

DONZIGER

Written by

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Based on the New Yorker article "Reversal of Fortune" by Patrick  
Radden Keefe

EXT. LOADING DOCK. NIGHT.

Close up on a wall of dull gray. Something metal.

The SOUND of an industrial latch being pulled, the lock on the back of a moving truck.

The gray doors swing open to reveal...huge cardboard boxes. A dozen of them, stacked one atop the other, 8 feet deep.

CUT TO:

Two MEN unloading the boxes, one handing them down from the van to the next guy.

And as we watch, we HEAR the voice. It's deep, confidential, compelling.

DONZIGER (V.O.)

I think a lot about Dad now. The house on Marbury. The store. Especially the store. I don't know why.

Close up on the boxes stacked now on a cart. They're being wheeled down a long hallway of hardwood flooring, which we glimpse under the rolling wheels.

A large stamp on one of the boxes says: UNITED STATES DISTRICT COURT EVIDENCE. DO NOT TAMPER.

DONZIGER (V.O.)

I loved the store. I think about all the hours I just sat there on a stool, while he showed our customers the transistor radios and the 8-track hifis.

Now the boxes are being piled onto a long, beautifully polished conference table.

DONZIGER (V.O.)

I think a lot about the batteries. C cell, D cell, 9-Volt. We threw them out. Thousands of them. There weren't any laws about it. From trash to landfill to groundwater. Millions of crushed up batteries. All that mercury. God knows.

The light in the conference room goes out. We can barely make out the boxes as we stare at them in the dark.

DONZIGER (V.O.)

I read the other day that now we use something like twice as many batteries as we did in 1970. Almost 3 million dry cell batteries a year, for our watches and our phones and our video games. But because of Nader...and Waxman and people who actually fought for what was right...we reclaim them. We recycle them.

CUT TO:

The light flickers on. We're close up on the top of a box. A woman's manicured hands rip it open. The hands begin unloading the cargo: stacks of legal pads, calendars, a digital recorder.

There's a bobblehead Alex Rodriguez, which the hands examine for a moment before tossing it aside dismissively.

DONZIGER (V.O.)

But what if no one had fought? What if -- like with coal and oil -- the powerful people just rolled over, got paid off, gave up...?

And then the hands produce a leather-bound journal. Red ribbon holding it closed. The hands hold it in front of us for a long moment as the voice speaks.

Whoever is opening the box, this is what she's been looking for...

DONZIGER (V.O.)

Kids would be drinking mercury-tainted water and scoring lower on tests. Breaking more bones on the soccer field. Coughing up blood for no good reason. How smug would you be then? How hard would you cling to your precious rule of law as you watched your kids die a little bit every day, like a light slowly going out?

The hands unwrap and open the leather journal -- it opens to a page filled with someone's illegible scrawl.

DONZIGER (V.O.)

What wouldn't you do then? How hard would you beg me to fight?

FADE TO BLACK.

PRELAP: THE LOW CHANTING OF DEMONSTRATORS. CHEVRON, CHEVRON,  
YOU CAN'T HIDE! CHEVRON, CHEVRON, YOU CAN'T HIDE!

Mixed in with: *What do we want? Justicia! When do we want it?*  
*Ahora!*

INT. VANDERBILT ROOM, WALDORF ASTORIA HOTEL, MANHATTAN. DAY.

As the muffled CHANT from outside the room continues, we open tight on the grim, ceremonially-painted face of an old Ecuadorian man, EMERGILDO CROJILLO, in tribal dress.

He's standing at a microphone.

CROJILLO  
(nervous, halting)  
My name is Emergildo Crojillo. I am  
an elder of the Cofan people. I  
have traveled very far to be with  
you today.

CUT TO STEVEN DONZIGER, tall, early 50s, salt and pepper hair, large features, burning eyes, standing off to the side. He has an undeniable magnetism.

Donziger is mouthing the words as the old man speaks.

CROJILLO (CONT'D)  
I came by foot, then by canoe, and  
then by bus and airplane. My first  
time on an airplane. I ask humbly  
for a few minutes of your time.

Donziger nods.

CUT TO Chevron's corporate board of DIRECTORS, assembled on the dais under a large banner: '*Chevron - The Power of Human Energy*' looking confused.

Then BACK TO --

CROJILLO (CONT'D)  
If Chevron does not take  
responsibility for what it did to  
our water and our land, my people,  
my wife, my children may *all*  
disappear. Gone.

Then the POUNDING of a gavel as we return to the dais where DAVID O'REILLY, Chevron's CEO, early 60s and southern, sits in the center.

O'REILLY  
I'm sorry. I'm sorry.  
Mr....uh...Cro-uhh  
(looks down at notes)  
Cro-jee-yo, this is a meeting for  
shareholders. If you --

Crojillo looks over to Donziger who gives him a nod.

CROJILLO  
I...I wish only to speak for a few  
minutes. My people suffer from --

O'REILLY  
Sir, you should be talking to  
Petroecuador. They drilled 700  
wells after Texaco picked up and  
left. You must know that, right?

Donziger gives Crojillo an urgent "keep going!" motion with his hand.

O'REILLY (CONT'D)  
That was long before Chevron even  
bought 'em. Nobody in this room's  
had drills down there for 20 years--

CROJILLO  
The smell of petrol for us is the  
smell of death. My youngest son,  
Rafael.  
(holds up a photo)  
At age four, he stopped eating, we  
take him to --

Donziger nodding -- yes, yes, yes.

CROJILLO (CONT'D)  
-- a doctor in Quito, takes us 2  
days to get there on 3 buses. The  
doctor, he tells us he have cancer.  
All through his stomach and  
intestines.

O'REILLY  
I'm sorry, but we will have to cut  
your microphone, sir.

CROJILLO  
Six month later, Rafa is --

The mic dies so this last word lands at a spoken volume.

CROJILLO (CONT'D)  
-- dead.

Donziger snarls.

PABLO FAJARDO, late 30s, earnest, bookish, grabs Donziger, holds him back.

Crojillo raises his voice, but O'Reilly TALKS over him.

O'REILLY  
(rapping his gavel)  
That's quite enough!

The convention hall verges on chaos.

Donziger breaks away from Fajardo's hold and rushes the mic in the adjacent aisle, pushing other WAITING SPEAKERS aside.

DONZIGER  
(BOOMING into the mic)  
You can't do that! You can't do  
that! You killed his child. You  
killed his --

GUARDS in suits slam into Donziger. The gavel BANGS. Struggling against the guards, Donziger catches Fajardo's eye: NOW!

Fajardo hits SEND on a message on his phone.

The doors to the hall open, PROTESTORS flood in past the sparse SECURITY and the background CHANTS -- CHEVRON! CRIMINAL! JUSTICIA! AHORA! -- become a ROAR.

DONZIGER (CONT'D)  
(pushing past the guard)  
You can't silence the Cofan people!

O'REILLY  
That's enough! That is enough! Get  
them out of here! Close the doors!

The guards grab Donziger, carry him roughly toward the doors.

DONZIGER  
(struggling, shouting over  
the chaos)  
You killed his son! You people have  
no decency!

The guards shove Donziger roughly against the door, which gives way and he stumbles into:

THE HOTEL HALLWAY.

As the doors close...

He catches a look of himself in a mirror. His lip is bleeding a little, he's disheveled.

He thinks for half a beat, then smears the small trickle of blood down his chin, pulls his tie a little more askew, musses his hair.

INT. WALDORF ASTORIA LOBBY. MINUTES LATER.

Cameras flash as Donziger, blood now *clearly* visible on his mouth, chin, sweeps through the lobby, Fajardo in tow.

PRESS rush out the rear doors of the convention hall to follow.

Donziger glances over at the press, then at Fajardo.

FAJARDO  
If I said no, would you listen?

Donziger smiles slightly, turns and walks toward the press. A noisy scrum forms around him.

DONZIGER  
Chevron has just spoken volumes in their treatment of me. But more importantly, in their treatment of a true victim of their destructive behavior --

EXT. THE WALDORF ASTORIA. DAY.

Donziger and Fajardo emerge onto Lexington Avenue --

FAJARDO  
He's upstairs now, changing out of the costume.

Donziger pulls out his BUZZING phone, silences it.

DONZIGER  
*Traditional dress.*

FAJARDO

Right.

FAJARDO (CONT'D)

They would have been smarter to  
just let him speak.

Donziger's phone is BUZZING again. He silences it.

DONZIGER

(distracted)

But corporate structures are  
predictable that way. They can't  
hear dissent. It's in the culture.  
They create and preserve their own  
realities.

His phone begins BUZZING again. This time he checks the  
number.

DONZIGER (CONT'D)

*Shit!*

EXT. LEXINGTON AVENUE. DAY.

Donziger runs along the crowded sidewalk dodging people with  
an agility surprising for his age and height.

INT. 53RD STREET SUBWAY STATION. E TRAIN. DAY.

We HEAR the ROAR of the train and see the whoosh of air it  
makes pulling into the station. Donziger, sweating, rushed,  
is outside the turnstiles, swiping a MetroCard.

