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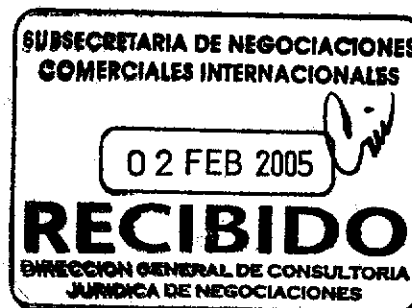
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February 2, 2005

VIA TELECOPY

Christopher Greenwood, CWG, QC
President of the Tribunal
via ICSID Secretariat



Re: Corn Products International, Inc. v. United Mexican States
(Case No. ARB (AF)/04/01)

Dear Prof. Greenwood:

On behalf of Corn Products International, Inc. ("Claimant"), we hereby request that the Tribunal in the above-captioned case extend the schedule for submitting memorials on responsibility in the written phase of these proceedings by 30 days. The current deadline for submitting Claimant's Memorial on responsibility is February 15, 2005. Should the Tribunal grant this request, Claimant's Memorial would be due on March 17, 2005; and the schedule for submission of the remaining pleadings on responsibility would be adjusted accordingly.

An extension is appropriate given the lack of resolution at this writing of Respondent's request for consolidation. As the Tribunal is aware, Respondent has sought to consolidate this claim with a claim submitted jointly by Archer Daniels Midland Co. and A.E. Staley Manufacturing Co. ("the ADM/Staley" claim) under Chapter 11 of the North American Free Trade Agreement (NAFTA).¹

During the first meeting of the Tribunal on September 16, 2004, Respondent requested that the Tribunal suspend these proceedings due to the pendency of Respondent's consolidation request. The Tribunal rejected that request, for the reasons detailed in its Procedural Order No. 2 of January 14, 2005, and proceeded to establish a schedule for submitting memorials on state responsibility that would allow the case to

¹ At the time of the first meeting of the Tribunal, the ADM/Staley claim had not yet been registered by ICSID, but it has since been registered.

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move forward without prejudicing either party. This schedule was based on the explicit expectation that Respondent's consolidation request would be resolved by the time Claimant would have to submit its Memorial. In fixing the schedule for written submissions on state responsibility, however, this Tribunal left it open to either party to request an extension of the schedule for written submissions if the deadline for submitting Claimant's Memorial approached and the consolidation issues remained unresolved.²

After Mexico twice had extended the deadline established by Article 1126 of the NAFTA for the establishment of a consolidation panel, the parties notified ICSID on January 7, 2005, of their agreement on the members of a consolidation tribunal. At this writing, however, that tribunal's constitution has not been completed, although we believe it to be imminent. There has therefore been no hearing on, much less a determination on the merits of, Respondent's consolidation request by the consolidation tribunal, and it is now a virtual certainty that no such determination will be made before February 15, the filing deadline established by this tribunal.

In light of this situation, Claimant has reluctantly come to the conclusion that an extension is appropriate. Although Claimant continues to be opposed to Respondent's consolidation request, and is eager to move forward with its claim before this tribunal, for it to file its Memorial at this time would not advance the interests of fairness or efficiency which have been the touchstones of this Tribunal's approach to the question of suspension.³

However, Claimant continues to be deeply troubled by the many delays incurred to date in the proceedings relative to this case, and is prepared to submit its Memorial on state responsibility, with accompanying proof, as soon as the consolidation issues are resolved. For that reason, we have requested only a 30-day initial extension, in the hope the consolidation issues can be resolved expeditiously. In the event that 30 days proves insufficient, Claimant requests that it be permitted to return to this Tribunal to request a further limited extension of the schedule for written submissions in this case.⁴

For the foregoing reasons, Claimant respectfully requests that the Tribunal extend the deadlines for submitting memorials in these proceedings, in order to permit resolution

² Procedural Order No. 2 (14 January 2005) at para. 12 ("[I]n the event that the position regarding consolidation remained unclear by the time the deadline for the Claimant to file its Memorial approached, the Tribunal would be perfectly willing to hear an application from either party to vary the timetable").

³ It goes without saying that an extension will not prejudice Mexico.

⁴ Claimant intends to urge the consolidation tribunal to move as expeditiously as possible on the consolidation request, to avoid further prejudice to Claimant.

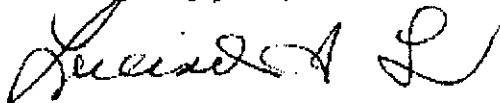
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of Respondent's consolidation request, initially by 30 days, but without prejudice to either party's right to request further limited extensions should such extensions prove to be necessary.

Very truly yours,



Lucinda A. Low

Miller & Chevalier, Chartered

Counsel for Corn Products International, Inc.

cc: Lic. Hugo Perezcano Diaz, Asesor Juridico, Mexico
Mr. Gonzalo Flores, Senior Counsel, ICSID

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