1718/2 1718/7 1719/20 1720/11 1720/15</p> <p><b>gone [2]</b> 1523/22 1552/6</p> <p><b>Gonzalez [1]</b> 1503/6</p> <p><b>González [25]</b> 1510/17 1510/23 1512/6 1514/22 1534/20 1534/24 1549/7 1550/6 1551/7 1554/3 1586/19 1586/21 1586/24 1587/15 1588/8 1589/25 1591/2 1592/18 1597/15 1617/11 1643/10 1648/5 1649/9 1650/22 1651/6</p> <p><b>González's [1]</b> 1642/8</p> <p><b>good [23]</b> 1504/15 1505/1 1509/9 1512/10 1512/11 1518/25 1553/18 1554/15 1565/8 1595/18 1595/24 1601/3 1601/13 1607/7 1618/24 1618/25 1642/16 1661/7 1679/16 1689/25 1701/14 1713/19 1730/4</p> <p><b>goods [2]</b> 1647/11 1671/25</p> <p><b>got [9]</b> 1603/16 1613/8 1622/15 1630/16 1646/12 1646/23 1687/11 1687/18 1718/25</p> <p><b>gotten [1]</b> 1624/8</p> <p><b>govern [2]</b> 1506/25 1644/5</p>	<p><b>governed [7]</b> 1591/9 1601/20 1601/24 1602/8 1676/4 1709/10 1711/18</p> <p><b>government [24]</b> 1515/14 1521/8 1560/9 1566/16 1566/17 1566/24 1572/9 1585/24 1601/17 1601/18 1602/12 1612/13 1614/24 1614/25 1615/4 1615/22 1620/8 1621/11 1637/17 1637/22 1679/4 1684/2 1684/6 1698/3</p> <p><b>government-run [1]</b> 1684/2</p> <p><b>governs [1]</b> 1577/6</p> <p><b>graduate [2]</b> 1662/12 1662/13</p> <p><b>graduating [1]</b> 1687/10</p> <p><b>graduation [1]</b> 1682/6</p> <p><b>grant [1]</b> 1663/16</p> <p><b>granted [7]</b> 1516/14 1519/13 1627/1 1632/11 1672/13 1672/21 1694/4</p> <p><b>granting [2]</b> 1626/16 1672/23</p> <p><b>grants [2]</b> 1516/25 1559/2</p> <p><b>grasp [1]</b> 1555/17</p> <p><b>grateful [1]</b> 1583/11</p> <p><b>great [1]</b> 1605/25</p> <p><b>green [3]</b> 1689/4 1689/6 1689/7</p> <p><b>Greenwood [7]</b> 1500/23 1501/9 1604/3 1619/2 1619/5 1620/7 1621/10</p> <p><b>greenwoodarbitratio n.com [1]</b> 1501/9</p> <p><b>gremlins [1]</b> 1506/10</p> <p><b>grounds [4]</b> 1663/19 1663/20 1665/9 1709/20</p> <p><b>groves [1]</b> 1573/25</p> <p><b>guarantee [1]</b> 1549/2</p> <p><b>guard [3]</b> 1585/5 1632/21 1674/7</p> <p><b>guess [3]</b> 1585/16 1613/24 1658/16</p> <p><b>guidance [1]</b> 1598/24</p> <p><b>guide [1]</b> 1704/15</p> <p><b>GUNSTER [1]</b> 1502/14</p>	<p><b>GUTIÉRREZ [77]</b> 1504/4 1505/2 1512/3 1512/10 1513/5 1515/25 1529/2 1551/10 1553/10 1553/18 1553/22 1554/12 1561/1 1561/23 1564/12 1564/23 1566/9 1567/5 1571/9 1572/17 1579/13 1581/20 1583/1 1584/16 1585/21 1586/8 1588/3 1588/5 1588/6 1592/16 1594/14 1595/1 1595/8 1595/20 1601/9 1601/13 1601/16 1605/7 1606/1 1607/8 1608/25 1609/21 1609/23 1610/4 1611/23 1611/24 1612/9 1613/3 1613/18 1615/6 1615/24 1616/18 1617/23 1618/13 1618/24 1619/1 1623/11 1623/21 1624/13 1628/2 1630/12 1631/12 1632/8 1632/17 1633/8 1633/15 1633/21 1634/13 1634/20 1635/19 1636/6 1638/9 1639/14 1639/21 1640/1 1640/10 1659/20</p> <p><b>Gutiérrez's [2]</b> 1535/1 1593/4</p> <p><b>guy [1]</b> 1525/24</p> <hr/> <p><b>H</b></p> <p><b>habitat [2]</b> 1562/13 1678/1</p> <p><b>Hacienda [48]</b> 1513/25 1521/10 1533/4 1533/8 1533/24 1533/24 1535/3 1535/4 1538/12 1541/12 1548/20 1551/25 1552/9 1552/19 1565/6 1567/16 1568/2 1568/17 1569/23 1570/8 1570/12 1573/15 1574/15 1575/12 1575/12 1575/13 1577/4 1577/6 1585/12 1591/12 1591/22 1592/5</p>	<p>1609/15 1611/3 1612/11 1612/13 1638/11 1638/17 1639/1 1639/3 1663/18 1670/12 1690/14 1691/11 1711/14 1712/22 1713/2 1717/2</p> <p><b>had [66]</b> 1512/3 1512/25 1514/4 1514/17 1514/19 1514/25 1521/22 1523/17 1533/3 1535/24 1541/15 1543/13 1545/2 1549/8 1552/8 1552/14 1564/15 1573/24 1574/16 1578/6 1600/13 1605/7 1605/8 1611/9 1614/10 1615/1 1617/2 1617/3 1622/17 1623/4 1626/13 1627/5 1627/7 1628/16 1629/14 1633/10 1635/4 1646/18 1653/21 1655/10 1670/9 1673/2 1674/2 1677/11 1678/15 1678/24 1681/21 1682/11 1682/13 1692/12 1692/21 1693/9 1694/4 1697/17 1704/22 1707/6 1707/24 1708/3 1711/22 1719/19 1722/4 1722/7 1722/21 1724/5 1727/4 1728/23</p> <p><b>half [4]</b> 1553/8 1594/18 1686/17 1719/20</p> <p><b>hand [2]</b> 1546/13 1546/14</p> <p><b>handedness [1]</b> 1656/8</p> <p><b>handle [3]</b> 1597/20 1614/22 1641/12</p> <p><b>hands [2]</b> 1596/15 1701/17</p> <p><b>happen [2]</b> 1623/2 1627/16</p> <p><b>happened [9]</b> 1515/23 1515/24 1520/13 1531/23 1627/19 1629/7 1639/25 1696/8 1697/9</p> <p><b>happens [3]</b> 1627/12 1673/12 1726/5</p> <p><b>happy [4]</b> 1537/20</p>
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<p><b>H</b></p> <p><b>happy... [3]</b> 1585/7 1659/4 1694/6</p> <p><b>hard [1]</b> 1505/20</p> <p><b>Hardly [1]</b> 1582/24</p> <p><b>harm [9]</b> 1627/21 1663/23 1680/25 1715/6 1715/6 1715/10 1715/11 1715/11 1715/11</p> <p><b>harmed [2]</b> 1627/22 1627/23</p> <p><b>harming [1]</b> 1631/9</p> <p><b>has [118]</b> 1510/17 1516/18 1516/22 1516/24 1521/3 1521/4 1521/15 1522/2 1523/19 1525/13 1528/21 1532/1 1536/8 1539/4 1540/2 1543/23 1547/23 1547/25 1549/3 1550/24 1551/24 1557/21 1558/4 1558/23 1559/15 1559/18 1566/20 1569/6 1569/13 1569/16 1572/3 1575/13 1575/14 1583/24 1584/9 1589/10 1602/14 1604/4 1605/23 1607/21 1608/1 1619/24 1620/6 1620/17 1620/22 1621/9 1621/20 1622/10 1622/24 1626/18 1630/6 1635/13 1637/18 1638/11 1639/25 1640/12 1641/2 1652/7 1653/12 1656/4 1657/21 1657/22 1658/14 1665/11 1666/5 1666/10 1668/4 1668/5 1668/9 1669/4 1670/13 1670/24 1671/7 1671/8 1671/16 1672/8 1673/10 1677/2 1685/21 1695/21 1695/21 1699/23 1700/9 1702/10 1702/24 1705/12 1705/15 1705/16 1708/24 1711/17 1714/10 1714/23 1715/4 1715/13 1715/15 1715/23 1716/2 1716/5 1717/1 1717/2 1717/14 1719/21</p>	<p>1724/2 1724/18 1725/1 1725/7 1725/11 1725/13 1725/16 1725/21 1726/2 1726/8 1726/13 1726/15 1726/20 1726/20 1726/23 1727/2</p> <p><b>hasn't [2]</b> 1563/19 1564/1</p> <p><b>Hass [4]</b> 1614/5 1614/20 1615/7 1678/23</p> <p><b>have [317]</b></p> <p><b>haven't [14]</b> 1517/8 1533/10 1535/19 1540/23 1542/6 1544/21 1545/16 1561/18 1563/12 1600/13 1606/25 1610/9 1647/16 1652/4</p> <p><b>having [13]</b> 1552/17 1596/19 1613/14 1615/15 1625/14 1629/13 1633/3 1636/16 1672/10 1686/23 1687/21 1707/11 1723/1</p> <p><b>he [61]</b> 1517/14 1517/18 1517/21 1517/25 1518/4 1518/5 1518/6 1518/17 1518/18 1518/18 1534/4 1534/4 1534/5 1534/7 1549/14 1549/17 1549/22 1549/24 1549/24 1550/11 1550/16 1550/24 1550/24 1552/8 1563/19 1563/21 1563/22 1563/25 1564/1 1564/6 1564/6 1569/16 1578/8 1578/8 1581/12 1584/1 1584/1 1594/15 1607/23 1626/18 1627/16 1627/17 1627/18 1630/7 1633/4 1633/6 1633/7 1633/10 1642/4 1643/2 1649/14 1649/20 1649/21 1650/7 1652/8 1658/14 1680/12 1680/13 1694/3 1698/9 1727/6</p> <p><b>he's [12]</b> 1518/15 1518/15 1641/4 1641/10 1649/2 1649/5 1649/17 1652/8 1652/19</p>	<p>1652/20 1658/16 1721/15</p> <p><b>headings [3]</b> 1543/18 1543/23 1544/1</p> <p><b>headphones [1]</b> 1620/13</p> <p><b>hear [23]</b> 1547/20 1553/20 1576/1 1576/5 1576/6 1576/6 1576/9 1576/10 1576/11 1595/2 1601/14 1611/17 1611/19 1655/20 1672/15 1672/15 1672/20 1679/16 1679/18 1687/14 1698/23 1699/2 1700/23</p> <p><b>heard [5]</b> 1552/2 1577/15 1587/17 1692/10 1700/20</p> <p><b>hearing [23]</b> 1500/14 1505/21 1509/8 1509/12 1509/23 1510/2 1510/22 1511/21 1512/19 1528/11 1528/19 1535/10 1549/6 1549/11 1576/2 1595/25 1614/15 1649/11 1672/17 1692/5 1692/7 1694/13 1730/10</p> <p><b>hears [1]</b> 1576/7</p> <p><b>hectare [1]</b> 1585/12</p> <p><b>hectares [21]</b> 1573/19 1573/22 1573/25 1574/6 1574/16 1575/1 1575/3 1575/3 1575/14 1575/17 1575/17 1575/23 1577/2 1577/3 1577/7 1591/13 1591/23 1592/5 1635/5 1635/11 1677/23</p> <p><b>heiskanalegal.com [1]</b> 1501/5</p> <p><b>Heiskanen [2]</b> 1500/21 1501/5</p> <p><b>hello [2]</b> 1576/7 1576/8</p> <p><b>help [7]</b> 1510/9 1529/5 1529/15 1584/13 1656/6 1706/1 1706/1</p> <p><b>helpful [7]</b> 1509/16 1532/2 1597/4 1610/19 1646/16 1650/4 1658/25</p> <p><b>her [13]</b> 1510/18</p>	<p>1579/8 1580/25 1587/16 1588/8 1592/18 1610/18 1618/8 1623/17 1623/18 1650/24 1651/13 1729/20</p> <p><b>here [110]</b> 1506/5 1506/8 1509/1 1510/20 1512/4 1513/10 1514/13 1519/12 1525/1 1525/18 1527/18 1532/18 1537/16 1538/25 1541/25 1543/3 1544/16 1544/24 1558/8 1558/9 1562/20 1564/2 1565/9 1576/24 1583/20 1583/25 1584/16 1587/15 1592/18 1593/5 1594/3 1596/19 1597/10 1597/11 1605/12 1605/21 1609/6 1613/20 1614/12 1614/19 1617/11 1617/12 1617/16 1618/11 1619/18 1620/3 1629/9 1633/11 1636/22 1641/17 1643/15 1644/17 1646/19 1646/20 1646/21 1649/16 1650/7 1650/8 1652/2 1656/17 1659/13 1661/11 1667/7 1667/23 1667/24 1668/9 1668/14 1668/16 1668/18 1669/5 1669/10 1669/14 1669/23 1670/1 1670/2 1670/4 1670/8 1670/12 1670/14 1670/15 1670/20 1670/21 1672/20 1673/14 1673/18 1677/25 1681/10 1689/22 1692/10 1694/6 1714/15 1716/5 1716/9 1716/22 1719/20 1721/3 1721/6 1721/19 1721/20 1721/23 1722/16 1723/22 1724/17 1724/18 1725/1 1725/12 1725/19 1726/4 1726/5 1726/7</p> <p><b>hereby [1]</b> 1525/2</p> <p><b>Hernaldo [1]</b></p>	<p>1503/15</p> <p><b>Hernández [3]</b> 1581/3 1581/8 1645/14</p> <p><b>hierarchy [1]</b> 1601/20</p> <p><b>high [3]</b> 1644/9 1644/12 1662/11</p> <p><b>highest [2]</b> 1557/14 1558/11</p> <p><b>highlight [1]</b> 1619/10</p> <p><b>highlighted [1]</b> 1546/7</p> <p><b>highly [2]</b> 1549/16 1614/12</p> <p><b>Hill [1]</b> 1502/15</p> <p><b>him [26]</b> 1517/16 1534/3 1534/7 1534/8 1534/9 1534/18 1549/16 1549/21 1549/22 1550/15 1557/23 1563/18 1563/25 1564/4 1564/4 1569/18 1580/15 1580/16 1581/15 1581/16 1584/2 1635/16 1648/1 1652/10 1652/20 1698/23</p> <p><b>himself [2]</b> 1578/17 1709/19</p> <p><b>his [32]</b> 1518/6 1535/5 1548/4 1549/17 1549/24 1569/16 1569/19 1578/8 1581/16 1583/25 1588/4 1608/3 1609/22 1627/11 1630/8 1630/22 1649/6 1649/9 1649/17 1649/18 1649/19 1652/8 1652/10 1652/14 1652/21 1680/13 1694/3 1695/18 1698/11 1701/13 1717/15 1717/19</p> <p><b>his statement [1]</b> 1649/9</p> <p><b>hitter [1]</b> 1729/19</p> <p><b>holder [1]</b> 1605/13</p> <p><b>holding [2]</b> 1513/16 1713/4</p> <p><b>holds [3]</b> 1668/17 1716/3 1721/16</p> <p><b>hole [1]</b> 1532/21</p> <p><b>honor [1]</b> 1660/16</p> <p><b>hope [1]</b> 1543/1</p> <p><b>hopefully [1]</b> 1729/7</p> <p><b>hoping [2]</b> 1505/17 1720/6</p>
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<b>H</b>	1578/1 1581/21 1583/11 1584/25 1586/8 1655/19 1657/9 1663/13 1664/19 1700/24 1714/21 <b>I'll [15]</b> 1513/4 1554/2 1585/7 1617/16 1624/2 1634/17 1641/23 1644/15 1645/2 1646/12 1648/6 1650/20 1658/15 1679/7 1706/17 <b>I'm [169]</b> 1505/17 1508/2 1508/7 1508/15 1510/13 1512/19 1512/24 1513/7 1513/18 1514/7 1514/9 1514/11 1514/13 1516/5 1516/5 1516/9 1516/12 1517/6 1517/9 1517/17 1518/19 1518/20 1519/4 1519/11 1520/23 1522/6 1522/9 1526/3 1527/13 1528/12 1528/12 1528/19 1529/19 1530/2 1530/8 1531/4 1531/23 1532/23 1533/5 1533/16 1533/18 1534/14 1535/6 1537/8 1537/10 1543/9 1543/10 1543/22 1547/16 1547/19 1548/5 1548/5 1550/9 1550/10 1550/18 1550/20 1551/1 1552/13 1554/16 1557/11 1558/4 1558/7 1563/17 1563/19 1566/13 1566/13 1567/21 1570/5 1571/13 1571/23 1571/23 1575/8 1575/8 1575/9 1578/2 1578/4 1579/14 1580/5 1581/5 1585/4 1585/4 1587/19 1587/19 1591/20 1593/20 1593/20 1593/21 1593/24 1594/3 1594/13 1594/24 1595/16 1597/17 1604/4 1604/22 1610/17 1610/17 1610/17 1611/11 1611/20 1613/3	1613/8 1613/15 1616/4 1616/4 1616/11 1616/15 1624/18 1628/12 1629/22 1630/6 1640/15 1641/21 1641/22 1641/23 1645/8 1646/12 1646/20 1646/24 1647/20 1649/2 1649/4 1649/6 1649/9 1649/14 1652/3 1652/20 1652/20 1653/9 1653/11 1653/15 1653/18 1654/8 1655/1 1656/20 1658/12 1661/9 1661/12 1661/13 1661/16 1662/24 1674/11 1679/24 1679/25 1684/23 1693/1 1693/17 1694/6 1696/16 1696/19 1700/20 1700/20 1701/15 1705/19 1709/7 1709/13 1709/23 1709/25 1710/4 1711/3 1712/25 1718/2 1718/6 1718/14 1720/10 1720/14 1721/6 1724/9 1728/16 <b>I've [14]</b> 1507/1 1510/18 1512/25 1537/23 1545/16 1550/6 1550/15 1622/5 1629/18 1652/12 1662/10 1662/14 1663/3 1676/14 <b>icj [1]</b> 1501/7 <b>icj-cij.org [1]</b> 1501/7 <b>ICSID [1]</b> 1500/11 <b>ID [1]</b> 1670/17 <b>idea [5]</b> 1612/2 1657/16 1675/6 1675/9 1689/25 <b>identical [1]</b> 1543/8 <b>identification [2]</b> 1612/4 1713/9 <b>identified [18]</b> 1576/24 1600/24 1608/18 1609/8 1609/24 1655/8 1655/10 1687/21 1688/5 1691/7 1711/13 1713/6 1713/10 1714/11 1715/14 1716/5 1716/25 1717/3 <b>identifies [10]</b>	1545/23 1575/23 1612/7 1669/19 1704/6 1712/9 1712/14 1713/3 1715/21 1716/19 <b>identify [5]</b> 1566/3 1670/14 1699/24 1704/24 1714/3 <b>identifying [1]</b> 1705/13 <b>ii [3]</b> 1608/22 1609/4 1609/5 <b>illegal [2]</b> 1557/3 1562/18 <b>immediate [1]</b> 1704/15 <b>immediately [2]</b> 1686/9 1714/12 <b>impact [10]</b> 1519/8 1620/5 1621/8 1652/7 1653/24 1654/1 1654/1 1655/3 1700/25 1728/13 <b>impacted [5]</b> 1520/7 1651/7 1651/15 1695/12 1695/16 <b>impair [1]</b> 1589/20 <b>impeded [1]</b> 1631/21 <b>implementation [4]</b> 1566/6 1582/12 1620/24 1656/24 <b>implemented [2]</b> 1654/14 1657/22 <b>implementing [1]</b> 1644/19 <b>implements [3]</b> 1640/13 1645/1 1646/7 <b>import [2]</b> 1647/3 1649/18 <b>import/export [1]</b> 1649/18 <b>important [11]</b> 1543/2 1546/19 1578/15 1578/22 1636/24 1637/22 1673/17 1673/25 1674/20 1675/14 1676/12 <b>importing [1]</b> 1648/20 <b>impose [4]</b> 1519/24 1626/13 1626/21 1637/20 <b>imposed [2]</b> 1515/22 1548/23 <b>inaccurate [1]</b> 1551/1 <b>inadvertently [1]</b> 1578/14 <b>INAGROSA [155]</b> 1513/11 1514/1 1514/3 1514/4	1514/15 1514/17 1514/17 1514/19 1514/25 1515/9 1515/11 1516/19 1516/23 1517/2 1520/6 1522/24 1523/8 1523/13 1524/9 1524/10 1525/8 1525/11 1525/13 1525/22 1526/8 1527/1 1527/8 1527/19 1529/7 1529/10 1530/5 1530/9 1530/12 1533/3 1533/7 1533/14 1535/4 1535/4 1537/22 1537/24 1538/5 1538/11 1539/1 1540/22 1542/17 1545/4 1547/2 1548/14 1548/19 1548/21 1551/24 1552/15 1561/1 1561/11 1561/14 1561/15 1562/25 1563/10 1565/22 1566/2 1566/12 1566/15 1566/22 1567/2 1573/18 1573/21 1575/16 1577/8 1577/20 1579/4 1579/9 1580/4 1580/7 1580/12 1580/25 1581/21 1590/1 1590/19 1590/23 1592/3 1593/16 1593/17 1594/7 1608/17 1608/23 1609/6 1609/19 1613/7 1613/13 1613/21 1614/2 1614/4 1614/10 1614/13 1615/7 1615/11 1615/14 1615/17 1623/13 1623/22 1626/12 1627/2 1627/13 1628/5 1628/10 1628/16 1629/13 1629/25 1630/9 1630/13 1630/16 1631/19 1632/4 1632/9 1632/19 1638/3 1638/7 1638/21 1639/16 1650/24 1651/6 1651/14 1654/2 1666/2 1669/6 1673/20 1676/16 1678/14 1678/24 1690/23 1690/25 1691/9 1691/11
<b>I</b>				
<b>I'd [14]</b> 1532/15 1537/19 1552/19				

<p><b>I</b></p> <p><b>INAGROSA... [22]</b>  1711/11 1711/15  1712/1 1712/15  1712/18 1712/22  1712/23 1713/2  1715/2 1715/4 1715/6  1715/11 1715/12  1715/14 1715/16  1716/6 1717/7 1717/7  1717/8 1717/14  1717/18 1722/25</p> <p><b>INAGROSA's [13]</b>  1521/1 1524/24  1538/19 1552/18  1579/23 1581/3  1581/6 1586/15  1613/5 1613/11  1626/14 1633/17  1672/4</p> <p><b>include [8]</b> 1592/10  1638/12 1689/3  1690/2 1690/7 1690/9  1696/25 1726/23</p> <p><b>included [9]</b> 1513/12  1520/2 1675/15  1687/9 1689/11  1690/5 1699/14  1704/4 1705/15</p> <p><b>includes [5]</b> 1589/15  1592/23 1606/19  1679/4 1702/24</p> <p><b>including [7]</b> 1509/8  1583/14 1631/24  1632/1 1662/7  1716/14 1717/18</p> <p><b>incompatibility [1]</b>  1674/20</p> <p><b>incompatible [1]</b>  1674/15</p> <p><b>incorporates [1]</b>  1604/13</p> <p><b>incorrect [3]</b>  1624/18 1634/24  1664/22</p> <p><b>increase [1]</b> 1618/8</p> <p><b>indeed [4]</b> 1527/22  1528/1 1540/6 1553/6</p> <p><b>independent [1]</b>  1689/22</p> <p><b>INDEX [1]</b> 1504/2</p> <p><b>indicate [13]</b>  1514/14 1515/8  1547/1 1548/12  1551/11 1552/14  1624/9 1665/4  1702/18 1706/14  1706/18 1706/20  1723/7</p> <p><b>indicated [14]</b>  1521/14 1548/18  1549/8 1582/5  1638/12 1642/17</p>	1678/14 1692/12 1698/15 1703/8 1704/22 1713/23 1713/23 1721/8 <p><b>indicates [14]</b>  1545/7 1584/19  1584/20 1638/21  1665/7 1666/22  1667/14 1671/6  1672/19 1692/3  1693/2 1695/4  1700/21 1714/1</p> <p><b>indicating [2]</b>  1612/24 1694/9</p> <p><b>indication [5]</b>  1533/7 1584/23  1719/13 1719/19  1729/8</p> <p><b>indirectly [1]</b>  1724/23</p> <p><b>individual [2]</b>  1615/5 1678/12</p> <p><b>inform [1]</b> 1639/2</p> <p><b>information [38]</b>  1505/11 1536/9  1536/18 1536/24  1540/16 1542/14  1545/12 1545/13  1546/21 1560/5  1612/19 1613/2  1634/21 1666/23  1666/24 1667/15  1667/20 1668/7  1668/19 1669/4  1669/8 1670/1 1670/4  1677/12 1689/20  1699/18 1700/10  1702/22 1702/25  1703/2 1703/7  1703/21 1704/1  1704/7 1704/12  1704/18 1705/9  1706/5</p> <p><b>informed [3]</b>  1513/19 1521/5  1726/14</p> <p><b>infraction [5]</b>  1531/14 1639/16  1639/23 1640/3  1640/5</p> <p><b>infrastructure [3]</b>  1593/18 1687/7  1689/18</p> <p><b>initial [1]</b> 1677/8</p> <p><b>injured [2]</b> 1521/3  1521/22</p> <p><b>innocent [1]</b> 1550/9</p> <p><b>inside [3]</b> 1505/21  1646/10 1646/11</p> <p><b>inspect [1]</b> 1560/7</p> <p><b>inspected [1]</b>  1564/12</p> <p><b>inspection [11]</b></p>	1560/8 1564/16 1609/9 1609/11 1610/4 1610/20 1611/9 1611/9 1611/13 1614/18 1671/14 <p><b>inspections [2]</b>  1614/9 1657/21</p> <p><b>instance [2]</b> 1611/16  1611/22</p> <p><b>instances [1]</b>  1637/14</p> <p><b>instead [1]</b> 1511/22</p> <p><b>Institute [1]</b>  1662/11</p> <p><b>institution [2]</b>  1687/3 1687/4</p> <p><b>institutions [6]</b>  1548/19 1601/19  1601/24 1602/2  1602/12 1605/9</p> <p><b>instructed [4]</b>  1569/14 1601/1  1635/14 1635/16</p> <p><b>instruction [4]</b>  1519/2 1574/15  1595/3 1595/4</p> <p><b>INTA [1]</b> 1612/11</p> <p><b>integral [1]</b> 1657/18</p> <p><b>integrated [1]</b>  1536/25</p> <p><b>intend [2]</b> 1506/17  1599/14</p> <p><b>intended [1]</b>  1585/25</p> <p><b>intending [2]</b>  1507/14 1701/17</p> <p><b>intends [1]</b> 1695/17</p> <p><b>intent [2]</b> 1716/22  1726/3</p> <p><b>intention [5]</b>  1505/18 1586/3  1678/16 1701/7  1729/24</p> <p><b>intentions [1]</b>  1677/8</p> <p><b>interest [11]</b>  1528/17 1607/6  1668/4 1668/8  1689/21 1699/24  1700/2 1700/9  1705/13 1705/16  1708/24</p> <p><b>interested [3]</b>  1543/25 1559/14  1633/5</p> <p><b>interests [1]</b>  1711/14</p> <p><b>international [3]</b>  1500/2 1502/5  1647/11</p> <p><b>interpret [4]</b>  1535/21 1537/18</p>	1616/13 1652/10 <p><b>interpretation [14]</b>  1511/7 1512/20  1512/21 1512/22  1576/3 1576/20  1623/16 1623/20  1683/4 1724/14  1726/10 1726/11  1726/12 1726/18</p> <p><b>interpreted [1]</b>  1704/8</p> <p><b>interpreter [10]</b>  1528/21 1561/12  1576/4 1576/7  1576/17 1618/17  1698/21 1699/1  1700/21 1701/10</p> <p><b>interpreters [5]</b>  1501/19 1509/1  1683/10 1701/15  1728/20</p> <p><b>interpreting [1]</b>  1541/16</p> <p><b>interprets [1]</b>  1711/16</p> <p><b>interrupt [6]</b> 1526/1  1526/13 1526/19  1534/11 1534/13  1550/4</p> <p><b>interrupted [1]</b>  1625/3</p> <p><b>interrupting [2]</b>  1649/12 1649/21</p> <p><b>intervention [4]</b>  1572/21 1572/21  1625/21 1675/9</p> <p><b>intimidation [1]</b>  1625/16</p> <p><b>intra [1]</b> 1646/3</p> <p><b>intricate [1]</b> 1623/1</p> <p><b>introduction [1]</b>  1688/23</p> <p><b>introductory [1]</b>  1656/14</p> <p><b>invalidity [2]</b>  1530/16 1630/21</p> <p><b>invasion [1]</b> 1654/4</p> <p><b>invasions [1]</b> 1521/9</p> <p><b>Inversiones [11]</b>  1540/12 1541/18  1545/7 1562/4 1580/7  1610/6 1667/25  1668/16 1669/5  1669/24 1670/14</p> <p><b>investigative [1]</b>  1725/4</p> <p><b>investment [14]</b>  1500/2 1516/22  1593/18 1711/14  1711/16 1711/17  1711/21 1714/10  1715/5 1715/15  1716/3 1716/24</p>	1717/1 1717/2 <p><b>investor [4]</b> 1564/20  1663/22 1704/23  1711/13</p> <p><b>investor's [1]</b> 1556/8</p> <p><b>invite [1]</b> 1510/5</p> <p><b>involved [1]</b> 1512/4</p> <p><b>iron [1]</b> 1571/6</p> <p><b>irony [1]</b> 1592/13</p> <p><b>irrelevant [7]</b>  1517/22 1525/10  1530/16 1530/17  1630/19 1630/19  1631/3</p> <p><b>is [783]</b></p> <p><b>isn't [2]</b> 1517/1  1556/18</p> <p><b>Israel [2]</b> 1661/8  1661/13</p> <p><b>issuance [2]</b> 1538/6  1693/12</p> <p><b>issue [21]</b> 1509/22  1510/17 1510/25  1530/17 1532/11  1534/25 1549/22  1596/23 1598/23  1618/11 1641/3  1649/22 1650/20  1650/21 1652/9  1657/11 1660/24  1661/2 1692/23  1725/5 1727/5</p> <p><b>issued [35]</b> 1520/10  1523/17 1524/6  1528/10 1537/3  1538/16 1539/25  1542/12 1542/13  1542/15 1542/18  1542/23 1544/25  1545/1 1545/5  1546/18 1551/15  1551/21 1565/4  1610/24 1627/3  1628/20 1629/5  1629/19 1631/2  1664/8 1676/5  1690/19 1691/14  1692/11 1693/16  1696/17 1698/4  1720/25 1721/4</p> <p><b>issues [16]</b> 1506/5  1509/5 1509/13  1511/10 1517/19  1560/14 1563/15  1597/9 1639/24  1647/3 1647/5  1647/10 1650/10  1652/2 1674/11  1724/15</p> <p><b>issuing [1]</b> 1509/20</p> <p><b>it [713]</b></p> <p><b>it's [150]</b> 1505/20  1506/4 1506/21</p>
