

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

OCEANIC EXPLORATION COMPANY et al.,

Plaintiffs,

v.

CONOCOPHILLIPS, INC. et al.,

Defendants.

Civil Action No. 4:07-cv-00815

**PLAINTIFFS OCEANIC EXPLORATION COMPANY AND PETROTIMOR
COMPANHIA DE PETROLEOS, S.A.R.L. MOTION TO FILE UNDER SEAL EXHIBIT
A TO PLAINTIFFS' SUBMISSION IN RESPONSE TO
COURT'S APRIL 6, 2007 ORDER AND [PROPOSED] ORDER**

Pursuant to Local Rule 83.6 and the Agreed Confidentiality Order dated March 30, 2007 entered by the Court in this action, plaintiffs Oceanic Exploration Company and Petrotimor Companhia de Petroleos, S.A.R.L. ("Oceanic"), respectfully request that the Court order that Exhibit A attached to Oceanic's Submission in Response to Court's April 6, 2007 Order, filed concurrently herewith, be filed under seal.

Exhibit A to Oceanic's Submission contains and relies upon proprietary and confidential information regarding the private holdings of the family that owns, or owns a controlling interest in, the entities listed therein. The structure of the owning family's private business holdings is the product of decades of confidential investment, acquisition, and development activity. The relationships among the various private corporations delineated in Exhibit A are not available to the general public and it is of a confidential, proprietary, private and personal nature. In addition, disclosure of this corporate structure could expose the owning family to unwarranted

public exposure. Therefore, good cause exists for filing Exhibit A to Oceanic's Submission under seal.

Oceanic respectfully requests that the Court order Exhibit A to Oceanic's Submission be filed under seal.

Respectfully submitted,

DIAMOND MCCARTHY, L.L.P.

By: /s/ Julie N. Searle

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CERTIFICATE OF CONFERENCE

This is to certify that Michael L. Fazio, representing the Plaintiffs, conferred with David Pluchinsky, representing the Defendants, regarding the above and foregoing Motion to Seal on this, the 13th day of April, 2007. The Defendants are undecided as to that Motion

/s/ Michael L. Fazio _____

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served upon the following list via electronic court filing or deposited in the United States Mail, first class delivery on this, the 30th day of March, 2007.

By /s/ Julie N. Searle _____

By /s/ Jon D. Corey _____

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