

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

J&F INVESTIMENTOS S.A.,
Av. Marginal Direita do Tietê, 500
Bloco: 1, Primeiro Andar
Vila Jaguara
São Paulo, SP 05118-100
Brazil

Plaintiff,

v.

TRENCH, ROSSI E WATANABE
ADVOGADOS,
Rua Arquiteto Olavo Redig De Campos, 105,
31° Andar, Ed. EZ Towers, Torre A,
São Paulo, SP 04711-904; and

BAKER & MCKENZIE LLP,
815 Connecticut Ave NW
Washington, DC 20006
United States,

Defendants.

Civil Action No. _____

Jury Demand

COMPLAINT

1. Plaintiff J&F Investimentos S.A. (“J&F”) brings this action against Defendants Trench, Rossi e Watanabe Advogados (“Trench Rossi”) and Baker & McKenzie LLP (“Baker” or “Baker McKenzie,” and together with Trench Rossi, “Defendants”).

PRELIMINARY STATEMENT

2. J&F engaged Baker McKenzie and Trench Rossi, closely affiliated law firms with offices in the United States and Brazil, to represent J&F in connection with investigations being pursued by authorities in each country. As a result of gross negligence by the Trench Rossi and

Baker attorneys hired to represent the interests of J&F, the company and several of its officers and directors are now at risk of criminal prosecution and even possibly imprisonment. J&F brings this action to hold Defendants responsible for their malpractice.

3. In early 2017, the same period in which they were representing J&F, Defendants Trench Rossi and Baker approved the hiring of a senior prosecutor in Brazil's Federal Prosecution Service ("MPF"), Marcello Miller, to become a partner at Trench Rossi. Defendants began having Mr. Miller participate as a member of the legal team representing J&F, working alongside attorneys from Trench Rossi's office in São Paulo and Baker's office in Washington, D.C., before he left his position with the MPF.

4. For several weeks while he was still employed as a prosecutor, Mr. Miller participated with Trench Rossi and Baker attorneys in strategy sessions and meetings with J&F and its personnel, including its general counsel. Mr. Miller also worked with partners from Trench Rossi and Baker on a presentation that he and those partners delivered on behalf of J&F, the day after Mr. Miller left the MPF, to officials from the United States Department of Justice ("DOJ") in Washington, D.C.

5. At no time did the responsible attorneys from Trench Rossi or Baker advise J&F that Mr. Miller's participation in the company's legal team, while he was still working as a prosecutor, was problematic. Defendants provided no indication that they had failed to take appropriate measures to ensure that Mr. Miller's participation as counsel to J&F would not be deemed improper and would not otherwise jeopardize J&F's interests.

6. Brazilian authorities are now seeking to tear up agreements entered into between Brazil's Office of the Prosecutor General ("PGR") and four of J&F's senior officers and directors, pursuant to which Brazilian authorities agreed not to prosecute those officers in exchange for their cooperation. The Brazilian authorities have also announced that they are investigating whether revelations concerning Mr. Miller's role will have any impact on an agreement entered into by J&F with the MPF providing for J&F's cooperation. One of the main reasons identified by the Brazilian authorities for taking these steps, and thereby exposing J&F's

officers and directors to possible criminal prosecution, is the highly irresponsible decision by Trench Rossi and Baker to include Mr. Miller as counsel to the company.

7. J&F relied on Defendants, as J&F's retained counsel, to take all appropriate steps to ensure that Mr. Miller's participation in the representation would be appropriate, and J&F had no reason to expect that Defendants had failed to do so. Defendants did fail, however, and that failure has resulted in severe harm to the company, including possible criminal exposure for its senior personnel, costs associated with working with Brazilian prosecutors in an effort to maintain previously secured agreements, and extreme damage to its reputation. The harm to J&F and its senior leaders is a direct consequence of Defendants' reckless and ill-advised decision to employ a government prosecutor as part of J&F's defense team, and to do so without advising J&F as to the implications of that decision.