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<p><b>I</b>  <b>it's... [147]</b> 1506/24  1507/6 1508/4 1508/6  1508/13 1510/25  1516/3 1516/11  1516/20 1517/15  1517/15 1517/20  1518/1 1519/8  1519/11 1525/24  1528/21 1530/17  1530/19 1534/12  1534/17 1535/6  1536/11 1536/13  1539/2 1539/7 1539/9  1539/9 1539/11  1539/15 1539/17  1539/20 1539/23  1542/8 1542/10  1542/14 1543/2  1543/8 1543/8  1543/11 1543/17  1545/7 1546/7  1549/24 1550/9  1554/13 1555/16  1557/19 1560/18  1562/17 1563/6  1567/4 1569/11  1573/7 1577/5  1577/10 1577/24  1578/9 1578/9  1578/14 1578/16  1578/22 1579/21  1580/4 1582/7 1584/2  1584/3 1587/24  1589/11 1592/2  1592/13 1593/7  1593/24 1599/12  1599/20 1600/25  1603/9 1603/14  1603/16 1603/22  1605/2 1607/17  1609/3 1615/1  1615/14 1616/24  1619/10 1630/4  1630/8 1630/18  1632/4 1632/19  1635/14 1636/9  1636/24 1639/13  1640/8 1643/2 1649/5  1649/5 1649/7  1649/11 1649/19  1649/21 1649/23  1652/9 1652/22  1653/5 1653/15  1658/20 1663/7  1668/20 1670/17  1671/7 1673/15  1679/9 1679/12  1684/3 1685/24  1687/17 1698/11  1698/12 1700/22  1701/7 1702/19  1703/15 1703/21</p>	<p>1704/21 1705/1  1705/2 1705/5  1705/10 1705/12  1709/17 1711/4  1711/4 1713/19  1713/23 1714/5  1714/17 1714/21  1714/23 1723/19  1723/20 1727/1  1728/17 1729/16  <b>item [1]</b> 1695/2  <b>items [1]</b> 1526/22  <b>its [42]</b> 1516/22  1547/3 1552/15  1559/6 1559/25  1570/16 1577/21  1590/20 1598/21  1605/13 1607/13  1607/14 1614/5  1619/14 1620/24  1621/13 1627/15  1631/19 1633/3  1637/13 1637/24  1638/23 1650/9  1654/3 1654/12  1655/5 1656/13  1657/10 1658/2  1658/2 1663/20  1672/4 1673/12  1679/1 1694/10  1710/21 1714/9  1715/4 1715/14  1716/24 1723/12  1723/17  <b>itself [8]</b> 1523/1  1525/15 1536/8  1614/25 1615/20  1658/7 1690/11  1718/16  <b>Iván [1]</b> 1535/25</p> <p><b>J</b>  <b>Jaguar [4]</b> 1570/18  1572/10 1573/3  1580/1  <b>January [3]</b> 1654/19  1664/16 1696/18  <b>January 2022 [1]</b>  1664/16  <b>jeopardize [1]</b>  1692/8  <b>Jinotega [2]</b> 1523/14  1610/8  <b>Jo [3]</b> 1502/18  1651/25 1652/5  <b>job [1]</b> 1642/12  <b>joins [1]</b> 1606/6  <b>José [1]</b> 1611/22  <b>judge [12]</b> 1532/10  1607/17 1621/25  1626/13 1626/16  1626/20 1627/3  1630/22 1663/16</p>	<p>1711/16 1720/25  1721/8  <b>judgment [2]</b> 1608/4  1665/19  <b>judicial [43]</b> 1513/12  1529/8 1530/21  1531/16 1531/22  1547/2 1548/12  1548/18 1548/23  1619/3 1619/5 1619/6  1619/9 1619/19  1621/15 1621/18  1624/5 1628/5  1631/14 1631/16  1632/10 1662/11  1664/4 1664/9  1664/18 1664/25  1665/17 1665/21  1665/22 1666/5  1667/2 1670/24  1671/1 1671/2  1671/11 1671/13  1694/10 1706/11  1707/12 1714/22  1718/22 1721/16  1728/10  <b>Julio [1]</b> 1720/25  <b>July [2]</b> 1500/15  1504/1  <b>jump [1]</b> 1585/8  <b>June [11]</b> 1538/5  1538/20 1543/4  1545/2 1567/12  1567/25 1628/6  1628/11 1628/16  1629/14 1638/24  <b>June 16 [3]</b> 1567/12  1567/25 1638/24  <b>June 2022 [2]</b>  1538/20 1628/11  <b>June 6 [2]</b> 1538/5  1543/4  <b>jure [4]</b> 1552/17  1631/14 1631/15  1631/23  <b>jurisdiction [11]</b>  1500/14 1528/4  1607/14 1625/12  1625/14 1626/10  1626/16 1626/18  1679/3 1710/6  1710/10  <b>jurisdictional [2]</b>  1688/23 1726/25  <b>just [132]</b> 1505/5  1505/21 1506/4  1506/9 1506/16  1507/3 1507/20  1507/20 1508/2  1508/13 1510/5  1510/15 1511/4  1511/11 1513/1  1513/4 1517/13</p>	<p>1518/23 1522/20  1527/18 1531/4  1532/4 1532/5  1534/11 1540/22  1542/12 1543/16  1544/13 1548/8  1549/17 1549/18  1549/20 1549/23  1552/20 1552/22  1554/1 1557/8 1558/2  1558/5 1563/14  1563/19 1563/24  1564/4 1564/17  1571/4 1571/6 1573/1  1576/15 1577/17  1578/21 1582/6  1584/6 1585/10  1585/13 1597/24  1600/4 1600/6  1600/12 1603/5  1603/7 1603/15  1607/17 1607/18  1609/4 1613/23  1614/20 1615/1  1617/3 1617/25  1618/10 1619/8  1619/11 1620/14  1621/7 1625/2 1625/3  1628/6 1632/25  1638/15 1640/21  1641/13 1641/18  1641/21 1641/24  1642/1 1643/2 1643/6  1643/7 1643/25  1644/8 1644/9  1645/11 1646/12  1647/17 1649/5  1650/19 1650/20  1651/2 1651/5  1651/24 1653/12  1654/16 1655/2  1656/6 1657/10  1657/15 1657/25  1659/3 1659/12  1661/19 1663/9  1680/13 1680/19  1681/7 1681/10  1682/11 1682/12  1685/10 1686/21  1687/8 1687/15  1687/17 1691/8  1696/6 1706/5  1706/17 1710/1  1714/25 1714/25  1717/18 1726/16  1729/4  <b>justice [5]</b> 1656/16  1661/23 1662/12  1684/21 1685/6</p> <p><b>K</b>  <b>keep [11]</b> 1534/25  1569/13 1581/12</p>	<p>1581/16 1639/22  1641/3 1646/23  1649/12 1650/2  1670/24 1686/9  <b>kept [1]</b> 1642/13  <b>key [1]</b> 1597/19  <b>keyword [1]</b> 1713/4  <b>kilometers [2]</b>  1593/3 1594/15  <b>kind [4]</b> 1512/3  1526/4 1669/8 1676/8  <b>kinds [2]</b> 1704/17  1713/21  <b>know [97]</b> 1506/5  1506/9 1506/16  1506/22 1506/23  1509/17 1510/23  1510/23 1514/7  1515/22 1518/22  1518/24 1523/4  1523/8 1523/11  1523/13 1524/5  1524/11 1524/11  1524/12 1527/6  1532/15 1536/1  1537/6 1537/6  1544/14 1546/2  1552/20 1561/6  1561/7 1561/18  1563/5 1564/14  1567/5 1571/24  1583/25 1587/14  1589/7 1589/21  1592/21 1595/3  1595/15 1603/7  1611/11 1611/15  1611/16 1611/16  1611/21 1612/1  1612/2 1612/6  1612/21 1613/16  1616/12 1616/12  1616/13 1617/8  1617/10 1621/20  1622/13 1622/14  1622/14 1623/2  1623/8 1628/13  1630/18 1633/25  1634/1 1634/7  1634/20 1634/23  1642/7 1643/7 1643/8  1645/13 1648/14  1649/10 1650/4  1660/23 1662/15  1681/16 1687/25  1691/20 1693/24  1696/23 1697/4  1697/5 1697/13  1698/1 1698/16  1698/18 1713/18  1727/16 1728/17  1729/6 1729/13  1729/23  <b>knowing [1]</b> 1707/11</p>
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<b>K</b>	1686/19 1686/23 1693/9 1695/3 1698/23 1706/18 1706/19 <b>lasted [1]</b> 1531/16 <b>late [4]</b> 1510/22 1523/21 1629/10 1635/15 <b>later [14]</b> 1506/24 1510/8 1511/3 1511/9 1542/13 1542/24 1561/11 1561/14 1561/15 1598/22 1601/4 1641/13 1683/18 1722/25 <b>latitude [1]</b> 1602/9 <b>Laurie [1]</b> 1501/16 <b>law [171]</b> 1514/1 1514/4 1524/3 1525/5 1531/6 1547/6 1547/7 1547/11 1547/17 1549/1 1555/2 1555/9 1555/9 1555/11 1556/18 1556/23 1557/4 1557/10 1558/3 1558/3 1558/6 1558/17 1558/18 1559/10 1560/22 1562/23 1564/19 1564/23 1565/1 1565/14 1565/18 1565/23 1566/3 1566/11 1566/12 1567/11 1568/7 1570/1 1571/15 1572/3 1572/5 1572/12 1573/1 1573/2 1573/7 1580/10 1582/6 1585/6 1587/6 1587/7 1587/9 1587/9 1587/23 1588/2 1588/10 1588/14 1588/14 1588/15 1589/7 1589/15 1591/14 1591/25 1592/1 1592/7 1592/20 1593/6 1593/8 1593/9 1593/16 1593/23 1595/12 1601/21 1601/24 1601/25 1602/1 1602/3 1602/6 1602/6 1602/9 1602/16 1605/10 1605/21 1606/2 1606/3 1606/4 1606/9 1606/9 1606/14 1606/14 1606/19 1607/14 1607/22 1608/7 1608/12 1608/14 1608/25 1616/12 1616/12	1616/13 1622/5 1624/22 1624/24 1624/24 1627/6 1630/20 1631/6 1631/10 1644/4 1645/22 1645/22 1645/24 1647/8 1647/9 1648/13 1651/3 1651/4 1652/24 1653/5 1656/7 1656/15 1657/8 1658/4 1661/14 1661/22 1662/17 1662/22 1663/2 1663/3 1663/3 1663/5 1663/5 1663/6 1666/21 1666/25 1667/9 1667/10 1667/14 1668/6 1671/17 1672/6 1672/9 1672/18 1673/20 1675/7 1675/12 1675/21 1675/23 1676/1 1678/5 1678/18 1679/2 1682/4 1687/11 1687/11 1687/12 1687/15 1687/15 1687/19 1687/19 1687/22 1687/22 1687/24 1687/25 1688/2 1688/2 1688/18 1688/22 1688/24 1688/24 1689/1 1708/10 <b>laws [8]</b> 1570/9 1605/15 1605/23 1605/23 1605/24 1606/18 1626/1 1671/5 <b>lawyer [18]</b> 1521/5 1521/12 1522/7 1576/6 1576/7 1585/4 1616/4 1616/14 1616/15 1625/21 1679/21 1682/6 1703/17 1705/11 1705/18 1705/18 1705/20 1707/16 <b>lawyers [8]</b> 1502/5 1517/6 1519/4 1679/20 1689/23 1694/4 1697/17 1722/23 <b>leading [7]</b> 1646/15 1646/18 1647/21 1648/9 1649/3 1649/8 1658/14 <b>learn [1]</b> 1686/10 <b>learned [8]</b> 1628/10 1629/13 1630/1 1630/9 1630/13	1706/25 1726/15 1726/20 <b>learning [1]</b> 1707/10 <b>least [11]</b> 1509/14 1509/25 1511/9 1517/15 1517/21 1534/8 1546/15 1546/16 1546/16 1634/7 1705/14 <b>leave [8]</b> 1510/20 1511/9 1511/24 1522/16 1523/6 1543/18 1617/6 1679/7 <b>leaving [1]</b> 1600/6 <b>led [1]</b> 1682/14 <b>left [5]</b> 1600/11 1618/13 1666/17 1719/9 1719/17 <b>legal [59]</b> 1521/2 1525/2 1532/4 1552/11 1562/7 1563/22 1564/6 1568/6 1568/6 1581/12 1581/15 1613/4 1613/11 1625/22 1634/3 1641/4 1641/10 1649/19 1650/7 1650/20 1650/21 1650/23 1652/18 1653/24 1654/1 1654/6 1654/16 1655/2 1656/7 1657/16 1659/6 1661/10 1662/16 1662/17 1662/20 1662/24 1664/5 1665/14 1666/19 1673/7 1673/23 1674/19 1676/11 1678/8 1678/18 1680/8 1680/9 1680/16 1684/23 1689/7 1690/24 1707/13 1707/17 1715/19 1716/4 1716/13 1717/7 1717/17 1726/6 <b>legality [23]</b> 1602/23 1605/17 1605/19 1606/1 1606/11 1606/16 1641/12 1641/16 1641/23 1643/14 1643/15 1643/18 1644/2 1644/5 1644/16 1644/22 1645/4 1645/5 1645/17 1645/25 1646/4 1655/25 1678/25 <b>legally [6]</b> 1555/6	1616/15 1666/13 1674/2 1678/12 1678/20 <b>legislation [2]</b> 1587/17 1664/21 <b>legitimate [3]</b> 1699/24 1700/2 1705/12 <b>leisure [1]</b> 1582/13 <b>lender [1]</b> 1549/2 <b>length [1]</b> 1640/19 <b>lengthy [1]</b> 1518/8 <b>let [57]</b> 1506/5 1506/16 1506/23 1514/22 1515/14 1520/5 1520/25 1522/8 1526/1 1526/16 1527/7 1535/9 1539/18 1550/5 1550/7 1550/13 1550/19 1563/25 1565/21 1566/1 1566/9 1567/11 1568/13 1570/7 1570/7 1571/24 1571/25 1573/13 1574/25 1575/2 1575/11 1576/22 1587/12 1587/14 1590/5 1591/11 1591/22 1607/12 1616/7 1617/8 1628/25 1629/17 1671/15 1671/15 1679/25 1687/5 1691/2 1691/20 1693/16 1695/1 1695/8 1710/13 1718/1 1720/13 1720/24 1723/21 1725/17 <b>let's [35]</b> 1525/16 1534/19 1540/7 1542/23 1553/6 1556/17 1561/8 1563/13 1567/9 1569/23 1572/12 1579/12 1581/20 1584/10 1591/11 1594/22 1595/1 1595/8 1599/9 1599/23 1615/11 1615/11 1643/14 1643/25 1647/2 1647/17 1660/4 1699/15 1707/18 1712/7 1718/14 1719/10 1719/23 1720/3 1723/19 <b>letter [10]</b> 1533/21 1534/7 1534/10 1534/23 1540/22 1545/21 1545/23
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<p><b>L</b></p> <p><b>letter...</b> [3] 1559/14 1596/12 1695/12</p> <p><b>letters</b> [6] 1533/21 1676/17 1693/7 1693/11 1693/16 1693/24</p> <p><b>level</b> [4] 1598/5 1644/9 1644/12 1662/11</p> <p><b>Levine</b> [1] 1503/11</p> <p><b>liabilities</b> [2] 1637/21 1637/21</p> <p><b>liable</b> [2] 1517/2 1517/3</p> <p><b>liens</b> [2] 1672/5 1701/24</p> <p><b>lieu</b> [1] 1660/20</p> <p><b>life</b> [6] 1588/18 1605/22 1642/15 1682/10 1682/10 1718/22</p> <p><b>lifted</b> [1] 1620/19</p> <p><b>lifting</b> [2] 1620/16 1621/2</p> <p><b>light</b> [1] 1664/21</p> <p><b>like</b> [48] 1519/1 1526/5 1526/9 1526/12 1530/3 1532/15 1546/15 1552/19 1554/14 1561/20 1578/1 1580/25 1581/21 1584/1 1586/8 1596/4 1596/9 1599/5 1602/22 1604/24 1607/21 1619/11 1628/7 1629/24 1633/1 1634/6 1638/15 1642/11 1642/16 1646/19 1649/10 1652/13 1655/19 1656/1 1657/5 1657/9 1657/13 1663/13 1664/19 1666/13 1668/25 1669/13 1669/22 1682/1 1693/23 1700/24 1705/5 1720/2</p> <p><b>Likewise</b> [1] 1706/21</p> <p><b>Lillian</b> [1] 1502/8</p> <p><b>limit</b> [7] 1509/13 1547/8 1547/12 1569/2 1657/17 1672/3 1677/14</p> <p><b>limitation</b> [2] 1587/4 1592/16</p> <p><b>limitations</b> [2] 1532/14 1658/17</p> <p><b>limited</b> [5] 1512/14 1513/6 1675/22</p>	<p>1675/25 1680/16</p> <p><b>limits</b> [2] 1657/16 1717/19</p> <p><b>line</b> [9] 1509/11 1542/20 1569/11 1595/5 1634/2 1635/24 1695/4 1713/10 1718/2</p> <p><b>lines</b> [3] 1508/18 1628/8 1628/15</p> <p><b>list</b> [11] 1500/25 1501/23 1502/20 1534/25 1550/24 1611/24 1612/3 1612/3 1612/12 1689/11 1698/20</p> <p><b>listed</b> [3] 1535/1 1537/25 1538/1</p> <p><b>listen</b> [2] 1512/14 1518/2</p> <p><b>listening</b> [3] 1550/6 1659/3 1661/16</p> <p><b>literal</b> [24] 1535/18 1535/21 1536/16 1537/9 1537/11 1539/2 1539/17 1539/23 1540/1 1540/8 1544/25 1545/3 1545/5 1552/21 1667/11 1667/14 1667/18 1669/2 1669/3 1669/10 1669/21 1670/10 1705/6 1706/22</p> <p><b>litigating</b> [1] 1714/1</p> <p><b>litigation</b> [2] 1663/1 1714/2</p> <p><b>litigator</b> [1] 1662/24</p> <p><b>little</b> [12] 1505/5 1600/4 1610/19 1618/3 1618/8 1634/18 1661/12 1661/20 1686/13 1701/14 1701/16 1729/7</p> <p><b>live</b> [3] 1562/15 1597/8 1597/10</p> <p><b>LLC</b> [3] 1500/5 1669/20 1712/14</p> <p><b>LLP</b> [1] 1502/10</p> <p><b>loan</b> [2] 1552/9 1655/11</p> <p><b>loans</b> [3] 1551/24 1631/22 1631/22</p> <p><b>located</b> [5] 1593/13 1593/24 1594/12 1595/10 1712/18</p> <p><b>location</b> [2] 1559/21 1633/7</p> <p><b>locked</b> [1] 1505/12</p> <p><b>lodge</b> [3] 1718/19 1718/21 1719/2</p>	<p><b>logging</b> [5] 1573/4 1588/24 1588/25 1591/21 1592/21</p> <p><b>logic</b> [2] 1680/8 1680/17</p> <p><b>logistical</b> [3] 1510/16 1510/19 1510/25</p> <p><b>long</b> [20] 1518/10 1519/17 1523/19 1524/1 1531/6 1544/13 1547/8 1547/13 1547/15 1570/1 1594/18 1626/17 1653/15 1683/16 1686/19 1686/20 1719/16 1719/23 1728/17 1729/5</p> <p><b>longer</b> [2] 1650/10 1659/13</p> <p><b>look</b> [51] 1526/5 1526/16 1563/14 1578/21 1579/12 1581/21 1581/25 1600/13 1600/17 1615/11 1634/2 1634/6 1639/18 1648/25 1649/22 1658/19 1668/21 1668/21 1668/25 1670/11 1673/13 1674/20 1674/22 1676/12 1678/7 1691/2 1691/17 1693/15 1695/1 1695/8 1697/8 1697/11 1697/12 1699/15 1699/16 1701/2 1702/12 1707/18 1710/13 1712/5 1712/7 1714/22 1715/24 1717/9 1718/1 1719/25 1720/13 1720/24 1723/19 1723/21 1727/22</p> <p><b>looked</b> [2] 1650/13 1674/1</p> <p><b>looking</b> [8] 1543/24 1605/3 1632/2 1655/4 1689/5 1703/17 1721/6 1721/9</p> <p><b>looks</b> [1] 1720/2</p> <p><b>looping</b> [1] 1649/5</p> <p><b>lose</b> [1] 1559/6</p> <p><b>losses</b> [2] 1663/25 1681/2</p> <p><b>lost</b> [8] 1610/17 1610/17 1613/8 1613/9 1623/16 1627/24 1654/14 1655/5</p>	<p><b>lot</b> [2] 1535/24 1728/18</p> <p><b>loud</b> [3] 1516/10 1528/19 1528/22</p> <p><b>lower</b> [1] 1528/18</p> <p><b>LP</b> [1] 1502/5</p> <p><b>Lucy</b> [2] 1500/23 1501/9</p> <p><b>lucy.greenwood</b> [1] 1501/9</p> <p><b>Luis</b> [2] 1593/4 1594/14</p> <p><b>Luis Gutiérrez's</b> [1] 1593/4</p> <p><b>lunch</b> [6] 1594/22 1595/6 1595/22 1595/23 1600/18 1600/19</p> <p><b>lunchtime</b> [3] 1600/3 1600/6 1600/9</p> <p><b>lying</b> [1] 1678/13</p> <hr/> <p><b>M</b></p> <p><b>ma'am</b> [3] 1534/17 1681/7 1681/14</p> <p><b>Madam</b> [1] 1529/14</p> <p><b>made</b> [35] 1506/14 1511/8 1525/21 1533/17 1535/3 1548/1 1564/16 1583/8 1587/15 1596/12 1603/21 1612/18 1624/6 1624/11 1629/10 1629/14 1637/2 1638/16 1642/4 1649/14 1665/15 1669/15 1669/21 1670/23 1672/8 1673/16 1676/18 1697/1 1698/10 1698/16 1699/6 1704/24 1712/9 1712/23 1725/7</p> <p><b>MAGFOR</b> [1] 1612/10</p> <p><b>main</b> [5] 1549/9 1555/11 1555/19 1622/11 1663/19</p> <p><b>mainly</b> [1] 1682/7</p> <p><b>maintain</b> [2] 1572/6 1572/20</p> <p><b>maintained</b> [1] 1620/20</p> <p><b>maintenance</b> [1] 1675/5</p> <p><b>majority</b> [3] 1513/15 1516/18 1516/21</p> <p><b>make</b> [43] 1506/17 1506/19 1507/4 1510/10 1511/5 1511/17 1514/4 1514/17 1514/19</p>	<p>1517/17 1525/16 1528/2 1529/16 1529/20 1539/19 1544/13 1548/8 1549/18 1564/2 1564/15 1597/1 1597/12 1597/14 1598/1 1604/23 1620/15 1626/22 1641/24 1642/2 1642/15 1645/11 1649/11 1649/23 1653/4 1653/9 1660/11 1660/13 1666/1 1677/7 1700/15 1700/17 1719/14 1729/20</p> <p><b>makes</b> [10] 1523/1 1541/21 1588/9 1656/14 1667/9 1674/8 1712/15 1713/12 1713/14 1714/7</p> <p><b>making</b> [10] 1514/9 1587/5 1660/19 1669/15 1670/21 1679/2 1712/21 1721/18 1723/23 1724/7</p> <p><b>manage</b> [2] 1677/2 1729/25</p> <p><b>managed</b> [1] 1683/25</p> <p><b>management</b> [23] 1515/2 1560/3 1563/10 1564/18 1564/19 1564/21 1564/25 1565/3 1566/14 1569/15 1580/9 1581/21 1581/22 1582/2 1582/17 1584/17 1585/23 1636/15 1636/19 1638/13 1640/16 1640/23 1677/4</p> <p><b>managing</b> [1] 1583/2</p> <p><b>Managua</b> [5] 1524/9 1524/24 1525/4 1527/10 1683/14</p> <p><b>mandamiento</b> [1] 1664/7</p> <p><b>mandate</b> [2] 1572/25 1699/13</p> <p><b>mandated</b> [2] 1567/4 1601/25</p> <p><b>mandates</b> [2] 1602/20 1607/22</p> <p><b>mandatory</b> [1] 1573/7</p> <p><b>maneuver</b> [1] 1623/1</p>
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1724/2 1724/14 1724/19 1724/21 1725/2 1725/3 1725/23 1726/15 1726/20</p> <p><b>matters [5]</b> 1505/4 1598/6 1635/15 1650/13 1653/6</p> <p><b>may [76]</b> 1505/19 1511/16 1511/20 1511/23 1516/15</p>	<p>1517/4 1519/8 1519/14 1526/10 1528/10 1529/1 1529/2 1533/17 1534/5 1534/13 1535/21 1542/25 1544/18 1547/24 1549/22 1553/15 1561/9 1561/16 1564/10 1568/5 1569/11 1573/2 1576/12 1578/20 1596/22 1598/6 1598/19 1604/5 1605/5 1610/10 1618/13 1619/17 1622/16 1628/7 1651/21 1663/23 1665/7 1667/15 1668/14 1672/2 1672/8 1672/11 1675/11 1680/25 1683/20 1689/23 1692/7 1694/22 1695/5 1695/13 1695/14 1695/16 1696/5 1698/8 1701/1 1701/11 1705/14 1708/11 1708/23 1710/22 1711/7 1711/19 1718/14 1720/19 1721/1 1721/21 1721/23 1722/6 1722/10 1722/14 1723/5</p> <p><b>May 2022 [6]</b> 1683/20 1721/23 1722/6 1722/10 1722/14 1723/5</p> <p><b>May 26 [1]</b> 1561/16</p> <p><b>maybe [9]</b> 1522/3 1570/21 1610/18 1623/8 1626/8 1642/11 1643/7 1719/21 1729/7</p> <p><b>me [114]</b> 1510/17 1514/22 1515/14 1515/22 1517/5 1517/9 1520/5 1522/2 1525/22 1526/1 1526/6 1526/13 1526/19 1527/7 1528/20 1534/2 1534/11 1535/9 1537/19 1538/4 1539/18 1539/19 1540/5 1540/23 1541/15 1541/24 1543/10 1547/5 1550/1 1550/4 1550/5 1550/7 1550/13 1550/17 1550/19 1550/19 1554/13</p>	<p>1555/18 1557/17 1557/18 1563/17 1565/11 1565/21 1566/1 1566/9 1568/13 1570/25 1571/25 1574/24 1575/11 1576/6 1576/7 1576/22 1578/4 1583/19 1585/6 1587/12 1587/14 1588/14 1590/5 1591/11 1591/22 1594/15 1596/16 1603/5 1605/8 1607/1 1607/12 1608/20 1609/1 1615/10 1616/7 1624/16 1628/25 1629/4 1629/17 1631/3 1635/20 1635/25 1637/8 1660/24 1677/15 1678/19 1679/16 1679/25 1681/9 1681/13 1684/18 1686/22 1687/5 1689/2 1690/6 1690/8 1690/9 1691/3 1691/19 1691/20 1692/17 1693/11 1693/16 1703/9 1703/13 1703/16 1705/1 1705/2 1705/5 1706/14 1708/20 1709/23 1714/13 1715/9 1716/7 1725/6 1725/17</p> <p><b>mean [6]</b> 1608/8 1640/25 1668/23 1670/5 1685/11 1726/16</p> <p><b>meaning [4]</b> 1546/3 1622/21 1702/10 1726/24</p> <p><b>means [18]</b> 1528/6 1546/3 1564/20 1565/15 1572/6 1602/2 1611/15 1621/14 1622/2 1622/4 1622/19 1668/23 1703/10 1719/21 1723/16 1724/15 1724/23 1728/9</p> <p><b>meant [2]</b> 1613/20 1719/1</p> <p><b>measure [120]</b> 1515/8 1515/10 1515/19 1515/21 1519/25 1520/8 1520/10 1520/14 1520/17 1520/19 1521/3 1521/6 1521/7</p>	<p>1521/11 1521/16 1521/21 1521/22 1522/8 1522/11 1522/14 1522/18 1522/21 1522/24 1523/11 1523/12 1524/6 1524/7 1524/8 1524/18 1524/19 1525/12 1525/20 1526/4 1526/9 1526/11 1526/15 1526/24 1526/24 1527/9 1527/19 1527/22 1527/23 1528/10 1530/11 1532/24 1539/5 1540/18 1541/1 1541/1 1541/7 1552/14 1619/13 1620/17 1620/19 1620/22 1620/23 1621/2 1621/5 1623/10 1623/10 1626/13 1626/21 1628/17 1628/18 1628/24 1629/1 1629/1 1629/2 1629/10 1629/16 1630/1 1630/9 1630/14 1651/15 1654/14 1664/12 1669/16 1671/16 1672/12 1672/21 1672/23 1674/1 1674/5 1681/19 1681/20 1690/12 1690/15 1690/21 1691/4 1691/7 1691/8 1691/14 1692/9 1693/10 1694/12 1694/20 1695/11 1695/13 1696/17 1702/3 1704/5 1706/9 1706/22 1706/25 1707/11 1711/7 1711/18 1712/2 1712/4 1713/5 1713/14 1715/19 1715/25 1716/20 1721/4 1721/5 1721/11 1722/2 1722/13 1722/19</p> <p><b>measures [16]</b> 1516/2 1517/8 1519/8 1519/13 1584/24 1620/18 1651/7 1663/10 1663/16 1664/4 1672/3 1672/17 1692/4 1704/25 1710/20 1711/23</p> <p><b>mechanism [2]</b> 1673/21 1673/22</p>	<p><b>mediation [1]</b> 1684/21</p> <p><b>meet [1]</b> 1671/8</p> <p><b>meeting [1]</b> 1650/16</p> <p><b>Melva [3]</b> 1502/18 1651/25 1652/5</p> <p><b>Melva Jo [1]</b> 1651/25</p> <p><b>memorial [5]</b> 1549/9 1549/10 1551/10 1551/11 1714/24</p> <p><b>memorials [4]</b> 1549/9 1551/23 1714/1 1714/21</p> <p><b>memory [1]</b> 1715/14</p> <p><b>mention [24]</b> 1535/19 1535/20 1544/19 1554/18 1554/23 1577/16 1583/8 1586/21 1615/25 1663/13 1684/19 1688/17 1688/19 1688/19 1688/25 1689/14 1689/25 1690/1 1696/6 1696/10 1710/17 1712/9 1712/15 1712/18</p> <p><b>mentioned [41]</b> 1530/19 1530/23 1531/7 1532/4 1532/5 1532/24 1533/2 1534/9 1537/2 1543/4 1568/11 1570/17 1577/13 1581/25 1583/7 1586/19 1586/24 1588/8 1599/4 1608/16 1612/10 1613/12 1622/5 1626/9 1682/22 1683/11 1683/25 1686/23 1686/25 1687/18 1688/9 1688/16 1690/14 1697/21 1699/13 1699/22 1701/3 1711/2 1723/3 1727/8 1728/8</p> <p><b>mentions [2]</b> 1620/3 1695/10</p> <p><b>meritorious [1]</b> 1649/12</p> <p><b>MERITS [1]</b> 1500/14</p> <p><b>meter [1]</b> 1595/10</p> <p><b>meters [6]</b> 1592/24 1593/14 1593/25 1594/4 1594/8 1594/16</p> <p><b>mic [3]</b> 1618/9 1618/11 1618/13</p> <p><b>microphone [13]</b> 1512/17 1528/23 1576/5 1585/20</p>
