

## Melsheimer, Andrew (DAL - X61305)

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**From:** Melsheimer, Andrew (DAL - X61305)  
**Sent:** Monday, January 23, 2023 6:44 PM  
**To:** 'Roberto Keoseyan A'  
**Cc:** Derman, Andrew B (DAL - X61307); Browndorf, Cole (DAL - X61381); Porter, Javan (DAL - X61345)  
**Subject:** RE: Finley v. Mexico

Dear Rob:

You told me that you have a WhatsApp message exchange with Rodrigo about meeting at La Aceituna on September 26, 2018. In fact, you explained your messages were about him running late. That is a fact that is relevant and material to the outcome of our arbitration.

You also told me that you have a WhatsApp message exchange with Rodrigo on October 1, 2018 about a possible settlement. I am using your description of your exchange.

You then told me that you and a colleague (perhaps Juan José Paullada?) met with the magistrate between these two dates, because otherwise, you would not have had the October 1, 2018 exchange with Rodrigo.

As I said before, it would be very helpful if you shared these communications with us. Our preference is to avoid issues when there are alternative ways to obtain such information.

We kindly ask you to reconsider and appreciate your cooperation.

Saludos cordiales,

Andrew

**Andrew Melsheimer | Holland & Knight**

Partner

Holland & Knight LLP

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**From:** Roberto Keoseyan A [REDACTED]  
**Sent:** Monday, January 23, 2023 6:30 PM  
**To:** Melsheimer, Andrew (DAL - X61305) <Andrew.Melsheimer@hklaw.com>  
**Cc:** Derman, Andrew B (DAL - X61307) <Andrew.Derman@hklaw.com>; Browndorf, Cole (DAL - X61381) <Cole.Browndorf@hklaw.com>; Porter, Javan (DAL - X61345) <Javan.Porter@hklaw.com>  
**Subject:** Re: Finley v. Mexico

*[External email]*

Andrew:

Clarifying the conversation we had today, please I want to ratify that I do not recall the presence of Rodrigo in the lunch with Adolfo and Luis at La Aceituna.

Also I did not have meetings with him to discuss a possible settlement as I was not hired by Luis and his company.

And Finally I want to ratify to you what I told Luis this morning, I do not wish to be involved in this matter any further.

Thank you.

Enviado desde mi iPhone

El 23 ene 2023, a la(s) 18:17, Melsheimer, Andrew (DAL - X61305) <[Andrew.Melsheimer@hklaw.com](mailto:Andrew.Melsheimer@hklaw.com)> escribió:

Dear Rob,

Thank you for talking with me today over the Teams platform.

Also, thank you for calling me afterwards to fill in some gaps with information from your WhatsApp chats with Rodrigo, particularly that you all met with Luis and Adolfo Hellmund at La Aceituna on September 26, 2018 and then had chats with Rodrigo about possible settlement on October 1, 2018.

During our Teams discussion, you agreed to share your WhatsApp chats with Rodrigo. Obviously, we are only interested in those chats related to the Finley / Drake-Mesa matter that we discussed.

In addition, it would be helpful if you shared the communications relating to your visit with the magistrate, which you said occurred at some point between September 26, 2018 and October 1, 2018.

Please let us know how we can help in sharing those communications with us. For example, we can establish a Box site (or something similar) to receive them.

As we discussed today, our goal is to obtain facts that are key to our dispute with Mexico. In doing so, we make every effort to do so without issue. We appreciate your cooperation thus far and going forward.

Saludos cordiales,

Andrew

**Andrew Melsheimer | Holland & Knight**

Partner

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**From:** Lic. Keoseyan R [REDACTED]

**Sent:** Monday, January 23, 2023 12:21 PM

**To:** Melsheimer, Andrew (DAL - X61305) <[Andrew.Melsheimer@hklaw.com](mailto:Andrew.Melsheimer@hklaw.com)>; Derman, Andrew B (DAL -

X61307) <[Andrew.Derman@hklaw.com](mailto:Andrew.Derman@hklaw.com)>; Browndorf, Cole (DAL - X61381) <[Cole.Browndorf@hklaw.com](mailto:Cole.Browndorf@hklaw.com)>; Porter, Javan (DAL - X61345) <[Javan.Porter@hklaw.com](mailto:Javan.Porter@hklaw.com)>  
**Subject:** RE: Finley v. Mexico

*[External email]*

Andrew:

I found some messages from those days.

Do you have time for a quick call. So I can explain.

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**De:** Melsheimer, Andrew (DAL - X61305) <[Andrew.Melsheimer@hklaw.com](mailto:Andrew.Melsheimer@hklaw.com)>

**Enviado el:** lunes, 23 de enero de 2023 10:59 a. m.

**Para:** Roberto Keoseyan A [REDACTED]; Derman, Andrew B (DAL - X61307) <[Andrew.Derman@hklaw.com](mailto:Andrew.Derman@hklaw.com)>; Browndorf, Cole (DAL - X61381) <[Cole.Browndorf@hklaw.com](mailto:Cole.Browndorf@hklaw.com)>; Porter, Javan (DAL - X61345) <[Javan.Porter@hklaw.com](mailto:Javan.Porter@hklaw.com)>

**Asunto:** RE: Finley v. Mexico

Hi Rob.

We look forward to talking with you at 11 AM.

Saludos.

**Andrew Melsheimer | [Holland & Knight](#)**

Partner

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-----Original Appointment-----

**From:** Melsheimer, Andrew (DAL - X61305)

**Sent:** Thursday, January 19, 2023 1:33 PM

**To:** Melsheimer, Andrew (DAL - X61305); Roberto Keoseyan A; Derman, Andrew B (DAL - X61307); Browndorf, Cole (DAL - X61381); Porter, Javan (DAL - X61345)

**Subject:** Finley v. Mexico

**When:** Monday, January 23, 2023 11:00 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).

**Where:** Microsoft Teams Meeting

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