JURISDICTION AND VENUE

8. Subject matter jurisdiction is conferred on this Court by D.C. Code § 11-921.

9. Personal jurisdiction is invoked pursuant to the provisions of D.C. Code §§ 13-422 and 13-423 because Defendant Baker maintains an office in the District of Columbia and the claims arise from both Baker and Trench Rossi's business transactions in the District of Columbia.

PARTIES

10. Plaintiff J&F is a Brazilian corporation that, through various affiliates and subsidiaries, is among the world's largest meat and poultry producers with hundreds of thousands of employees in Brazil and throughout the world.

11. Defendant Baker is a law firm with offices at locations throughout the United States, including an office at 815 Connecticut Avenue, N.W., Washington, D.C. 20006. Baker

markets itself as an international law firm, with offices throughout the world, including through its affiliation with Trench Rossi in Brazil.

12. Defendant Trench Rossi is an international law firm based in Brazil. At all relevant times, Trench Rossi was affiliated with Baker, which it represented to clients and prospective clients, including in its engagement letter with Defendants here, to be part of its worldwide network of affiliated law firms. For a time, the email addresses for Trench Rossi attorneys and other Trench Rossi personnel included, “@bakermckenzie.”

FACTUAL ALLEGATIONS

A. J&F Retains Trench Rossi and Baker As Counsel To Handle Investigations in The United States and Brazil

13. In early 2017, authorities in Brazil and the United States were separately investigating various companies in connection with a corruption scandal involving alleged payments to government officials in Brazil. J&F sought legal counsel capable of representing it in connection with simultaneous investigations in both countries.

14. Trench Rossi marketed itself as uniquely qualified to handle such a cross-border representation, both because of its expertise in corruption-related investigations in Brazil and because of its affiliation with Baker in the United States—an affiliation it features on its website to the present day. Likewise, Baker marketed itself as an international law firm, including on its website, where it reports having locations in Brazil based specifically on its affiliation with Trench Rossi.

15. J&F selected Trench Rossi as counsel in connection with the corruption investigations, in large part based on Trench Rossi’s affiliation with Baker in the United States. J&F entered into an engagement letter with Trench Rossi dated March 6, 2017. Later, on May 29, 2017, J&F entered into an engagement letter with Baker, though—as discussed below—the

firm's attorneys had already been working as part of the Trench Rossi team for two to three months by that time.

16. In its March 6 engagement letter, Trench Rossi confirmed and highlighted its affiliation with Baker, and Baker's role in the representation. Trench Rossi emphasized that it operates on a "global scale," and advised that it would be working "in cooperation with" Baker, and that Baker attorneys would be available as part of J&F's legal "team."

17. Esther Flesch, the head of Trench Rossi's white collar practice, signed the engagement letter on behalf of Trench Rossi, and, pursuant to its terms, was designated to serve as lead counsel for Trench Rossi in its representation of J&F. Trench Rossi marketed Ms. Flesch as a highly experienced and capable white collar attorney, and Ms. Flesch personally emphasized to J&F that her team would include United States counsel, from Baker, capable of advising in connection with the DOJ investigation.

B. Trench Rossi and Baker Hire Marcelo Miller, While He Was Still A Brazilian Prosecutor, To Work As Part Of J&F's Legal Team

18. Marcelo Miller was a member of the MPF involved in corruption prosecutions. Mr. Miller delivered a resignation letter to the MPF on or about February 23, 2017, but remained in his position with the MPF until on or about April 5, 2017.

19. At or around the time Mr. Miller gave notice that he was resigning from the MPF, he accepted an offer to join Defendant Trench Rossi as a partner in its white-collar practice, headed by Ms. Flesch. According to Ms. Flesch, as set out in an application she has pending in an action she instituted against Trench Rossi in Brazil in connection with her recent termination from the firm, the decision to hire Mr. Miller was a "joint decision" by the partners of Trench Rossi and Baker.