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[9]</b> 1611/18 1616/22 1618/18 1661/3 1680/13 1698/22 1699/1 1699/3 1717/16</p> <p><b>might [15]</b> 1507/20 1508/11 1518/21 1543/5 1569/7 1570/21 1597/16 1604/7 1608/13 1616/25 1618/7 1630/3 1719/12 1719/22 1728/20</p> <p><b>Miguel [1]</b> 1632/21</p> <p><b>mind [8]</b> 1534/25 1548/4 1569/13 1575/7 1581/12 1581/16 1641/4 1650/2</p> <p><b>mindful [2]</b> 1511/6 1727/18</p> <p><b>minimize [1]</b> 1505/11</p> <p><b>minimum [2]</b> 1534/6 1675/9</p> <p><b>ministerial [7]</b> 1565/15 1567/7 1567/23 1568/21 1575/22 1576/23 1634/14</p> <p><b>ministries [1]</b> 1606/5</p> <p><b>ministry [3]</b> 1644/23 1687/6 1689/18</p> <p><b>minor [1]</b> 1709/3</p> <p><b>minute [3]</b> 1543/22 1554/2 1677/13</p> <p><b>minutes [20]</b> 1505/22 1507/12 1527/7 1553/7 1594/21 1616/22 1617/1 1660/1 1660/20 1677/14 1677/17 1677/18 1677/18 1679/10 1719/11 1719/11 1719/17 1720/3 1729/7 1729/10</p> <p><b>misdeed [1]</b> 1615/1</p> <p><b>misinterpreting [2]</b> 1703/11 1725/14</p> <p><b>misleading [1]</b> 1534/14</p> <p><b>misrepresentation [1]</b> 1614/8</p> <p><b>misrepresentations [1]</b> 1580/20</p> <p><b>missed [1]</b> 1554/21</p> <p><b>misspoken [1]</b> 1549/22</p> <p><b>misstatement [2]</b></p>	<p>1550/9 1550/10</p> <p><b>mistake [2]</b> 1525/20 1603/21</p> <p><b>mitigate [3]</b> 1640/14 1644/20 1646/8</p> <p><b>mixed [2]</b> 1570/18 1572/10</p> <p><b>mixing [1]</b> 1546/12</p> <p><b>modality [1]</b> 1702/1</p> <p><b>model [1]</b> 1684/22</p> <p><b>modification [3]</b> 1666/1 1666/3 1666/8</p> <p><b>modify [3]</b> 1573/10 1573/12 1675/10</p> <p><b>Molina [1]</b> 1503/7</p> <p><b>moment [10]</b> 1520/25 1576/16 1625/6 1653/16 1654/9 1683/2 1683/6 1706/17 1710/1 1727/17</p> <p><b>money [2]</b> 1685/14 1685/17</p> <p><b>monitoring [1]</b> 1582/15</p> <p><b>month [3]</b> 1622/1 1683/19 1683/22</p> <p><b>months [2]</b> 1545/1 1620/21</p> <p><b>more [24]</b> 1508/3 1511/15 1511/22 1534/6 1536/4 1569/12 1589/10 1594/21 1597/20 1602/9 1605/13 1620/21 1635/11 1636/16 1651/3 1655/12 1667/19 1676/19 1683/22 1686/13 1698/22 1714/6 1717/18 1729/7</p> <p><b>morning [20]</b> 1505/1 1505/2 1505/8 1505/18 1512/10 1512/11 1553/18 1598/12 1598/14 1598/18 1598/20 1599/4 1612/10 1614/14 1626/9 1648/5 1650/22 1653/23 1729/2 1730/5</p> <p><b>mortgage [2]</b> 1547/3 1549/2</p> <p><b>mortgages [1]</b> 1655/11</p> <p><b>mortgagor [1]</b> 1547/8</p> <p><b>most [4]</b> 1513/8 1546/19 1599/18 1604/10</p> <p><b>motion [11]</b> 1505/7</p>	<p>1506/17 1506/22 1507/3 1596/8 1596/20 1600/8 1707/20 1708/4 1708/4 1708/8</p> <p><b>move [23]</b> 1511/3 1513/6 1513/9 1532/23 1535/16 1552/11 1554/5 1554/9 1562/10 1569/7 1584/5 1584/6 1597/22 1611/6 1618/10 1618/13 1642/12 1650/17 1655/19 1660/24 1694/2 1694/6 1694/7</p> <p><b>moved [2]</b> 1513/1 1536/5</p> <p><b>moving [2]</b> 1506/8 1710/18</p> <p><b>Mr [20]</b> 1500/22 1501/7 1501/21 1501/22 1502/11 1502/12 1502/15 1502/19 1503/7 1503/8 1503/10 1503/11 1503/12 1503/15 1503/18 1544/18 1553/22 1643/12 1644/11 1660/6</p> <p><b>Mr. [75]</b> 1505/2 1505/4 1507/10 1507/12 1510/6 1510/11 1512/3 1512/7 1533/22 1535/15 1542/25 1550/1 1551/2 1552/2 1552/7 1557/7 1558/25 1569/21 1579/3 1579/12 1580/18 1581/18 1581/19 1595/16 1596/2 1596/9 1596/13 1596/14 1596/20 1598/4 1599/2 1599/4 1599/11 1601/7 1604/8 1608/16 1616/21 1617/9 1617/20 1617/21 1618/21 1629/20 1632/21 1634/20 1635/7 1638/9 1640/15 1640/18 1640/22 1641/11 1642/1 1642/2 1642/17 1642/23 1646/14 1646/15 1646/21 1647/20 1649/25 1652/3 1658/12 1658/24 1659/17 1660/5</p>	<p>1660/23 1661/5 1661/15 1679/16 1686/8 1689/10 1693/22 1698/6 1701/11 1717/12 1728/16</p> <p><b>Mr. Appleton [16]</b> 1507/12 1533/22 1550/1 1579/12 1580/18 1596/13 1599/4 1604/8 1617/9 1642/2 1642/17 1642/23 1646/15 1649/25 1658/24 1659/17</p> <p><b>Mr. Ferrufino's [1]</b> 1596/9</p> <p><b>Mr. Gutiérrez [4]</b> 1505/2 1512/3 1634/20 1638/9</p> <p><b>Mr. Miguel [1]</b> 1632/21</p> <p><b>Mr. President [43]</b> 1505/4 1507/10 1510/6 1510/11 1512/7 1535/15 1542/25 1551/2 1558/25 1569/21 1579/3 1581/18 1581/19 1595/16 1596/2 1596/14 1596/20 1598/4 1599/2 1599/11 1601/7 1616/21 1617/20 1617/21 1618/21 1629/20 1635/7 1640/15 1640/18 1640/22 1641/11 1642/1 1646/14 1646/21 1647/20 1652/3 1658/12 1660/23 1693/22 1698/6 1701/11 1717/12 1728/16</p> <p><b>Mr. Renaldy [2]</b> 1557/7 1608/16</p> <p><b>Mr. Rondón [1]</b> 1552/2</p> <p><b>Mr. Rondón's [1]</b> 1552/7</p> <p><b>Mr. Sequeira [6]</b> 1660/5 1661/5 1661/15 1679/16 1686/8 1689/10</p> <p><b>Mrs. [1]</b> 1653/8</p> <p><b>Mrs. Rondón [1]</b> 1653/8</p> <p><b>Ms [13]</b> 1500/23 1501/9 1501/13 1501/16 1501/17 1501/20 1502/7 1502/8 1502/18</p>	<p>1503/6 1503/9 1550/6 1649/9</p> <p><b>Ms. [39]</b> 1510/17 1510/23 1512/6 1514/22 1534/20 1534/24 1549/7 1551/7 1553/4 1553/9 1554/3 1588/8 1589/25 1591/2 1592/18 1594/17 1596/3 1597/15 1601/9 1603/18 1617/11 1617/17 1617/24 1618/4 1642/3 1642/8 1642/22 1643/3 1643/10 1643/18 1644/17 1647/4 1648/5 1650/22 1651/6 1652/5 1655/24 1701/4 1720/8</p> <p><b>Ms. Cardenas [2]</b> 1701/4 1720/8</p> <p><b>Ms. Cortes [10]</b> 1553/4 1553/9 1594/17 1596/3 1601/9 1603/18 1617/24 1643/18 1647/4 1655/24</p> <p><b>Ms. De Pena [6]</b> 1617/17 1618/4 1642/3 1642/22 1643/3 1644/17</p> <p><b>Ms. González [19]</b> 1510/17 1510/23 1512/6 1514/22 1534/20 1534/24 1549/7 1551/7 1554/3 1588/8 1589/25 1591/2 1592/18 1597/15 1617/11 1643/10 1648/5 1650/22 1651/6</p> <p><b>Ms. González's [1]</b> 1642/8</p> <p><b>Ms. Melva Jo [1]</b> 1652/5</p> <p><b>much [31]</b> 1513/3 1519/1 1544/22 1554/11 1558/20 1577/12 1584/13 1586/5 1601/11 1616/17 1617/20 1617/21 1618/20 1623/11 1628/2 1631/11 1632/7 1635/17 1643/13 1659/13 1659/15 1659/22 1659/23 1660/18 1661/6 1680/3 1700/18 1719/4 1719/9</p>
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<b>N</b>	<b>Nahila [3]</b> 1503/9 1553/18 1553/22 <b>name [9]</b> 1553/18 1553/22 1554/14 1631/25 1632/1 1634/5 1661/8 1661/13 1679/19 <b>names [2]</b> 1665/22 1717/21 <b>naming [1]</b> 1717/17 <b>NAP [1]</b> 1670/16 <b>narrow [1]</b> 1646/23 <b>nation [1]</b> 1677/3 <b>national [9]</b> 1555/7 1557/13 1558/10 1573/4 1611/25 1612/5 1675/15 1683/12 1683/13 <b>natural [13]</b> 1555/13 1555/20 1557/12 1558/9 1570/14 1570/15 1583/13 1583/17 1640/14 1644/20 1646/9 1675/13 1675/19 <b>nature [2]</b> 1556/6 1599/12 <b>necessary [12]</b> 1515/1 1515/4 1515/5 1515/7 1515/9 1554/13 1608/14 1615/2 1638/22 1655/16 1672/20 1677/4 <b>necessity [1]</b> 1615/12 <b>need [66]</b> 1505/19 1506/11 1506/15 1507/18 1509/16 1509/17 1514/6 1517/18 1517/25 1521/8 1528/11 1528/18 1532/20 1534/25 1547/10 1548/3 1549/18 1550/7 1555/15 1558/5 1571/4 1571/16 1572/1 1574/5 1583/7 1584/6 1594/19 1597/12 1604/9 1605/9 1608/6 1608/8 1608/11 1608/23 1609/19 1609/20 1609/20 1613/21 1615/20 1624/17 1626/8 1636/20 1637/13 1637/17 1637/18 1649/23 1659/4 1659/25 1660/11	<b>needed [9]</b> 1566/16 1598/25 1613/7 1613/13 1614/22 1615/7 1615/11 1615/17 1618/12 <b>needs [9]</b> 1549/14 1564/10 1568/7 1584/8 1621/13 1637/13 1667/3 1674/1 1676/21 <b>negative [1]</b> 1552/18 <b>neighbor [1]</b> 1700/9 <b>neighboring [1]</b> 1570/2 <b>neither [5]</b> 1566/25 1627/1 1627/5 1637/16 1637/17 <b>never [23]</b> 1525/13 1527/20 1529/7 1529/12 1529/22 1530/7 1535/4 1535/13 1587/17 1590/2 1609/15 1609/17 1614/14 1614/15 1614/17 1632/12 1639/9 1639/10 1639/10 1680/21 1688/12 1688/14 1718/25 <b>new [18]</b> 1506/15 1506/19 1524/5 1561/15 1571/5 1599/14 1600/22 1622/16 1622/22 1622/23 1622/25 1623/4 1623/5 1623/9 1684/21 1687/19 1687/24 1688/2 <b>news [1]</b> 1510/25 <b>next [11]</b> 1507/12 1545/16 1545/17 1610/11 1610/12 1649/15 1650/18 1660/4 1677/14 1677/18 1694/19 <b>NICARAGUA [124]</b> 1500/8 1515/23 1515/24 1519/19 1519/22 1522/18 1523/2 1525/15 1525/16 1533/14 1533/22 1535/25 1537/25 1541/5 1541/9 1541/11	1541/12 1541/14 1541/23 1542/2 1546/11 1546/18 1547/12 1554/20 1554/25 1555/2 1558/19 1559/1 1559/6 1588/22 1601/16 1601/19 1602/12 1602/19 1602/24 1603/2 1605/22 1605/24 1606/17 1608/6 1608/9 1608/10 1614/12 1616/1 1616/9 1623/13 1623/23 1626/20 1627/12 1628/3 1629/4 1632/12 1635/2 1636/14 1640/2 1640/21 1644/6 1647/15 1648/16 1648/24 1650/11 1657/24 1661/24 1662/4 1662/8 1662/12 1663/11 1663/15 1663/20 1663/24 1664/6 1664/10 1664/25 1665/6 1665/23 1669/20 1670/8 1670/21 1671/3 1676/10 1680/10 1680/20 1681/1 1681/6 1681/12 1681/21 1681/25 1682/2 1682/18 1684/13 1684/16 1686/2 1686/6 1686/12 1686/14 1686/23 1687/2 1688/21 1689/9 1689/18 1692/13 1692/19 1693/4 1693/20 1694/5 1697/13 1698/3 1698/17 1699/9 1699/9 1699/10 1702/7 1703/24 1704/3 1705/15 1705/17 1711/13 1712/10 1713/16 1713/21 1714/16 1714/22 1715/15 1722/23	<b>Nicaragua's [6]</b> 1534/1 1628/19 1632/9 1636/18 1693/19 1697/16 <b>Nicaraguan [41]</b> 1514/1 1514/3 1515/5 1519/24 1520/18 1522/12 1531/6 1555/11 1559/10	<b>nine [2]</b> 1547/5 1549/1 <b>no [178]</b> 1500/11 1505/12 1507/9 1512/15 1512/17 1513/9 1516/20 1517/13 1518/4 1518/14 1521/10 1521/18 1521/24 1523/16 1525/16 1527/20 1533/3 1533/7 1533/16 1534/12 1534/18 1535/3 1535/13 1535/23 1536/20 1545/23 1547/15 1549/1 1549/2 1550/22 1552/2 1555/1 1563/12 1564/4 1564/9 1565/20 1565/20 1565/24 1565/25 1566/4 1566/5 1566/13 1567/3 1567/18 1567/20 1568/4 1568/15 1568/19 1568/19 1568/24 1569/14 1569/15 1571/14 1571/17 1571/18 1572/7 1573/11 1573/12 1573/12 1574/9 1575/25 1576/15 1576/20 1585/16 1585/20 1587/20 1588/1 1588/1 1589/14 1589/25 1590/1 1590/21 1591/3 1591/8 1591/15 1591/20 1591/25 1592/8 1593/23 1594/3 1594/21 1598/3 1600/23 1603/25 1605/13 1609/25 1612/2 1613/1 1614/11

<p><b>N</b></p> <p><b>no...</b> [89] 1615/16 1615/18 1616/10 1616/11 1621/6 1623/7 1623/19 1624/2 1625/17 1626/5 1626/5 1626/13 1626/25 1627/1 1627/9 1627/20 1631/7 1633/7 1633/11 1633/12 1633/13 1633/14 1633/25 1633/25 1638/13 1638/13 1638/14 1639/17 1639/23 1640/4 1640/6 1641/18 1642/20 1642/24 1643/1 1647/19 1648/8 1648/16 1648/16 1649/4 1650/2 1650/10 1653/6 1657/17 1659/19 1665/7 1666/8 1671/8 1672/15 1673/16 1673/21 1680/21 1681/13 1682/21 1683/1 1684/13 1687/24 1688/13 1688/15 1689/2 1690/24 1691/5 1691/10 1692/15 1694/16 1695/5 1696/22 1697/19 1698/19 1699/3 1699/16 1699/16 1700/9 1701/6 1702/10 1703/10 1706/15 1708/21 1712/5 1712/11 1712/15 1712/15 1712/22 1718/9 1718/20 1719/10 1721/20 1725/12 1729/24</p> <p><b>No. [11]</b> 1626/8 1626/24 1627/19 1639/18 1662/21 1668/20 1668/22 1669/6 1695/8 1705/3 1727/24</p> <p><b>No. 1 [1]</b> 1626/8</p> <p><b>No. 2 [3]</b> 1662/21 1669/6 1705/3</p> <p><b>No. 20 [1]</b> 1727/24</p> <p><b>No. 4 [3]</b> 1626/24 1627/19 1695/8</p> <p><b>No. 6 [3]</b> 1639/18 1668/20 1668/22</p> <p><b>No.1 [1]</b> 1506/18</p> <p><b>No.2 [3]</b> 1516/9 1539/13 1545/5</p>	<p><b>non [7]</b> 1525/9 1525/21 1527/16 1527/17 1646/18 1649/8 1649/12</p> <p><b>non-leading [2]</b> 1646/18 1649/8</p> <p><b>non-meritorious [1]</b> 1649/12</p> <p><b>non-party [4]</b> 1525/9 1525/21 1527/16 1527/17</p> <p><b>none [2]</b> 1648/24 1685/12</p> <p><b>nonetheless [2]</b> 1702/5 1730/9</p> <p><b>Norma [4]</b> 1586/19 1586/21 1586/24 1587/15</p> <p><b>normally [3]</b> 1700/5 1705/17 1714/21</p> <p><b>norms [1]</b> 1625/17</p> <p><b>Norte [1]</b> 1610/8</p> <p><b>not [304]</b></p> <p><b>not decided [1]</b> 1656/19</p> <p><b>notary [2]</b> 1661/14 1661/22</p> <p><b>notation [3]</b> 1539/21 1540/20 1549/3</p> <p><b>note [8]</b> 1509/20 1600/10 1621/1 1636/24 1659/5 1694/3 1727/18 1728/23</p> <p><b>noted [3]</b> 1507/7 1509/3 1601/4</p> <p><b>notes [1]</b> 1576/17</p> <p><b>nothing [13]</b> 1512/2 1530/23 1531/17 1562/17 1562/18 1601/7 1639/24 1639/24 1648/14 1659/12 1681/21 1703/14 1717/14</p> <p><b>nothing's [1]</b> 1599/13</p> <p><b>notice [84]</b> 1520/7 1525/9 1526/15 1526/25 1527/8 1527/11 1527/12 1527/15 1528/5 1528/6 1529/10 1529/17 1529/18 1530/9 1530/15 1530/15 1539/4 1539/8 1539/12 1539/15 1539/15 1540/18 1541/1 1545/25 1546/6 1623/6 1624/6 1624/8 1626/25 1627/1 1627/2 1627/7 1627/9 1627/14 1627/20</p>	<p>1627/21 1627/22 1627/23 1628/5 1628/10 1630/17 1631/9 1632/10 1632/11 1632/12 1632/18 1632/20 1632/23 1633/10 1637/23 1639/23 1640/5 1651/15 1657/5 1657/6 1672/13 1672/22 1674/5 1674/9 1695/9 1695/15 1695/20 1695/21 1695/22 1695/23 1696/1 1696/5 1696/6 1696/12 1696/24 1697/17 1698/2 1698/8 1708/7 1712/19 1713/12 1718/20 1718/22 1718/23 1718/25 1724/12 1724/15 1724/15 1724/23</p> <p><b>notices [3]</b> 1526/21 1673/9 1697/5</p> <p><b>notification [9]</b> 1526/15 1529/12 1530/7 1545/20 1655/22 1656/4 1697/10 1712/17 1727/1</p> <p><b>notifications [1]</b> 1526/20</p> <p><b>notified [29]</b> 1520/18 1524/8 1524/10 1524/11 1525/23 1529/21 1529/22 1530/5 1624/7 1694/21 1696/21 1707/24 1724/1 1724/17 1724/18 1725/8 1725/12 1725/12 1725/13 1725/16 1725/19 1725/21 1726/3 1726/5 1726/8 1726/14 1726/20 1727/2 1727/4</p> <p><b>notify [8]</b> 1525/2 1525/23 1525/24 1697/14 1698/11 1698/17 1699/6 1699/8</p> <p><b>notifying [1]</b> 1525/6</p> <p><b>notion [3]</b> 1591/19 1626/25 1631/17</p> <p><b>notwithstanding [2]</b> 1723/7 1723/25</p> <p><b>November [9]</b> 1542/13 1542/15 1663/15 1706/10 1706/23 1706/25</p>	<p>1707/6 1722/3 1722/13</p> <p><b>November 1 [1]</b> 1706/23</p> <p><b>November 11 [1]</b> 1706/25</p> <p><b>November 2021 [1]</b> 1663/15</p> <p><b>November 2022 [2]</b> 1706/10 1722/3</p> <p><b>now [90]</b> 1521/6 1525/1 1525/22 1531/23 1533/19 1534/22 1535/16 1538/24 1540/1 1546/7 1553/3 1553/6 1555/1 1562/10 1563/13 1569/1 1571/19 1571/21 1574/25 1576/7 1576/10 1576/11 1577/24 1578/1 1582/21 1583/12 1594/22 1597/15 1597/16 1598/9 1603/1 1606/23 1610/2 1610/11 1611/6 1613/3 1616/24 1617/1 1617/11 1623/7 1627/11 1629/1 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[18]</b> 1509/13 1538/7 1555/13 1638/25 1641/16 1643/17 1656/5 1661/24 1670/16 1670/16 1670/17 1670/18 1674/24 1697/6 1702/13 1702/24 1706/24 1721/16</p> <p><b>numbers [1]</b> 1697/6</p> <p><b>número [1]</b> 1670/17</p> <hr/> <p><b>O</b></p> <p><b>object [6]</b> 1652/4 1679/7 1679/8 1693/23 1696/11 1698/6</p> <p><b>objected [1]</b> 1518/14</p> <p><b>objecting [1]</b> 1518/19</p> <p><b>objection [18]</b> 1517/11 1518/11 1534/21 1534/21 1550/7 1550/15 1550/21 1550/23 1557/16 1557/19 1557/20 1563/18 1563/18 1578/5 1642/4 1643/5 1664/14 1672/24</p> <p><b>objections [3]</b> 1642/10 1642/14 1643/6</p> <p><b>objective [7]</b> 1562/11 1583/3 1584/24 1610/14</p>
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1544/17 1545/1 1545/4</p> <p><b>October 2022 [1]</b> 1545/1</p> <p><b>off [4]</b> 1553/21 1576/18 1661/4 1717/16</p> <p><b>offense [1]</b> 1676/6</p> <p><b>offer [3]</b> 1533/18 1535/3 1693/7</p> <p><b>offered [3]</b> 1533/14</p>	<p>1633/5 1693/6</p> <p><b>offering [1]</b> 1552/9</p> <p><b>offers [2]</b> 1533/23 1560/22</p> <p><b>office [16]</b> 1526/25 1605/13 1664/11 1665/24 1686/1 1686/5 1687/5 1690/13 1696/23 1698/7 1699/6 1699/8 1713/25 1721/10 1721/17 1722/8</p> <p><b>officeholder [1]</b> 1605/15</p> <p><b>officer [1]</b> 1671/13</p> <p><b>officers [1]</b> 1658/2</p> <p><b>offices [2]</b> 1524/9 1527/10</p> <p><b>official [19]</b> 1524/20 1539/4 1539/8 1539/12 1540/17 1540/25 1545/20 1545/25 1546/6 1611/25 1612/4 1612/5 1612/6 1621/1 1625/24 1644/22 1645/6 1646/4 1702/2</p> <p><b>officials [3]</b> 1611/14 1612/1 1612/13</p> <p><b>oh [3]</b> 1512/24 1619/20 1620/13</p> <p><b>okay [57]</b> 1507/7 1507/16 1509/3 1514/23 1516/12 1521/19 1521/25 1522/9 1542/11 1543/21 1545/10 1546/25 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1664/18 1664/23 1664/23 1666/16 1673/9 1673/19 1675/20 1676/20 1678/20 1679/19 1680/4 1682/16 1693/9 1700/2 1700/12 1700/15 1700/17 1702/18 1702/24 1703/3 1705/20 1710/5 1711/20 1711/20 1713/4 1713/18 1716/2 1716/14 1721/3 1726/19 1727/9 1728/1 1729/22</p> <p><b>ones [5]</b> 1537/16 1541/6 1607/5 1703/24 1728/7</p> <p><b>only [44]</b> 1511/17 1516/15 1518/1 1518/19 1519/14 1522/21 1522/22 1525/24 1559/12 1597/10 1602/3</p>	<p>1602/5 1608/3 1613/1 1624/5 1627/7 1627/14 1637/8 1640/22 1647/21 1648/25 1654/10 1657/23 1658/6 1666/6 1691/24 1692/15 1694/5 1697/19 1697/24 1698/19 1708/3 1708/7 1710/22 1711/10 1711/19 1711/25 1712/9 1712/17 1713/8 1714/14 1717/21 1719/11 1725/1</p> <p><b>open [6]</b> 1505/13 1505/16 1505/24 1505/25 1646/21 1649/15</p> <p><b>open-ended [2]</b> 1646/21 1649/15</p> <p><b>opening [2]</b> 1690/15 1694/3</p> <p><b>opens [1]</b> 1602/17</p> <p><b>operating [1]</b> 1654/3</p> <p><b>operation [2]</b> 1639/12 1645/5</p> <p><b>operations [3]</b> 1638/23 1639/1 1639/4</p> <p><b>operative [3]</b> 1569/15 1638/14 1665/20</p> <p><b>opinion [29]</b> 1535/5 1569/17 1571/13 1591/4 1608/4 1615/19 1616/6 1616/16 1622/16 1626/4 1637/19 1644/3 1651/3 1651/4 1678/8 1684/15 1684/22 1688/16 1690/6 1690/7 1697/24 1700/24 1702/9 1707/10 1715/1 1715/16 1717/20 1723/10 1725/14</p> <p><b>opportunities [1]</b> 1533/13</p> <p><b>opportunity [18]</b> 1506/11 1508/19 1517/16 1519/5 1525/14 1528/7 1528/15 1596/10 1598/2 1598/17 1599/5 1599/9 1627/6 1627/24 1653/12 1673/2 1718/19 1719/1</p> <p><b>oppose [2]</b> 1694/23 1708/4</p>	<p><b>opposing [4]</b> 1664/14 1672/16 1692/5 1694/14</p> <p><b>opposite [2]</b> 1598/3 1627/22</p> <p><b>opposition [5]</b> 1505/7 1600/8 1695/14 1695/18 1707/24</p> <p><b>optimistic [2]</b> 1719/7 1719/9</p> <p><b>option [3]</b> 1511/20 1521/7 1522/9</p> <p><b>options [1]</b> 1522/7</p> <p><b>order [136]</b> 1506/18 1513/13 1515/7 1517/14 1523/1 1523/16 1523/18 1523/23 1523/25 1524/2 1524/4 1525/21 1529/8 1529/19 1529/21 1529/25 1530/21 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[36]</b> 1690/18 1692/11 1692/24 1693/13 1694/3 1694/17 1694/21 1695/1 1695/5 1695/10 1695/16 1695/20 1695/22 1696/17 1696/19 1698/4 1699/14 1700/1 1705/20 1706/11 1707/7 1707/10 1707/25 1713/20 1714/24 1718/22 1721/12 1724/1 1724/12 1725/9 1725/20 1725/22 1726/6 1726/14 1726/21 1728/13</p> <p><b>ordered [6]</b> 1664/16 1666/1 1666/3 1721/13 1721/20 1721/24</p> <p><b>ordering [1]</b> 1727/1</p> <p><b>orders [4]</b> 1656/24 1664/4 1664/6 1666/6</p> <p><b>ordinary [1]</b> 1709/4</p> <p><b>organization [2]</b> 1606/2 1679/3</p> <p><b>organized [1]</b> 1666/14</p> <p><b>original [3]</b> 1572/6 1572/20 1675/8</p> <p><b>other [57]</b> 1506/23 1513/23 1517/1 1518/11 1518/14 1521/9 1522/9 1523/19 1528/11 1543/4 1546/14 1554/6 1556/10 1572/10 1601/18 1602/18 1606/7 1616/14 1617/10 1618/1 1618/14 1621/15 1622/24 1623/4 1626/1 1632/4 1637/5 1637/10 1637/14 1641/3 1642/5 1645/22 1648/25 1649/22 1650/10 1650/14 1654/3 1655/6 1656/2 1657/12 1658/15 1664/15 1672/15 1672/20 1686/21 1690/9 1690/10 1691/6 1694/13 1700/8 1704/13 1704/17 1706/4 1712/22 1716/14 1719/13 1725/4</p> <p><b>others [2]</b> 1571/5</p>	<p>1608/13</p> <p><b>otherwise [3]</b> 1508/22 1513/10 1683/4</p> <p><b>our [16]</b> 1505/23 1513/5 1553/2 1557/9 1563/16 1600/17 1617/1 1617/17 1626/4 1642/5 1643/7 1643/8 1658/13 1683/9 1727/18 1730/1</p> <p><b>ours [1]</b> 1603/22</p> <p><b>out [31]</b> 1505/20 1508/22 1512/25 1516/10 1517/15 1517/21 1566/10 