He swipes the first one: INSUFFICIENT FARE.

DONZIGER

*Fuck.*

He grabs another card from his wallet, swipes. INSUFFICIENT  
FARE.

DONZIGER (CONT'D)

*Fuck!*

He grabs a third and final card and swipes. INSUFFICIENT  
FARE.

The CROWD on the platform is now piled inside the car.

SUBWAY CONDUCTOR (O.S.)  
Next-stop-5th-Avenue-stand-clear-of-the-closing-doors.

We HEAR the BEEP of the door closing warning.

Donziger looks left, right and leaps over the turnstiles in one jump.

He jams an arm into the closing subway car door which releases and he dives into the car.

The door closes hard behind him and he SIGHS -- relief.

The train is pulling away as he clocks a TEENAGE BLACK KID, 14, who saw the whole thing. The kid gives Donziger a little 'what's up?' nod of respect. Donziger smiles back.

EXT. THE FRANKLIN MONTESSORI SCHOOL. UPPER WEST SIDE. 20 MINS LATER.

We are TIGHT ON a sad/annoyed looking DAVID DONZIGER, 5, and his impatient teacher, ANNIE GOLDMAN, attractive, 30.

All of a sudden, both of their faces change. David's face lights up, and Goldman smiles despite herself.

A huffing Donziger jogs up.

DONZIGER  
(to David)  
Before you say a word. Stuffed animal of your choice. No size limit.

David beams.

DONZIGER (CONT'D)  
(to Ms. Goldman)  
Inside of 10 minutes is an agreed upon grace period.

David nods in agreement.

DONZIGER (CONT'D)  
Between 10 and 20, small to medium toy. Over 20 --

GOLDMAN  
(knowingly)  
Stuffed animal, no size limit.

He smiles.

DONZIGER  
(noticing a change in her  
expression)  
What?

Goldman, wincing, reaches up and wipes the smear of blood  
from his chin -- a surprisingly intimate gesture.

GOLDMAN  
Those guys who follow you?

DONZIGER  
No, no. Little bike accident,  
that's all.

GOLDMAN  
I see.  
(looking around, not  
buying it)  
And the bike?

DONZIGER  
Who knows? I jumped off just before  
the collision.

A flirtatious beat while she laughs.

GOLDMAN  
(to David, teacherly)  
I'll see you tomorrow. You can tell  
me about your new toy.  
(to Donziger, softly)  
Take care of yourself, Steven.

DONZIGER  
Always do.

GOLDMAN  
(as he leaves)  
And be on time tomorrow!

EXT. THE FRANKLIN MONTESSORI SCHOOL. UPPER WEST SIDE.  
CONTINUOUS.

Donziger stares at something O.S. as he and David walk hand  
in hand from the school.

DAVID  
I was sharing. But Rory always  
wants the glue.

Now we see what Donziger is staring at -- a black town car idling, with the window down a quarter.

DONZIGER  
(absently)  
Uh-huh.

DAVID  
I told Ms. Annie, I didn't do what  
she said.

A camera appears in the passenger side window, shoots a few frames, disappears.

DONZIGER  
Uh-huh.  
(pointing back toward the  
school)  
Hey buddy, they put up a new flag?

As David turns to look, Donziger turns toward the town car and flashes a long middle finger at the window.

The window goes up silently as --

DAVID  
No, daddy! That's the same one  
that's always been there!

DONZIGER  
(as if nothing happened)  
If you say so, pal.

PRELAP: A LOUD GRINDING NOISE.

INT. DONZIGER'S UPPER WEST SIDE APARTMENT. AN HOUR LATER.

David, a big grin on his face, carries a stuffed giraffe with the tags still on it under his arm.

Donziger's wife, LAURA, late 30s and stylish, clocks the toy, looks suspiciously at Donziger.

The GRINDING NOISE continues throughout the scene, grating everyone's nerves.

DONZIGER  
How was your launch?

LAURA

It's in three hours -- were you  
late again?

DONZIGER

I knew that. No. Not really.  
(beat, she rolls her eyes)  
You should have seen the way those  
fuckers tried to shut down  
Emergildo --

DAVID (O.S.)

Swear jar, daddy!

Donziger tosses a dollar bill into the already 2/3 full jar  
marked "DADDY CURSES."

Donziger finally clocks the grinding noise, looks at Laura.

LAURA

Our pre-war pipes. Esteban says  
we're one clog away from a Biblical  
flood.

DONZIGER

Esteban?!

The GRINDING stops and Donziger takes a few steps down the  
hallway and into a really old, ugly, orange formica kitchen.

ESTEBAN

Si Steven.

DONZIGER

How's Maribel?

ESTEBAN

Good, good. Doctor say all normal,  
so...we good.

DONZIGER

I told you. Spotting is normal.  
Laura bled when she was pregnant.

LAURA

Steve. Really?

DONZIGER

In the shower. Very alarming.

LAURA

Steve!

DONZIGER  
He's worried!

ESTEBAN  
No worries, all good.

DONZIGER  
The spotting -- it's just blood  
from the uterine wall, I told you.  
After the egg implants --

LAURA  
(to Steve)  
He's not worried!

Esteban's torso disappears under the sink and the GRINDING starts again.

LAURA (CONT'D)  
(taking Steve's arm)  
Stop talking, for once. Let me show  
you something.

INT. DONZIGER'S UPPER WEST SIDE APARTMENT. CONTINUOUS.

Donziger and Laura are staring at something on the desk in the tiny, cluttered study. We notice a framed slingshot above the desk.

DONZIGER  
(re the paper on the desk)  
Wow. I mean WOW.

LAURA  
I know.

DONZIGER  
You know you've never been sexier.

She gives him a 'cut it out' look.

We SEE what they're looking at: printed computer renderings of a brand new kitchen complete with marble countertops, gleaming stainless steel, Wolf oven/range, Sub-Zero fridge...

DONZIGER (CONT'D)  
I told you we could afford it.

Laura points to the number on the last page.

LAURA

We can't afford it. Any of it.  
We're behind on David's school.

DONZIGER

This time I'm coming home with a  
verdict.

LAURA

I've been hearing that for 20  
years.

DONZIGER

So a few more weeks won't matter.

LAURA

I love your optimism, giant-slayer.  
But 100 grand on a kitchen.

(beat)

Even for *this* kitchen.

DONZIGER

Did I mention I love you?

He runs his hand lovingly, suggestively down her neck and arm  
-- and then onto the kitchen plans.

DONZIGER (CONT'D)

Almost as much as I love these  
marble counter tops.

She laughs. He pulls her close, grabs her ass.

And then we HEAR tinny music --

*Dancing queen...young and sweet...only seventeen...*

A ring tone. Laura looks at him like, "Really?"

He shrugs and fishes the phone from his pocket (where  
something is clearly in the way).

DONZIGER (CONT'D)

(peering at the caller ID)

Pablo! Que pasa?

(beat while he tries to  
focus on what he's  
hearing)

What?!

Prelap: the GRINDING NOISE becomes the ROAR of a plane  
touching down...

EXT. MARISCAL SUCRE INTERNATIONAL AIRPORT, QUITO

Quick shot of the American Airlines jet on the runway.

Slide: Quito, Ecuador

INT. AMERICAN AIRLINES 777. QUITO, ECUADOR. DAY.

A quick POP of the 6'4" Donziger in a first class seat and yet still cramped.

The plane is taxiing to the gate. He looks like he didn't sleep a wink and he's doodling -- oil derricks, clouds, a frog -- on the back of his Customs form.

INT. AIRPORT TERMINAL. QUITO. DAY.

Amid a crush of people, Donziger walks with Fajardo and WILSON, who looks like a younger, burlier Fajardo.

DONZIGER  
(urgently, as they walk)  
We need Sacha Sur. The whole case depends on it.

FAJARDO  
Si, por supesto. Chevron says the test can't go forward because of security concerns at that well.

DONZIGER  
Security concerns? That's presposterous! What does that even mean?

FAJARDO  
More bullshit to get a less contaminated site.

BERLINGER (O.S.)  
Careful!

Wilson has become tangled up in a wire. He tries to free himself and collides with a boom mike.

DONZIGER  
(to Wilson)  
Wilson! Cuidadoso!  
(to Pablo)  
(MORE)

DONZIGER (CONT'D)  
Tell your brother to stay out of  
their way.

We PAN OUT to reveal a three-person DOCUMENTARY CREW  
following Donziger.

JOE BERLINGER, 50, bushy beard, leans around the camera.

BERLINGER  
We're OK. Still shooting.

FAJARDO  
(glancing uncomfortably at  
the camera)  
Judge Zambrano is under a lot of  
pressure.

DONZIGER  
Then let's go make sure he feels  
some from us.

Prelap: Guns n' Roses "*Welcome to the Jungle*" BLASTS.

INT./EXT. INSIDE A VAN ON THE MAIN ROAD IN LAGO AGRIO  
"Welcome to the Jungle" plays at top VOLUME, Donziger,  
wearing headphones, stares glumly out the back window of the  
sweltering van.

Everyone is sweating. We can almost feel the stale air.