20. Throughout March 2017, J&F, through its officers, met regularly with attorneys from Trench Rossi and Baker, whose attorneys participated at least once in person in São Paulo and on other occasions by phone from their offices in Washington, D.C., to discuss strategy surrounding negotiations with authorities in Brazil and the United States, and to plan for J&F's

overall legal strategy. Mr. Miller acted as a member of J&F's legal team in a number of those meetings, though Ms. Flesch and her colleagues at Trench Rossi and Baker knew or should have known that he had not yet left his position as a prosecutor with the MPF.

21. A large focus of these meetings, and of Mr. Miller's involvement, concerned efforts to secure a leniency agreement between J&F and the Brazilian government, and to pursue a similar agreement with the DOJ to avoid prosecution in the United States. Defendants never advised J&F that Mr. Miller's participation as part of J&F's legal team posed any ethical concerns or otherwise jeopardized Defendants' ability to effectively represent J&F's interests.

22. Mr. Miller continued to be employed by the MPF until April 5, 2017. The next day, he delivered a presentation with Ms. Flesch and two partners from Baker's Washington D.C. office, Joan Meyer and John Rowley, to DOJ officials in Washington D.C. Ms. Meyer and Mr. Rowley are both identified on the Baker website as former prosecutors and specialists in criminal white collar investigations, and both were brought into the J&F legal team to lead negotiations with the DOJ.

23. The presentation to the DOJ by Mr. Miller, Ms. Flesch, Ms. Meyer and Mr. Rowley was substantial and detailed, and included the use of a PowerPoint presentation. All four attorneys had begun preparing for that presentation, and coordinating with one another, in advance of the April 6 meeting, while Mr. Miller was still employed by the MPF.

24. The bills sent to J&F by Trench Rossi confirm that Baker attorneys, and Mr. Miller, were participating in the J&F representation, including before Mr. Miller left his position with the MPF. Trench Rossi sent an invoice to J&F, dated May 17, 2017, that includes more than twenty time entries involving calls or meetings with Mr. Miller and/or Mr. Rowley and Ms. Meyer. For example, on her time entry for March 3, 2017, Ms. Flesch bills time for "internal and external meetings with Marcelo Miller." On March 24, 2017, Ms. Flesch and a Trench Rossi colleague, Camila Steinhoff, each billed time to a meeting with Mr. Miller "about the case." On her time entry for March 25, 2017, Ms. Flesch billed for conference calls with "Baker attorneys." On April 4, 2017, Ms. Flesch reported providing "Instructions to Baker attorneys in preparation

for DOJ meeting.” The next day, Ms. Steinhoff reported participating in a conference call with Mr. Rowley and Ms. Meyer “in preparation for the meetings in the United States,” and conferring with Ms. Flesch and Mr. Miller “about the case.”

C. Brazilian Authorities Act To Rescind Or Renegotiate Agreements With J&F and Its Personnel Based On Defendants’ Negligence in Hiring Mr. Miller To Represent the Company

25. On or around May 3, 2017, certain officers and directors of J&F—including Joesley Batista, Wesley Batista, Francisco de Assis e Silva and Ricardo Saud—entered into agreements with PGR. Mr. Assis was at that time, and remains, J&F’s General Counsel. The Batistas were on J&F’s Board of Directors. And Mr. Saud was J&F’s Director of Government Relations.

26. Pursuant to the terms of the May 3 agreements, the Batistas, Mr. Assis and Mr. Saud agreed to cooperate in the ongoing investigation and to pay fines, and the PGR agreed, in exchange, not to prosecute those individuals.

27. On or around June 5, 2017, J&F itself entered into a “leniency agreement” with Brazilian authorities pursuant to which it agreed to pay a significant amount in fines, 10.3 billion reais (approximately \$3.18 billion), and to cooperate in the ongoing corruption investigation.