1577/25 1582/3 1582/10 1582/23 1584/21 1585/11 1585/25 1586/1 1599/21 1600/7 1609/12 1621/15 1646/20 1676/7 1684/11 1706/2 1706/8 1708/1 1710/3 1713/3 1714/6 1714/7 1725/1 1725/4</p> <p><b>outcome [2]</b> 1664/3 1664/15</p> <p><b>outer [1]</b> 1717/19</p> <p><b>output [1]</b> 1705/8</p> <p><b>outs [1]</b> 1583/12</p> <p><b>outside [4]</b> 1593/13 1644/21 1645/4 1646/10</p> <p><b>over [22]</b> 1516/19 1516/22 1516/22 1521/10 1521/14 1521/17 1522/9 1522/10 1528/4 1536/9 1550/17 1552/19 1575/23 1617/16 1633/4 1656/3 1660/1 1679/12 1715/4 1715/13 1717/8 1717/14</p> <p><b>overhead [1]</b> 1661/11</p> <p><b>overlap [1]</b> 1683/5</p> <p><b>overnight [1]</b> 1728/21</p> <p><b>own [4]</b> 1541/11 1541/12 1578/8 1630/22</p> <p><b>owner [39]</b> 1514/2 1514/15 1515/1 1515/11 1537/21 1537/24 1538/1 1538/1 1540/11 1541/17 1541/22 1542/16 1542/19</p>	<p>1545/7 1545/11 1545/15 1546/19 1559/11 1559/12 1559/18 1562/16 1563/4 1564/20 1582/23 1584/21 1585/11 1585/24 1586/2 1586/3 1657/23 1666/10 1667/25 1667/25 1668/4 1670/5 1670/14 1703/7 1703/10 1717/7</p> <p><b>owners [5]</b> 1515/21 1582/3 1631/25 1632/2 1668/13</p> <p><b>ownership [20]</b> 1538/22 1541/18 1546/15 1548/15 1552/15 1552/23 1665/2 1665/8 1666/2 1666/10 1668/3 1668/8 1668/9 1668/12 1668/15 1669/23 1670/5 1670/15 1703/6 1705/16</p> <p><b>owns [2]</b> 1632/3 1691/11</p> <hr/> <p><b>P</b></p> <p><b>p.m [1]</b> 1730/10</p> <p><b>PA [1]</b> 1502/14</p> <p><b>page [45]</b> 1509/13 1524/15 1524/15 1526/5 1526/14 1533/20 1534/8 1534/22 1534/22 1562/10 1579/17 1580/2 1580/8 1605/2 1605/4 1609/4 1610/11 1611/6 1611/6 1615/5 1619/9 1619/23 1628/8 1628/14 1630/4 1632/15 1635/19 1635/20 1636/12 1636/16 1638/4 1638/19 1638/20 1638/20 1639/19 1640/11 1684/19 1695/3 1701/24 1702/14 1706/17 1706/18 1708/21 1720/14 1720/24</p> <p><b>page 1 [3]</b> 1534/22 1534/22 1611/6</p> <p><b>Page 119 [1]</b> 1684/19</p> <p><b>page 1470 [1]</b> 1628/8</p> <p><b>page 1478 [1]</b> 1628/14</p>	<p><b>page 2 [2]</b> 1611/6 1630/4</p> <p><b>page 242 [1]</b> 1720/24</p> <p><b>page 30 [1]</b> 1706/18</p> <p><b>page 46 [2]</b> 1605/2 1605/4</p> <p><b>page 49 [1]</b> 1638/19</p> <p><b>page 5 [2]</b> 1526/14 1695/3</p> <p><b>page 50 [1]</b> 1638/20</p> <p><b>page 505 [1]</b> 1579/17</p> <p><b>Page 51 [1]</b> 1638/20</p> <p><b>page 55 [3]</b> 1524/15 1632/15 1720/14</p> <p><b>Page 7 [1]</b> 1609/4</p> <p><b>pages [1]</b> 1563/9</p> <p><b>paid [4]</b> 1684/10 1684/12 1685/8 1685/17</p> <p><b>papers [2]</b> 1559/4 1574/18</p> <p><b>paragraph [50]</b> 1506/17 1507/5 1514/10 1514/12 1514/21 1519/7 1519/10 1519/11 1525/1 1533/2 1533/5 1534/1 1542/1 1547/4 1548/24 1557/7 1558/7 1583/4 1586/13 1587/5 1588/7 1588/11 1589/23 1591/4 1592/17 1593/11 1593/22 1600/23 1604/25 1608/22 1609/1 1609/3 1609/4 1613/15 1614/1 1614/7 1619/15 1621/5 1633/2 1645/10 1653/8 1694/19 1695/8 1706/16 1706/19 1706/20 1710/19 1718/7 1720/15 1723/23</p> <p><b>paragraph 101 [1]</b> 1548/24</p> <p><b>paragraph 102 [1]</b> 1533/2</p> <p><b>paragraph 116 [1]</b> 1613/15</p> <p><b>paragraph 148 [4]</b> 1587/5 1588/7 1592/17 1593/22</p> <p><b>paragraph 149 [2]</b> 1588/11 1589/23</p> <p><b>paragraph 150 [1]</b> 1593/11</p> <p><b>paragraph 16.3 [4]</b> 1506/17 1507/5</p>	<p>1600/23 1706/16</p> <p><b>paragraph 17 [2]</b> 1608/22 1609/4</p> <p><b>paragraph 2 [2]</b> 1519/7 1519/11</p> <p><b>paragraph 24 [1]</b> 1609/3</p> <p><b>paragraph 38 [1]</b> 1653/8</p> <p><b>paragraph 4 [1]</b> 1718/7</p> <p><b>paragraph 47 [2]</b> 1514/10 1514/21</p> <p><b>paragraph 49 [1]</b> 1591/4</p> <p><b>paragraph 99 [1]</b> 1547/4</p> <p><b>paragraphs [2]</b> 1586/11 1656/14</p> <p><b>part [27]</b> 1518/2 1524/17 1555/7 1561/9 1563/3 1566/6 1567/23 1573/23 1577/16 1577/21 1579/2 1579/23 1580/4 1581/3 1581/6 1609/8 1653/17 1657/18 1665/20 1676/14 1684/24 1684/25 1686/12 1686/17 1688/1 1689/2 1713/17</p> <p><b>parte [4]</b> 1528/10 1530/1 1623/7 1672/13</p> <p><b>partial [1]</b> 1558/3</p> <p><b>partially [1]</b> 1576/18</p> <p><b>participants [9]</b> 1501/1 1502/1 1503/1 1611/8 1611/13 1612/3 1669/17 1669/19 1670/7</p> <p><b>participate [1]</b> 1525/19</p> <p><b>participated [3]</b> 1517/3 1670/6 1703/25</p> <p><b>participation [1]</b> 1611/9</p> <p><b>particular [17]</b> 1579/3 1652/15 1652/16 1656/22 1659/7 1680/22 1681/12 1687/3 1688/20 1689/16 1695/2 1695/10 1707/19 1708/17 1710/4 1720/14 1720/21</p> <p><b>particularly [2]</b> 1539/12 1662/25</p> <p><b>parties [59]</b> 1506/22 1509/9 1509/18</p>
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[56]</b>  1509/21 1510/5  1511/15 1515/19  1515/20 1516/16  1519/15 1519/17  1519/20 1520/23  1525/15 1525/17  1525/17 1525/18  1525/24 1532/10  1560/20 1567/6  1567/13 1567/22  1568/5 1568/8  1594/10 1595/25  1597/4 1627/4  1627/10 1637/21  1656/16 1656/24  1669/19 1671/12  1673/9 1673/22  1680/5 1704/4  1704/25 1708/19  1709/1 1709/1 1709/3  1710/22 1711/7  1711/8 1712/9 1714/6  1714/15 1715/25  1716/2 1716/13  1716/25 1720/17  1728/9 1728/14  1729/13 1729/25  <b>parties' [1]</b> 1626/17  <b>parts [1]</b> 1582/1  <b>party [88]</b> 1502/17  1503/14 1513/12  1515/1 1515/1 1515/4  1515/5 1515/7 1515/9  1520/2 1522/23  1522/23 1522/25  1525/6 1525/8 1525/9  1525/11 1525/21  1525/23 1526/9  1527/16 1527/17  1527/19 1527/20  1528/2 1528/3  1528/11 1529/7  1529/11 1529/23  1530/10 1530/10  1530/12 1530/13  1531/6 1532/12  1532/12 1559/14  1566/25 1620/25  1621/5 1623/6 1626/6  1626/13 1626/22  1627/17 1627/20  1627/23 1630/21  1631/9 1631/21  1633/6 1636/25  1654/11 1664/1  1664/14 1672/10  1672/15 1672/16  1672/20 1673/1  1673/3 1674/8 1681/3  1686/21 1691/6  1692/5 1692/19</p>	1694/14 1694/14 1695/15 1695/16 1695/21 1705/16 1710/21 1711/11 1712/1 1713/5 1713/6 1714/10 1714/14 1715/21 1715/22 1716/5 1716/19 1717/3 1718/10 1718/15 <b>password [2]</b> 1505/13 1505/15 <b>past [1]</b> 1595/19 <b>pastries [1]</b> 1596/19 <b>path [1]</b> 1646/23 <b>patience [1]</b> 1588/5 <b>patient [2]</b> 1568/25 1659/14 <b>Paul [1]</b> 1503/11 <b>Pause [2]</b> 1514/23 1539/19 <b>pay [1]</b> 1566/17 <b>pdf [6]</b> 1524/15 1579/17 1579/17 1580/8 1605/3 1720/24 <b>Pena [7]</b> 1502/8 1617/17 1618/4 1642/3 1642/22 1643/3 1644/17 <b>penalized [1]</b> 1676/9 <b>pendency [1]</b> 1567/6 <b>people [7]</b> 1506/12 1510/20 1611/21 1682/15 1684/24 1705/17 1728/18 <b>people's [2]</b> 1511/2 1662/17 <b>percent [14]</b> 1513/16 1533/18 1537/22 1538/19 1540/13 1541/18 1542/17 1545/8 1668/10 1668/14 1668/14 1668/15 1668/17 1670/15 <b>percentage [6]</b> 1540/12 1668/3 1668/8 1668/10 1668/12 1717/13 <b>perfect [5]</b> 1514/14 1521/19 1617/19 1634/19 1636/5 <b>perhaps [21]</b> 1510/7 1517/7 1569/4 1569/7 1578/14 1597/16 1600/3 1600/4 1613/22 1614/11 1620/13 1632/4 1639/8 1642/13 1643/10 1645/8 1650/9 1656/19 1681/16 1701/12	1701/14 <b>period [8]</b> 1520/10 1531/8 1547/3 1582/4 1621/4 1653/25 1654/2 1654/7 <b>periods [1]</b> 1531/7 <b>permanent [8]</b> 1556/13 1556/19 1556/25 1557/2 1558/14 1558/17 1570/13 1675/18 <b>permanently [1]</b> 1575/4 <b>permissible [1]</b> 1650/1 <b>permissions [1]</b> 1657/13 <b>permit [10]</b> 1571/4 1609/21 1613/21 1613/22 1613/23 1615/2 1635/4 1635/8 1676/5 1676/8 <b>permits [16]</b> 1553/24 1613/5 1613/6 1613/11 1613/12 1613/16 1613/25 1614/5 1614/9 1615/8 1616/1 1616/9 1638/22 1657/13 1657/20 1678/24 <b>permitted [2]</b> 1570/1 1588/24 <b>person [48]</b> 1528/4 1535/25 1547/25 1586/19 1620/22 1624/7 1633/4 1633/9 1665/7 1668/14 1668/14 1674/9 1675/20 1677/1 1678/11 1694/21 1695/12 1695/13 1700/8 1702/16 1702/22 1704/8 1705/8 1705/12 1715/20 1716/18 1723/17 1723/25 1724/11 1724/16 1724/16 1724/18 1725/1 1725/7 1725/8 1725/11 1725/12 1725/13 1725/19 1725/21 1725/23 1726/4 1726/8 1726/13 1726/19 1727/1 1727/3 1727/4 <b>personal [1]</b> 1505/10 <b>personalities [2]</b> 1513/21 1715/19 <b>personality [3]</b> 1650/20 1650/21 1650/23 <b>personally [2]</b>	1513/18 1707/16 <b>perspective [1]</b> 1655/5 <b>pertaining [1]</b> 1585/6 <b>pertains [4]</b> 1629/3 1702/17 1703/7 1703/21 <b>Pertenace [1]</b> 1704/19 <b>Pertenace A [1]</b> 1704/19 <b>Pertenece [4]</b> 1703/5 1703/9 1703/14 1704/18 <b>perturbing [1]</b> 1556/9 <b>petition [1]</b> 1527/21 <b>petitioner [4]</b> 1523/24 1566/19 1614/23 1615/5 <b>petitioner's [3]</b> 1516/14 1516/15 1519/14 <b>Ph.D [4]</b> 1687/18 1687/24 1688/1 1688/1 <b>phcouvreurh [1]</b> 1501/7 <b>Philippe [2]</b> 1500/22 1501/7 <b>photocopy [4]</b> 1539/1 1539/7 1539/11 1540/8 <b>phytosanitary [9]</b> 1614/3 1615/7 1615/15 1615/18 1616/1 1616/9 1647/6 1647/24 1648/8 <b>pick [2]</b> 1518/7 1518/11 <b>piece [5]</b> 1587/17 1666/11 1667/5 1672/10 1698/24 <b>pieces [2]</b> 1505/15 1646/19 <b>place [11]</b> 1526/20 1526/20 1527/9 1565/2 1565/8 1569/19 1572/7 1625/10 1625/13 1637/7 1686/16 <b>placed [2]</b> 1530/11 1571/6 <b>plain [1]</b> 1592/2 <b>plan [25]</b> 1560/3 1563/11 1564/18 1564/19 1564/21 1564/25 1565/3 1569/15 1569/15 1573/22 1575/6 1577/8 1580/10 1581/21 1581/22	1582/2 1584/17 1585/23 1617/17 1636/15 1636/19 1638/13 1638/14 1640/23 1677/4 <b>planning [5]</b> 1510/20 1590/20 1643/14 1659/2 1729/4 <b>plans [2]</b> 1511/8 1566/14 <b>plant [3]</b> 1571/5 1574/7 1574/8 <b>plantation [5]</b> 1590/24 1593/13 1594/11 1674/16 1678/23 <b>planted [1]</b> 1574/1 <b>planting [2]</b> 1570/19 1594/7 <b>play [1]</b> 1630/25 <b>pleading [1]</b> 1716/18 <b>pleadings [1]</b> 1647/18 <b>please [99]</b> 1512/14 1513/7 1514/22 1516/9 1516/10 1518/25 1519/1 1519/3 1526/13 1526/17 1526/18 1526/19 1528/18 1532/2 1533/25 1540/1 1543/16 1543/22 1544/11 1547/10 1547/16 1550/4 1550/13 1551/7 1552/11 1554/21 1557/4 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[3]</b> 1640/20 1641/16 1656/10</p> <p><b>position [23]</b> 1505/8 1514/25 1520/20 1529/6 1529/7 1529/10 1529/13 1529/21 1530/4 1530/6 1530/20 1532/1 1562/17 1564/3 1568/23 1573/9 1574/9</p>	<p>1589/25 1591/17 1597/25 1598/11 1598/21 1598/22</p> <p><b>positions [3]</b> 1567/6 1594/11 1608/15</p> <p><b>possession [7]</b> 1533/15 1547/5 1548/15 1548/25 1631/19 1631/20 1654/14</p> <p><b>possibility [1]</b> 1672/9</p> <p><b>possible [17]</b> 1506/9 1510/8 1510/13 1510/21 1511/6 1511/13 1551/3 1573/10 1584/13 1588/22 1616/22 1616/25 1629/6 1642/13 1674/8 1709/17 1720/18</p> <p><b>possibly [1]</b> 1549/22</p> <p><b>post [5]</b> 1509/8 1509/11 1510/2 1511/21 1662/13</p> <p><b>post-graduate [1]</b> 1662/13</p> <p><b>postulates [2]</b> 1664/20 1664/22</p> <p><b>potential [3]</b> 1575/16 1663/23 1680/25</p> <p><b>power [6]</b> 1602/21 1606/20 1606/24 1607/3 1607/21 1700/6</p> <p><b>powers [3]</b> 1607/4 1608/3 1608/11</p> <p><b>practical [3]</b> 1588/18 1597/14 1605/22</p> <p><b>practically [1]</b> 1597/19</p> <p><b>practice [4]</b> 1535/24 1647/9 1662/23 1682/13</p> <p><b>Practices [1]</b> 1662/16</p> <p><b>precautionary [1]</b> 1721/11</p> <p><b>precise [3]</b> 1578/22 1589/10 1699/19</p> <p><b>precisely [3]</b> 1524/7 1638/15 1653/1</p> <p><b>preclude [1]</b> 1672/23</p> <p><b>prefer [1]</b> 1584/15</p> <p><b>preference [3]</b> 1509/18 1511/24 1557/22</p> <p><b>preferred [1]</b> 1521/20</p> <p><b>prejudice [1]</b> 1547/24</p> <p><b>prejudicial [1]</b></p>	<p>1511/10</p> <p><b>preliminary [3]</b> 1509/14 1511/17 1629/2</p> <p><b>premised [1]</b> 1626/10</p> <p><b>premising [2]</b> 1515/16 1515/16</p> <p><b>preparation [2]</b> 1509/7 1535/10</p> <p><b>prepare [3]</b> 1511/15 1549/5 1560/11</p> <p><b>prepared [4]</b> 1511/1 1597/15 1598/11 1598/13</p> <p><b>preparing [3]</b> 1549/11 1698/10 1716/18</p> <p><b>prerogatives [1]</b> 1672/4</p> <p><b>prescription [2]</b> 1531/7 1709/4</p> <p><b>presence [1]</b> 1690/19</p> <p><b>present [4]</b> 1510/16 1578/1 1586/23 1661/7</p> <p><b>presentation [9]</b> 1612/9 1619/2 1656/18 1660/19 1667/1 1680/19 1681/10 1690/15 1694/11</p> <p><b>presented [19]</b> 1537/12 1561/5 1561/7 1561/11 1561/15 1561/16 1562/25 1564/25 1577/20 1579/22 1580/3 1603/3 1603/19 1603/24 1604/2 1604/15 1673/15 1693/7 1707/20</p> <p><b>presenting [1]</b> 1656/21</p> <p><b>preservation [10]</b> 1555/12 1572/19 1572/23 1573/17 1575/13 1577/6 1675/1 1675/4 1675/6 1675/6</p> <p><b>preserve [9]</b> 1562/12 1571/16 1572/1 1572/5 1575/17 1671/10 1675/7 1675/10 1678/1</p> <p><b>preserving [1]</b> 1583/17</p> <p><b>president [52]</b> 1500/21 1505/4 1507/10 1508/17 1510/6 1510/11</p>	<p>1512/7 1519/2 1535/15 1542/25 1544/18 1551/2 1558/23 1558/25 1559/2 1569/21 1573/4 1579/3 1581/18 1581/19 1595/16 1596/2 1596/14 1596/20 1598/4 1599/2 1599/11 1601/7 1616/21 1617/20 1617/21 1618/10 1618/21 1629/20 1635/7 1638/11 1640/15 1640/18 1640/22 1641/11 1642/1 1646/14 1646/21 1647/20 1652/3 1658/12 1660/23 1693/22 1698/6 1701/11 1717/12 1728/16</p> <p><b>president's [1]</b> 1570/22</p> <p><b>pressure [1]</b> 1729/24</p> <p><b>presumably [1]</b> 1531/17</p> <p><b>presumed [1]</b> 1699/18</p> <p><b>pretty [1]</b> 1604/4</p> <p><b>prevails [2]</b> 1572/23 1573/17</p> <p><b>prevent [8]</b> 1521/9 1588/13 1657/4 1663/22 1663/25 1680/24 1681/2 1714/24</p> <p><b>preventive [38]</b> 1539/3 1540/17 1540/25 1545/19 1545/20 1545/25 1546/5 1547/9 1547/13 1547/23 1664/17 1664/25 1666/6 1666/7 1666/18 1667/1 1667/3 1667/4 1667/17 1669/7 1670/2 1672/7 1672/10 1696/15 1699/14 1699/23 1700/25 1702/1 1702/15 1702/19 1702/20 1702/23 1703/1 1703/3 1703/25 1705/4 1722/24 1724/22</p> <p><b>previous [4]</b> 1604/13 1621/4 1677/5 1695/8</p> <p><b>previously [1]</b> 1689/17</p> <p><b>principal [2]</b></p>	<p>1620/17 1621/3</p> <p><b>principle [47]</b> 1532/7 1570/13 1572/23 1572/24 1573/6 1573/7 1573/17 1575/4 1575/13 1577/6 1602/4 1602/23 1605/18 1606/1 1606/11 1606/16 1607/9 1631/10 1641/12 1641/15 1641/23 1643/18 1644/2 1644/5 1644/10 1644/16 1644/22 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[4]</b> 1683/17 1684/3 1684/7 1690/1</p> <p><b>probably [3]</b> 1551/19 1582/7 1587/3</p> <p><b>problem [16]</b> 1505/22 1507/17 1512/25 1541/8 1564/4 1564/9 1623/19 1624/2 1639/8 1641/19 1641/25 1642/20 1643/1 1706/15 1708/21 1712/5</p> <p><b>problems [2]</b> 1510/16 1510/19</p> <p><b>procedural [31]</b> 1506/18 1508/6 1508/16 1597/1 1598/6 1600/23 1601/1 1625/8 1625/23 1663/3 1663/5 1671/17 1688/1 1688/24 1691/18 1695/6 1709/21 1710/9 1712/4 1716/5 1718/8 1718/13 1723/11 1723/15 1727/9 1727/14 1727/21 1728/6 1728/7 1728/11 1728/12</p> <p><b>procedure [32]</b> 1516/1 1516/7 1559/8 1560/20 1606/10 1606/15 1619/16 1620/4 1620/6 1620/12 1621/9 1623/14 1623/24 1625/18 1627/10 1656/13 1656/13 1658/6 1665/12 1671/2 1671/18 1674/8 1678/6 1690/20 1706/3 1710/1 1710/14 1711/4 1718/2 1718/5 1718/9 1720/14</p> <p><b>proceed [15]</b> 1518/25 1532/2 1553/15 1579/12 1605/5 1607/23 1617/18 1643/12 1648/8 1650/1 1660/4 1660/21 1661/5 1698/14 1720/8</p> <p><b>proceeded [1]</b> 1515/14</p> <p><b>proceeding [37]</b> 1515/6 1515/18 1516/16 1519/15</p>	<p>1519/21 1519/21 1519/24 1520/1 1522/17 1522/23 1522/25 1523/4 1523/7 1524/10 1525/10 1529/24 1530/10 1530/11 1564/24 1609/16 1620/17 1620/20 1624/10 1657/20 1686/12 1686/13 1704/5 1704/25 1710/23 1711/8 1711/11 1714/16 1715/21 1715/22 1716/19 1716/21 1721/20</p> <p><b>proceedings [18]</b> 1519/18 1523/2 1529/8 1529/11 1530/6 1530/20 1657/25 1662/25 1663/1 1676/18 1679/20 1680/5 1714/22 1716/1 1717/4 1720/19 1721/13 1721/24</p> <p><b>process [38]</b> 1506/15 1531/22 1559/13 1560/25 1567/4 1577/16 1584/8 1597/18 1599/8 1600/24 1614/22 1618/1 1621/3 1624/22 1624/24 1631/6 1631/10 1644/5 1646/3 1648/20 1655/22 1656/4 1656/8 1656/15 1656/22 1657/7 1657/18 1657/19 1658/4 1672/18 1684/24 1684/25 1686/19 1688/23 1712/1 1714/8 1714/15 1714/19</p> <p><b>processes [2]</b> 1582/10 1657/12</p> <p><b>processing [4]</b> 1554/19 1554/24 1615/25 1672/16</p> <p><b>product [3]</b> 1615/3</p> <p>1650/15 1650/15</p> <p><b>production [1]</b> 1582/12</p> <p><b>profession [1]</b> 1682/14</p> <p><b>professional [6]</b> 1536/1 1662/23 1682/10 1685/3 1685/5 1685/25</p> <p><b>professor [11]</b></p>	<p>1502/6 1617/23 1647/10 1649/18 1662/6 1662/7 1682/12 1682/23 1682/25 1698/25 1730/6</p> <p><b>Professor Sequeira [1]</b> 1730/6</p> <p><b>professors [1]</b> 1682/12</p> <p><b>programs [1]</b> 1662/13</p> <p><b>progress [1]</b> 1604/23</p> <p><b>prohibited [1]</b> 1556/14</p> <p><b>prohibition [6]</b> 1556/12 1556/19 1556/24 1558/13 1558/16 1592/2</p> <p><b>project [3]</b> 1577/18 1587/22 1674/16</p> <p><b>promote [1]</b> 1556/5</p> <p><b>promotion [1]</b> 1582/13</p> <p><b>proper [2]</b> 1549/23 1683/5</p> <p><b>properly [2]</b> 1529/21 1691/20</p> <p><b>property [88]</b> 1515/12 1515/21 1516/16 1519/8 1519/15 1521/9 1521/15 1521/17 1522/9 1522/10 1533/15 1533/15 1537/22 1538/19 1539/9 1541/13 1547/13 1547/14 1547/22 1547/22 1548/4 1548/14 1548/15 1549/3 1552/4 1552/6 1552/18 1552/19 1552/24 1560/8 1562/1 1572/9 1573/5 1593/18 1621/18 1621/19 1626/14 1626/17 1626/21 1631/22 1631/24 1632/1 1632/2 1632/3 1639/8 1654/13 1654/15 1655/13 1662/25 1663/17 1663/21 1663/25 1665/2 1665/8 1666/1 1666/11 1666/16 1667/5 1667/22 1668/11 1668/24 1670/6 1670/18 1670/22 1670/25 1671/22 1672/2 1672/4 1672/5 1672/7 1672/11 1675/22</p>	<p>1675/24 1675/25 1681/1 1692/13 1692/22 1693/6 1693/21 1700/9 1701/1 1703/20 1710/22 1711/7 1711/19 1713/8 1714/14 1721/11</p> <p><b>propiedad [1]</b> 1670/18</p> <p><b>proposal [5]</b> 1534/10 1579/21 1610/7 1636/13 1637/2</p> <p><b>proposals [1]</b> 1534/1</p> <p><b>propose [2]</b> 1637/1 1695/17</p> <p><b>proposed [4]</b> 1582/22 1610/16 1610/22 1636/22</p> <p><b>proposing [1]</b> 1726/12</p> <p><b>proposition [1]</b> 1631/18</p> <p><b>proprium [2]</b> 1678/9 1678/17</p> <p><b>protect [6]</b> 1521/8 1562/13 1562/14 1663/17 1678/2 1716/22</p> <p><b>protected [42]</b> 1555/3 1555/4 1555/6 1555/8 1555/12 1555/20 1555/25 1556/5 1556/11 1556/24 1557/10 1558/8 1558/12 1558/15 1567/17 1568/18 1569/24 1570/8 1570/9 1570/12 1571/2 1571/10 1571/15 1571/18 1572/1 1572/15 1572/18 1572/22 1573/9 1573/15 1575/3 1575/12 1577/5 1577/5 1577/10 1592/3 1592/4 1611/10 1651/7 1674/23 1675/8 1675/15</p> <p><b>protecting [1]</b> 1583/17</p> <p><b>protection [4]</b> 1556/1 1557/12 1558/9 1676/1</p> <p><b>protective [72]</b> 1515/8 1515/10 1516/2 1517/8 1521/3 1521/6 1521/11 1521/16 1521/21 1521/22 1522/8 1522/11 1522/14</p>	<p>1524/5 1524/8 1524/18 1524/18 1525/12 1526/4 1526/9 1526/14 1526/23 1526/24 1527/9 1527/19 1527/22 1527/23 1528/10 1532/24 1541/1 1619/13 1628/17 1628/18 1628/23 1629/10 1629/15 1630/1 1630/14 1653/25 1654/17 1655/3 1657/11 1669/16 1671/16 1672/3 1672/21 1674/1 1674/5 1690/12 1691/7 1692/4 1694/20 1695/11 1696/16 1702/2 1704/5 1704/25 1706/8 1707/11 1710/20 1711/6 1711/23 1712/2 1712/4 1713/14 1715/19 1716/20 1721/4 1721/5 1722/2 1722/13 1722/18</p> <p><b>protegida [1]</b> 1571/18</p> <p><b>proves [1]</b> 1693/18</p> <p><b>provide [9]</b> 1544/6 1556/23 1562/13 1588/12 1589/23 1598/23 1667/19 1671/22 1680/1</p> <p><b>provided [15]</b> 1518/5 1525/5 1546/21 1565/13 1566/10 1590/14 1605/14 1640/2 1650/24 1685/3 1685/5 1685/9 1685/15 1685/16 1686/25</p> <p><b>provides [11]</b> 1605/12 1621/12 1626/20 1668/7 1669/3 1672/6 1672/9 1675/16 1677/10 1695/19 1718/17</p> <p><b>providing [4]</b> 1509/4 1667/15 1682/15 1694/22</p> <p><b>provision [17]</b> 1509/2 1532/11 1572/25 1573/8 1589/20 1592/12 1592/15 1602/15 1607/24 1709/5 1711/1 1723/22 1724/7 1724/11</p>
