

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

JANE DOE 1 <i>et seq.</i>	:	
	:	
Plaintiffs,	:	
	:	
v.	:	No. 3:11-cv-01433-MPS
	:	
ERNESTO ZEDILLO PONCE de LEÓN,	:	
	:	
Defendant.	:	July 10, 2013

**DEFENDANT’S RESPONSE TO
PLAINTIFFS’ NOTICE OF FILING TRANSLATION (DOC. #78)**

Earlier today, the plaintiffs provided this Court with a 225-page translation of what they characterized as a “final decision” of a Mexican trial court. Doc. #78. Their Notice did not mention that the Mexican trial court’s “final decision” was subsequently reversed, unanimously and in its entirety, by a Mexican appellate court. *See generally* Doc. #77 (noting that the Mexican appellate decision reversed the trial court’s decision, dismissed the case, and denied the plaintiffs’ request that Mexico’s Supreme Court of Justice consider the appeal). While the defendant believes that any and all filings and decisions in Mexican courts are irrelevant to the issue before this Court, *see generally* Doc. #55 and Doc. #65, a *reversed* Mexican trial court decision self-evidently has no validity and is thus irrelevant. In advance of the Court’s preparation for the oral argument set for July 18, 2013, the defendant thought it appropriate to note that the 225-page translation of a reversed trial court opinion cannot have any bearing on the

issue before this Court.

Respectfully submitted,

ERNESTO ZEDILLO PONCE de LEÓN

By: /s/ Jonathan M. Freiman
Jonathan M. Freiman (ct24248)
Tahlia Townsend (ct27687)
Wiggin and Dana LLP
One Century Tower
P.O. Box 1832
New Haven, CT 06508-1832
(203) 498-4400
(203) 782-2889 fax
jfreiman@wiggin.com
ttownsend@wiggin.com

CERTIFICATION

I hereby certify that on July 10, 2013, a copy of the foregoing **Defendant's Notice Regarding Mexican Appellate Court Decision** was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Jonathan M. Freiman
Jonathan M. Freiman