28. Defendants’ decision to include Mr. Miller on J&F’s legal team has now placed the agreements in jeopardy. Brazilian authorities recently announced they have initiated steps to rescind the agreements entered into by Mr. Assis, Mr. Saud and the Batistas, citing Trench Rossi’s conflict of interest in having Mr. Miller represent J&F while simultaneously serving as a prosecutor. Brazilian authorities separately provided notice to J&F that they are investigating Mr. Miller’s role in the company’s representation and whether it would have any impact on J&F’s own agreement.

D. Trench Rossi and Baker Work Together To Try To Limit The Damage From Revelations About Their Decision To Hire Mr. Miller

29. The decision to rescind the agreements was widely reported in Brazil, with Trench Rossi coming under heavy criticism. It was reported, for instance, that Brazil's President, himself embroiled in the corruption scandal, had criticized Trench Rossi for including Mr. Miller as part of J&F's legal team. Defendants' misguided decision to hire Mr. Miller while he was still a prosecutor has also led to speculation in the media that J&F was to blame, which is incorrect, but has been damaging to J&F's reputation.

30. Attorneys for Trench Rossi and Baker went into damage control mode once their error became public. In an application she has pending in Court proceedings that she initiated against Trench Rossi in Brazil, Ms. Flesch describes an incident, in July 2017, in which lawyers from both firms met with Ms. Flesch in Miami, for more than ten hours, and "harassed" and "pressured" her as part of a larger effort to "scapegoat" her for hiring Mr. Miller to participate in representing J&F. According to Ms. Flesch, as noted above, Trench Rossi and Baker had in fact collaborated in the decision to hire Mr. Miller at Trench Rossi in the first place.

31. Defendants placed Ms. Flesch on leave from Trench Rossi in approximately July 2017, and, in September, removed her from her position with the firm. Ms. Flesch has filed suit against Trench Rossi in connection with her termination.

32. Also during late 2017, a Congressional committee in Brazil recommended that Mr. Miller be indicted in connection with his work at Trench Rossi, as part of the legal team representing J&F, while he was still employed as a prosecutor. Mr. Miller has been interviewed by Brazilian authorities and acknowledged meeting with J&F officers, and Trench Rossi attorneys, even before he officially left his position with the MPF.

33. If the Brazilian government succeeds in rescinding its agreements, which requires approval from the Brazilian Supreme Court, four J&F officers or directors—Joesley Batista, Wesley Batista, Mr. Assis and Mr. Saud—will be placed at risk of criminal prosecution and possibly imprisonment. Even if the leniency agreements ultimately survive, J&F is obligated to indemnify Joesley Batista and Ricardo Saud for the substantial legal fees they have already incurred, and will continue to incur, attempting to preserve their agreements. Moreover, J&F has

incurred costs on its own behalf, and will continue to incur costs, in connection with its ongoing negotiations with Brazilian authorities arising out of the MPF's decision to open an investigation into the status of J&F's leniency agreement in light of the revelations concerning Defendants' inclusion of Mr. Miller as part of the company's legal team.

FIRST CAUSE OF ACTION

(Professional Malpractice)

34. Plaintiff repeats and realleges each and every allegation above as if set forth in full herein.

35. J&F engaged Trench Rossi and Baker McKenzie to represent J&F in connection with criminal investigations in Brazil and the United States.

36. In their representation of J&F, Defendants were required to exercise the degree of care and skill that a reasonable, competent lawyer, engaged in a similar practice and acting under similar circumstances, would exercise.

37. Defendants failed to exercise a reasonable degree of care and skill by hiring Mr. Miller, before he left his role in the Brazilian prosecutor's office, to participate with the team of Baker and Trench Rossi attorneys representing J&F in connection with investigations in Brazil and the United States.

38. Because of Defendants' failure to exercise a reasonable degree of skill and care in their role counseling J&F, J&F has been harmed. Brazilian authorities have initiated actions to rescind agreements entered into with J&F's officers and directors, placing them at risk of criminal prosecution and possible imprisonment; and Brazilian authorities have opened an investigation into whether Mr. Miller's participation in J&F's legal team will have any impact on the status of the company's agreement, which has required J&F to incur costs negotiating with authorities in connection with that new investigation.