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1675/24 1683/8 1699/22</p> <p><b>purpose-wise [1]</b> 1674/21</p> <p><b>purposes [15]</b> 1525/2 1544/9</p>	<p>1555/12 1555/19 1556/4 1562/22 1610/14 1655/7 1655/8 1655/9 1671/14 1712/19 1713/18 1727/21 1729/4</p> <p><b>pursuant [1]</b> 1600/23</p> <p><b>pursued [1]</b> 1583/7</p> <p><b>put [30]</b> 1505/13 1516/6 1522/13 1529/16 1543/10 1544/8 1544/21 1547/16 1552/13 1564/7 1577/17 1579/1 1579/15 1581/15 1581/22 1584/4 1584/11 1584/17 1586/9 1597/18 1611/18 1613/10 1638/18 1641/7 1652/13 1685/18 1698/13 1709/17 1727/16 1729/24</p> <p><b>putting [6]</b> 1551/25 1650/2 1652/17 1652/20 1669/9 1729/20</p> <p><b>PWR [3]</b> 1674/15 1674/18 1674/19</p> <p><b>Pérez [2]</b> 1661/8 1661/13</p> <hr/> <p><b>Q</b></p> <p><b>quantify [1]</b> 1614/16</p> <p><b>quarter [1]</b> 1660/2</p> <p><b>question [139]</b> 1508/10 1512/14 1512/15 1514/6 1516/17 1517/9 1519/4 1522/2 1522/4 1526/18 1527/6 1528/16 1529/1 1529/3 1530/19 1531/5 1533/11 1535/9 1537/5 1544/21 1544/23 1545/17 1547/10 1548/6 1548/8 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[83]</b> 1509/21 1509/25 1510/4 1510/7 1510/10 1511/18 1511/19 1511/21 1512/13 1513/8 1513/8 1517/10 1522/3 1524/14 1537/1 1537/14 1537/15 1548/7 1548/10 1550/22 1552/10 1554/8 1554/17 1558/5 1561/23 1564/7 1578/3 1579/14</p>	<p>1579/15 1580/6 1581/9 1581/12 1581/16 1581/23 1585/9 1586/9 1601/14 1613/10 1633/16 1636/7 1636/14 1638/25 1639/2 1640/20 1640/25 1641/1 1641/6 1641/8 1641/14 1641/16 1642/23 1643/3 1643/17 1643/20 1644/12 1644/12 1644/13 1646/15 1646/18 1646/25 1647/21 1648/7 1648/9 1648/19 1649/3 1650/1 1650/3 1650/25 1653/2 1655/18 1655/25 1656/2 1656/10 1658/14 1659/18 1659/19 1679/24 1694/1 1696/7 1698/9 1708/9 1716/11 1718/3</p> <p><b>quick [4]</b> 1562/25 1563/7 1563/9 1686/20</p> <p><b>quickly [4]</b> 1506/9 1597/3 1599/20 1642/13</p> <p><b>quietly [2]</b> 1618/9 1653/16</p> <p><b>quite [7]</b> 1513/18 1536/22 1578/9 1596/21 1598/3 1656/2 1675/14</p> <p><b>quote [1]</b> 1681/18</p> <p><b>quotes [1]</b> 1681/8</p> <hr/> <p><b>R</b></p> <p><b>R-0005 [1]</b> 1543/15</p> <p><b>R-0006 [1]</b> 1538/25</p> <p><b>R-0032 [1]</b> 1633/20</p> <p><b>R-0199 [1]</b> 1632/15</p> <p><b>R-12 [3]</b> 1565/5 1576/14 1634/16</p> <p><b>R-152 [2]</b> 1720/24 1721/3</p> <p><b>R-199 [1]</b> 1524/15</p> <p><b>R-228 [3]</b> 1577/18 1636/10 1640/9</p> <p><b>R-32 [1]</b> 1561/22</p> <p><b>R-34 [1]</b> 1610/2</p> <p><b>R-5 [2]</b> 1543/17 1543/23</p> <p><b>rabbit [1]</b> 1532/21</p> <p><b>radius [3]</b> 1593/14 1594/7 1595/11</p> <p><b>Rafael [1]</b> 1610/8</p> <p><b>raise [6]</b> 1509/6</p>	<p>1512/1 1532/11 1532/13 1534/21 1578/13</p> <p><b>raised [4]</b> 1510/17 1550/15 1614/12 1644/13</p> <p><b>raising [1]</b> 1578/5</p> <p><b>rapid [12]</b> 1577/14 1577/21 1579/22 1580/9 1636/7 1636/12 1638/2 1640/8 1640/19 1645/7 1645/13 1676/19</p> <p><b>rate [2]</b> 1561/8 1693/25</p> <p><b>rather [11]</b> 1511/3 1523/13 1533/17 1549/21 1572/14 1580/15 1600/19 1610/13 1648/20 1684/4 1703/6</p> <p><b>ratification [2]</b> 1708/19 1709/2</p> <p><b>ratifying [1]</b> 1612/24</p> <p><b>ray [1]</b> 1705/5</p> <p><b>reach [5]</b> 1509/10 1511/25 1590/4 1590/7 1594/1</p> <p><b>reached [1]</b> 1509/21</p> <p><b>read [48]</b> 1513/4 1514/22 1516/9 1516/10 1516/12 1522/3 1522/20 1525/2 1525/3 1532/7 1533/25 1535/19 1537/23 1539/18 1547/19 1551/18 1551/19 1557/11 1558/7 1559/3 1568/12 1571/8 1584/25 1585/13 1605/12 1607/1 1607/2 1616/12 1619/11 1620/14 1624/1 1624/3 1625/3 1628/7 1633/1 1633/3 1637/18 1640/10 1653/12 1653/15 1653/21 1681/16 1681/7 1692/15 1696/3 1705/7 1713/7 1726/13</p> <p><b>read it [1]</b> 1584/25</p> <p><b>reading [4]</b> 1535/10 1562/20 1592/1 1709/6</p> <p><b>reads [2]</b> 1533/25 1691/22</p> <p><b>ready [5]</b> 1522/10 1547/21 1595/25 1617/8 1641/22</p> <p><b>real [7]</b> 1537/4</p>
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1685/14 1695/22 1704/7 1706/23 1722/19</p> <p><b>receives [1]</b> 1669/18</p> <p><b>receiving [1]</b></p>	<p>1712/19</p> <p><b>recent [1]</b> 1604/10</p> <p><b>recently [1]</b> 1559/5</p> <p><b>reception [1]</b> 1713/25</p> <p><b>recess [7]</b> 1553/2 1553/14 1595/17 1595/23 1617/7 1660/3 1720/7</p> <p><b>recognition [2]</b> 1727/21 1728/7</p> <p><b>recognize [4]</b> 1514/5 1561/25 1633/21 1633/23</p> <p><b>recognized [5]</b> 1602/23 1610/22 1675/2 1728/9 1728/14</p> <p><b>recognizes [3]</b> 1605/18 1606/11 1606/15</p> <p><b>record [42]</b> 1533/10 1535/11 1549/4 1549/5 1549/7 1549/7 1552/6 1553/21 1557/8 1558/2 1561/10 1565/5 1578/21 1580/4 1607/2 1620/14 1628/6 1629/12 1633/1 1640/13 1641/18 1644/18 1646/2 1661/4 1664/5 1666/16 1666/23 1666/24 1667/5 1667/6 1668/7 1669/14 1669/15 1679/6 1693/24 1697/1 1706/11 1708/25 1709/11 1709/15 1710/15 1711/2</p> <p><b>recording [1]</b> 1621/25</p> <p><b>records [8]</b> 1666/18 1666/22 1667/6 1667/9 1667/14 1667/17 1668/6 1672/6</p> <p><b>recreation [1]</b> 1582/13</p> <p><b>recreational [1]</b> 1556/5</p> <p><b>rectification [1]</b> 1673/8</p> <p><b>rectified [2]</b> 1600/10 1600/17</p> <p><b>rectify [1]</b> 1581/5</p> <p><b>red [1]</b> 1668/21</p> <p><b>redaction [2]</b> 1505/9 1505/10</p> <p><b>redirect [9]</b> 1518/7 1616/20 1617/22</p>	<p>1618/22 1642/3 1642/18 1650/3 1701/13 1729/9</p> <p><b>redo [1]</b> 1505/14</p> <p><b>reduced [1]</b> 1668/20</p> <p><b>reducing [1]</b> 1572/21</p> <p><b>REED [1]</b> 1502/10</p> <p><b>reestablished [1]</b> 1677/10</p> <p><b>refer [9]</b> 1537/9 1585/14 1608/20 1689/16 1690/12 1695/2 1696/13 1718/7 1720/15</p> <p><b>reference [24]</b> 1514/9 1524/20 1587/6 1588/9 1629/9 1656/14 1656/15 1667/9 1669/15 1670/22 1671/18 1697/1 1702/9 1703/15 1704/15 1712/21 1712/23 1713/13 1713/14 1714/7 1721/18 1723/23 1724/8 1725/6</p> <p><b>references [1]</b> 1641/17</p> <p><b>referred [5]</b> 1609/11 1621/4 1630/15 1636/18 1693/12</p> <p><b>referring [12]</b> 1542/20 1586/11 1587/3 1593/8 1603/8 1606/21 1613/4 1613/15 1619/17 1632/19 1644/25 1727/20</p> <p><b>refers [10]</b> 1532/16 1589/16 1592/19 1593/23 1604/11 1632/23 1670/6 1670/22 1701/25 1727/13</p> <p><b>reflect [1]</b> 1612/22</p> <p><b>reflected [4]</b> 1586/4 1703/2 1704/1 1704/9</p> <p><b>reflection [1]</b> 1629/7</p> <p><b>reflects [1]</b> 1704/24</p> <p><b>reflex [1]</b> 1685/22</p> <p><b>reformulate [1]</b> 1569/12</p> <p><b>reformulated [1]</b> 1569/10</p> <p><b>refusal [2]</b> 1663/23 1680/25</p> <p><b>refused [1]</b> 1674/9</p> <p><b>regard [3]</b> 1614/9 1663/13 1664/2</p> <p><b>regarding [20]</b> 1522/18 1524/14</p>	<p>1537/14 1574/10 1586/10 1593/15 1593/18 1609/16 1613/10 1633/16 1635/3 1636/7 1636/14 1637/9 1657/20 1657/21 1657/21 1700/25 1705/21 1706/8</p> <p><b>regardless [1]</b> 1573/1</p> <p><b>regards [1]</b> 1638/16</p> <p><b>regime [1]</b> 1650/8</p> <p><b>Regina [1]</b> 1501/17</p> <p><b>regions [2]</b> 1555/14 1555/22</p> <p><b>registral [1]</b> 1721/12</p> <p><b>registrar [4]</b> 1539/1 1539/21 1666/1 1704/7</p> <p><b>registration [5]</b> 1593/17 1661/24 1666/25 1670/13 1704/6</p> <p><b>registries [4]</b> 1547/7 1547/11 1547/17 1702/20</p> <p><b>registry [25]</b> 1524/23 1535/23 1536/1 1536/4 1536/6 1536/8 1536/24 1536/25 1537/4 1538/6 1541/22 1621/17 1622/1 1628/21 1631/24 1632/3 1669/18 1699/15 1700/11 1700/14 1704/7 1705/23 1706/1 1706/5 1722/20</p> <p><b>regulated [2]</b> 1556/15 1556/21</p> <p><b>regulates [2]</b> 1602/15 1606/14</p> <p><b>regulation [9]</b> 1572/14 1572/15 1572/18 1586/24 1587/12 1593/6 1593/12 1606/9 1667/13</p> <p><b>regulations [15]</b> 1556/16 1560/25 1571/3 1582/7 1586/18 1588/21 1602/10 1608/17 1609/7 1635/3 1647/24 1648/8 1650/16 1667/10 1689/9</p> <p><b>regulatory [4]</b> 1567/11 1650/12 1727/10 1727/11</p> <p><b>reiterate [7]</b></p>	<p>1565/21 1566/1 1566/9 1568/13 1571/25 1575/11 1607/12</p> <p><b>rejecting [1]</b> 1560/15</p> <p><b>rejection [1]</b> 1693/10</p> <p><b>Rejoinder [2]</b> 1549/10 1551/16</p> <p><b>related [32]</b> 1505/5 1535/18 1535/22 1536/15 1537/10 1537/12 1538/6 1538/12 1558/16 1607/9 1641/2 1643/20 1644/13 1647/11 1648/19 1662/16 1662/25 1663/4 1663/6 1667/7 1667/8 1667/11 1667/19 1667/24 1669/25 1686/15 1688/9 1703/22 1715/20 1722/24 1723/1 1727/9</p> <p><b>relates [1]</b> 1640/20</p> <p><b>relation [6]</b> 1529/8 1529/18 1531/15 1548/14 1643/25 1656/10</p> <p><b>relationship [5]</b> 1669/1 1685/11 1703/6 1712/3 1713/1</p> <p><b>relative [13]</b> 1623/12 1623/22 1624/4 1624/14 1624/14 1624/15 1627/18 1631/5 1631/7 1673/8 1708/11 1728/7 1728/11</p> <p><b>relatively [2]</b> 1509/2 1599/20</p> <p><b>relay [1]</b> 1691/7</p> <p><b>relevant [15]</b> 1517/15 1530/4 1531/8 1559/15 1563/15 1582/4 1642/14 1652/21 1654/6 1692/6 1692/7 1697/22 1724/2 1724/19 1724/20</p> <p><b>relied [1]</b> 1549/24 1550/11</p> <p><b>relief [9]</b> 1516/13 1539/8 1539/12 1545/21 1546/1 1546/6 1546/22 1547/14 1548/13</p> <p><b>rely [2]</b> 1507/23 1580/15</p> <p><b>relying [3]</b> 1579/8</p>
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<p><b>repeal</b> [1] 1587/17</p> <p><b>repealed</b> [1] 1587/16</p> <p><b>repeat</b> [10] 1551/7 1554/21 1570/5 1576/12 1576/22 1621/7 1623/17 1623/18 1623/19 1699/4</p> <p><b>repeated</b> [2] 1547/10 1551/4</p> <p><b>repeatedly</b> [1] 1510/24</p>	<p><b>repeating</b> [1] 1649/14</p> <p><b>rephrase</b> [1] 1514/6</p> <p><b>replace</b> [2] 1571/5 1588/22</p> <p><b>replaced</b> [1] 1531/18</p> <p><b>replacement</b> [2] 1531/20 1531/21</p> <p><b>Reply</b> [5] 1549/10 1551/16 1551/17 1551/17 1551/19</p> <p><b>report</b> [80] 1513/11 1513/24 1514/10 1514/11 1514/14 1514/20 1520/15 1532/24 1533/2 1535/2 1537/9 1547/1 1547/4 1548/24 1549/8 1549/17 1549/24 1550/25 1551/11 1551/15 1551/15 1551/17 1554/18 1554/23 1560/11 1574/14 1574/19 1586/9 1588/4 1588/6 1588/9 1588/11 1589/19 1589/23 1590/8 1591/20 1593/11 1593/22 1608/16 1609/23 1610/3 1610/24 1612/15 1612/15 1612/22 1612/23 1613/5 1613/12 1613/15 1615/24 1616/8 1661/10 1663/7 1673/16 1674/13 1677/11 1680/7 1684/15 1686/23 1687/9 1688/5 1688/18 1688/25 1689/10 1696/4 1696/10 1697/21 1697/23 1698/10 1698/11 1698/20 1699/17 1706/9 1707/9 1717/15 1722/17 1723/4 1729/12 1729/15 1729/23</p> <p><b>reported</b> [1] 1697/5</p> <p><b>reporter</b> [4] 1501/16 1501/17 1661/19 1701/10</p> <p><b>reporters</b> [3] 1501/15 1554/5 1728/19</p> <p><b>reporting</b> [1] 1683/4</p> <p><b>repossess</b> [1] 1533/24</p> <p><b>represent</b> [9] 1555/21 1664/1</p>	<p>1680/4 1680/20 1681/4 1681/6 1681/12 1681/24 1682/2</p> <p><b>representation</b> [1] 1686/7</p> <p><b>representative</b> [5] 1503/14 1562/7 1634/3 1681/20 1689/12</p> <p><b>REPRESENTATIVES</b> [1] 1502/17</p> <p><b>represented</b> [5] 1664/10 1665/23 1686/11 1686/14 1686/23</p> <p><b>representing</b> [4] 1580/11 1638/3 1638/7 1679/20</p> <p><b>represents</b> [2] 1555/13 1668/3</p> <p><b>REPUBLIC</b> [19] 1500/8 1546/10 1559/2 1661/24 1663/11 1663/15 1663/20 1664/10 1665/5 1670/8 1670/20 1681/21 1686/11 1698/16 1703/23 1704/3 1705/15 1711/13 1712/10</p> <p><b>request</b> [32] 1516/14 1519/14 1523/5 1523/5 1536/23 1538/11 1539/20 1539/25 1545/4 1559/11 1561/5 1561/25 1599/14 1600/22 1609/20 1620/25 1621/5 1623/10 1664/3 1669/1 1669/9 1669/21 1677/25 1695/11 1696/16 1700/10 1702/16 1702/24 1710/21 1712/20 1714/17 1714/18</p> <p><b>requested</b> [46] 1523/8 1538/5 1540/16 1540/19 1540/20 1540/21 1540/22 1541/5 1541/10 1543/1 1544/2 1545/12 1545/13 1545/18 1545/19 1546/9 1546/20 1620/22 1663/11 1668/18 1668/19 1669/12 1669/25 1670/9 1670/20 1690/13</p>	<p>1690/16 1690/21 1690/25 1691/4 1691/9 1702/6 1702/8 1702/13 1702/14 1703/2 1703/3 1703/7 1703/12 1703/15 1703/20 1703/22 1704/16 1705/3 1705/6 1721/10</p> <p><b>requester</b> [4] 1669/4 1669/5 1676/25 1681/19</p> <p><b>requesting</b> [3] 1540/24 1713/5 1714/10</p> <p><b>requests</b> [5] 1545/22 1691/22 1692/4 1698/21 1702/18</p> <p><b>require</b> [2] 1596/23 1598/2</p> <p><b>required</b> [10] 1509/12 1562/17 1580/10 1622/23 1623/6 1623/9 1627/13 1635/4 1709/3 1709/4</p> <p><b>requirement</b> [3] 1615/21 1656/4 1676/20</p> <p><b>requirements</b> [5] 1565/17 1614/19 1637/6 1637/9 1637/10</p> <p><b>requires</b> [4] 1564/19 1585/3 1724/11 1725/8</p> <p><b>requiring</b> [1] 1699/14</p> <p><b>requisites</b> [1] 1639/11</p> <p><b>research</b> [3] 1582/15 1616/5 1662/15</p> <p><b>Reserva</b> [1] 1580/1</p> <p><b>reservation</b> [2] 1570/18 1572/10</p> <p><b>reservations</b> [1] 1572/11</p> <p><b>reserve</b> [55] 1553/24 1554/17 1556/9 1559/9 1559/10 1560/10 1560/16 1560/21 1561/3 1562/1 1565/2 1565/7 1565/15 1565/18 1565/24 1566/4 1566/7 1566/8 1566/17 1566/23 1568/3 1574/10 1574/11 1579/21 1579/25 1580/2 1582/4 1582/23 1585/22 1609/14 1610/7 1610/23</p>	<p>1610/25 1633/17 1638/10 1639/5 1639/6 1639/7 1639/9 1639/12 1663/12 1674/12 1674/15 1674/21 1674/24 1675/11 1675/17 1676/17 1676/22 1676/25 1677/1 1677/6 1677/10 1678/15 1678/21</p> <p><b>reserves</b> [6] 1554/20 1554/25 1555/3 1555/7 1664/13 1675/14</p> <p><b>reserving</b> [1] 1598/7</p> <p><b>resisted</b> [3] 1533/3 1533/8 1535/4</p> <p><b>resolution</b> [26] 1525/3 1560/14 1564/16 1565/4 1565/9 1565/10 1565/15 1567/7 1567/12 1567/15 1567/23 1567/24 1568/14 1568/21 1568/22 1575/22 1575/23 1576/23 1580/5 1634/14 1634/22 1637/6 1637/7 1637/17 1637/23 1688/10</p> <p><b>resolutions</b> [1] 1637/13</p> <p><b>resolve</b> [1] 1694/10</p> <p><b>resort</b> [2] 1671/19 1673/22</p> <p><b>resource</b> [1] 1569/25</p> <p><b>resources</b> [18] 1556/13 1556/19 1556/25 1557/13 1558/9 1558/13 1558/16 1570/14 1570/15 1583/14 1583/17 1640/17 1675/13 1675/18 1675/19 1676/5 1678/3 1678/22</p> <p><b>respect</b> [16] 1505/6 1506/13 1506/18 1539/5 1540/17 1547/14 1547/23 1548/20 1552/24 1605/16 1644/2 1650/11 1652/6 1656/22 1664/3 1711/22</p> <p><b>respects</b> [1] 1614/13</p> <p><b>respond</b> [8] 1522/4 1555/18 1596/10 1596/11 1598/2 1599/6 1599/9 1630/8</p> <p><b>responded</b> [3]</p>
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[3]</b> 1567/20 1628/12 1628/25</p> <p><b>respondent [15]</b> 1500/9 1503/3 1597/25 1598/10 1598/17 1599/8 1603/25 1641/7 1644/14 1704/11 1704/23 1713/13 1713/16 1714/4 1714/5</p> <p><b>Respondent's [3]</b> 1507/8 1604/1 1653/2</p> <p><b>responding [1]</b> 1514/8</p> <p><b>response [12]</b> 1533/23 1534/10 1539/25 1571/14 1596/8 1596/21 1598/12 1598/14 1598/18 1600/7 1626/3 1705/21</p> <p><b>responsibilities [1]</b> 1608/3</p> <p><b>responsibility [4]</b> 1516/15 1557/14 1558/11 1710/21</p> <p><b>responsible [1]</b> 1586/20</p> <p><b>responsive [2]</b> 1641/15 1652/15</p> <p><b>rest [2]</b> 1507/15 1513/4</p> <p><b>restate [3]</b> 1526/17 1630/10 1687/6</p> <p><b>restated [1]</b> 1551/3</p> <p><b>restoration [1]</b> 1582/11</p> <p><b>restrict [1]</b> 1588/13</p> <p><b>restricted [2]</b> 1548/13 1659/6</p> <p><b>restriction [2]</b> 1647/22 1648/3</p> <p><b>restrictions [7]</b> 1548/22 1588/8 1591/16 1647/14 1648/12 1648/16 1648/23</p> <p><b>restricts [1]</b> 1639/7</p> <p><b>result [5]</b> 1584/20 1627/5 1664/2 1669/23 1710/11</p> <p><b>results [4]</b> 1583/14 1661/9 1665/16 1705/8</p> <p><b>resume [1]</b> 1595/25</p> <p><b>resumé [1]</b> 1689/2</p> <p><b>resuscitate [1]</b> 1622/17</p> <p><b>retake [3]</b> 1533/14 1533/15 1533/23</p>	<p><b>retract [1]</b> 1562/16</p> <p><b>return [4]</b> 1533/8 1535/3 1535/4 1671/25</p> <p><b>returned [1]</b> 1672/2</p> <p><b>returning [1]</b> 1533/4</p> <p><b>revert [1]</b> 1601/4</p> <p><b>review [22]</b> 1508/19 1524/13 1524/13 1526/10 1526/12 1533/10 1538/3 1542/14 1542/17 1542/23 1545/6 1549/20 1551/10 1599/5 1612/14 1612/23 1638/6 1639/14 1640/1 1687/8 1691/20 1697/4</p> <p><b>reviewed [14]</b> 1528/8 1537/16 1549/4 1549/4 1549/9 1551/16 1551/24 1552/22 1610/9 1637/15 1647/18 1688/4 1697/20 1697/25</p> <p><b>revised [1]</b> 1697/20</p> <p><b>Ricky [6]</b> 1503/12 1543/21 1544/11 1583/22 1584/4 1588/4</p> <p><b>right [85]</b> 1516/16 1516/21 1520/3 1528/23 1535/22 1543/9 1543/19 1547/3 1547/25 1548/4 1552/24 1553/3 1554/20 1555/4 1555/14 1556/2 1556/6 1558/8 1559/11 1560/12 1560/23 1583/24 1590/11 1591/2 1594/2 1594/12 1601/17 1609/5 1622/10 1627/11 1627/15 1627/17 1634/5 1635/9 1640/11 1643/15 1645/22 1648/25 1651/19 1651/24 1664/13 1665/2 1666/4 1666/9 1666/10 1668/2 1668/2 1669/11 1670/15 1672/4 1675/22 1679/22 1690/23 1691/6 1694/23 1695/13 1709/6 1711/8 1711/15 1711/16 1711/20 1713/4</p>	<p>1713/5 1713/11 1714/9 1714/12 1715/15 1715/23 1716/3 1716/8 1716/16 1716/22 1716/24 1717/2 1721/15 1721/21 1722/10 1723/11 1724/9 1724/13 1727/14 1728/1 1728/13 1729/16 1729/20</p> <p><b>rights [24]</b> 1516/19 1516/22 1516/24 1519/8 1519/15 1521/13 1540/13 1547/22 1548/13 1552/18 1552/19 1627/15 1631/19 1672/7 1675/25 1710/22 1711/7 1711/20 1713/8 1714/14 1715/4 1715/25 1717/7 1717/10</p> <p><b>rise [2]</b> 1629/2 1642/8</p> <p><b>river [3]</b> 1593/3 1594/5 1608/24</p> <p><b>riverbanks [1]</b> 1592/25</p> <p><b>RIVERSIDE [114]</b> 1500/5 1513/15 1513/24 1514/3 1514/16 1516/18 1517/2 1519/18 1519/21 1520/2 1520/7 1520/18 1522/13 1523/13 1525/16 1527/1 1533/14 1533/22 1538/1 1541/6 1542/2 1544/19 1545/22 1546/11 1627/2 1628/5 1628/10 1629/13 1629/25 1630/8 1630/13 1632/1 1650/24 1651/6 1651/14 1651/22 1655/3 1655/4 1663/22 1669/20 1670/4 1670/7 1670/21 1673/19 1690/19 1690/22 1691/3 1691/4 1692/11 1692/21 1693/3 1693/19 1694/4 1696/4 1696/11 1696/21 1696/25 1697/14 1697/18 1698/1 1698/3 1698/11 1698/17</p>	<p>1699/7 1703/24 1704/3 1706/8 1706/10 1707/6 1707/10 1707/20 1707/23 1708/3 1711/10 1711/12 1711/17 1711/22 1712/10 1712/14 1712/17 1712/18 1713/4 1713/16 1714/8 1714/11 1714/16 1715/1 1715/4 1715/6 1715/10 1715/11 1715/13 1715/16 1716/5 1716/23 1716/23 1717/1 1717/3 1717/6 1717/8 1717/14 1717/17 1717/21 1718/18 1718/25 1719/1 1722/1 1722/12 1723/9 1723/11 1724/20 1724/21 1724/24 1725/2</p> <p><b>Riverside's [2]</b> 1521/1 1713/1</p> <p><b>RL [17]</b> 1516/7 1557/4 1572/12 1572/13 1572/15 1587/23 1587/24 1588/2 1603/1 1603/21 1605/1 1606/23 1691/21 1708/21 1709/12 1709/15 1723/20</p> <p><b>RL-0001 [1]</b> 1516/7</p> <p><b>RL-0007 [2]</b> 1587/23 1587/24</p> <p><b>RL-0017 [3]</b> 1557/4 1572/12 1572/13</p> <p><b>RL-007 [1]</b> 1572/15</p> <p><b>RL-0175 [2]</b> 1605/1 1606/23</p> <p><b>RL-168 [3]</b> 1708/21 1709/12 1709/15</p> <p><b>RL-169 [1]</b> 1603/1</p> <p><b>RL-17 [1]</b> 1588/2</p> <p><b>RL-191 [2]</b> 1691/21 1723/20</p> <p><b>Roberts [1]</b> 1501/21</p> <p><b>role [2]</b> 1680/16 1680/24</p> <p><b>Rondón [6]</b> 1502/18 1502/19 1552/2 1562/7 1634/6 1653/8</p> <p><b>Rondón's [1]</b> 1552/7</p> <p><b>room [1]</b> 1507/21</p> <p><b>roughly [2]</b> 1719/19 1729/5</p> <p><b>round [6]</b> 1596/23 1596/24 1596/25 1598/9 1598/9</p>	<p>1651/21</p> <p><b>rounds [2]</b> 1509/13 1597/13</p> <p><b>routine [4]</b> 1613/7 1613/13 1613/16 1613/25</p> <p><b>rule [2]</b> 1559/3 1593/1</p> <p><b>rules [6]</b> 1560/25 1591/19 1647/2 1647/5 1709/9 1718/9</p> <p><b>run [1]</b> 1684/2</p> <p><b>running [1]</b> 1678/16</p> <p><b>RWS [1]</b> 1586/20</p> <p><b>RWS-09 [1]</b> 1586/20</p> <hr/> <p><b>S</b></p> <p><b>S.A [6]</b> 1540/12 1541/18 1542/17 1562/5 1580/7 1668/1</p> <p><b>SA [1]</b> 1670/15</p> <p><b>safeguard [1]</b> 1577/8</p> <p><b>said [76]</b> 1511/12 1511/16 1513/11 1518/14 1527/11 1527/25 1531/2 1537/23 1542/8 1548/22 1550/8 1558/23 1564/15 1567/20 1574/21 1576/5 1578/18 1578/21 1579/3 1579/5 1580/24 1581/5 1583/10 1583/25 1584/1 1584/9 1589/1 1589/21 1592/18 1593/15 1600/24 1603/19 1606/17 1608/24 1609/17 1609/19 1613/14 1613/17 1614/6 1614/11 1614/13 1614/18 1615/19 1616/11 1621/21 1632/6 1636/25 1649/21 1651/13 1652/7 1655/11 1658/16 1664/24 1672/18 1673/20 1674/15 1680/19 1680/21 1680/22 1680/23 1681/10 1681/11 1681/13 1681/24 1684/15 1690/5 1692/22 1693/3 1694/3 1694/4 1698/19 1702/11 1704/11 1709/8 1709/8 1717/6</p> <p><b>salary [3]</b> 1684/10 1685/8 1685/10</p>