We SEE the scenery along the road: ramshackle storefronts and  
barely-standing homes on stilts, amateur architectural feats,  
surrounded by tropical forest.

A giant oil pipeline runs parallel to the road, like an  
endless steel bannister.

Donziger, deep in thought, pulls the earphones out. The SONG  
ends abruptly.

He looks over at Berlinger who immediately picks up the  
camera and begins shooting.

DONZIGER  
This is why they forced us down  
here.

BERLINGER  
(positioning the camera)  
What do you mean?

DONZIGER

Chevron. This thing with Sacha Sur. It's exactly why they pushed so hard to get the case thrown out of American courts and moved to Ecuador. It's home field for them.

BERLINGER

Home field? You mean --

DONZIGER

They were here for decades. They have it wired. The army. The courts. Civil service.

He shakes his head, lowers the window.

Dust and noise POUR in. The sound from myriad BEEP-BEEPING mini-bikes is suddenly deafening. Berlinger motions for the SOUND GUY to move the boom in closer to Donziger.

DONZIGER (CONT'D)

(raising his voice over  
the noise)

Every time we get close. Every time we think we've evened the playing field. They show us how deep their reach goes.

A beat. Berlinger nods. Pablo looks uncomfortably at the camera and boom mic.

Donziger leans his head out the window to get some air. We SEE what he sees: a row of seedy storefronts.

A petrol truck ROARS by, and he closes the window. It's suddenly quiet again.

DONZIGER (CONT'D)

Sex clubs. Gringo contractors. Colombian thugs. Ever wonder what the *Oriente* would be without all the fucking oil?

FAJARDO

My father used to ask us, "What would there be if there were no sky?"

DONZIGER

What's the answer?

Fajardo gazes out the window at two dirt-poor little boys throwing rocks at a tied-up old dog.

FAJARDO  
One cannot conceive of it.

Off Berlinger nodding, still shooting.

INT. LAGO AGRIO COURTHOUSE, CHAMBERS OF JUDGE NICOLAS ZAMBRANO LOZADA. LATER THAT DAY.

We're close in on Donziger mid-oration, with the boom mic again visible above his head.

The scene is claustrophobic and chaotic.

\*Most of the dialogue is in *Spanish*.

DONZIGER  
-- a decade's worth of litigation because now they're afraid of the result! Because *this man* has decided that his client can't allow the scientific truth to be revealed!

Donziger looms over the desk of a cowed JUDGE ZAMBRANO, 50, savvy, using his physical presence to intimidate.

Fajardo is behind him, along with the doc film crew and a bevy of REPORTERS and CAMERAMEN.

LARREA (O.S.)  
That is simply not true, Judge, and it's an obvious --

DONZIGER  
Which part?!

We SEE DIEGO LARREA, 50s, Chevron's Ecuadorean counsel.

LARREA  
-- *an obvious* attempt to once again intimidate and berate --

DONZIGER  
Which part then?!

LARREA  
Which part what?

DONZIGER

Which part isn't true! That after years of discovery you now seek to block us testing the most contaminated site in the world outside of Chernobyl? While the third largest corporation in the world accuses me of intimidation! And sends its goons to harass me!

ZAMBRANO

Gentlemen. Por favor.

(to Donziger, re the film crew)

We need this?

The packed room is sweltering and Donziger takes off his jacket, hangs it on the back of a chair.

LARREA

(jostled by camera crew)

Your honor, we have repeatedly seen Mr. Donziger bully this court --

DONZIGER

(hard, right in Larrea's face)

*Abogado Chevron corrupto.*

LARREA

Your honor!

(to Donziger)

Sir! You will be held responsible for what you say here!

DONZIGER

You are a *corrupt* Chevron lawyer!

(slowly, theatrically, for the cameras)

*Abogado Chevron corrupto!* That is what I said. And it is the truth!

A attractive young female CLERK opens the door --

CLERK

There are trials in session.

DONZIGER

(winks, lowers his voice)

Judge, the Sacha Sur well is the centerpiece of our case. We believe we will find stunning rates of contamination at that site.

ZAMBRANO  
(motioning to the cameras  
uncomfortably)  
Off. Please. We don't need.

The cameras -- including the doc crew -- don't move.

ZAMBRANO (CONT'D)  
(re the cameras)  
I said out!

Zambrano takes a deep breath and waits as the cameras and press file out. The door closes behind them, and suddenly our POV is Berlinger's who is now shooting from outside in through the window.

We don't hear what is being said.

Zambrano looks uncomfortable, takes a deep breath, says a sentence or two with finality.

Larrea erupts, his hands in the air, protesting.

Zambrano stops the protest with a wave of his hand.

Larrea turns to go in a huff. Donziger follows, smiling.

We exit with Donziger.

MINUTES LATER. OUTSIDE JUDGE ZAMBRANO'S CHAMBERS.

Donziger huddles with Fajardo and Berlinger and the doc crew.

BERLINGER  
-- if you pick us up a little  
earlier, maybe --

DONZIGER  
(remembering something)  
Crap.

He RAPS on Zambrano's door and enters.

We stay outside and again our POV becomes the POV of Berlinger's camera.

We are looking through the blinds and don't hear what is said.

Inside, Donziger picks up the jacket.

Donziger's back is to us, so we can't quite see, but it appears Donziger reaches into a pocket of the jacket and pulls something out, says something to Zambrano, who nods.

Off Donziger's back and Zambrano's face. A loaded moment.

EXT. WELL 63 AT SACHA SUR. AN HOUR OR SO LATER.

A loud, chaotic argument, bordering on an outright brawl.

Fajardo and two engineers -- DAVE RUSSELL and FEDERICO RAIGOSA are shouting at a pair of CHEVRON ENGINEERS.

A court OFFICIAL in between them, trying to go about his work, sticks a long pole into the muck.

RUSSELL  
(protesting frantically)  
C'mon, it's too high a grade! You  
know it's too high a grade! Gravity  
pulls the chemicals downhill! This  
is bullshit!

CHEVRON ENGINEER  
*Basura, basura! Tranquilo!*

FAJARDO  
*Ten cuidado!*

The official pulls out the stick, now half-covered in a tar-like substance. Petrol.

As he lowers it into a long, plastic specimen bag --

RUSSELL  
I'm telling you -- this is  
bullshit! We're 50 meters from the  
real shit, and you damn well know  
it!

The Chevron engineer smiles innocently as Russell and Fajardo look desperately off in the direction of --

EXT. SACHA SUR. CONTINUOUS.

LONG SHOT of Donziger furiously arguing with Zambrano. He hovers over him, gesticulating toward the distance.

Zambrano holds up his hands like 'what do you want me to do?' Off Donziger, exasperated.

INT. FAJARDO'S OFFICE. NIGHT.

Donziger, visibly uncomfortable on the taco-like fold-out couch, reads a legal brief and doodles nervously -- lightning bolts, a giraffe -- in the margins as he reads.

All of a sudden the hum of the generators stops. The lights flicker, and then BLACK.

DONZIGER  
Fuck.

INT. FAJARDO'S OFFICE. HOURS LATER.

Donziger 'sleeps', tossing and turning, on the fold-out.

Suddenly we HEAR a RATTLE on the front door and a THUD -- something falling.

Donziger wakes with a start.

DONZIGER  
Pablo?

Donziger swivels and rises in a single motion. He grabs the flashlight and turns it on. He shines it toward the doorway and listens, breathing hard.

A long tense beat. SILENCE.

Must be a false alarm, or he startled whoever it was.

He looks longingly at the bare bed for a long moment, but sees the dawn light beginning to stream in the grimy windows.

He SIGHS, trudges into the bathroom.

We HEAR the shower running.

PRELAP: the shower SOUND becomes a pounding RAIN.

INT. AN OLD VAN. MORNING.

Pablo and Donziger, bags under his eyes, drive in silence, as the pounding rain covers the windshield. The wipers can barely keep up.

FAJARDO  
(dejected)  
We needed that test.

DONZIGER  
I know. I know.

EXT. LAGO AGRIO COURTHOUSE STEPS. DAY.

Donziger and Fajardo, now with the doc crew in tow, jog up the courthouse steps under umbrellas as a tropical storm pounds the concrete.

INT. LAGO AGRIO COURTHOUSE. DAY.

Fajardo and Donziger and the doc crew shake water off as they HEAR a confident Larrea, surrounded by reporters.

LARREA  
You all saw the same thing I saw this week. Our test sample showed very little contamination. Today at last we will see the plaintiff's case for what it is -- a *circus* of outright lies and distortion intended to enrich the attorneys.

MEL HABERMAN  
The largest-ever verdict in a class action suit is, like, 200 million? You really think the plaintiffs have a chance of getting more than a billion?

Donziger's pushed his way to the back of the scrum.

LARREA  
(scoffs)  
I highly doubt --

DONZIGER  
It's Mel, isn't it?

The reporters all pivot.

DONZIGER (CONT'D)  
Chevron earned 204 billion dollars in revenue last year, Mel. The year before that, it was 250 billion.  
(beat)  
Two Hundred and Fifty Billion.  
(MORE)

DONZIGER (CONT'D)  
So do I think it's realistic to suggest that the people of the Oriente deserve a fraction of that money?