SECOND CAUSE OF ACTION

(Breach of Fiduciary Duty)

39. Plaintiff repeats and realleges each and every allegation above as if set forth in full herein.

40. Defendants owed J&F a fiduciary duty. Trench Rossi and Baker McKenzie had an attorney client relationship with J&F.

41. Defendants breached this duty by making Mr. Miller a partner and failing to disclose to J&F that Defendants' decision to include Mr. Miller on the J&F legal team raised ethical concerns that would jeopardize the ability of J&F and its officers and directors to maintain leniency agreements entered into with Brazilian authorities, or obtain such an agreement with the DOJ.

42. As a result of their breach of duty, Defendants caused damages to Plaintiffs. If not for Defendants' failure to disclose the implications of their decision to hire Miller, Plaintiffs would have sought representation from a firm without the ethical conflicts that now jeopardize the ability of J&F and its officers and directors to secure and maintain agreements protecting them from prosecution. Plaintiffs are entitled to damages caused by Defendants' breach of fiduciary duty.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully seek from this Court:

- a. Damages, compensatory and punitive, in an amount to be determined at trial.
- b. Attorneys' fees, costs, and expenses the Plaintiff incurred in connection with this matter.
- c. Such other relief as the Court deems appropriate.

DATED this 10th day of April, 2018

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

By: 

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Attorney for Plaintiff

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_____ Plaintiff

vs.

Case Number _____

_____ Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Clerk of the Court

 Name of Plaintiff's Attorney

By _____
 Deputy Clerk

 Address

Date _____

 Telephone

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IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

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_____ Demandante
 contra

Número de Caso: _____

_____ Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

SECRETARIO DEL TRIBUNAL

 Nombre del abogado del Demandante

Por: _____
 Subsecretario

 Dirección

Fecha _____

 Teléfono

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IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

Vea al dorso el original en inglés
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Clerk of the Court

 Name of Plaintiff's Attorney

By _____
 Deputy Clerk

 Address

Date _____

 Telephone

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 Teléfono

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 번역을 원하시면 (202) 879-4828 로 전화하십시오 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

Vea al dorso el original en inglés
 See reverse side for English original

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH INFORMATION SHEET

J&F INVESTIMENTOS S.A., Case Number: _____

vs
TRENCH, ROSSI E WATANABE ADVOGADOS
AND BAKER & MCKENZIE LLP, Date: April 10, 2018

One of the defendants is being sued
in their official capacity.

Name: <i>(Please Print)</i> Eric C. Lyttle	Relationship to Lawsuit <input checked="" type="checkbox"/> Attorney for Plaintiff <input type="checkbox"/> Self (Pro Se) <input type="checkbox"/> Other: _____
Firm Name: Quinn Emanuel Urquhart & Sullivan, LLP	
Telephone No.: 202-538-8000	Six digit Unified Bar No.: 482856

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
 Demand: \$ Damages To Be Determined At Trial Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED
 Case No.: _____ Judge: _____ Calendar #: _____
 Case No.: _____ Judge: _____ Calendar#: _____