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1570/8 1570/12 1573/15 1574/16 1575/2 1575/12 1575/13 1575/14</p>	<p>1577/4 1577/7 1585/12 1591/12 1591/22 1592/5 1609/15 1611/3 1612/11 1638/11 1638/17 1639/1 1639/3 1663/18 1670/13 1690/14 1691/12 1705/14 1711/14 1712/22 1713/3 1717/2</p> <p><b>save [2]</b> 1508/4 1508/12</p> <p><b>saw [15]</b> 1527/11 1527/14 1527/18 1538/4 1538/8 1538/15 1538/17 1540/22 1545/23 1550/24 1565/13 1566/10 1577/20 1583/4 1651/23</p> <p><b>say [78]</b> 1510/15 1510/17 1511/13 1513/24 1514/16 1515/4 1518/1 1518/23 1519/10 1522/10 1531/9 1533/16 1533/17 1537/17 1541/24 1551/6 1556/14 1556/17 1556/21 1563/12 1566/15 1569/8 1570/20 1571/12 1575/2 1578/11 1580/1 1580/24 1585/14 1585/25 1598/11 1602/6 1603/13 1603/14 1608/20 1608/21 1609/2 1609/2 1611/4 1611/5 1613/17 1613/20 1613/20 1614/4 1614/11 1615/16 1628/9 1629/17 1631/1 1632/3 1632/5 1634/7 1657/19 1658/9 1666/4 1666/23 1668/14 1671/15 1676/1 1684/18 1685/2 1692/11 1692/15 1693/6 1700/9 1702/11 1703/16 1704/18 1705/2 1708/6 1714/21 1715/5 1716/9 1725/13 1725/16 1726/7 1729/6 1729/19</p> <p><b>saying [38]</b> 1512/15 1513/9 1518/15 1518/20 1522/1</p>	<p>1526/8 1530/9 1531/24 1536/15 1552/20 1552/22 1555/17 1567/24 1570/22 1573/14 1573/16 1582/9 1590/1 1591/20 1593/24 1594/3 1594/16 1609/2 1609/23 1610/9 1611/20 1646/1 1648/5 1680/15 1681/5 1681/8 1685/10 1692/14 1709/14 1718/23 1726/2 1726/25 1728/2</p> <p><b>says [139]</b> 1517/14 1517/18 1517/25 1518/18 1519/12 1522/21 1523/22 1523/25 1524/3 1532/8 1540/9 1540/11 1540/12 1540/15 1540/16 1540/21 1541/8 1541/13 1541/17 1541/22 1541/25 1542/1 1542/2 1542/16 1542/22 1545/6 1545/11 1545/13 1545/15 1545/24 1546/10 1555/9 1557/12 1558/6 1558/8 1558/18 1564/1 1565/1 1572/24 1574/23 1576/6 1579/20 1582/2 1582/19 1583/2 1583/13 1586/3 1586/4 1589/3 1589/7 1589/15 1590/19 1590/22 1590/23 1591/2 1591/17 1594/7 1619/12 1622/5 1624/24 1626/12 1626/16 1627/16 1630/20 1633/3 1633/10 1634/3 1634/4 1634/6 1635/20 1635/23 1635/25 1636/3 1636/13 1640/11 1640/11 1644/24 1666/17 1666/18 1667/6 1667/8 1667/24 1668/3 1668/9 1668/18 1668/22 1669/5 1669/24 1670/4 1670/20 1671/19 1671/24 1674/9</p>	<p>1675/7 1675/13 1681/23 1681/23 1681/24 1682/2 1690/3 1690/3 1692/16 1694/19 1701/24 1702/1 1702/4 1702/6 1702/7 1702/12 1703/5 1703/13 1703/23 1709/7 1710/19 1710/24 1711/9 1711/19 1712/16 1712/20 1713/8 1714/13 1715/24 1716/23 1717/1 1718/12 1720/16 1721/7 1721/14 1721/19 1721/20 1721/22 1722/4 1724/17 1724/18 1725/1 1725/12 1725/19 1726/4 1726/5</p> <p><b>scenario [2]</b> 1567/10 1567/21</p> <p><b>schedule [2]</b> 1597/18 1728/25</p> <p><b>scholastic [1]</b> 1678/8</p> <p><b>school [4]</b> 1662/20 1662/22 1682/10 1687/10</p> <p><b>science [1]</b> 1614/20</p> <p><b>Sciences [2]</b> 1662/10 1662/21</p> <p><b>scope [4]</b> 1549/20 1645/18 1658/13 1687/16</p> <p><b>scratch [1]</b> 1505/14</p> <p><b>screen [17]</b> 1516/5 1516/6 1519/9 1524/19 1538/24 1544/8 1546/7 1557/5 1577/17 1603/12 1630/5 1638/19 1652/13 1665/17 1666/15 1691/19 1727/16</p> <p><b>scroll [6]</b> 1619/22 1620/2 1634/16 1634/18 1712/13 1713/19</p> <p><b>second [46]</b> 1506/1 1506/13 1522/21 1523/16 1527/24 1530/19 1530/21 1531/19 1533/20 1534/11 1540/6 1540/15 1541/25 1542/1 1543/16 1557/7 1562/10 1577/18 1594/20 1596/23 1596/24</p>	<p>1596/25 1598/8 1598/9 1609/4 1619/15 1622/18 1622/19 1632/23 1632/24 1633/1 1646/7 1651/21 1656/23 1666/5 1668/21 1670/8 1685/23 1686/17 1687/8 1691/8 1710/19 1720/15 1721/7 1722/20 1723/23</p> <p><b>seconds [2]</b> 1554/4 1596/16</p> <p><b>secretariat [1]</b> 1662/20</p> <p><b>Secretary [1]</b> 1501/12</p> <p><b>section [26]</b> 1506/17 1553/24 1557/10 1574/8 1582/1 1583/2 1583/13 1583/18 1586/9 1586/14 1586/23 1588/9 1619/11 1619/25 1620/2 1620/3 1635/23 1635/23 1637/15 1640/11 1640/16 1666/15 1675/4 1701/23 1701/25 1709/18</p> <p><b>sector [2]</b> 1682/8 1688/20</p> <p><b>sectors [1]</b> 1606/6</p> <p><b>secure [1]</b> 1579/24</p> <p><b>security [5]</b> 1505/15 1557/14 1558/10 1632/21 1674/7</p> <p><b>see [169]</b> 1507/3 1519/9 1524/19 1524/22 1524/25 1525/7 1525/8 1525/11 1526/19 1526/23 1527/4 1527/5 1534/4 1534/6 1534/7 1535/20 1537/21 1538/9 1539/6 1539/24 1540/8 1540/13 1540/18 1541/2 1541/3 1541/7 1541/16 1541/19 1541/20 1541/20 1542/18 1542/21 1543/1 1544/1 1544/19 1545/6 1545/8 1545/12 1545/15 1545/24 1546/6 1546/8 1546/11 1548/2 1548/3 1549/15 1549/16 1561/21</p>
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[121]</b> 1562/1 1562/3 1563/25 1565/10 1572/19 1575/6 1578/17 1578/19 1578/20 1579/9 1582/23 1583/9 1583/22 1584/1 1585/3 1585/15 1585/16 1585/16 1585/23 1587/14 1587/21 1598/20 1598/25 1599/9 1599/20 1603/9 1603/9 1603/10 1603/12 1603/14 1603/16 1604/10 1605/21 1606/24 1607/16 1607/22 1610/12 1611/8 1611/14 1611/24 1612/4 1615/9 1615/20 1615/20 1619/23 1620/9 1622/11 1632/18 1632/23 1633/11 1636/3 1636/21 1637/18 1639/20 1642/11 1642/12 1643/4 1643/11 1643/25 1644/1 1645/9 1645/14 1647/17 1651/20 1652/21 1653/10 1653/12 1653/14 1653/17 1660/13 1661/11 1663/7 1666/15 1666/17 1667/7 1667/20 1667/21 1667/21 1667/23 1668/2 1669/1 1669/11 1669/14 1669/23 1670/11 1670/12 1670/16 1671/9 1672/14 1673/14 1674/23 1677/25 1688/6 1689/10 1691/18 1691/22 1691/24 1692/2 1692/25 1694/14 1694/17 1694/24 1695/3 1695/4 1695/7 1695/19 1701/24 1702/3 1704/9 1705/1 1705/14 1710/2 1710/7 1710/19 1714/19 1718/15 1720/22 1721/1 1721/23 1725/24 1727/7</p> <p><b>seeing [1]</b> 1584/16</p>	<p><b>seek [4]</b> 1601/2 1706/5 1724/3 1725/23</p> <p><b>seeking [3]</b> 1539/2 1598/7 1677/23</p> <p><b>seem [2]</b> 1543/7 1543/18</p> <p><b>seems [6]</b> 1562/21 1575/19 1611/4 1611/5 1641/22 1646/11</p> <p><b>seen [35]</b> 1536/16 1537/3 1545/2 1559/1 1561/18 1562/21 1563/12 1563/19 1564/1 1570/16 1577/15 1583/10 1602/10 1629/12 1629/18 1636/16 1637/14 1639/15 1640/2 1647/16 1651/19 1652/8 1652/20 1676/14 1691/14 1693/2 1693/18 1696/3 1696/20 1696/22 1698/19 1702/5 1706/7 1710/25 1722/12</p> <p><b>sees [1]</b> 1578/8</p> <p><b>sell [2]</b> 1631/22 1672/4</p> <p><b>send [3]</b> 1505/25 1547/21 1721/17</p> <p><b>sending [2]</b> 1507/11 1508/7</p> <p><b>sense [1]</b> 1539/19</p> <p><b>sent [10]</b> 1524/21 1526/15 1533/22 1534/23 1599/15 1600/7 1600/10 1600/16 1600/21 1729/16</p> <p><b>sentence [5]</b> 1522/21 1619/11 1619/12 1619/25 1706/18</p> <p><b>sentences [1]</b> 1706/19</p> <p><b>separate [2]</b> 1522/3 1722/21</p> <p><b>separately [1]</b> 1618/2</p> <p><b>September [2]</b> 1533/13 1579/23</p> <p><b>September 2015 [1]</b> 1579/23</p> <p><b>September 9 [1]</b> 1533/13</p> <p><b>Sequeira [15]</b> 1503/18 1627/11 1631/4 1655/20 1660/5 1660/6 1661/5</p>	<p>1661/8 1661/13 1661/15 1679/16 1686/8 1689/10 1698/25 1730/6</p> <p><b>series [7]</b> 1636/7 1636/13 1641/6 1643/19 1675/5 1676/13 1679/4</p> <p><b>serve [5]</b> 1526/15 1526/25 1695/20 1696/24 1697/17</p> <p><b>served [19]</b> 1527/15 1527/16 1695/9 1695/15 1695/21 1696/1 1696/5 1696/6 1696/11 1698/2 1724/1 1724/12 1724/16 1724/24 1725/9 1725/20 1725/21 1726/14 1726/21</p> <p><b>serves [1]</b> 1715/14</p> <p><b>service [8]</b> 1682/15 1685/3 1687/1 1724/3 1724/4 1725/24 1726/6 1726/7</p> <p><b>services [6]</b> 1658/15 1662/17 1685/5 1685/5 1685/8 1685/16</p> <p><b>serving [1]</b> 1698/8</p> <p><b>session [3]</b> 1506/7 1506/24 1509/7</p> <p><b>set [3]</b> 1621/19 1705/10 1708/1</p> <p><b>sets [1]</b> 1664/12</p> <p><b>setting [1]</b> 1599/21</p> <p><b>SETTLEMENT [1]</b> 1500/2</p> <p><b>seven [1]</b> 1637/18</p> <p><b>several [14]</b> 1510/18 1533/12 1537/3 1537/11 1584/18 1586/22 1594/15 1612/13 1628/4 1630/15 1633/16 1640/20 1688/5 1710/3</p> <p><b>severe [1]</b> 1657/7</p> <p><b>shall [24]</b> 1516/13 1519/13 1589/4 1589/5 1592/11 1605/15 1620/19 1620/19 1620/23 1620/25 1621/1 1624/5 1625/8 1660/17 1668/7 1671/25 1692/5 1692/6 1694/21 1710/20 1721/13 1721/20 1724/4 1728/9</p> <p><b>shared [2]</b> 1536/18</p>	<p>1668/11</p> <p><b>shareholder [6]</b> 1513/16 1516/18 1516/20 1516/22 1516/25 1717/6</p> <p><b>shareholding [3]</b> 1717/10 1717/13 1717/13</p> <p><b>shareholdings [1]</b> 1715/13</p> <p><b>she [29]</b> 1543/4 1549/14 1549/15 1550/22 1550/23 1550/25 1569/10 1578/25 1578/25 1579/3 1579/5 1579/11 1580/21 1580/24 1587/1 1587/18 1588/9 1595/4 1617/11 1618/8 1635/3 1642/10 1642/10 1643/7 1651/13 1652/1 1693/23 1693/25 1727/6</p> <p><b>she's [6]</b> 1510/24 1580/22 1580/22 1617/12 1645/14 1698/6</p> <p><b>short [4]</b> 1513/1 1599/12 1653/3 1719/5</p> <p><b>shortage [1]</b> 1653/6</p> <p><b>shortly [1]</b> 1651/5</p> <p><b>should [30]</b> 1510/16 1513/12 1515/9 1515/20 1523/22 1559/24 1560/2 1566/15 1570/9 1574/12 1575/17 1577/8 1615/5 1621/18 1623/1 1641/3 1642/11 1644/12 1645/18 1657/24 1658/19 1660/12 1677/14 1677/17 1701/9 1707/15 1707/20 1708/24 1714/3 1727/12</p> <p><b>shouldn't [2]</b> 1515/24 1541/9</p> <p><b>shout [1]</b> 1528/19</p> <p><b>shouting [1]</b> 1528/20</p> <p><b>show [38]</b> 1516/5 1524/15 1533/19 1534/22 1537/19 1538/24 1540/1 1540/7 1557/5 1558/1 1561/22 1564/3 1572/12 1576/14 1578/2 1579/14</p>	<p>1580/14 1580/15 1581/1 1603/1 1604/14 1606/23 1610/2 1610/11 1620/11 1623/25 1630/5 1632/14 1633/19 1635/20 1635/25 1668/7 1693/8 1697/15 1700/2 1700/3 1708/20 1709/25</p> <p><b>showed [4]</b> 1538/18 1623/14 1623/23 1714/13</p> <p><b>showing [7]</b> 1527/8 1538/21 1628/23 1697/13 1700/16 1700/17 1709/23</p> <p><b>shown [4]</b> 1557/22 1638/4 1652/4 1670/1</p> <p><b>shows [2]</b> 1524/24 1585/24</p> <p><b>shut [1]</b> 1517/23</p> <p><b>sic [2]</b> 1631/2 1632/12</p> <p><b>side [10]</b> 1506/23 1507/8 1518/11 1518/14 1542/5 1584/14 1584/15 1617/11 1618/15 1719/13</p> <p><b>sign [3]</b> 1564/21 1566/5 1674/10</p> <p><b>signature [9]</b> 1525/6 1633/7 1633/11 1633/13 1633/14 1634/2 1638/4 1638/7 1674/6</p> <p><b>signed [6]</b> 1580/11 1580/25 1621/16 1629/5 1633/9 1638/2</p> <p><b>significant [1]</b> 1529/17</p> <p><b>signing [3]</b> 1621/24 1621/24 1634/4</p> <p><b>signs [1]</b> 1533/3</p> <p><b>SIICAR [1]</b> 1536/21</p> <p><b>Silvia [1]</b> 1501/20</p> <p><b>simple [5]</b> 1550/11 1561/23 1572/17 1626/14 1626/24</p> <p><b>simply [16]</b> 1506/2 1508/21 1510/3 1510/12 1518/20 1518/23 1534/14 1544/1 1564/2 1578/11 1578/22 1649/14 1659/5 1679/7 1701/19 1709/14</p> <p><b>since [16]</b> 1510/19 1512/14 1513/5 1513/6 1536/6</p>
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[11]</b> 1549/23 1551/14 1551/15 1626/11 1627/9 1651/19 1652/8 1673/16 1682/6 1689/6 1689/21 <b>sincere [1]</b> 1660/17 <b>Sincerely [1]</b> 1552/25 <b>sir [33]</b> 1514/20 1516/10 1517/6 1517/9 1519/3 1533/6 1533/21 1540/23 1541/15 1548/2 1552/14 1554/16 1555/2 1556/11 1556/18 1558/21 1589/19 1590/6 1618/16 1643/23 1646/10 1651/1 1651/12 1653/13 1659/10 1659/16 1659/22 1694/6 1698/12 1701/7 1716/11 1725/17 1729/3 <b>sit [1]</b> 1607/1 <b>site [1]</b> 1679/1 <b>situate [1]</b> 1709/19 <b>situates [1]</b> 1713/18 <b>situation [10]</b> 1521/15 1522/12 1530/22 1559/1 1573/13 1573/14 1573/16 1574/14 1673/23 1673/24 <b>situations [1]</b> 1709/9 <b>six [2]</b> 1617/2 1620/21 <b>six hours [1]</b> 1617/2 <b>six months [1]</b> 1620/21 <b>slight [1]</b> 1600/9 <b>slightly [1]</b> 1719/6 <b>slow [4]</b> 1610/18 1661/19 1683/8 1685/18 <b>slower [3]</b> 1522/6 1555/17 1646/12 <b>slowly [2]</b> 1555/15 1624/3 <b>small [2]</b> 1509/2 1603/9 <b>SMITH [1]</b> 1502/10 <b>so [292]</b> <b>social [2]</b> 1675/24 1689/6 <b>soften [1]</b> 1573/2 <b>soil [2]</b> 1587/2 1587/2 <b>Sole [1]</b> 1728/2</p>	<p><b>solemnly [1]</b> 1660/16 <b>solitary [1]</b> 1730/8 <b>some [42]</b> 1505/10 1505/17 1506/11 1506/14 1506/18 1508/12 1509/21 1509/25 1511/9 1524/14 1530/24 1537/1 1537/9 1537/23 1544/14 1554/22 1560/22 1571/7 1578/3 1578/13 1579/13 1579/15 1581/9 1581/23 1582/1 1586/9 1591/16 1601/14 1613/10 1617/23 1644/8 1647/5 1647/5 1655/8 1661/17 1663/14 1676/7 1685/25 1693/1 1693/7 1705/16 1720/21 <b>somebody [2]</b> 1678/10 1685/21 <b>somehow [1]</b> 1717/18 <b>someone [2]</b> 1607/21 1699/23 <b>something [29]</b> 1508/3 1508/11 1508/24 1517/15 1517/18 1517/22 1534/13 1542/9 1548/3 1549/14 1549/15 1549/23 1550/8 1550/25 1563/18 1564/10 1569/4 1604/19 1613/17 1629/17 1649/16 1673/25 1675/13 1678/10 1685/19 1686/20 1693/23 1704/23 1709/23 <b>soon [1]</b> 1701/16 <b>sorry [41]</b> 1506/1 1513/3 1517/6 1533/5 1534/11 1543/11 1543/22 1544/21 1547/16 1548/5 1549/13 1557/16 1563/17 1570/3 1570/5 1576/4 1576/6 1578/4 1587/19 1588/1 1610/17 1613/8 1616/22 1625/2 1630/6 1635/7 1640/15 1646/12 1647/20 1649/2 1649/9 1652/3 1656/20 1658/12</p>	<p>1660/25 1661/15 1698/24 1709/13 1709/23 1711/3 1718/14 <b>sorted [1]</b> 1505/20 <b>sound [1]</b> 1642/16 <b>sounds [1]</b> 1602/22 <b>sources [1]</b> 1562/13 <b>Spanish [36]</b> 1501/17 1516/11 1538/9 1538/25 1539/18 1540/2 1540/7 1542/15 1543/11 1543/20 1544/7 1554/1 1554/3 1557/5 1557/11 1561/23 1563/5 1572/13 1576/15 1577/19 1578/5 1580/8 1604/10 1605/12 1611/15 1620/14 1624/1 1634/17 1660/8 1660/9 1661/17 1664/7 1670/17 1691/25 1692/1 1723/22 <b>speak [6]</b> 1506/11 1553/11 1595/21 1596/15 1618/3 1618/18 <b>speaking [7]</b> 1512/18 1662/1 1662/21 1674/2 1678/12 1678/20 1700/19 <b>speaks [4]</b> 1618/8 1690/11 1702/13 1713/10 <b>special [1]</b> 1700/5 <b>specialists [1]</b> 1611/10 <b>specialization [1]</b> 1687/22 <b>specific [8]</b> 1539/3 1546/20 1558/5 1647/17 1652/12 1656/15 1674/21 1690/8 <b>specifically [10]</b> 1519/3 1586/11 1624/24 1644/15 1644/18 1647/24 1651/13 1652/1 1656/10 1666/22 <b>specified [1]</b> 1636/1 <b>specifies [1]</b> 1549/24 <b>specify [1]</b> 1669/22 <b>Spector [1]</b> 1501/17 <b>speculate [1]</b> 1698/7 <b>speech [2]</b> 1517/18 1517/22 <b>spelled [3]</b> 1710/3</p>	<p>1713/3 1714/6 <b>spells [1]</b> 1714/7 <b>spent [1]</b> 1651/10 <b>spirit [1]</b> 1558/12 <b>spoke [1]</b> 1716/7 <b>spoken [1]</b> 1677/16 <b>sponte [3]</b> 1532/10 1621/1 1708/25 <b>spot [1]</b> 1729/21 <b>spurious [1]</b> 1643/7 <b>stand [4]</b> 1514/24 1531/23 1533/9 1605/24 <b>standardized [3]</b> 1704/14 1704/16 1705/7 <b>standards [1]</b> 1647/6 <b>standpoint [1]</b> 1707/17 <b>stands [1]</b> 1597/7 <b>start [7]</b> 1510/8 1572/13 1630/25 1634/5 1635/15 1641/23 1643/15 <b>started [2]</b> 1646/17 1648/5 <b>starting [3]</b> 1533/13 1643/14 1665/4 <b>state [65]</b> 1519/18 1525/16 1529/24 1533/14 1533/17 1537/25 1541/9 1541/11 1541/12 1541/13 1541/23 1542/1 1544/19 1546/10 1557/15 1558/11 1564/21 1570/3 1585/11 1601/19 1601/24 1606/3 1606/8 1608/6 1608/10 1608/11 1609/6 1611/23 1613/6 1614/7 1621/20 1622/9 1622/22 1623/3 1631/25 1632/4 1636/21 1637/3 1637/3 1648/21 1649/22 1656/18 1657/12 1658/2 1658/18 1665/23 1669/20 1670/7 1671/1 1675/20 1680/20 1682/1 1683/25 1684/1 1684/4 1684/10 1684/12 1687/2 1692/6 1692/6 1699/9 1703/23 1704/3 1705/15 1712/10 <b>state's [1]</b> 1648/20 <b>stated [6]</b> 1535/15</p>	<p>1680/7 1693/19 1715/3 1716/3 1717/4 <b>statement [26]</b> 1514/24 1533/9 1568/20 1582/7 1592/19 1593/4 1594/14 1610/18 1631/18 1636/25 1645/4 1646/1 1646/7 1649/9 1651/20 1651/25 1652/5 1652/9 1653/8 1660/17 1679/2 1681/8 1684/19 1706/16 1722/15 1730/2 <b>standards [7]</b> 1510/1 1511/16 1511/19 1542/3 1587/16 1640/2 1651/21 <b>states [6]</b> 1515/18 1527/1 1648/23 1648/25 1715/13 1716/23 <b>stating [3]</b> 1571/9 1573/21 1607/20 <b>status [2]</b> 1530/3 1675/8 <b>statute [2]</b> 1532/14 1657/3 <b>stay [1]</b> 1646/20 <b>step [2]</b> 1615/2 1645/11 <b>steps [5]</b> 1565/13 1565/17 1565/22 1566/2 1566/10 <b>still [19]</b> 1506/7 1513/25 1534/21 1544/21 1545/16 1567/12 1571/20 1571/23 1571/23 1594/19 1639/22 1652/22 1654/2 1682/20 1682/25 1719/24 1729/5 1729/11 1730/6 <b>stipulates [2]</b> 1708/18 1711/6 <b>stop [5]</b> 1557/19 1648/6 1661/16 1679/10 1692/10 <b>stopped [1]</b> 1694/6 <b>stopping [1]</b> 1512/19 <b>story [1]</b> 1560/19 <b>strategically [1]</b> 1593/13 <b>street [1]</b> 1525/25 <b>strengthening [1]</b> 1582/17 <b>strict [1]</b> 1605/16 <b>strike [1]</b> 1596/9</p>
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1564/25 1580/6 1581/2 1581/6 1581/14 1581/14 1581/15 1581/21 1585/21 1585/23 1595/9 1603/25 1604/4</p> <p><b>subparagraph [3]</b> 1526/20 1526/21 1675/7</p> <p><b>subsequent [2]</b></p>	<p>1566/14 1728/9</p> <p><b>subsequently [4]</b> 1542/18 1603/25 1664/1 1681/3</p> <p><b>subsidiary [2]</b> 1654/13 1655/6</p> <p><b>substance [1]</b> 1648/18</p> <p><b>substantiate [1]</b> 1695/18</p> <p><b>substantive [2]</b> 1688/2 1709/5</p> <p><b>substitute [1]</b> 1729/19</p> <p><b>success [1]</b> 1692/8</p> <p><b>such [17]</b> 1505/13 1509/13 1529/16 1529/16 1541/16 1549/3 1580/5 1598/6 1625/21 1653/6 1657/13 1666/24 1671/13 1675/2 1705/13 1711/15 1724/4</p> <p><b>suffice [1]</b> 1665/15</p> <p><b>suffices [1]</b> 1665/4</p> <p><b>sufficient [1]</b> 1532/22</p> <p><b>suggest [2]</b> 1550/9 1550/10</p> <p><b>suggested [1]</b> 1648/1</p> <p><b>suggesting [1]</b> 1594/4</p> <p><b>suggestion [1]</b> 1510/7</p> <p><b>summary [5]</b> 1529/13 1531/1 1531/5 1665/6 1665/7</p> <p><b>summoned [4]</b> 1525/14 1527/20 1530/15 1624/8</p> <p><b>summoning [1]</b> 1528/3</p> <p><b>summons [8]</b> 1528/5 1724/1 1724/12 1725/9 1725/20 1725/22 1726/14 1726/21</p> <p><b>supervisor [1]</b> 1611/23</p> <p><b>supplementary [1]</b> 1678/7</p> <p><b>support [1]</b> 1676/18</p> <p><b>supporting [1]</b> 1505/25</p> <p><b>supposed [4]</b> 1535/14 1605/22 1606/17 1621/21</p> <p><b>Supposedly [1]</b> 1601/22</p> <p><b>Supreme [6]</b> 1661/23 1662/11</p>	<p>1684/16 1684/20 1685/1 1685/6</p> <p><b>sure [27]</b> 1506/19 1507/4 1508/21 1510/10 1517/23 1533/16 1533/18 1535/6 1544/14 1549/18 1554/10 1557/24 1564/1 1564/2 1604/4 1611/20 1617/20 1618/5 1619/21 1625/2 1641/25 1642/2 1645/21 1649/23 1700/20 1701/15 1729/20</p> <p><b>surprise [2]</b> 1505/9 1506/24</p> <p><b>suspended [1]</b> 1620/20</p> <p><b>sustainable [4]</b> 1582/12 1582/13 1589/5 1592/11</p> <p><b>swallow [1]</b> 1596/16</p> <p><b>switch [3]</b> 1554/2 1641/22 1641/24</p> <p><b>system [13]</b> 1536/11 1536/11 1536/14 1536/23 1555/8 1616/13 1616/14 1664/6 1675/15 1703/18 1704/13 1704/21 1705/8</p> <p><b>systems [5]</b> 1582/11 1582/12 1640/14 1645/1 1646/8</p> <hr/> <p><b>T</b></p> <p><b>tag [1]</b> 1642/24</p> <p><b>tag-teaming [1]</b> 1642/24</p> <p><b>take [26]</b> 1509/17 1520/20 1521/10 1521/14 1521/17 1522/8 1522/10 1534/3 1534/8 1534/18 1582/24 1585/18 1586/6 1586/8 1625/10 1625/13 1634/11 1646/13 1648/22 1659/5 1661/9 1677/4 1686/16 1718/3 1724/4 1727/7</p> <p><b>taken [4]</b> 1506/16 1552/4 1656/18 1677/22</p> <p><b>takes [3]</b> 1507/1 1508/23 1661/17</p> <p><b>taking [2]</b> 1623/2 1637/15</p> <p><b>talented [1]</b> 1508/25</p> <p><b>talk [8]</b> 1550/17</p>	<p>1564/18 1565/9 1588/3 1661/12 1674/12 1703/5 1724/25</p> <p><b>talked [5]</b> 1514/6 1644/18 1655/21 1656/3 1720/12</p> <p><b>talking [41]</b> 1508/8 1513/20 1519/11 1524/7 1526/3 1526/6 1526/7 1527/24 1530/2 1536/2 1538/13 1544/15 1546/13 1546/15 1555/16 1561/19 1565/12 1577/24 1578/1 1587/1 1593/2 1593/20 1593/20 1614/19 1627/2 1627/18 1629/1 1645/21 1651/10 1656/17 1670/19 1696/15 1696/19 1697/8 1703/19 1714/9 1718/5 1720/10 1724/9</p> <p><b>talks [7]</b> 1624/20 1627/17 1652/1 1678/8 1703/12 1714/8 1717/15</p> <p><b>tangential [1]</b> 1513/25</p> <p><b>tantamount [1]</b> 1532/25</p> <p><b>taught [2]</b> 1688/21 1688/24</p> <p><b>team [5]</b> 1511/7 1511/7 1560/6 1616/15 1623/20</p> <p><b>teaming [1]</b> 1642/24</p> <p><b>teams [1]</b> 1510/10</p> <p><b>technical [10]</b> 1505/20 1506/10 1506/11 1560/6 1560/11 1607/18 1610/3 1610/5 1610/21 1612/15</p> <p><b>technically [5]</b> 1610/15 1650/1 1662/21 1667/19 1684/8</p> <p><b>technician [1]</b> 1503/12</p> <p><b>tell [16]</b> 1521/7 1525/13 1525/22 1532/17 1585/4 1615/10 1650/9 1654/5 1684/18 1686/4 1686/13 1693/16 1699/17 1706/2 1706/9 1706/17</p>	<p><b>telling [7]</b> 1513/5 1541/3 1567/21 1570/25 1607/21 1627/11 1690/6</p> <p><b>tells [2]</b> 1602/16 1631/4</p> <p><b>ten [11]</b> 1505/22 1531/10 1531/11 1531/11 1531/13 1532/5 1532/16 1630/24 1630/25 1719/11 1720/3</p> <p><b>ten minutes [3]</b> 1505/22 1719/11 1720/3</p> <p><b>ten years [8]</b> 1531/10 1531/11 1531/11 1531/13 1532/5 1532/16 1630/24 1630/25</p> <p><b>tendency [1]</b> 1589/1</p> <p><b>tendered [1]</b> 1667/3</p> <p><b>tenets [1]</b> 1673/19</p> <p><b>tenths [2]</b> 1547/5 1549/1</p> <p><b>term [6]</b> 1524/4 1622/6 1674/2 1674/3 1703/10 1718/23</p> <p><b>terminated [1]</b> 1620/18</p> <p><b>terms [8]</b> 1544/3 1652/23 1662/5 1662/23 1666/20 1698/14 1704/13 1705/8</p> <p><b>terrain [2]</b> 1585/8 1590/2</p> <p><b>territorial [1]</b> 1625/14</p> <p><b>test [1]</b> 1513/1</p> <p><b>testified [8]</b> 1549/18 1550/24 1578/6 1578/7 1578/10 1609/1 1649/17 1652/19</p> <p><b>testifying [5]</b> 1549/14 1578/23 1578/25 1581/13 1660/8</p> <p><b>testimony [32]</b> 1514/5 1552/2 1552/7 1552/8 1553/11 1578/14 1584/1 1593/4 1595/21 1596/9 1597/7 1597/8 1597/8 1597/10 1597/11 1597/21 1597/21 1609/22 1615/14 1622/6 1627/12 1649/5 1649/11 1651/2 1652/11 1652/12 1653/23 1655/1</p>
