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**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.

Civil Action No. _____

PETITION TO CONFIRM ARBITRAL AWARD

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"), by and through their attorneys , petition for entry of an order and judgment pursuant to 9 U.S.C. § 207 (i) recognizing and confirming the partial final arbitral award dated May 30, 2013 (the "Partial Final Award") in the arbitration between Petitioners and Respondent Nigerian National Petroleum Corporation ("NNPC") captioned *SNEPCo et ors v. NNPC* (the "Arbitration"); (ii) entering judgment in Petitioners' favor against NNPC in the amount of \$1,416,932,000, plus interest and the costs of this proceeding; and (iii) awarding Petitioners such other and further relief as the Court deems just and proper.

PARTIES

1. Petitioner Shell Nigeria Exploration and Production Company Ltd ("SNEPCo") is a company incorporated under the laws of the Federal Republic of Nigeria with its registered office at No. 21/22 Freeman House, Marina, Lagos, Nigeria. SNEPCo is a member of the Shell