



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SHELL NIGERIA EXPLORATION AND  
PRODUCTION COMPANY LTD, ESSO  
EXPLORATION AND PRODUCTION  
NIGERIA (DEEPWATER) LTD, NIGERIAN  
AGIP EXPLORATION LTD, and TOTAL  
E&P NIGERIA LTD,

Petitioners,

v.

NIGERIAN NATIONAL PETROLEUM  
CORPORATION,

Respondent.

No. 16-cv-3939 (LAK)

**STIPULATION AND PROPOSED  
ORDER FOR STAY**

WHEREAS, Petitioners Shell Nigeria Exploration and Production Company Ltd, Esso Exploration and Production Nigeria (Deepwater) Ltd, Nigerian Agip Exploration Ltd, and Total E&P Nigeria Ltd (collectively, "Petitioners") filed a Petition to Confirm Arbitral Award on May 26, 2016 (the "Petition");

WHEREAS, Petitioners and Respondent Nigerian National Petroleum Corporation ("NNPC" or "Respondent") entered into a Stipulation on Service and Time to Respond to Petition on February 22, 2017, which was "so ordered" by the Court on February 24, 2017 ("Stipulation on Service and Time to Respond") (Dkt. #13);

WHEREAS, the Stipulation on Service and Time to Respond provided, among other things, that NNPC accepted service of the Petition as of February 17, 2017; that Petitioners' would file their motion to stay this proceeding ("Motion to Stay") on or before March 3, 2017; that NNPC would file its Opposition to Petitioners' Motion to Stay on or before April 7, 2017; and that Petitioners would file their Reply in support of their Motion to Stay on or before April 21, 2017;