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[4]</b> 1704/2 1704/5 1706/7 1730/7</p> <p><b>text [3]</b> 1604/24 1660/13 1665/25</p> <p><b>than [15]</b> 1511/3 1536/4 1549/21 1580/15 1594/21 1600/19 1605/14 1610/13 1620/21 1635/11 1648/20 1651/3 1659/14 1683/22 1717/19</p> <p><b>thank [91]</b> 1507/16 1509/3 1510/6 1512/7 1513/3 1513/4 1519/1 1520/5 1529/5 1530/18 1532/1 1532/22 1533/11 1536/13 1544/10 1544/22 1548/11 1553/2 1553/9 1553/13 1553/16 1554/11 1557/21 1557/25 1558/20 1558/21 1558/25 1559/7 1559/8 1564/22 1569/21 1577/12 1581/18 1581/19 1586/5 1588/4 1588/5 1595/7 1595/14 1596/7 1599/1 1599/2 1601/3 1601/11 1604/8 1616/17 1616/19 1616/20 1617/5 1617/19 1617/21 1618/20 1619/20 1620/15 1623/11 1628/2 1630/11 1631/11 1632/7 1633/15 1634/9 1634/11 1634/16 1634/19 1635/17 1636/5 1636/11 1637/25 1638/9 1643/13 1650/17 1651/5 1659/13 1659/14 1659/16 1659/17 1659/21 1659/22 1659/23 1660/18 1660/22 1661/6 1661/20 1679/11 1680/3 1680/13 1692/2 1700/17 1719/4 1727/19 1730/9</p> <p><b>that [1279]</b> <b>that's [102]</b> 1516/21 1517/20 1517/22 1518/3 1518/16 1518/19 1518/19</p>	<p>1518/24 1528/4 1531/2 1531/5 1532/2 1539/22 1540/8 1540/21 1541/23 1542/22 1545/10 1546/12 1547/15 1549/23 1551/1 1555/9 1555/23 1556/7 1556/8 1558/18 1559/17 1560/18 1569/1 1573/23 1574/1 1574/23 1574/23 1580/22 1582/19 1582/24 1583/16 1587/9 1587/20 1588/18 1589/7 1589/15 1590/22 1591/6 1596/17 1596/18 1597/22 1600/14 1602/4 1602/10 1604/5 1604/6 1604/17 1604/18 1604/22 1606/4 1608/24 1608/25 1609/21 1610/25 1611/4 1612/19 1614/6 1614/22 1617/4 1618/11 1622/11 1627/19 1632/6 1636/4 1641/20 1648/18 1652/21 1653/18 1654/25 1655/14 1656/1 1658/16 1672/19 1679/8 1689/14 1690/23 1698/14 1701/8 1702/4 1702/11 1702/19 1703/23 1704/8 1704/14 1706/17 1708/16 1711/23 1717/14 1717/24 1717/25 1718/12 1720/6 1721/14 1721/22 1724/9</p> <p><b>their [8]</b> 1506/25 1602/13 1608/14 1610/6 1665/8 1694/23 1695/13 1707/16</p> <p><b>them [25]</b> 1509/22 1510/4 1511/9 1511/10 1520/19 1536/16 1560/23 1602/3 1602/16 1602/17 1606/25 1607/1 1608/12 1637/18 1651/23 1664/23 1685/2 1693/15 1697/6 1704/6 1706/2 1706/2</p>	<p>1710/5 1714/5 1722/24</p> <p><b>themselves [1]</b> 1612/7</p> <p><b>then [99]</b> 1508/5 1508/11 1508/12 1508/13 1509/16 1512/16 1514/25 1516/12 1517/21 1518/7 1518/13 1519/4 1521/10 1522/6 1522/10 1527/6 1530/18 1532/9 1534/20 1538/3 1540/7 1540/15 1541/20 1545/11 1546/25 1550/16 1550/17 1550/17 1553/2 1553/3 1560/11 1565/13 1571/14 1573/9 1576/18 1578/2 1578/23 1579/15 1581/15 1590/4 1595/5 1596/25 1597/16 1598/19 1598/20 1598/25 1600/8 1600/16 1601/8 1602/15 1603/24 1607/23 1608/3 1615/22 1624/25 1626/18 1627/14 1629/22 1637/19 1642/23 1643/2 1643/11 1647/4 1648/1 1648/19 1652/14 1654/8 1659/11 1661/18 1661/18 1666/18 1666/18 1668/12 1669/24 1670/3 1670/15 1673/10 1674/3 1674/15 1675/10 1677/10 1694/19 1702/1 1704/2 1704/10 1705/7 1714/12 1715/1 1716/8 1717/2 1718/3 1719/7 1719/20 1722/25 1725/17 1725/24 1727/1 1727/7 1729/23</p> <p><b>theory [4]</b> 1678/9 1678/16 1688/24 1724/16</p> <p><b>there [198]</b> 1505/10 1505/14 1506/5 1507/21 1508/11 1509/5 1510/4 1514/11 1514/16 1517/4 1520/22</p>	<p>1521/10 1524/5 1524/20 1526/1 1526/10 1526/23 1527/15 1527/16 1531/17 1533/3 1533/7 1533/12 1534/5 1534/24 1534/25 1535/2 1538/23 1540/16 1543/5 1543/6 1543/10 1545/6 1545/11 1545/24 1547/8 1547/13 1547/23 1549/24 1550/21 1552/22 1556/11 1556/18 1556/24 1558/2 1558/12 1558/15 1560/8 1564/10 1568/15 1568/20 1569/14 1569/24 1570/20 1570/23 1570/25 1571/7 1571/16 1571/17 1571/18 1572/1 1572/8 1572/22 1573/16 1577/7 1583/19 1583/22 1584/18 1584/23 1585/15 1588/19 1589/1 1591/12 1591/20 1592/1 1592/16 1594/3 1598/9 1600/9 1600/10 1601/16 1603/13 1603/16 1605/21 1606/24 1608/13 1611/8 1612/10 1612/21 1614/8 1614/15 1617/11 1622/1 1623/8 1624/21 1625/17 1625/18 1625/23 1626/25 1627/1 1630/3 1630/15 1631/7 1633/6 1633/7 1633/12 1633/14 1636/1 1637/5 1638/6 1638/10 1638/13 1639/23 1640/25 1641/6 1641/14 1642/16 1642/23 1643/11 1644/3 1644/4 1647/4 1648/7 1648/15 1648/16 1648/24 1650/10 1650/14 1655/12 1656/1 1656/2 1657/16 1657/17 1658/17 1659/3 1659/4 1660/13 1664/19 1665/11</p>	<p>1665/12 1666/3 1666/19 1667/2 1673/17 1673/21 1673/21 1674/4 1674/6 1674/6 1674/12 1674/23 1675/18 1676/7 1676/16 1676/17 1676/19 1678/12 1682/23 1683/3 1683/16 1683/19 1685/11 1685/22 1693/1 1693/5 1693/6 1693/7 1693/10 1693/24 1694/16 1695/3 1695/20 1697/13 1701/24 1703/2 1704/24 1705/23 1706/1 1707/11 1710/3 1710/4 1711/23 1712/18 1713/24 1716/8 1718/9 1718/15 1719/8 1722/15 1722/24 1723/21 1725/3 1725/10 1726/17 1727/7 1728/1 1729/12 1729/24</p> <p><b>there's [27]</b> 1507/25 1508/3 1509/15 1512/2 1517/14 1517/18 1557/18 1569/2 1583/21 1596/20 1597/7 1597/8 1597/8 1603/6 1623/7 1626/19 1639/23 1646/2 1665/8 1665/20 1672/15 1673/25 1677/5 1701/25 1702/23 1708/14 1723/20</p> <p><b>thereafter [2]</b> 1651/5 1724/4</p> <p><b>therefore [7]</b> 1513/21 1574/4 1602/19 1611/2 1622/8 1690/18 1713/2</p> <p><b>therein [1]</b> 1699/25 <b>these [48]</b> 1510/3 1517/19 1537/9 1537/18 1537/21 1544/9 1552/10 1554/19 1554/24 1555/3 1555/7 1565/17 1569/19 1572/3 1580/20 1585/2 1602/20 1602/20 1611/20 1612/16 1612/24 1639/24 1647/21</p>
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[25]</b> 1649/25</p> <p>1663/25 1664/6</p> <p>1664/22 1666/12</p> <p>1666/14 1666/20</p> <p>1667/9 1667/18</p> <p>1671/8 1676/4 1677/8</p> <p>1677/21 1678/6</p> <p>1679/20 1680/5</p> <p>1681/2 1704/16</p> <p>1704/17 1705/7</p> <p>1713/21 1716/13</p> <p>1722/6 1722/21</p> <p>1723/4</p> <p><b>they [129]</b> 1506/22</p> <p>1515/17 1519/5</p> <p>1520/19 1520/20</p> <p>1522/3 1522/21</p> <p>1529/22 1529/22</p> <p>1529/25 1530/4</p> <p>1530/6 1536/13</p> <p>1536/18 1543/5</p> <p>1543/7 1544/1</p> <p>1544/20 1546/12</p> <p>1546/13 1546/20</p> <p>1546/21 1552/3</p> <p>1552/5 1560/11</p> <p>1560/24 1561/5</p> <p>1561/7 1561/8</p> <p>1561/14 1564/15</p> <p>1564/15 1566/5</p> <p>1566/18 1566/19</p> <p>1570/19 1570/19</p> <p>1570/21 1571/4</p> <p>1573/24 1574/1</p> <p>1574/5 1574/7 1574/8</p> <p>1585/25 1602/1</p> <p>1602/6 1602/7 1602/7</p> <p>1602/14 1602/17</p> <p>1605/24 1608/14</p> <p>1611/11 1612/17</p> <p>1612/21 1613/21</p> <p>1618/1 1618/7</p> <p>1622/13 1622/14</p> <p>1622/15 1622/25</p> <p>1622/25 1623/1</p> <p>1623/3 1623/5 1623/9</p> <p>1625/10 1625/13</p> <p>1625/15 1625/20</p> <p>1627/7 1637/8</p> <p>1642/18 1665/2</p> <p>1669/8 1672/18</p> <p>1673/20 1675/20</p> <p>1677/23 1678/2</p> <p>1678/3 1678/4</p> <p>1692/12 1692/22</p> <p>1693/3 1693/8</p> <p>1693/20 1694/5</p> <p>1694/22 1694/23</p> <p>1697/14 1697/17</p> <p>1700/13 1702/17</p> <p>1702/25 1703/24</p> <p>1704/4 1705/9</p>	<p>1705/25 1706/3</p> <p>1706/4 1706/6 1708/6</p> <p>1708/6 1708/6 1710/5</p> <p>1714/3 1714/3 1714/4</p> <p>1715/18 1716/9</p> <p>1717/4 1717/11</p> <p>1719/13 1719/19</p> <p>1721/17 1722/4</p> <p>1722/18 1722/19</p> <p>1722/20 1722/25</p> <p>1723/8 1725/4 1725/5</p> <p>1727/11 1727/11</p> <p>1729/19</p> <p><b>they're [12]</b> 1506/22</p> <p>1586/1 1596/24</p> <p>1648/17 1650/3</p> <p>1664/22 1670/21</p> <p>1706/4 1706/5</p> <p>1715/18 1717/18</p> <p>1719/20</p> <p><b>thing [15]</b> 1517/24</p> <p>1546/20 1554/6</p> <p>1554/11 1564/17</p> <p>1568/5 1570/23</p> <p>1571/8 1602/10</p> <p>1615/9 1652/15</p> <p>1653/5 1654/9 1674/5</p> <p>1685/23</p> <p><b>things [18]</b> 1506/8</p> <p>1514/7 1537/24</p> <p>1546/13 1554/7</p> <p>1558/20 1561/20</p> <p>1585/5 1602/18</p> <p>1614/16 1616/16</p> <p>1616/16 1642/14</p> <p>1656/1 1657/13</p> <p>1666/14 1677/2</p> <p>1680/17</p> <p><b>think [94]</b> 1506/6</p> <p>1506/21 1508/19</p> <p>1510/9 1512/25</p> <p>1517/20 1518/1</p> <p>1518/2 1529/19</p> <p>1530/3 1530/23</p> <p>1531/21 1531/25</p> <p>1534/3 1534/6</p> <p>1534/12 1539/9</p> <p>1543/2 1543/13</p> <p>1543/17 1547/15</p> <p>1549/14 1549/23</p> <p>1554/21 1556/8</p> <p>1556/10 1556/15</p> <p>1557/3 1558/22</p> <p>1571/3 1571/6</p> <p>1574/12 1576/18</p> <p>1578/7 1578/9 1582/6</p> <p>1583/4 1587/1 1587/2</p> <p>1587/25 1589/10</p> <p>1589/21 1591/16</p> <p>1591/19 1593/7</p> <p>1594/18 1597/4</p> <p>1597/10 1602/4</p> <p>1604/9 1605/23</p>	<p>1606/5 1613/20</p> <p>1614/14 1615/4</p> <p>1626/9 1631/17</p> <p>1632/19 1632/23</p> <p>1635/14 1636/25</p> <p>1640/19 1646/6</p> <p>1646/13 1646/16</p> <p>1646/19 1654/19</p> <p>1655/11 1655/12</p> <p>1655/14 1658/19</p> <p>1658/20 1658/24</p> <p>1659/7 1666/13</p> <p>1673/5 1680/13</p> <p>1687/9 1689/20</p> <p>1697/22 1698/12</p> <p>1701/4 1701/6 1716/7</p> <p>1717/22 1719/12</p> <p>1719/13 1719/19</p> <p>1719/19 1719/24</p> <p>1722/16 1726/8</p> <p>1728/20 1729/11</p> <p><b>thinking [1]</b> 1615/10</p> <p><b>third [3]</b> 1584/19</p> <p>1626/21 1695/14</p> <p><b>this [495]</b></p> <p><b>those [52]</b> 1509/18</p> <p>1509/25 1510/10</p> <p>1511/10 1523/23</p> <p>1535/2 1535/14</p> <p>1537/14 1542/3</p> <p>1544/3 1544/3</p> <p>1561/20 1574/18</p> <p>1575/3 1583/8</p> <p>1584/22 1584/24</p> <p>1585/5 1591/23</p> <p>1605/14 1605/23</p> <p>1607/5 1612/20</p> <p>1614/16 1616/16</p> <p>1624/23 1628/1</p> <p>1630/25 1641/7</p> <p>1644/8 1647/16</p> <p>1650/16 1654/5</p> <p>1655/8 1655/9 1656/9</p> <p>1656/10 1657/2</p> <p>1657/4 1661/7</p> <p>1667/15 1671/4</p> <p>1693/16 1695/25</p> <p>1696/20 1696/25</p> <p>1698/14 1708/1</p> <p>1714/2 1723/12</p> <p>1726/23 1727/22</p> <p><b>though [4]</b> 1521/21</p> <p>1529/9 1606/25</p> <p>1627/12</p> <p><b>thought [9]</b> 1505/7</p> <p>1505/24 1507/18</p> <p>1527/13 1604/7</p> <p>1680/12 1690/2</p> <p>1690/5 1698/8</p> <p><b>thoughts [1]</b> 1617/1</p> <p><b>thousand [1]</b></p> <p>1573/19</p> <p><b>three [11]</b> 1554/4</p>	<p>1561/23 1627/7</p> <p>1632/4 1662/2</p> <p>1674/13 1694/11</p> <p>1695/23 1695/25</p> <p>1718/21 1728/24</p> <p><b>three days [5]</b></p> <p>1627/7 1694/11</p> <p>1695/23 1695/25</p> <p>1718/21</p> <p><b>three hours [1]</b></p> <p>1728/24</p> <p><b>through [9]</b> 1563/15</p> <p>1583/25 1602/18</p> <p>1643/19 1643/22</p> <p>1661/17 1700/5</p> <p>1701/18 1706/22</p> <p><b>Thursday [5]</b></p> <p>1509/22 1510/8</p> <p>1598/20 1598/22</p> <p>1598/25</p> <p><b>tied [5]</b> 1663/1</p> <p>1663/17 1711/14</p> <p>1714/12 1714/17</p> <p><b>time [61]</b> 1506/25</p> <p>1507/1 1507/18</p> <p>1508/4 1508/22</p> <p>1508/23 1510/18</p> <p>1510/24 1511/15</p> <p>1512/14 1513/6</p> <p>1518/12 1522/5</p> <p>1528/17 1531/8</p> <p>1532/13 1534/17</p> <p>1534/20 1535/10</p> <p>1569/2 1569/12</p> <p>1582/5 1615/9</p> <p>1616/18 1621/4</p> <p>1622/21 1630/22</p> <p>1630/23 1631/1</p> <p>1633/6 1643/8 1643/9</p> <p>1645/12 1651/10</p> <p>1653/25 1654/9</p> <p>1654/11 1659/24</p> <p>1661/9 1661/17</p> <p>1672/2 1674/11</p> <p>1678/11 1678/21</p> <p>1683/21 1683/24</p> <p>1684/9 1693/2</p> <p>1694/20 1696/23</p> <p>1698/8 1699/11</p> <p>1720/18 1722/16</p> <p>1722/20 1722/22</p> <p>1723/2 1727/18</p> <p>1728/17 1729/13</p> <p>1729/25</p> <p><b>timeline [2]</b> 1612/12</p> <p>1612/20</p> <p><b>times [8]</b> 1510/18</p> <p>1569/1 1569/2</p> <p>1586/22 1628/4</p> <p>1656/5 1671/12</p> <p>1671/17</p> <p><b>timing [3]</b> 1505/5</p> <p>1653/18 1719/7</p>	<p><b>title [17]</b> 1540/15</p> <p>1541/21 1546/16</p> <p>1579/20 1583/17</p> <p>1632/5 1632/6</p> <p>1655/13 1666/2</p> <p>1666/9 1668/17</p> <p>1701/1 1704/15</p> <p>1705/14 1709/18</p> <p>1712/21 1721/6</p> <p><b>titleholder [3]</b></p> <p>1668/4 1668/9</p> <p>1670/22</p> <p><b>titles [2]</b> 1536/12</p> <p>1715/25</p> <p><b>today [10]</b> 1505/19</p> <p>1506/3 1506/18</p> <p>1513/6 1530/24</p> <p>1601/4 1655/9</p> <p>1679/24 1681/11</p> <p>1720/3</p> <p><b>today's [1]</b> 1505/6</p> <p><b>together [1]</b> 1560/6</p> <p><b>told [13]</b> 1510/18</p> <p>1541/15 1612/22</p> <p>1633/6 1680/15</p> <p>1686/11 1692/21</p> <p>1698/15 1705/11</p> <p>1707/19 1711/10</p> <p>1722/1 1724/21</p> <p><b>tomorrow [6]</b></p> <p>1596/11 1598/12</p> <p>1598/14 1598/18</p> <p>1729/2 1730/5</p> <p><b>tonight [2]</b> 1719/14</p> <p>1730/8</p> <p><b>too [5]</b> 1540/4</p> <p>1607/17 1635/15</p> <p>1686/20 1701/13</p> <p><b>took [7]</b> 1527/9</p> <p>1628/10 1643/19</p> <p>1644/17 1684/4</p> <p>1684/6 1723/8</p> <p><b>top [9]</b> 1524/19</p> <p>1540/9 1603/7</p> <p>1603/14 1603/16</p> <p>1666/15 1667/8</p> <p>1668/2 1713/22</p> <p><b>topic [8]</b> 1524/14</p> <p>1532/23 1535/17</p> <p>1586/8 1647/2</p> <p>1650/18 1653/3</p> <p>1713/20</p> <p><b>topics [2]</b> 1618/2</p> <p>1663/9</p> <p><b>total [5]</b> 1558/13</p> <p>1569/24 1570/13</p> <p>1570/20 1570/20</p> <p><b>totality [3]</b> 1570/16</p> <p>1637/14 1637/24</p> <p><b>totally [3]</b> 1525/9</p> <p>1530/16 1575/5</p> <p><b>touch [1]</b> 1713/20</p> <p><b>tourism [2]</b> 1556/5</p>
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<p><b>T</b></p> <p><b>tourism...</b> [1] 1570/19</p> <p><b>toward</b> [1] 1701/23</p> <p><b>trade</b> [1] 1524/23</p> <p><b>training</b> [1] 1682/14</p> <p><b>transcribed</b> [1] 1661/18</p> <p><b>transcript</b> [14] 1513/4 1518/12 1579/12 1625/4 1628/7 1647/3 1680/23 1681/17 1681/23 1681/24 1683/6 1683/9 1690/3 1690/11</p> <p><b>transcription</b> [1] 1511/7</p> <p><b>transcriptionists</b> [1] 1701/16</p> <p><b>transfer</b> [2] 1552/23 1665/1</p> <p><b>transformation</b> [4] 1689/4 1689/4 1689/6 1689/8</p> <p><b>translate</b> [4] 1508/18 1508/22 1554/5 1698/23</p> <p><b>translated</b> [4] 1508/24 1544/2 1558/4 1661/18</p> <p><b>translation</b> [22] 1507/10 1507/11 1507/13 1507/22 1507/23 1508/7 1508/9 1508/16 1544/6 1544/8 1547/20 1547/21 1555/16 1557/23 1558/3 1584/5 1603/4 1605/3 1610/18 1624/2 1661/16 1723/21</p> <p><b>translations</b> [1] 1544/3</p> <p><b>transport</b> [1] 1676/4</p> <p><b>transportation</b> [2] 1687/6 1689/17</p> <p><b>travel</b> [6] 1511/3 1692/12 1692/22 1693/3 1693/20 1694/5</p> <p><b>treated</b> [2] 1598/8 1657/24</p> <p><b>treatment</b> [4] 1640/13 1644/19 1645/1 1646/8</p> <p><b>tree</b> [1] 1592/22</p> <p><b>trees</b> [6] 1571/5 1571/5 1592/23 1595/10 1676/7 1678/4</p> <p><b>tremendous</b> [2]</p>	<p>1510/16 1510/19</p> <p><b>trends</b> [3] 1687/19 1687/24 1688/2</p> <p><b>TRIBUNAL</b> [32] 1500/20 1501/3 1501/12 1506/23 1507/13 1507/21 1507/23 1508/18 1509/6 1509/16 1509/20 1511/6 1529/6 1531/25 1532/22 1547/21 1595/8 1596/22 1597/5 1597/25 1598/15 1598/16 1598/21 1609/22 1650/4 1656/6 1659/1 1659/19 1681/11 1689/21 1727/18 1728/22</p> <p><b>Tribunal's</b> [2] 1511/21 1511/24</p> <p><b>tried</b> [2] 1597/22 1714/25</p> <p><b>true</b> [6] 1544/24 1545/5 1640/24 1699/19 1699/21 1707/1</p> <p><b>try</b> [15] 1505/18 1508/25 1509/10 1509/18 1509/24 1511/25 1512/15 1513/7 1584/13 1597/3 1646/20 1676/7 1683/8 1720/5 1730/9</p> <p><b>trying</b> [7] 1525/22 1552/3 1563/19 1578/13 1624/13 1717/19 1723/8</p> <p><b>turn</b> [7] 1617/16 1638/19 1641/14 1647/2 1650/21 1665/15 1705/17</p> <p><b>two</b> [34] 1505/4 1513/20 1515/20 1520/10 1522/7 1523/22 1523/23 1526/7 1531/16 1537/24 1542/3 1546/12 1547/3 1619/14 1620/24 1621/13 1628/22 1631/6 1660/1 1663/9 1664/4 1664/13 1668/13 1670/12 1670/13 1674/2 1674/4 1677/14 1677/18 1706/19 1710/5 1722/16 1722/21 1723/2</p> <p><b>two hours</b> [1] 1660/1</p>	<p><b>two years</b> [9] 1523/22 1523/23 1531/16 1619/14 1620/24 1621/13 1628/22 1664/13 1674/4</p> <p><b>two-year</b> [3] 1520/10 1547/3 1674/2</p> <p><b>type</b> [4] 1650/12 1650/12 1686/4 1686/13</p> <p><b>types</b> [2] 1667/9 1705/9</p> <hr/> <p><b>U</b></p> <p><b>unable</b> [1] 1655/15</p> <p><b>unclear</b> [2] 1546/12 1655/1</p> <p><b>under</b> [58] 1506/17 1507/5 1516/14 1525/5 1527/23 1531/6 1538/7 1540/15 1542/19 1546/9 1555/2 1555/11 1558/17 1559/9 1562/22 1565/14 1565/17 1566/2 1566/11 1567/11 1571/15 1572/5 1572/8 1583/16 1588/16 1588/21 1591/13 1591/24 1594/2 1595/13 1601/23 1601/25 1607/14 1607/15 1624/6 1625/15 1648/13 1666/24 1667/4 1667/4 1668/24 1670/2 1671/21 1673/20 1673/23 1678/5 1678/16 1678/23 1702/8 1702/20 1702/23 1703/1 1704/14 1708/10 1710/21 1713/9 1716/25 1730/7</p> <p><b>undergraduate</b> [1] 1662/2</p> <p><b>underlying</b> [1] 1655/25</p> <p><b>undermine</b> [1] 1665/2</p> <p><b>understand</b> [67] 1514/10 1515/23 1517/14 1517/19 1517/23 1519/17 1520/22 1529/6 1529/16 1529/20 1530/3 1550/3 1552/25 1555/23</p>	<p>1562/24 1563/20 1564/3 1565/16 1566/21 1567/10 1573/18 1574/14 1580/19 1584/7 1584/12 1593/1 1594/10 1595/7 1597/6 1597/20 1600/14 1601/23 1606/12 1607/10 1612/18 1624/17 1630/2 1645/23 1649/20 1654/25 1656/7 1659/5 1660/8 1660/19 1663/8 1679/8 1679/21 1680/3 1685/13 1687/14 1689/23 1690/18 1700/24 1704/2 1704/21 1705/3 1707/5 1707/9 1708/11 1714/25 1723/3 1723/9 1723/22 1726/11 1726/16 1726/18 1726/19</p> <p><b>understandable</b> [1] 1703/19</p> <p><b>understanding</b> [14] 1518/1 1521/12 1554/8 1559/13 1575/21 1629/25 1630/4 1630/8 1630/13 1632/11 1636/17 1645/8 1659/8 1663/8</p> <p><b>understands</b> [2] 1673/3 1727/5</p> <p><b>understood</b> [5] 1592/2 1599/23 1600/20 1614/1 1671/3</p> <p><b>undertake</b> [2] 1705/24 1707/12</p> <p><b>undertook</b> [1] 1725/4</p> <p><b>unfortunately</b> [3] 1511/13 1511/14 1668/20</p> <p><b>unhelpful</b> [1] 1599/19</p> <p><b>United</b> [1] 1527/1</p> <p><b>Universidad</b> [2] 1662/3 1662/9</p> <p><b>universities</b> [2] 1662/7 1682/16</p> <p><b>university</b> [10] 1662/8 1662/9 1682/17 1683/12 1683/13 1683/18 1684/2 1684/5 1684/7 1688/21</p> <p><b>unless</b> [4] 1517/3</p>	<p>1566/17 1606/25 1631/3</p> <p><b>UNP</b> [6] 1683/14 1683/24 1683/25 1684/2 1684/4 1684/9</p> <p><b>unprotected</b> [1] 1570/17</p> <p><b>until</b> [13] 1514/12 1544/22 1553/8 1566/3 1595/19 1660/2 1686/9 1701/5 1701/9 1720/3 1722/13 1730/5 1730/5</p> <p><b>unusual</b> [1] 1549/16</p> <p><b>up</b> [46] 1511/22 1518/7 1518/12 1520/20 1540/9 1543/10 1544/14 1546/7 1547/16 1551/25 1565/14 1569/11 1577/17 1583/2 1596/25 1597/13 1597/17 1603/6 1603/7 1603/16 1603/16 1618/3 1620/2 1621/19 1634/15 1634/18 1636/10 1641/13 1653/7 1656/4 1660/19 1660/24 1677/14 1677/18 1677/19 1701/18 1702/5 1703/8 1706/3 1706/4 1709/18 1712/8 1713/19 1713/22 1714/23 1717/23</p> <p><b>update</b> [1] 1600/5</p> <p><b>updated</b> [2] 1536/8 1621/6</p> <p><b>uploads</b> [1] 1536/9</p> <p><b>UPOLI</b> [6] 1682/18 1682/20 1682/25 1683/17 1683/17 1684/4</p> <p><b>upon</b> [7] 1535/10 1550/11 1608/12 1647/15 1648/17 1655/3 1660/16</p> <p><b>upper</b> [1] 1713/17</p> <p><b>urgency</b> [1] 1623/8</p> <p><b>urgent</b> [15] 1527/23 1528/9 1623/8 1663/10 1663/16 1664/3 1664/12 1665/21 1671/16 1672/12 1672/17 1672/21 1672/23 1690/16 1692/4</p> <p><b>us</b> [64] 1508/18 1509/1 1510/19 1519/3 1520/25</p>
