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A Limited Liability Service Corporation

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June 18, 2012

*Via First Class Mail*  
*and Via Email*

Mr. Marco Tulio Montañés-Rumayor  
Secretary of the Tribunal  
ICSID  
1818 H Street, N.W.  
MSN U3-301  
Washington, D.C. 20433

**RE: Commerce Group Corp. and San Sebastian Gold Mines, Inc. v. Republic of El Salvador (ICSID Case No: ARB/09/17) - Annulment Proceeding**

Dear Mr. Montañés-Rumayor:

By this letter, I would like to respond to your letter dated May 22, 2012. The claimants are aware of ICSID Administrative and Financial Regulation 14(3)(d) and (e), which authorizes the Secretary-General, at his or her discretion, to discontinue proceedings in the event of nonpayment in excess of six (6) months.

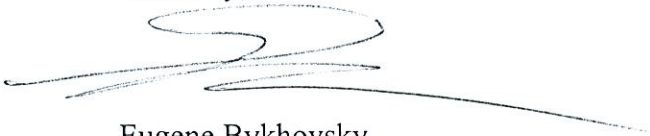
Please be advised that over the past six (6) months, the claimants have been diligently working on securing financing from various third parties for the continuation of these proceedings. These efforts included daily contacts with financing brokers and potential lenders. The claimants have recently learned that one of the lenders who was undertaking a due diligence examination of this matter has determined not to extend financing to the claimants. However, the claimants were advised that another third party financier is currently reviewing this matter and would like to undertake a due diligence examination of the file before making a final determination regarding the requested financing. As such, the claimants are requesting an additional extension of sixty (60) days to allow a full opportunity for the third party financier to review the relevant facts regarding this proceeding and make a determination regarding the extension of financing to the claimants. In light of the fact that this proceeding has been suspended for the past six (6) months, and in light of the fact that the respondent has not had to incur any substantial expenses during that time period, an additional sixty (60) day extension would not result in undue prejudice or expenses to the respondent, and would allow the claimants an opportunity to obtain relief.

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As all of the parties involved in these proceedings are aware, the claimants are small business entities with limited resources. In light of its limited resources, Commerce has had to fight an uphill battle during the course of these proceedings. Despite these difficulties, the claimants are fully committed to this process and would like to obtain a final review on the merits of their claims. As such, the claimants are doing everything they can to secure the necessary financing and would greatly appreciate if the Secretary-General would grant the requested extension of time limits to obtain the financing and make the necessary payments. Such an extension would be in the interest of justice and equity, and would be within the full discretion of the Secretary-General.

I thank you in advance for your consideration of this request.

Sincerely,



Eugene Bykhovsky  
John E. Machulak  
Milwaukee Office

EB:am

cc: Derek Smith, Esq.  
Commerce Group