

Exhibit R-294

Letter from Respondent to Claimant regarding
Production of Documents Responsive to
Claimant's March 12, 2012 Request,
April 13, 2012

April 13, 2012

By Email

Messrs. Carlos Paitán and Christian Carbajal
Estudio Paitán & Abogados
Calle Martir Olaya No. 129, oficina 1702-1703
Torre "A" Centro Empresarial José Pardo
Miraflores, Lima 18 – Perú

Re: Renée Rose Levy de Levi vs. Republic of Perú (ICSID Case No. ARB/10/17)

Dear Messrs. Paitán and Carbajal:

We write in response to Claimant's request for the production of documents dated March 12, 2012. Claimant has made three new requests for documents and renewed her request for certain documents that she initially requested on May 10, 2011 and that the Tribunal ordered Respondent to produce but that Respondent had not been able to locate as of the production deadline.

As noted in its letter of March 21, 2012, Respondent objected to all of Claimant's new requests but agreed to produce documents responsive to Claimant's new Request No. 1 to the extent it included documents that the Tribunal had already ordered Respondent to produce.¹ Respondent herewith produces such documents. Respondent also produces documents responsive to Claimant's Request No. 48 of May 10, 2011. Because the documents being produced total more than 1,500 pages, Respondent will provide a link to an online database from which Claimant may download the documents.

Respondent notes that documents responsive to Claimant's Requests Nos. 15 and 51 of May 10, 2011 are already on the record. They include a Letter from the BCR to SBS regarding BNM's BCR Current Account Balance, Oficio No. 225-2000-PRES, dated December 5, 2000, submitted as Exhibit R-123 (responsive to Request No. 15) and *Banco Nuevo Mundo in Liquidation*, SBS Final Report, dated February 28, 2003, submitted as Exhibit R-199 (responsive to Request No. 51). Respondent has not been able to locate any other documents responsive to these requests.

¹ See Procedural Order No. 2 of the Tribunal, July 12, 2011.

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After thoroughly reviewing its files, Respondent was unable to locate documents responsive to the following requests of May 10, 2011: Requests Nos. 4, 14, and 30. For Requests Nos. 16 and 17, Claimant seeks lists of rediscount loans that the BCR granted or denied between August 2000 and August 2001. Respondent has not been able to locate any such lists.

Respectfully yours,



Stanimir A. Alexandrov
Jennifer Haworth McCandless
Marinn Carlson
Counsel for Respondent

Encl.

cc: Ms. Anneliese Fleckenstein, ICSID (without enclosures)