(lets the question hang)  
Don't you?

The pack erupts with more questions and Donziger pauses, wants to take a few more, but sees Fajardo just inside the door, giving him the 'we're WAY late' look.

INT. JUDGE ZAMBRANO'S COURTROOM, LAGO AGARIO. 30 MINUTES LATER.

The courtroom has a serious but run-down feel to it. It's packed and hot as hell.

Hundreds of SPECTATORS fan themselves.

ZAMBRANO  
(reading his decision, \*in Spanish)  
Plaintiffs first sued Texaco in American courts, almost 20 years ago. Defendants urged the case be dismissed and brought here, to Ecuador, where it has now come before several judges in hundreds of hearings. I have been asked to render a conclusive verdict, which I do here today.

(suspenseful beat)  
Plaintiffs seek to hold Chevron accountable for the actions of Texaco, which it acquired over a decade ago. Plaintiffs also ask us to ignore the responsibility of PetroEcuador, who took over all operations here after Texaco left.

(beat)  
This is problematic.

Larrea and HEWITT PATE, 50s, Chevron's general counsel, can't hide their happiness at Zambrano's language and tone.

ZAMBRANO (CONT'D)  
I must also point out that the most egregious cases of contamination were not as the plaintiff alleges.

(MORE)

ZAMBRANO (CONT'D)  
According to Senior Cabrera's findings, the toxicity levels at Well 63 -- Sacha Sur -- were not what the plaintiffs claim.

(beat)  
Not even close.

A long beat as Larrea and Pate nod to each other in affirmation.

Donziger and Fajardo are turning pale. Fajardo hangs his head.

ZAMBRANO (CONT'D)  
But. Those factors cannot mitigate the fact that this once pristine region of our country has seen...an environmental holocaust.

Donziger perks up. Larrea's and Pate's faces change.

ZAMBRANO (CONT'D)  
Yes, most of this damage was done during the reign, if you will, of Texaco, but it is a matter of law that Chevron did assume that liability. It was Chevron who left the mess behind for someone else to clean up. These actions have caused immeasurable hardship to our people.

(beat)  
The damage must be remediated, totally and immediately.

Donziger and Larrea stare intently at the judge.

ZAMBRANO (CONT'D)  
This is not a small job. It is, in fact, historic in scope, but necessary. Therefore, in keeping with our neutral estimates of the costs involved, I find for...the plaintiffs --

(he turns the page)  
-- in the amount of 19.1 billion US dollars.

Donziger's eyes bug out.

GASPS, CLAPPING, SOBS in the courtroom.

Reporters clamber over one another. Could they have possibly heard that correctly?

English-speaking REPORTERS are frantically asking their Spanish-speaking COLLEAGUES for translation.

ZAMBRANO (CONT'D)  
(Spanish)

This court's judgment is final and binding. I thank Señor Cabrera and all of you for your patience and diligence in this matter. *Que Dios este con usted.*

We SEE Donziger with his hands clasped together, as if in prayer, head bowed, taking in the moment.

PRELAP: The rhythmic pounding of bongos...

EXT. THE COFAN VILLAGE, 50 MILES OUTSIDE LAGO AGRIO. THAT NIGHT.

Donziger takes part in a traditional celebratory dance by flickering firelight. Everyone is hugging, dancing, drinking copious amounts of pisco.

In suit pants, a loosened tie, and mud-covered bare feet, he looks a little awkward, but he's elated and in his element.

DONZIGER (V.O.)

I kept thinking about that moment, 50 years earlier, when the choppers first landed in the jungle. Crojillo saw them -- he and his dad were hunting monkeys with blow darts.

A full foot taller than any of the COFANS, he's continually leaning down to dance with the older women, talk with the older men. They come up to him one after another, hugging, kissing him.

DONZIGER (V.O.)

But these white men had guns. And drills. Told the villagers to rub the oil on their faces and chests to ward off sickness. On their balls.

A TRIBAL WOMAN, 60s, laughs and points at his feet, which makes Donziger laugh, too.

DONZIGER (V.O.)

I'm the only white man the Cofan ever trusted.

(MORE)

DONZIGER (V.O.) (CONT'D)  
I've kept my promise to them. But I  
know Chevron won't quit. I know  
they'll fight back.

ANGLE TO two Ecuadorian soldiers in fatigues -- they're peering at Donziger and the celebration, watching, unseen at the edge of the clearing.

DONZIGER (V.O.)  
I just don't know how.

INT. FAJARDO'S OFFICE. LATER THAT NIGHT.

The office is dark and empty. A phone is ringing.

The SOUND of keys in the door, and then Donziger and Fajardo stumble in, laughing and a little drunk.

FAJARDO  
A BMW, yes? With the convertible  
top?

DONZIGER  
In New York City?

The phone has stopped.

FAJARDO  
A Lear jet. I'll build you a  
private runway.

DONZIGER  
How about you just build a nicer  
fucking office.

The phone starts RINGING again.

FAJARDO  
You don't like my office?

DONZIGER  
At least, for God's sake, get a  
decent couch. And maybe a  
receptionist --

As Fajardo picks up the phone, laughing.

FAJARDO  
(affecting a fancy voice)  
La Fronta --  
(his whole face drops)  
Yes.  
(MORE)

FAJARDO (CONT'D)  
(beat, he's pale, shaking)  
What?  
(beat, urgently)  
Stay there!

EXT. LAGO AGRIO. URBAN STREET.

The WHEEEEEE!!! of the motorbike engine is deafening.

Donziger barely hangs onto the back of Fajardo's motorbike as Fajardo zig-zags through traffic at breakneck speed.

Every few seconds we think they're going to be clipped by a car or a rearview mirror but Fajardo keeps maneuvering around obstacles.

EXT. WILSON FAJARDO'S HOUSE, OUTSIDE AGO LAGRIO. MINUTES LATER.

Police lights illuminate the night as Fajardo skids the motorbike to a stop.

WILSON'S WIFE, 40s, runs up to Fajardo, sobbing hysterically.

FAJARDO  
Where is he?

He follows her gaze to a spot on the lawn where POLICE are carelessly poking and prodding Wilson's lifeless body.

Fajardo races for his brother. As he approaches...

FAJARDO (CONT'D)  
(to the cops)  
Hey. Stop that!

Fajardo gets to his brother and slowly drops to his knees.

He puts his hands on his brother's chest, and begins to cry.

Donziger is right behind him, his hands supportively on Pablo's back.

DONZIGER  
They will NOT get away with this.  
(beat)  
I'm so sorry.

OFF Donziger's stricken face, illuminated by the flashing lights.

FADE TO BLACK.

PRELAP: 10 seconds!...Five! Four!

INT. THE GOOD MORNING AMERICA SET. ABC. NEW YORK CITY.

Donziger sits in a chair across from ROBIN ROBERTS. A PRODUCER counts down three, two, one on his hand.

DONZIGER

It's true. It's the biggest legal decision against a corporation ever, but it has come at a high cost. 20 years of fighting, millions in legal expenses, thousands of innocent lives lost...and...the loss of my partner's, my Ecuadorean co-counsel's brother's life...

Roberts looks troubled, a little confused.

DONZIGER (CONT'D)

The night we defeated Chevron, he was killed, shot in the head -- execution style.

ROBERTS

Oh my...

DONZIGER

My attorneys tell me I can't say it's payback. So I won't. I'll let your viewers do the math.

INT. CHEVRON HEADQUARTERS. SAN RAMON, CA. DAY.

O'Reilly, the CEO who we may recognize from the opening, Pate, and a few other attorneys sit around a conference room.

The atmosphere is very tense.

O'REILLY

I mean Jesus Christ! We're murderers now? He can say that on national TV?

(beat while no one speaks)  
You know all the lefty enviro groups are giving this guy awards?  
(MORE)

O'REILLY (CONT'D)  
He's the biggest hero since Jane Fucking Fonda. He's got money from hedge funds now. And this German heiress, whatever her name is...

PATE  
Gretchen Morgan.

O'REILLY  
I don't actually care what her name is. Anybody got a plan?

VOICE (O.S.)  
(from the squawk box)  
Um...Mr. O'Reilly...New York here.  
We still think the verdict will be hard to enforce in American courts.  
At most he can --

O'REILLY  
Is that so? Because as I recall we were in American courts, son, and all you geniuses told me we'd have a slam dunk in Ecuador. Now you're saying whoops, should have stayed put!

(beat)  
Quito?

LARREA (O.S.)  
We're looking at the statutes here and we think we may have found precedent --

O'REILLY  
For Christ's sake. This is why I can't stand talking to lawyers.  
(aside)  
No offense, Hew.

Pate nods deferentially.

O'REILLY (CONT'D)  
You think this is a legal problem for me? We're talking about *six quarters* of profit some spic judge just ordered us to fork over. Not to mention having our image as a corporate citizen flushed through shitters on every continent. Stock price has already dropped 14 percent. Hell, our whole fucking market cap is only 10 times this verdict.