NATURE OF SUIT: <i>(Check One Box Only)</i>		
A. CONTRACTS	COLLECTION CASES	
<input type="checkbox"/> 01 Breach of Contract <input type="checkbox"/> 02 Breach of Warranty <input type="checkbox"/> 06 Negotiable Instrument <input type="checkbox"/> 07 Personal Property <input type="checkbox"/> 13 Employment Discrimination <input type="checkbox"/> 15 Special Education Fees	<input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent <input type="checkbox"/> 27 Insurance/Subrogation <input type="checkbox"/> 07 Insurance/Subrogation <input type="checkbox"/> 28 Motion to Confirm Arbitration Award (Collection Cases Only)	<input type="checkbox"/> 16 Under \$25,000 Consent Denied <input type="checkbox"/> 18 OVER \$25,000 Consent Denied <input type="checkbox"/> 26 Insurance/Subrogation <input type="checkbox"/> Over \$25,000 Consent Denied <input type="checkbox"/> 34 Insurance/Subrogation <input type="checkbox"/> Under \$25,000 Consent Denied
B. PROPERTY TORTS		
<input type="checkbox"/> 01 Automobile <input type="checkbox"/> 03 Destruction of Private Property <input type="checkbox"/> 05 Trespass <input type="checkbox"/> 02 Conversion <input type="checkbox"/> 04 Property Damage <input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102 (a)		
C. PERSONAL TORTS		
<input type="checkbox"/> 01 Abuse of Process <input type="checkbox"/> 02 Alienation of Affection <input type="checkbox"/> 03 Assault and Battery <input type="checkbox"/> 04 Automobile- Personal Injury <input type="checkbox"/> 05 Deceit (Misrepresentation) <input type="checkbox"/> 06 False Accusation <input type="checkbox"/> 07 False Arrest <input type="checkbox"/> 08 Fraud	<input type="checkbox"/> 10 Invasion of Privacy <input type="checkbox"/> 11 Libel and Slander <input type="checkbox"/> 12 Malicious Interference <input type="checkbox"/> 13 Malicious Prosecution <input checked="" type="checkbox"/> 14 Malpractice Legal <input type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death) <input type="checkbox"/> 16 Negligence- (Not Automobile, Not Malpractice)	<input type="checkbox"/> 17 Personal Injury- (Not Automobile, Not Malpractice) <input type="checkbox"/> 18 Wrongful Death (Not Malpractice) <input type="checkbox"/> 19 Wrongful Eviction <input type="checkbox"/> 20 Friendly Suit <input type="checkbox"/> 21 Asbestos <input type="checkbox"/> 22 Toxic/Mass Torts <input type="checkbox"/> 23 Tobacco <input type="checkbox"/> 24 Lead Paint

SEE REVERSE SIDE AND CHECK HERE IF USED

Information Sheet, Continued

C. OTHERS

- | | |
|---|---|
| <input type="checkbox"/> 01 Accounting | <input type="checkbox"/> 17 Merit Personnel Act (OEA) |
| <input type="checkbox"/> 02 Att. Before Judgment | (D.C. Code Title 1, Chapter 6) |
| <input type="checkbox"/> 05 Ejectment | <input type="checkbox"/> 18 Product Liability |
| <input type="checkbox"/> 09 Special Writ/Warrants
(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,
Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication | <input type="checkbox"/> 29 Merit Personnel Act (OHR) |
| <input type="checkbox"/> 11 Writ of Replevin | <input type="checkbox"/> 31 Housing Code Regulations |
| <input type="checkbox"/> 12 Enforce Mechanics Lien | <input type="checkbox"/> 32 Qui Tam |
| <input type="checkbox"/> 16 Declaratory Judgment | <input type="checkbox"/> 33 Whistleblower |

II.

- | | | |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name | <input type="checkbox"/> 15 Libel of Information | <input type="checkbox"/> 21 Petition for Subpoena
[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic | <input type="checkbox"/> 19 Enter Administrative Order as
Judgment [D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien |
| <input type="checkbox"/> 08 Foreign Judgment/International | 2-1802.03 (h) or 32-151 9 (a)] | <input type="checkbox"/> 23 Rule 27(a)(1)
(Perpetuate Testimony) |
| <input type="checkbox"/> 13 Correction of Birth Certificate | <input type="checkbox"/> 20 Master Meter (D.C. Code § | <input type="checkbox"/> 24 Petition for Structured Settlement |
| <input type="checkbox"/> 14 Correction of Marriage
Certificate | 42-3301, et seq.) | <input type="checkbox"/> 25 Petition for Liquidation |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle) | | |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) | | |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other) | | |

D. REAL PROPERTY

- | | |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate | <input type="checkbox"/> 08 Quiet Title |
| <input type="checkbox"/> 12 Specific Performance | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain) | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) | |



Attorney's Signature

April 10, 2018

Date