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[59]</b> 1521/7 1522/4 1524/24 1526/16 1529/16 1536/5 1541/4 1543/2 1557/8 1567/11 1570/7 1570/7 1573/13 1574/25 1575/2 1579/18 1581/1 1597/18 1601/6 1601/14 1617/8 1624/15 1624/16 1627/11 1631/4 1650/9 1654/5 1655/3 1657/9 1662/15 1667/11 1671/15 1671/15 1674/20 1680/15 1686/4 1686/11 1686/13 1691/2 1692/21 1695/1 1695/8 1697/15 1698/15 1698/15 1699/17 1705/11 1706/9 1707/19 1710/13 1711/10 1715/1 1718/1 1720/13 1720/24 1722/1 1723/7 1723/21 1727/17 <b>use [38]</b> 1507/14 1508/12 1508/25 1528/24 1544/7 1544/9 1548/14 1556/12 1556/25 1570/17 1570/18 1571/5 1572/9 1574/5 1576/24 1587/1 1587/2 1588/17 1589/6 1589/14 1589/18 1590/20 1591/5 1591/6 1591/15 1591/18 1591/19 1591/24 1592/8 1607/25 1608/23 1639/7 1655/16 1676/3 1695/17 1701/16 1704/13 1723/14 <b>used [11]</b> 1544/4 1570/2 1588/25 1592/11 1655/6 1655/15 1684/3 1684/7 1714/20 1714/21 1714/21 <b>useful [1]</b> 1535/6 <b>user [1]</b> 1536/23 <b>uses [1]</b> 1572/10 <b>usual [1]</b> 1730/2 <b>usually [1]</b> 1729/16 <b>utility [1]</b> 1665/10 <b>utilized [1]</b> 1589/4</p>	<p><b>V</b></p> <p><b>vacuum [1]</b> 1608/1 <b>valid [8]</b> 1529/12 1530/7 1530/9 1568/22 1587/11 1587/13 1673/15 1698/12 <b>validated [2]</b> 1673/16 1723/16 <b>validation [2]</b> 1723/16 1727/14 <b>validity [2]</b> 1637/20 1639/11 <b>value [1]</b> 1655/16 <b>various [1]</b> 1662/7 <b>Veijo [2]</b> 1500/21 1501/5 <b>Velasquez [1]</b> 1632/21 <b>venire [2]</b> 1678/9 1678/17 <b>ventured [1]</b> 1590/2 <b>verifiable [1]</b> 1594/3 <b>verify [1]</b> 1578/17 <b>verity [1]</b> 1677/12 <b>version [27]</b> 1538/10 1540/3 1542/5 1542/7 1543/14 1543/19 1544/7 1572/13 1580/9 1583/20 1583/22 1583/23 1584/11 1600/10 1600/18 1603/8 1603/10 1603/15 1604/10 1604/11 1604/11 1604/12 1604/14 1604/18 1636/10 1640/9 1691/24 <b>versions [1]</b> 1603/7 <b>versus [1]</b> 1677/21 <b>very [78]</b> 1511/10 1513/3 1514/9 1518/25 1519/1 1523/18 1527/6 1528/22 1532/1 1532/2 1535/16 1536/3 1544/22 1546/12 1546/16 1549/19 1550/6 1550/10 1564/18 1568/25 1577/12 1578/12 1578/15 1578/22 1586/5 1589/12 1594/14 1595/18 1596/22 1597/4 1597/14 1599/12 1601/3 1601/11 1603/9 1616/17 1617/19 1617/21 1618/20 1623/11 1628/2 1631/11 1632/7</p>	<p>1635/17 1643/13 1644/9 1646/16 1647/17 1650/4 1658/25 1659/14 1659/15 1659/22 1659/23 1660/18 1661/6 1674/21 1677/20 1680/3 1682/3 1682/16 1691/21 1698/12 1698/22 1700/18 1700/23 1703/10 1713/19 1714/23 1717/20 1719/4 1719/9 1724/17 1727/19 1728/5 1729/22 1730/4 1730/9 <b>vheiskanen [1]</b> 1501/5 <b>viability [1]</b> 1705/21 <b>vice [1]</b> 1708/14 <b>view [11]</b> 1509/17 1509/22 1529/23 1569/19 1610/6 1610/22 1627/25 1634/25 1635/1 1639/22 1713/9 <b>viewpoint [2]</b> 1676/12 1678/8 <b>views [1]</b> 1613/11 <b>violated [8]</b> 1608/17 1609/7 1627/20 1657/3 1657/5 1711/21 1716/23 1716/24 <b>violation [11]</b> 1609/17 1609/25 1614/15 1614/15 1624/22 1624/23 1631/5 1656/22 1657/7 1714/9 1716/8 <b>violations [2]</b> 1605/21 1626/5 <b>violence [1]</b> 1625/15 <b>vires [1]</b> 1646/3 <b>Virtual [1]</b> 1688/7 <b>vis [2]</b> 1677/3 1677/3 <b>vis-à-vis [1]</b> 1677/3 <b>visit [3]</b> 1612/10 1677/11 1679/1 <b>visits [5]</b> 1612/13 1612/16 1612/18 1612/20 1612/24 <b>vocation [1]</b> 1589/8 <b>voice [2]</b> 1528/18 1528/22 <b>void [25]</b> 1522/17 1523/3 1523/6 1523/7 1523/9 1523/14 1523/17 1525/21 1527/12 1527/14 1530/21 1531/24</p>	<p>1532/9 1622/20 1625/8 1628/1 1673/1 1673/4 1673/19 1673/24 1718/6 1718/8 1718/14 1718/24 1720/12 <b>voidability [2]</b> 1720/17 1720/20 <b>voidable [6]</b> 1673/1 1673/3 1673/18 1673/23 1718/24 1720/10 <b>volume [3]</b> 1500/16 1528/23 1700/19 <b>voluntary [2]</b> 1559/13 1567/3</p> <hr/> <p><b>W</b></p> <p><b>wait [10]</b> 1514/12 1526/18 1544/22 1554/4 1584/10 1643/4 1643/10 1683/2 1683/6 1685/22 <b>waive [1]</b> 1723/14 <b>waived [1]</b> 1723/11 <b>want [59]</b> 1505/11 1506/9 1507/3 1508/21 1511/4 1511/11 1511/20 1513/6 1518/8 1518/20 1518/22 1518/23 1518/23 1521/25 1530/16 1534/5 1550/14 1561/20 1563/14 1563/18 1563/24 1564/2 1564/17 1567/9 1568/9 1569/5 1569/5 1569/12 1576/12 1578/11 1578/11 1585/6 1585/8 1599/15 1604/19 1607/1 1613/10 1617/3 1618/13 1623/17 1623/18 1637/1 1641/13 1641/24 1642/1 1643/24 1651/24 1652/9 1654/25 1655/18 1655/20 1659/12 1667/5 1677/6 1693/14 1698/3 1701/14 1717/23 1729/1 <b>wanted [24]</b> 1506/5 1506/16 1506/19 1509/6 1512/1 1518/6 1520/19 1520/20 1521/23 1532/3 1554/1 1587/20 1588/3 1614/11</p>	<p>1622/22 1625/3 1650/19 1659/5 1677/21 1678/2 1678/3 1678/4 1678/14 1729/19 <b>wants [6]</b> 1517/21 1580/21 1643/7 1657/4 1678/10 1702/22 <b>warning [1]</b> 1639/16 <b>was [350]</b> <b>was one [1]</b> 1655/12 <b>Washington [1]</b> 1500/17 <b>wasn't [9]</b> 1532/18 1569/9 1594/16 1612/21 1627/3 1629/6 1636/23 1643/14 1659/2 <b>waste [1]</b> 1643/8 <b>wastewater [3]</b> 1640/13 1644/19 1646/8 <b>watching [1]</b> 1543/3 <b>water [23]</b> 1556/1 1562/13 1592/20 1593/6 1593/16 1593/19 1593/23 1595/12 1608/17 1608/23 1609/7 1609/19 1609/20 1609/21 1609/25 1611/25 1612/1 1612/5 1612/6 1640/14 1640/17 1644/20 1646/9 <b>way [17]</b> 1507/6 1536/9 1536/17 1536/19 1537/5 1550/11 1550/12 1550/14 1569/4 1569/4 1569/8 1602/11 1631/7 1642/16 1680/8 1708/7 1728/24 <b>we [391]</b> <b>we'd [2]</b> 1600/17 1649/22 <b>we'll [18]</b> 1507/18 1508/13 1531/22 1538/23 1540/6 1564/1 1564/5 1596/25 1597/17 1641/13 1641/18 1645/11 1657/19 1701/12 1719/17 1719/25 1720/1 1727/23 <b>we're [55]</b> 1505/21 1506/7 1508/24 1510/19 1511/6 1512/12 1512/12 1512/13 1513/10</p>
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<b>W</b>	1681/20 1682/3	1509/12 1512/1	1615/21 1616/11	1625/13 1625/15
<b>we're... [46]</b> 1513/20	1682/16 1688/22	1514/7 1514/20	1620/5 1621/7	1625/17 1625/20
1513/22 1517/24	1690/24 1691/21	1515/23 1515/24	1621/20 1627/19	1625/23 1626/15
1518/1 1518/10	1696/19 1700/23	1518/5 1518/7	1629/24 1630/12	1627/17 1628/4
1538/3 1538/9	1705/24 1708/1	1518/15 1518/22	1631/13 1631/15	1629/25 1630/13
1538/13 1538/24	1710/3 1714/11	1520/13 1522/1	1632/5 1632/6	1630/16 1630/19
1545/6 1547/20	1714/20 1719/23	1522/14 1527/11	1632/22 1633/23	1630/24 1631/1
1549/19 1554/6	1721/6 1723/16	1528/8 1528/12	1635/1 1637/2 1642/7	1637/19 1641/12
1565/12 1577/25	1728/5	1529/19 1530/2	1644/25 1648/23	1652/1 1654/16
1578/22 1581/25	<b>well-known [1]</b>	1530/8 1531/2 1531/7	1650/5 1650/9	1654/17 1657/2
1584/12 1584/16	1535/25	1531/22 1532/3	1650/12 1653/18	1657/4 1657/19
1596/14 1609/2	<b>went [7]</b> 1569/4	1532/4 1532/5	1656/1 1656/8 1656/9	1669/18 1669/21
1610/11 1617/15	1611/2 1621/18	1532/15 1536/1	1657/3 1658/22	1670/19 1678/25
1637/6 1637/20	1622/1 1639/6 1647/4	1537/6 1537/8	1665/16 1667/5	1681/11 1681/16
1642/9 1643/5	1725/5	1539/22 1539/24	1667/11 1667/16	1682/3 1685/10
1645/21 1659/3	<b>were [94]</b> 1505/23	1540/9 1540/19	1667/20 1668/9	1685/22 1686/16
1659/4 1659/11	1507/18 1508/4	1540/22 1541/3	1668/23 1669/8	1687/14 1690/4
1670/19 1687/8	1511/11 1520/7	1541/3 1542/22	1670/1 1673/12	1691/22 1693/24
1691/17 1696/15	1520/22 1523/21	1543/25 1544/15	1674/14 1675/3	1695/10 1702/16
1701/1 1701/17	1526/4 1529/22	1546/2 1547/15	1675/3 1677/2 1677/3	1703/5 1703/17
1701/17 1703/19	1530/1 1530/5	1549/24 1550/11	1681/7 1681/23	1705/25 1706/4
1712/13 1716/11	1533/12 1543/25	1550/24 1551/5	1682/2 1684/7 1687/4	1706/6 1706/8
1719/4 1727/18	1544/1 1544/3 1544/3	1552/16 1552/16	1692/16 1692/25	1708/24 1710/5
1728/24 1729/20	1552/3 1552/5	1552/20 1555/9	1696/8 1697/8 1698/7	1710/9 1711/19
1730/1	1565/14 1573/14	1555/16 1556/9	1698/9 1698/10	1714/3 1722/20
<b>we've [9]</b> 1568/25	1581/14 1581/14	1558/6 1558/18	1698/16 1699/5	1723/8 1724/14
1577/25 1617/1	1593/2 1595/10	1561/18 1562/20	1702/4 1702/11	1724/21 1725/11
1617/3 1642/8 1702/5	1597/2 1600/6	1565/11 1565/13	1702/11 1702/18	1725/13 1725/21
1710/25 1720/10	1605/24 1607/20	1566/18 1566/19	1702/18 1703/3	1725/22 1726/2
1722/12	1612/18 1613/7	1566/19 1566/25	1705/2 1705/3	1726/2 1726/7
<b>week [1]</b> 1509/10	1613/13 1613/21	1573/20 1574/1	1705/17 1706/3	1726/13 1726/19
<b>weight [1]</b> 1529/17	1614/19 1619/2	1574/3 1574/23	1709/7 1710/24	1726/24 1726/25
<b>Welcome [1]</b> 1660/7	1623/12 1623/21	1574/23 1578/9	1711/9 1712/20	1727/2
<b>well [76]</b> 1509/14	1624/13 1628/9	1578/21 1579/18	1713/23 1714/25	<b>whenever [3]</b>
1514/9 1518/18	1628/14 1631/12	1581/5 1582/7	1715/3 1715/5 1717/4	1625/25 1672/1
1521/6 1523/12	1632/8 1633/16	1582/19 1582/24	1717/7 1718/12	1692/3
1527/6 1535/16	1634/13 1636/6	1585/3 1585/10	1718/17 1721/14	<b>where [50]</b> 1515/4
1535/25 1536/3	1636/13 1637/7	1585/13 1586/3	1721/18 1721/22	1524/19 1524/20
1537/12 1546/25	1638/1 1638/4 1638/9	1586/4 1587/3	1726/5 1726/16	1526/14 1531/13
1557/14 1558/2	1638/25 1640/25	1587/14 1587/21	1727/25 1729/18	1533/25 1541/24
1560/3 1560/24	1641/7 1641/14	1588/2 1589/7 1589/8	<b>what's [3]</b> 1532/21	1541/25 1572/18
1565/11 1576/10	1645/25 1648/7	1589/15 1590/22	1546/3 1705/5	1578/6 1578/9
1580/24 1581/25	1648/24 1649/21	1591/1 1592/15	<b>whatever [4]</b>	1578/18 1583/2
1596/22 1602/7	1651/7 1651/14	1592/18 1592/21	1537/13 1566/16	1588/2 1594/7
1606/4 1615/11	1653/3 1654/13	1593/15 1593/24	1602/13 1690/3	1594/11 1598/20
1621/12 1627/18	1656/1 1656/2	1595/3 1595/15	<b>whatsoever [2]</b>	1598/25 1599/22
1632/3 1633/1	1656/10 1659/6	1596/18 1597/17	1621/6 1702/10	1602/17 1610/11
1634/17 1636/20	1659/13 1670/2	1600/7 1602/3	<b>when [96]</b> 1505/22	1615/21 1629/13
1643/25 1644/24	1677/23 1681/11	1602/16 1603/23	1515/4 1518/11	1635/20 1635/25
1646/17 1650/6	1682/12 1682/15	1604/9 1606/21	1520/17 1521/5	1637/14 1640/11
1654/10 1656/2	1682/22 1683/24	1607/10 1607/19	1531/12 1531/23	1643/11 1645/9
1656/5 1656/12	1684/25 1689/5	1607/22 1608/2	1533/13 1535/23	1648/2 1650/14
1656/23 1658/15	1693/7 1693/7	1608/2 1608/8	1536/3 1541/22	1650/15 1667/6
1662/6 1662/8	1693/16 1696/6	1608/24 1608/25	1552/4 1555/5	1668/17 1682/11
1662/14 1663/1	1696/21 1697/5	1609/2 1609/21	1571/23 1592/13	1682/16 1684/18
1663/2 1663/14	1698/10 1698/16	1610/10 1611/4	1599/9 1599/15	1684/19 1688/5
1664/23 1665/15	1701/19 1704/4	1611/15 1612/21	1613/21 1616/4	1697/3 1701/24
1669/10 1670/1	1707/16 1716/13	1612/21 1613/1	1617/8 1620/17	1702/6 1702/12
1673/20 1673/25	1718/5 1719/6 1720/6	1613/16 1613/18	1621/14 1621/16	1706/18 1710/19
1674/23 1677/1	1720/6 1722/9 1724/7	1613/20 1613/20	1621/17 1621/17	1712/8 1714/6
1677/20 1677/22	1725/3	1614/6 1614/7	1622/14 1623/4	1720/15 1729/13
1678/24 1679/9	<b>weren't [1]</b> 1599/19	1614/11 1615/10	1624/7 1624/21	1729/23
1679/17 1679/18	<b>what [215]</b> 1508/5	1615/12 1615/19	1624/24 1625/10	<b>whereby [2]</b> 1686/13

<p><b>W</b></p> <p><b>whereby... [1]</b> 1693/5</p> <p><b>wherever [1]</b> 1701/14</p> <p><b>whether [38]</b> 1509/11 1509/22 1520/19 1523/8 1523/13 1525/11 1527/13 1527/14 1530/4 1530/5 1551/14 1577/4 1597/6 1598/22 1598/23 1598/24 1623/12 1623/22 1626/6 1630/7 1630/8 1632/9 1635/4 1636/18 1638/1 1638/6 1639/3 1651/2 1652/14 1659/6 1672/25 1673/18 1673/23 1693/17 1697/4 1697/17 1709/7 1719/13</p> <p><b>which [100]</b> 1511/23 1515/21 1516/7 1519/10 1522/24 1523/21 1525/21 1525/22 1527/9 1528/6 1530/12 1533/5 1538/1 1538/2 1539/3 1539/4 1540/2 1540/22 1540/24 1540/24 1541/6 1542/14 1544/25 1545/3 1545/4 1545/22 1546/19 1547/23 1549/3 1549/7 1549/7 1550/16 1554/14 1563/25 1564/19 1569/16 1572/8 1577/2 1577/10 1580/23 1581/13 1581/14 1584/17 1585/8 1586/13 1587/4 1587/6 1592/17 1600/18 1603/7 1603/10 1603/10 1603/15 1603/17 1608/1 1613/24 1620/12 1620/24 1622/15 1623/3 1624/21 1625/21 1626/24 1628/18 1628/20 1628/21 1631/2 1632/20 1635/15 1635/22 1637/7 1650/12 1655/6 1656/16 1657/3 1657/18 1662/17 1662/21 1663/6</p>	<p>1664/12 1664/16 1664/17 1665/6 1665/19 1670/16 1672/7 1676/1 1677/17 1680/9 1701/2 1702/17 1706/2 1706/2 1709/4 1711/15 1711/21 1714/1 1714/9 1714/13 1714/13</p> <p><b>while [4]</b> 1505/21 1506/7 1603/19 1654/2</p> <p><b>who [40]</b> 1510/20 1541/22 1546/19 1548/3 1548/5 1570/23 1581/8 1586/19 1611/11 1611/20 1612/1 1617/17 1620/22 1632/3 1632/18 1633/4 1652/1 1652/18 1658/17 1669/17 1670/6 1670/23 1685/8 1685/17 1689/25 1699/23 1700/9 1703/20 1703/22 1703/24 1704/8 1705/9 1705/12 1705/23 1706/1 1708/24 1714/2 1714/15 1715/20 1727/3</p> <p><b>whoever [1]</b> 1621/1</p> <p><b>whole [3]</b> 1508/16 1570/23 1711/21</p> <p><b>whom [1]</b> 1703/22</p> <p><b>whomever [1]</b> 1512/18</p> <p><b>whose [3]</b> 1547/25 1633/25 1634/1</p> <p><b>why [41]</b> 1510/24 1511/16 1517/20 1518/19 1524/3 1529/15 1529/16 1529/20 1530/4 1549/20 1551/1 1580/1 1586/24 1587/20 1588/12 1597/2 1597/22 1604/5 1604/6 1604/18 1609/20 1626/15 1627/23 1642/15 1643/4 1669/15 1677/4 1677/7 1679/2 1679/8 1702/19 1703/23 1704/9 1704/14 1714/4 1714/19 1716/4 1716/13 1718/23 1720/6 1722/7</p>	<p><b>widely [2]</b> 1714/20 1714/21</p> <p><b>wildlife [46]</b> 1553/24 1554/17 1554/25 1555/3 1559/9 1559/10 1560/16 1560/21 1561/3 1562/1 1565/7 1565/18 1565/23 1566/4 1566/7 1566/7 1566/23 1568/3 1574/11 1579/21 1579/25 1582/4 1585/22 1609/13 1610/7 1610/23 1610/25 1633/17 1638/10 1639/5 1639/9 1663/12 1674/12 1674/14 1674/21 1674/24 1675/14 1675/17 1676/17 1676/21 1676/25 1677/1 1677/6 1677/9 1678/15 1678/21</p> <p><b>will [113]</b> 1505/19 1507/5 1508/19 1509/7 1509/16 1509/20 1510/12 1511/4 1517/2 1517/5 1517/23 1521/10 1522/4 1522/16 1523/6 1528/14 1531/21 1532/11 1532/12 1538/4 1543/1 1549/2 1550/20 1553/1 1553/4 1553/19 1553/23 1554/1 1554/3 1555/18 1556/16 1556/21 1559/6 1564/1 1564/9 1564/21 1568/8 1570/6 1570/23 1571/24 1577/17 1579/15 1580/24 1595/15 1597/13 1597/18 1598/16 1598/21 1598/25 1599/8 1601/4 1602/7 1604/6 1608/21 1616/5 1616/6 1617/13 1617/17 1617/20 1617/22 1617/23 1617/25 1618/14 1619/13 1620/13 1621/5 1621/7 1623/19 1624/1 1624/10 1627/16 1630/10 1635/18 1640/10 1641/11 1642/3 1642/18 1642/23</p>	<p>1642/24 1642/25 1646/16 1650/5 1652/25 1653/4 1660/5 1661/2 1664/23 1669/20 1673/14 1683/8 1686/9 1691/21 1694/2 1694/2 1694/8 1694/10 1695/3 1697/11 1697/12 1697/15 1701/5 1710/18 1718/8 1720/4 1720/5 1724/15 1727/7 1727/17 1729/12 1729/14 1729/23 1730/2 1730/8</p> <p><b>William [1]</b> 1502/15</p> <p><b>window [1]</b> 1706/2</p> <p><b>Winger [2]</b> 1502/18 1651/25</p> <p><b>wireless [3]</b> 1618/9 1618/11 1641/24</p> <p><b>wise [1]</b> 1674/21</p> <p><b>wish [2]</b> 1511/17 1694/23</p> <p><b>withdraw [4]</b> 1566/22 1566/25 1567/2 1635/18</p> <p><b>withdrew [2]</b> 1598/15 1686/21</p> <p><b>within [20]</b> 1527/10 1558/12 1560/24 1592/24 1594/7 1595/10 1609/13 1612/20 1644/21 1645/3 1645/4 1645/18 1646/3 1649/19 1657/24 1658/18 1678/25 1680/9 1694/11 1695/22</p> <p><b>without [16]</b> 1528/3 1528/10 1547/24 1556/9 1582/18 1615/15 1622/18 1625/11 1625/13 1625/20 1672/13 1676/5 1690/19 1692/5 1694/13 1714/4</p> <p><b>witness [43]</b> 1512/2 1517/12 1517/24 1544/4 1550/13 1557/21 1563/22 1578/7 1578/16 1578/23 1579/1 1579/6 1579/7 1580/15 1581/13 1583/24 1584/8 1592/19 1618/18 1635/14 1640/1 1641/4 1641/9</p>	<p>1641/10 1646/23 1650/3 1651/20 1651/21 1651/25 1652/4 1652/4 1652/7 1652/8 1652/18 1653/8 1653/11 1660/5 1660/11 1660/12 1680/4 1719/14 1719/21 1730/3</p> <p><b>witnesses [2]</b> 1509/23 1511/8</p> <p><b>won't [4]</b> 1510/4 1510/13 1552/5 1617/5</p> <p><b>wonder [2]</b> 1592/14 1656/6</p> <p><b>wonderful [3]</b> 1596/19 1605/23 1653/5</p> <p><b>wondering [1]</b> 1508/2</p> <p><b>wood [1]</b> 1678/4</p> <p><b>word [6]</b> 1513/2 1572/19 1592/21 1636/13 1723/14 1726/1</p> <p><b>words [12]</b> 1621/15 1633/12 1654/3 1666/12 1700/8 1704/13 1706/4 1725/10 1725/11 1725/15 1726/9 1726/23</p> <p><b>work [19]</b> 1535/14 1567/9 1597/16 1606/6 1618/10 1662/24 1680/9 1682/11 1682/13 1683/9 1683/16 1685/2 1685/11 1685/14 1686/4 1687/16 1688/19 1689/12 1728/19</p> <p><b>worked [13]</b> 1535/23 1535/24 1536/3 1682/11 1682/17 1683/11 1683/18 1684/9 1688/12 1688/14 1689/4 1689/7 1689/17</p> <p><b>working [4]</b> 1583/22 1682/7 1682/20 1683/24</p> <p><b>works [5]</b> 1616/14 1670/10 1670/10 1679/22 1713/21</p> <p><b>world [1]</b> 1601/18</p> <p><b>would [163]</b> 1506/6 1506/15 1508/12 1509/6 1509/9 1509/15 1509/17</p>
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<p><b>W</b></p> <p><b>would... [156]</b>  1510/5 1510/9  1510/16 1510/18  1510/21 1511/1  1511/10 1511/13  1511/14 1511/23  1519/1 1521/20  1521/23 1522/14  1522/19 1526/4  1526/9 1526/12  1530/3 1530/22  1530/24 1531/7  1533/17 1534/3  1534/6 1538/15  1549/15 1550/12  1550/13 1551/2  1557/3 1561/20  1565/8 1566/15  1566/21 1567/17  1568/2 1568/17  1569/24 1570/14  1571/4 1571/14  1572/9 1572/25  1573/10 1573/17  1573/19 1573/21  1574/5 1575/6  1580/20 1580/25  1584/1 1585/11  1595/13 1596/4  1596/9 1596/23  1597/3 1597/19  1598/9 1598/13  1599/5 1599/18  1600/3 1602/20  1604/24 1605/25  1607/21 1608/20  1610/19 1613/22  1614/2 1614/5 1615/6  1616/21 1618/17  1619/11 1623/6  1623/9 1624/8 1624/9  1624/11 1624/17  1625/2 1626/22  1627/14 1627/19  1628/6 1628/9  1628/15 1628/22  1629/24 1630/25  1631/1 1632/3  1632/25 1633/1  1634/24 1636/1  1636/20 1638/15  1638/22 1639/3  1639/22 1642/7  1642/11 1642/15  1643/10 1644/21  1645/4 1646/1 1646/9  1646/19 1648/19  1648/24 1649/1  1650/13 1652/13  1660/23 1666/13  1668/12 1668/15  1668/25 1669/13</p>	<p>1669/22 1674/3  1678/13 1678/17  1682/1 1683/17  1683/22 1685/11  1686/22 1687/25  1689/20 1693/6  1693/11 1693/15  1693/23 1700/15  1700/17 1701/14  1703/9 1703/13  1704/18 1705/14  1705/18 1705/20  1707/17 1708/8  1711/15 1717/9  1719/14 1726/13  1729/6</p> <p><b>wouldn't [8]</b>  1521/14 1521/16  1556/14 1570/19  1685/2 1704/10  1704/22 1723/14</p> <p><b>wrap [3]</b> 1677/14  1677/17 1677/19</p> <p><b>write [1]</b> 1706/4</p> <p><b>writing [1]</b> 1596/11</p> <p><b>written [4]</b> 1597/8  1597/11 1597/21  1696/22</p> <p><b>wrong [4]</b> 1538/2  1541/14 1542/3  1561/13</p> <p><b>wrote [4]</b> 1514/20  1549/17 1613/18  1715/20</p> <hr/> <p><b>X</b></p> <p><b>x-ray [1]</b> 1705/5</p> <p><b>XYZ [1]</b> 1602/7</p> <hr/> <p><b>Y</b></p> <p><b>yeah [9]</b> 1539/9  1539/20 1541/3  1556/7 1566/7 1599/7  1606/4 1618/12  1632/19</p> <p><b>year [5]</b> 1520/10  1547/3 1674/2  1686/18 1686/24</p> <p><b>year's [1]</b> 1604/5</p> <p><b>years [22]</b> 1523/22  1523/23 1531/10  1531/11 1531/11  1531/13 1531/16  1532/5 1532/16  1536/4 1536/9  1536/17 1559/6  1619/14 1620/24  1621/13 1628/22  1630/24 1630/25  1633/4 1664/13  1674/4</p> <p><b>yellow [2]</b> 1546/7  1671/9</p>	<p><b>yes [283]</b>  <b>yesterday [14]</b>  1506/14 1507/9  1507/19 1516/4  1528/9 1530/23  1538/5 1538/8  1538/15 1543/14  1548/9 1600/24  1628/3 1642/4</p> <p><b>yet [7]</b> 1509/21  1517/9 1523/10  1545/16 1589/17  1589/17 1600/13</p> <p><b>you [1009]</b>  <b>you'd [3]</b> 1571/1  1656/6 1725/6</p> <p><b>you'll [6]</b> 1505/19  1507/3 1597/12  1660/7 1660/19  1714/19</p> <p><b>you're [55]</b> 1506/19  1507/24 1522/1  1526/8 1528/20  1534/13 1536/2  1536/15 1543/9  1544/15 1555/16  1563/25 1564/3  1570/25 1571/9  1577/13 1577/24  1578/15 1578/23  1578/23 1593/8  1594/6 1603/8  1603/11 1603/19  1605/3 1610/9 1617/8  1641/8 1644/25  1649/11 1656/20  1666/17 1669/1  1669/11 1670/3  1670/11 1670/12  1685/10 1688/17  1690/6 1690/9  1703/11 1704/20  1709/5 1709/23  1715/8 1723/23  1725/10 1725/15  1726/1 1726/2 1726/8  1726/11 1726/24</p> <p><b>you've [13]</b> 1550/15  1578/13 1578/18  1585/10 1646/1  1653/21 1655/21  1656/3 1659/14  1698/15 1701/2  1705/11 1714/25</p> <p><b>your [194]</b> 1509/25  1510/2 1510/2  1511/19 1511/20  1513/11 1513/24  1514/4 1514/6  1514/10 1514/10  1514/14 1514/20  1514/25 1517/6  1517/24 1517/24</p>	<p>1518/2 1519/4  1520/14 1521/2  1521/13 1521/14  1521/17 1521/22  1522/2 1522/14  1522/15 1528/15  1528/18 1528/23  1529/6 1529/7  1529/10 1529/13  1529/21 1529/23  1530/3 1530/6  1530/19 1530/22  1530/25 1532/1  1532/24 1533/2  1537/9 1547/1 1547/4  1548/24 1549/8  1551/11 1551/17  1552/20 1552/22  1552/25 1553/11  1553/19 1553/23  1554/18 1554/23  1557/20 1558/21  1561/8 1564/3  1565/16 1567/20  1568/11 1568/20  1568/23 1569/5  1571/13 1573/9  1574/14 1574/19  1575/21 1586/9  1588/5 1588/6  1588/11 1589/19  1589/23 1590/8  1591/1 1591/7  1591/17 1593/11  1593/21 1593/22  1595/3 1595/21  1596/15 1597/24  1601/23 1606/12  1608/16 1609/23  1612/9 1613/4 1613/5  1613/11 1613/11  1613/15 1613/24  1615/14 1615/23  1615/24 1616/8  1616/15 1616/17  1618/13 1619/2  1620/13 1623/18  1626/2 1629/25  1630/13 1636/17  1638/12 1639/2  1639/22 1640/1  1644/3 1645/9 1645/9  1645/18 1647/8  1647/9 1647/14  1648/11 1648/15  1649/17 1651/2  1651/16 1651/20  1651/24 1652/23  1653/23 1654/1  1655/1 1659/20  1659/23 1661/16  1677/13 1677/17  1680/1 1680/7</p>	<p>1680/15 1680/19  1681/10 1682/3  1682/6 1684/9  1684/15 1684/15  1684/19 1684/22  1685/8 1685/13  1685/19 1685/25  1686/22 1687/9  1688/5 1688/16  1688/18 1688/25  1689/10 1690/6  1690/15 1690/15  1696/3 1696/10  1697/6 1697/23  1699/17 1700/8  1700/24 1701/17  1702/9 1704/2 1704/5  1706/9 1706/16  1707/9 1710/4 1715/1  1715/16 1722/15  1723/4 1723/10  1723/10 1726/12  1726/18 1730/7</p> <p><b>yours [1]</b> 1601/10</p> <p><b>yourself [6]</b> 1578/14  1578/20 1585/2  1653/16 1679/21  1713/7</p> <hr/> <p><b>Z</b></p> <p><b>Zetina [1]</b> 1503/8</p> <p><b>zone [1]</b> 1659/7</p> <p><b>zoographic [1]</b>  1555/14</p> <p><b>zoom [6]</b> 1525/1  1526/21 1582/21  1583/12 1632/15  1691/19</p> <p><b>Zuniga [1]</b> 1503/10</p> <hr/> <p><b>á</b></p> <p><b>área [1]</b> 1571/17</p>
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