(MORE)

O'REILLY (CONT'D)  
(a long beat, everyone in  
the room looks scared)  
Do you guys get that I have a board  
I answer to?

INT. CHEVRON HEADQUARTERS BOARDROOM, SAN RAMON. CONTINUOUS.

As the others file out, O'Reilly stands at the window.

O'REILLY  
Hew.

Pate turns back and joins him.

O'REILLY (CONT'D)  
It's time for new counsel.

PATE  
Jones Day is as good as they come,  
Mr. O'Reilly.

O'Reilly turns to face him.

O'REILLY  
(hard)  
I don't want white shoe. I want  
jack boots, you understand?

INT. RANDY MASTRO'S HOME, SUMMIT, NEW JERSEY. DAY.

A traditional, gorgeous, marble-and-steel suburban kitchen.

RANDY MASTRO, early 50s with white hair and beard, glasses perched on the end of his nose, faces his 12-year-old shaggy-headed son, RYAN, who sits in a chair by the long antique kitchen table.

Mastro holds a BUZZING set of barber's clippers.

RYAN  
I'm going to look like a freak.

MASTRO  
No you won't. And it was too long  
anyway. Hold still.

Mastro runs the clippers through the thick locks and they start to drop onto the Star-Ledger covering the floor.

RAYMOND, 8, looks on anxiously.

MASTRO (CONT'D)  
(over the sound of the  
clippers)  
Hold still, would you?

RYAN  
I'm gonna look like I joined the  
Marines!

MASTRO  
Marines don't get lice.

RYAN  
Dad, my friends had it!

MASTRO  
Then get new friends.  
(beat while he struggles  
with the clippers)  
Hold still, Ryan.

Mastro feels a buzz in his pocket.

He fishes out the cell phone with his free hand, peers at it curiously, then switches off the clippers so he can answer.

MASTRO (CONT'D)  
(to Ryan)  
I'm not done.  
(then into the phone)  
It's Randy Mastro.  
(beat, then he smiles)  
Hew! That's a relief. Saw the  
caller ID and thought Jonine must  
be sitting at the Chevron down the  
street with my mangled Audi. Again.  
(beat, then glances at  
Ryan)  
If I told you, you wouldn't believe  
it. How 'bout you? What's got you  
working on Sunday?  
(beat)  
Uh-huh. Now's OK.

INT. DONZIGER'S APARTMENT. CONTINUOUS.

We HEAR the CRINKLING of industrial plastic as Donziger's long arm reaches through the break in a wall of an ET-style plastic barrier.

We SEE him part the plastic and step through.

Laura is standing in front of him, her back turned.

DONZIGER

So?

Laura steps aside, revealing a beautiful, half-finished, sparkling new gourmet kitchen.

LAURA

I mean, it takes my breath away. So does the price tag.

DONZIGER

30% of 19 billion? If Viking made anything in platinum, we'd buy that.

LAURA

We don't actually have the money yet.

DONZIGER

(grabbing her lovingly but firmly)

Details. Should we try it out?

Before she can ask what he means, he hoists her up onto the range and starts to kiss her.

She squeals, laughing.

He leans her back, and then she squeals louder. She reaches under her ass and produces the copy of *Vanity Fair* she just sat on, flattened to a page.

She glances at the magazine page and holds it up to him mischievously.

The open page features a picture of Donziger and the headline: "Jungle Law." She mocks his serious pose.

Donziger laughs and grabs the magazine, flings it over his shoulder, prompting both of them to crack up as they start to kiss again.

INT. RITZ CARLTON RESTAURANT, HOUSTON. DAY.

Mastro sits on the other side of a corner table from O'Reilly, with Pate next to him. A WAITRESS, 20s, attractive brings a round of martinis.

O'REILLY  
(clocking her ass)  
Thanks sweetie.

MASTRO  
Nothing. My answer would be  
nothing.

O'REILLY  
(incredulous)  
You think we can get out of this  
without paying a dime?

O'Reilly leans back and grins, looks over at Pate with a look  
that says -- 'this one. I like this one.'

O'REILLY (CONT'D)  
I've seen your client list at  
Gibson Dunn. It's impressive. But  
my guys are telling me the best we  
do is to cut this verdict in half.  
They're the ones who told me we'd  
roll right over the Ecuadoreans,  
even with this new socialist  
government in place. Now they're  
saying we have to get more 'wired  
up' there than we were, if that's  
even possible. But I have no  
interest --

MASTRO  
You a baseball fan, Dave?

A beat. O'Reilly doesn't get interrupted or called Dave very  
often.

O'REILLY  
I catch the Giants now and again.

MASTRO  
You know why the Yankees win so  
much?

O'REILLY  
Money. Everyone knows that.

MASTRO  
It's what they do with the money.  
They buy left handed hitting and  
left handed pitchers. Why?

O'REILLY  
Well, that stadium --

MASTRO  
Has a short porch in right field.  
Exactly. They build their team  
around that field. Always have.  
Babe Ruth. Reggie Jackson. Whitey  
Ford.

O'REILLY  
OK.

MASTRO  
When you go into Yankee Stadium,  
the game is rigged. You think  
you're playing the same game as the  
Yankees, but you're not. It's their  
field and they always have the  
advantage.

O'REILLY  
So you need some lefties of your  
own, right?

MASTRO  
(shaking his head)  
It's impractical. You'll never  
build as good a team for that  
ballpark as they have. You want to  
beat the Yankees, your best shot is  
to get them in another venue...say  
Fenway where right field goes on  
forever.

O'Reilly nods -- he gets it.

INT. HEDGE FUND CONFERENCE ROOM, MANHATTAN. FEW HOURS LATER.

Donziger, standing, is giving his PowerPoint presentation.  
Behind him we see the same slide as in the last scene.

Fajardo and GRETCHEN MORGAN, 50 and attractive with a slight  
German accent, sit nearby at the conference table, alongside  
six MEN IN BUSINESS CASUAL.

The doc crew is filming.

DONZIGER  
Pablo will handle the appeals in  
Ecuador...

Berlinger scurries over quickly and adjusts the lavalier mic  
on Donizger's lapel, which glows green.

DONZIGER (CONT'D)  
Patton Boggs in Washington will  
help with any appeals here --  
they're in pro bono.

FUND MANAGER  
(annoyed at Berlinger and  
the doc crew)  
So if the verdict stands as you say  
it will, when do we see our return?

INT./EXT. BACK SEAT OF A LIMOUSINE. A HALF HOUR LATER.

DONZIGER  
All they ask about is their money.

MORGAN  
They're a hedge fund.  
(a long, amused look)  
Idealism is what you have me for.

DONZIGER  
Gretchen, the appeals could take  
months. We have significant  
expenses going forward.

MORGAN  
I've seen to it you're taken care  
of haven't, haven't I?

A beat as Donziger stares back, nods gratefully. They hold  
the look half a beat too long.

INT. OFFICES OF GIBSON, DUNN AND CRUTCHER, NEW YORK. DAY.

About a dozen LAWYERS, recent Yale and Harvard types, sit or  
stand in the "fishbowl" conference room.

Mastro strides in purposefully and sits down at the end of  
the table.

MASTRO  
(no-nonsense)  
You've all seen the summary I sent  
last night. The case files should  
arrive tomorrow on a flatbed truck.

A few chuckles.

MASTRO (CONT'D)  
Not a joke.  
(beat)  
Don't go home. Don't sleep. Don't eat unless it's ordered from upstairs. I want a new venue and you're going to find the cause to get it. We're not going to have this out in some backwoods Ecuadorian courtroom. I want it here, where the whole world can see it exposed for what it is.  
Extortion, plain and simple.

Mastro nods to acknowledge the half-raised hand of SARAH STEIN, 29.

STEIN  
But if we get through the appeals in Ecuador, we'll end up with a smaller verdict. Starts us off at a better place?

MASTRO  
I'm not interested in a better verdict. I'm not interested in a negotiation. Chevron isn't caving in Ecuador, because if it does, it'll end up going through this same routine in every Godforsaken jungle, hovel and hut on the planet. OK?

STEIN  
There's no number for Chevron that makes it go away? Seems like it wouldn't be that hard to get this reduced to 10...even 8 billion?

MASTRO  
They fired the settlers over at Jones Day and hired *us* for a reason.  
(beat)  
We're going to make sure Chevron doesn't pay a penny -- not one red cent -- of this verdict.  
(beat)  
That means we're going to fight this until hell freezes over...And then we'll fight it out on the ice.

INT. OFFICES OF GIBSON, DUNN AND CRUTCHER, NEW YORK. DAY.

Mastro sits on the edge of his desk, listening to a LAW PROFESSOR, balding, late-30s and clasically nerdy.

Mastro looks irritated.

Behind him we SEE a large photo of Mastro and Rudy Giuliani celebrating on election night.

Stein sits in the chair next to the professor, listening intently with a binder in her lap.

LAW PROFESSOR

-- which in certain cases means jurisdiction can be transferred to any state with what the law calls a *guiding financial interest*. Now, this can be principle ownership of the company, or even a debt to the shipping entity. The country in question might not even --

MASTRO

We're talking about ships. At sea.

LAW PROFESSOR

Well, yes, but since Chevron uses tankers to export its product, maritime law might reasonably extend to its operations inland. If there's even a presumption that --

MASTRO

Yeah, OK.

(to Stein)

Let's keep it as an option.

(to the professor)

Thanks for coming in Professor, we appreciate it.

LAW PROFESSOR

Oh.

(looks at Stein, confused)

There are several other provisions in the maritime code that might apply equally --

MASTRO

(extending his hand)

Thank you. Really.

INT. OFFICES OF GIBSON, DUNN AND CRUTCHER, NEW YORK. TWO DAYS LATER.

Mastro enters the fishbowl in the middle of a brainstorming session.

The 'best and brightest' group sits around the table and on the window ledge, in front of a white board with scribbled lists of courts and legal citations.

LAWYER #1  
(clocking Mastro's entrance)

You can't attach assets if the assets aren't attachable, right?

Mastro silently takes a seat.

LAWYER #2  
So you're saying the Ecuadorian court has as much jurisdiction over Chevron as it does over, say, Ikea. Which doesn't operate there.

LAWYER #1  
Chevron doesn't operate there.

STEIN  
C'mon. A court's not going to set that precedent.

LAWYER #1  
Can I sue the successors of the East India Tea Company in Hartford?

Mastro leans forward, rubs his forehead, thinking.

LAWYER #3  
Wouldn't that be the British crown?  
You can't sue the queen.

LAWYER #2  
It's a metaphor.

STEIN  
More like an analogy.

LAWYER #2  
What if we could argue that Texaco's operation in Ecuador never really transferred to Chevron? That for all intents and purposes it was subsumed by PetroEcuador.

MASTRO

This isn't it.

The rest keep talking "blah blah blah motion this, venue that, jurisdiction, maritime precedents, etc etc etc"

MASTRO (CONT'D)

This isn't it!

Silence.

STEIN

What do you mean?

MASTRO

*This. What you're doing. Scouring for technicalities.*

LAWYER #1

(confused)

You said you wanted to move venues. We're looking for precedent to do that.

MASTRO

This isn't moot court, guys. Arcane motions filed by the rich and powerful oil company aren't going to get us a venue change. That's what Donziger wants us to do. He's been at this for 20 years already. He's obviously not looking for a quick payday. He gets off on being David against Goliath. And nobody likes Goliath. Goliath's mean. He wanted to eat David's bones.

(beat)

The more we pull piddly maneuvers like that --

(motions to the whiteboard)

-- the more Chevron gets pounded. And the more likely we pay.

STEIN

So what are we supposed to do?

MASTRO

Chevron's been on trial for 20 years. It's time to put Donziger on trial.

(beat)

We need to show this whole case is a *calculated shakedown*.

(MORE)

MASTRO (CONT'D)  
That fraud -- or something looking  
a hell of a lot like it -- was  
willfully perpetrated in Ecuador.  
You find that and a US judge will  
have no choice but to move the case  
back here.

STEIN  
Chevron's had a tail on the guy for  
years here and in Ecuador and we've  
got no evidence of anything like  
that.

MASTRO  
(exasperated)  
Go get it.

INT. EAST COAST/WEST SIDE POST PRODUCTION. NEW YORK CITY.

Donziger and Berlinger, the doc director, sit in a dark room  
with 5 or 6 screens arrayed in front of them.

A scene is playing on the screens -- it's Donziger prepping  
the Ecuadoreans in native dress before the Chevron  
shareholder meeting.

ON THE SCREENS --

DONZIGER  
(leaning over the  
Ecuadoreans)  
OK. That's great. That time was  
perfect. It's OK to be a little  
nervous. You're talking to a room  
of 1,000 rich white men. Don't be  
ashamed if you're nervous.  
(beat)  
If you shed a tear while telling  
your story, that's OK too.

BACK IN THE ROOM --

DONZIGER (CONT'D)  
That.

Berlinger stops the movie and the screen freezes.

BERLINGER  
You know this is my movie, right?  
And the final cut ships in two  
weeks?

DONZIGER  
It's one cut, man.

BERLINGER  
One more, you mean.

Berlinger sighs, jots down a note at the end of a long list.  
Donziger rolls his wrist in a "start up again" motion.  
Wearily, Berlinger hits play.

INT. GIBSON, DUNN AND CRUTCHER. NEW YORK CITY. EVENING.

Mastro walks into the fishbowl, where the 'best and brightest' are buried in books.

MASTRO  
Think you'll get an A?

They look up all at once with blank faces.

MASTRO (CONT'D)  
(to himself)  
Looks like Saturday night at the  
nerd dorm.

LAWYER #1  
We're divided into teams.

MASTRO  
Uh-huh. Looking for?

LAWYER #2  
Fraud. Malfeasance. Like you told  
us.

MASTRO  
In...  
(picking up a journal and  
examining it)  
The Colorado Journal of  
International Environmental Law and  
Policy?

LAWYER #1  
(pointing to the other  
team)  
They've got the case files. We're  
going through motions he filed.

MASTRO  
Motions.

Both young lawyers nod eagerly.

MASTRO (CONT'D)  
Right. It...it's a good instinct.  
(a long pensive beat)  
Good night everyone.

INT. FORDHAM LAW SCHOOL. NIGHT.

The seminar room is packed with 25 law students, but they don't have the un-calloused feel of Mastro's "best and brightest."

Most look like they've come from working construction or waiting tables.

We come in on a debate between the class stars: MIKE O'CONNELL, early 30s and burly with smart, quick eyes, and BECCA VERDOLINO, late 20s and as hot as she is smart.

MIKE  
Because it's the state's job to put up guardrails. If you're driving drunk, you know, that's on you. But if you kill my client because there's no guardrail, then why can't I sue the shit out of the state?

Laughs all around. These students have fun.

Mastro, feet perched on a desk in front of the room, smiles.

BECCA  
Because of sole proximate cause.

MIKE  
What?

BECCA  
Do the reading jackass.  
(more laughs)  
In order for the state to be liable, you have to show sole proximate cause. Which means the state has to be the *only* one at fault.

An impressed whistle from the next row back.

MIKE

Yeah, well, you can put that in your brief if you want, but I'm going to the court of public opinion, baby.

BECCA

Public opinion doesn't matter here. It's the law. Am I right?

They both look at Mastro, who's now staring off toward the window, wheels turning.

MIKE

Professor Mastro?

Beat.

MASTRO

Yeah. Change of lesson plan. Let's think about something else.

The students look confused.

MASTRO (CONT'D)

Close the books for a minute. Just listen.

INT. FORDHAM LAW SCHOOL. 30 MINUTES LATER.

MASTRO

But this guy's made it about himself. About *morality*. You club baby seals, he saves poor people. How do you make it about the law?

(hesitating)

Hypothetically, of course.

He looks out at the room and calls on --

MIKE

It's like scar tissue, man.

A few CHUCKLES from the side of the room. Mike shoots someone a look.

MIKE (CONT'D)

I've got scarring in my shoulder from football. The more scar tissue you remove, the worse it comes back.

MASTRO  
OK?

MIKE  
So you can file all the right motions. You might win some. But the more money you spend to defend yourself...you know, hypothetically...the more you look like some corrupt company that only cares about your stock price. And not about people. So you're still losing, and you're still stuck in a South American court...hypothetically.

MASTRO  
Exactly. Exactly. So you do what.

He calls on TONY TURCHEK, 28, handsome and wiry.

TONY  
Turn it around on him, man. Dig. Make it about *his* morality.

MIKE  
Like go through his garbage?

TONY  
Not in that suit, bro.

More laughs.

BECCA  
The guy you're describing.

MASTRO  
If he existed.

BECCA  
Yeah. It's all about him, right? I know guys like this.

TONY  
*Mike.*

MIKE  
Fuck you.

MASTRO  
Go on.

BECCA

Nobody that vain doesn't make a mess somewhere. Bragging about himself. Talking too much. Exaggerating.

INT. GIBSON, DUNN AND CRUTCHER. NEW YORK CITY. TWO DAYS LATER.

Back in the fishbowl, except now, alongside the two teams of young Ivy League lawyers we saw last, is the Fordham team: Mike, Tony and Becca.

Mike is scrolling through the New York Times on his laptop.

Tony has headphones plugged into a laptop, and Becca is typing away.

LAWYER #1

(looking up from a thick journal, to Mike)

Gonna do the crossword, now that you've gone through all the other sections?

LAWYER #2

(too himself, loud enough for everyone)

I doubt very much he does the Thursday puzzle.

MIKE

Yeah, no, I'm not that sharp. Otherwise I'm sure I'd be poring over the, uh...

(peering over at the spine of the journal)

*Berkley Journal of Employment and Labor Law.* I hear they, like, worship that in Ecuador. It's like Maxim.

LAWYER #1

Not that you'd understand this, but the standing of multinational corporations to challenge foreign verdicts in American courts happens to be central to --

BECCA

Guys. Please. There's a rest room down the hall if you really need to whip them out.

INT. GIBSON, DUNN AND CRUTCHER. CONTINUOUS.

Mastro, in the hallways, surveys the scene in the fishbowl before walking in.

WEATHERFORD (O.S.)  
New recruits, Randy?

ROLAND WEATHERFORD, late 60s, the managing partner, has sidled up to Mastro and is looking through the glass.

MASTRO  
An experiment, Roland. Fresh eyes.

WEATHERFORD  
(wryly)  
And who's paying them?

MASTRO  
I am.  
(as he opens the door the  
fishbowl)  
For now.

INT. GIBSON, DUNN AND CRUTCHER. CONFERENCE ROOM. MINS LATER.

MASTRO  
(to the Fordham team)  
So?

BECCA  
The lexis search here is like 12 times faster than school.

TONY  
(mouth full)  
Croissants are good too.

MASTRO  
I'm glad we're accommodating you.

BECCA  
This guy's given hundreds of interviews. Don't know how he finds time for anything else.

LAWYER #1  
(looking at Mike, who's  
reading the Times)  
Like reading through Sports, you  
mean.

MIKE  
Actually, it's Arts. And I did find  
something interesting.  
(taps the screen)  
From last month.

MASTRO  
I thought we'd pulled all the  
clips.

STEIN  
Only the news pages.

MIKE  
Little blurb says a documentary is  
premiering at the Sundance Film  
Festival. In...Wyoming I think?  
(reading from the screen)  
"The film gives a behind the scenes  
look at the battle waged by  
environmental hero Steven Donziger  
against corporate titan Chevron."  
(beat)  
Oh -- Utah. Not Wyoming.

Off Mastro, intrigued.

EXT./INT. THEATER. SUNDANCE FILM FESTIVAL. PARK CITY, UTAH.  
NIGHT.

Outside the theater, flash bulbs flash as Gretchen, Joe  
Berlinger and Donziger pull up and exit a large black SUV.

Every 3rd or so person asks Donziger for his autograph or  
picture and he happily signs/poses.

On the marquee we see: WORLD PREMIERE -- CRUDE: A NEW  
DOCUMENTARY FILM BY JOSEPH BERLINGER

INT. THEATER. SUNDANCE FILM FESTIVAL. PARK CITY, UTAH. A HALF  
HOUR LATER.

Becca and Mike sit in the crowded theater as the lights dim.

MIKE  
(whispering)  
You said you were going to put it  
in your pocket.

BECCA  
(rifling through her bag)  
Have you seen these pants? I can't  
fit a credit card in these pockets.

MIKE  
Jesus.

BECCA  
You weren't complaining when my ass  
got us in here.  
(pulling a battery pack  
from the bag)  
Voila!

The opening credits are starting to roll.

PATRON  
Shhhh!

BECCA  
(whispering)  
Sorry!  
(to Mike)  
Here.

He takes the battery pack, attaches it to a small camcorder, turns it on, is illuminated briefly by the green ON light, which he quickly covers with his thumb.

Becca and Mike slump down in their seats as he trains the camera on the screen.

We SEE a quick POP of the screen through his viewfinder -- a huge 15 by 20 foot Donziger talking to Crojillo -- the scene we saw Donziger and Berlinger editing earlier.

INT. THEATER. SUNDANCE FILM FESTIVAL. PARK CITY, UTAH. TWO HOURS LATER.

Donziger, on stage, is bowing to THUNDEROUS APPLAUSE, a huge screen shot of the movie poster behind him. Berlinger and Morgan stand off to the side, beaming.

INT. THEATER. SUNDANCE FILM FESTIVAL. PARK CITY, UTAH.  
CONTINUOUS.

As Berlinger answers questions about the movie from a pack of WRITERS, Morgan and a few ATTENDANTS lead Donziger through a rear door and into a hallway off stage.

As they briskly make their way down the hall --

MORGAN  
(exuberant, overcome)  
That was fantastic! What a night!

DONZIGER  
They liked the film.

MORGAN  
They loved it, Steven. It's going  
to be terrific for us!

They pass a stairwell --

DONZIGER  
Do we have a dinner reservation?

-- and as they do we see a couple pressed up against the wall, kissing and groping one another.

It's Mike and Becca.

They part lips and stare in disbelief at the spot where Donziger just passed.

Their faces say: was that *him*?

INT./EXT. MASTRO'S CAR. SUMMIT, NJ. EARLY MORNING.

A cold, gray early morning. Ryan, dressed in hockey gear, sits in the passenger seat of Mastro's Porsche Cayenne.

Ryan rubs sleep from his eyes, looks around at the quiet street and then up at the red light.

RYAN  
Just go Dad. We're already late.

MASTRO  
What?

RYAN  
I'm going to have to skate fartleks  
after practice if we're late again.

MASTRO  
We don't run red lights.

RYAN  
There's no one on the road.

MASTRO  
Maybe we should stop by the 7-11  
and steal some coffee.

Ryan's face says that's not the worst idea he's ever heard.

MASTRO (CONT'D)  
(softer now)  
Rules don't exist for when they're  
convenient. The most important time  
to follow the law is when you've  
got a good reason not to.

RYAN  
That makes no sense.

MASTRO  
(looking at him)  
Yes. It does. It's what holds the  
whole system together, Ryan. We  
don't get to pick the lights we  
obey and the lights we run. Do you  
get that?

RYAN  
It's green dad. Can we go now?

INT. GIBSON, DUNN AND CRUTCHER. NEW YORK CITY. AN HOUR LATER.

Mike and Tony are watching shaky, bootlegged documentary  
footage of Donziger, scenes we've seen before.

MASTRO (O.S.)  
Anything?

They turn to see Mastro, still dressed in the weekend polo  
and khakis he was wearing in the car.

MIKE  
Not really. Whole thing's a blow  
job.

TONY  
It's out on Netflix in a couple of  
weeks, anyway.

MASTRO

That's ok, but burn me a copy of  
what you got now, would you?

Back to the GRAINY SCREEN, which has now cut to the scene in Zambrano's office, as Donziger is saying --

DONZIGER

While the third largest corporation  
in the world accuses me of  
intimidation! And sends its goons  
to harrass me!

INT. RANDY MASTRO'S HOME, SUMMIT, NEW JERSEY. NIGHT.

We pan out from the screen and now we're in a mahogany library lined with antique books.

Mastro, reclined on a leather couch, has the shaky video on in the background. You can imagine it's been playing on a loop for hours.

He reads a thick memo, looking up every so often to eye the screen.

DONZIGER

(on the screen)

*Abogado corrupto!!*, ETC

Mastro looks up to see his wife, JONINE, 40s, lacrosse player pretty, standing in the doorway in her pajamas.

SUSAN

I rolled over and poof, you'd  
disappeared.

MASTRO

My mind was racing. Look at this  
asshole.

SUSAN

It's 2:30 in the morning, Randy. I  
think I won't.

(beat, as she walks away,  
wryly)

That's what everyone says about  
you, you know.

Off Mastro staring at the screen again.

INT. DONZIGER'S APARTMENT. EARLY MORNING.

Donziger's at his desk, a copy of the Wall Street Journal is folded to an article about Fajardo.

INTERCUT as needed with FAJARDO'S OFFICE in ECUADOR.

FAJARDO

You said we needed money for the appeals, Steven.

DONZIGER

Yeah, no. We do. But Gretchen's got it covered for now. It's a precarious time. We have to be methodical.

FAJARDO

Yes. But...I said nothing you yourself haven't, in many places...

DONZIGER

It's a good article, but it isn't helpful right now. Methodical. OK?

FAJARDO

(stung)  
Methodical.

We HEAR Donziger's other line BEEP.

DONZIGER

It's Gretchen. I'll talk to you later.

And Donziger flips to the other line.

INT. DONZIGER'S UPPER WEST SIDE APARTMENT. MORNING.

Donziger and Laura face each other tensely across the new, half-finished kitchen island.

LAURA

You could have called her back after you dropped David.

DONZIGER

It's already late afternoon in Berlin.

LAURA

It's morning here and you're late.

Quick pop of David, backpack on, standing nearby and looking anxious.

DONZIGER

What is this?

LAURA

What is *this*? You're amazing sometimes.

(quieter so David doesn't hear)

The whole thing...her...why don't you tell me what that's about.

DONZIGER

(voice rising)

What are you saying?

LAURA

What do you think I'm saying?

DONZIGER

Gretchen makes the entire case possible. Without her support, we're done. You know that...For fuck's sake!

LAURA

Steven!

DAVID

Jar, daddy!

DONZIGER

(to David)

I know, buddy. I will.

(to Laura)

She's a patron. That's all.

LAURA

Oh that's all.

DAVID

Ms. Annie is gonna be mad if I'm late again.

DONZIGER

And when it's over --

LAURA

When what's over? The case? Her? Us?

DONZIGER  
C'mon --

LAURA  
(motioning around the  
unfinished kitchen)  
This was supposed to be the end,  
not the beginning. 20 long years.  
We're supposed to be living the  
dream. And all you do is fawn over  
some woman in Germany like a  
lovesick teenager. Another woman.

DONZIGER  
Let's not do that again.

LAURA  
No, let's not. Let's not.

David's been clocking all this and his lip starts to quiver.

DONZIGER  
I told you --

WHACK. His packed attache case lands squarely in his sternum,  
and he manages to hold onto it while grimacing.

LAURA  
(to David)  
It's OK sweetheart. Just take Daddy  
to school. You'll never get there  
otherwise.

INT. RANDY MASTRO'S HOME, SUMMIT, NEW JERSEY. NIGHT.

Mastro walks in the door, tie still cinched up, leather  
briefcase under his arm, to controlled chaos.

His kids are arguing, Jonine is on a phone call and the  
Filipino NANNY is trying to tidy up.

They barely register his arrival.

Mastro goes over to the mail table, which is piled high in a  
disorganized way.

He straightens the piles meticulously. Letters, magazines...

MASTRO  
We still get *Ranger Rick*?

Then Mastro spots an envelope from Netflix, the old-fashioned red kind.

He tears it open.

INT. RANDY MASTRO'S HOME, SUMMIT, NEW JERSEY. NIGHT.

Mastro sits in his leather chair, papers arranged neatly around him.

He's watching the documentary out of one eye while he reads a research memo, which is open to surveillance photos of Donziger.

We recognize shots of Donziger flipping off the camera outside David's school.

On the TV screen, again, is the scene of Donziger talking into camera at Sacha Sur. Mastro glances at the TV over his glasses.

Then the TV shows Donziger and his team, as we saw earlier.

Mastro glances over again. Then he returns to his reading.

Something hits him. He bolts upright, and he gropes around for the remote.

He rewinds and replays the scene.

MASTRO  
(confused)  
...the fuck?

He hits rewind again.

TIME CUT TO 5 MINUTES LATER

Mastro's in his BEDROOM unplugging the bedroom TV and DVD player without much regard for how much noise he's making. Jonine wakes, clocks Randy, rolls her eyes and puts a pillow over her head.

TIME CUT TO 10 MINUTES LATER.

In the study, Mastro is hooking up the bedroom TV and DVD player. He's on his knees connecting cables, etc.

TIME CUT TO 15-20 MINUTES LATER.

Mastro stares hard at two versions of the doc in freeze frame, side by side. Both show a scene of Donziger's team huddled over topographical maps on the hood of a Jeep.

In one, a paunchy, sweaty Ecuadorian dude we may recognize from the group at Sacha Sur earlier.

But in the second version he's somehow...gone.

MASTRO  
(tapping the screen)  
Who are you, amigo?

He reaches for the phone.

INT. GIBSON, DUNN AND CRUTCHER. NEW YORK CITY. EARLY MORNING.

MIKE  
Carlos Beristain.

We see Mike, Becca, Tony, Stein and a few other lawyers gathered around Mastro's desk.

MASTRO  
He's Ecuadorian.

MIKE  
Spanish, actually.

TONY  
Isn't that a kids' book? The Berenstain Bears?

MASTRO  
(ignoring Tony, per usual)  
And he's an oncologist?

STEIN  
More like a cancer researcher. He studied the clusters around the oil pits.

MASTRO  
OK. So run this past me again. He worked for...

MIKE  
Cabrera.

STEIN

The judge appointed Richard Cabrera Vega as his *independent* scientific expert in the Chevron case. Cabrera's an engineer. He wrote a detailed report --

BECCA

(cutting in)

Three thousand pages --

STEIN

-- in which he relied heavily on Beristain's research into the cancer clusters.

MASTRO

So wait. Our Dr. Beristain is doing research for Mr. Cabrera, the court's impartial expert. Cabrera then issues his War-and-Peace size report to the judge. Which the judge then uses to hand down the largest verdict in the history of corporate litigation.

MIKE

Right.

MASTRO

Only somehow Beristain is huddling with Donziger at one of the most critical parts of the case.

MIKE

Right.

MASTRO

Except that when the final cut of the movie comes out, he's somehow been...I don't know...disappeared. Like he was never there.

BECCA

Yes.

MASTRO

I didn't even know you could do that.

TONY

You can do anything now. My mom, she's got this hilarious Christmas picture of all us with, like, Chewbacca sitting in --

MASTRO

(cutting him off, shouting  
into the hallway)

Chloe?! I need to see Judge Kaplan!

INT. NEW YORK STATE SUPERIOR COURT. NEW YORK CITY. DAY.

Mastro sits across from JUDGE LEWIS KAPLAN, 50s, bespectacled, intense.

Kaplan has a massive stack of paper in front of him.

KAPLAN

(looking up)

All of it?

MASTRO

Outtakes, bloopers, whatever's there.

(sensing Kaplan's  
skepticism)

We've found multiple discrepancies already. Altered footage, shortened scenes. We believe we'll find a pattern of corruption and a cover-up that's material to our case.

KAPLAN

A case decided by and still under the jurisdiction of an *Ecuadorian* court.

MASTRO

Yes, but once we have these materials, we'll be filing a motion to nullify the verdict here.

KAPLAN

Didn't your client already get a judge to *dismiss* the case here so they could move it to Ecuador?

MASTRO

(smiling thinly)

Circumstances have changed.

KAPLAN

I see.

(beat as he peruses the  
pages)

I don't have to tell you what the  
free speech crowd will say about  
this, Randy. Not to mention the  
MPAA. Probably the Bar Association  
too. This material belongs to a  
filmmaker.

MASTRO

The filmmaker appears to be in  
league with the plaintiff here,  
Judge.

KAPLAN

Which could make the material  
privileged, even if so.

MASTRO

Attorneys claim privilege. This  
guy's a PR impresario who happens  
to have a law degree.

(beat, then more  
familiarly)

He's been playing the system, Lew.

Off Kaplan, brow-furrowed.

INT. DONZIGER'S UPPER WEST SIDE APARTMENT. MORNING.

Donziger, in his half-finished kitchen, signs a check and  
rips it from the checkbook.

ESTEBAN

Fifteen.

DONZIGER

For the cabinets.

ESTEBAN

That was the first draw.

(re the check)

This twenty is for the next phase.

DONZIGER

(nodding at the half-hung  
cabinets)

Why didn't I go into a business  
where you're paid up front?

ESTEBAN  
Que?

A cell phone is ringing.

DONZIGER  
(to Esteban)  
OK, OK. Hang onto that for a day or  
two so I can move some things  
around.

(answering his phone)  
Steve Donziger.  
(beat)  
Wait. What?  
(beat)

Joe. Calm down. A subpoena for  
what?

(beat)  
That's outrageous. It's a first  
amendment violation! It'll never  
hold up!

(beat)  
No! You can't do that!  
(beat)  
For Christ's sake, Joe, it's a  
judge's order, no one is burning  
anything. We'll file a motion.  
We'll fight it and we'll win.

INT. JUDGE LEWIS KAPLAN'S CHAMBERS. U.S. DISTRICT COURT,  
SOUTHERN DISTRICT OF NEW YORK. DAY.

Close up on Berlinger, seated. He looks petrified.

KAPLAN (O.S.)  
Again. How did you meet this Mr.  
DeLeon?

PAN OUT to see a nervous Berlinger sitting in front of  
Kaplan's desk, flanked by Mastro on one side and Donziger on  
the other.

A group of other LAWYERS, male and female, hover near the  
windows.

BERLINGER  
I, uh, think it was...um...

DONZIGER  
DeLeon called me because he heard  
there was a movie in the works.  
(MORE)

DONZIGER (CONT'D)  
I'm sure I gave him Mr. Berlinger's  
number and --

KAPLAN  
(holding up his hand)  
Mr. Berlinger. I asked you.

BERLINGER  
Yeah, I think Steve introduced us.  
DeLeon wanted the story to be told,  
you know.

KAPLAN  
So he's a law school classmate of  
Mr. Donziger's here, and he  
contributed \$750,000 to your movie.  
Almost the entire budget.

DONZIGER  
He made an investment, Judge. I had  
nothing to do with that.

BERLINGER  
I mean, DeLeon basically said he  
wanted to, um, invest in the movie.  
It's really difficult to get  
funding for these films, but if  
they do well in foreign  
distribution, you can earn back --

DONZIGER  
(cutting in again)  
For crying out loud, your honor.  
Barack Obama went to law school  
with us too, but that doesn't mean  
his energy policy comes from me.  
There are plenty of --

KAPLAN  
(exasperated)  
Mr. Donziger! I was not asking you.

DONZIGER  
Yes, your honor.

KAPLAN  
(looking toward the  
window)  
And Mr. Abrams? To whose largess do  
we owe your esteemed presence?

FLOYD ABRAMS, early 60s and sharply dressed, steps forward.

ABRAMS

Your honor, I represent in this matter the New York Times, the Wall Street Journal, the Washington Post, ABC, NBC, and CBS.

KAPLAN

Is that all.

ABRAMS

We've filed an amicus brief, your honor, which you should have, asking that Mr. Berlinger's tapes and notes be granted protection under the recognized code of journalistic freedom with which you are familiar.

KAPLAN

The New York Times believes this documentary is a journalistic enterprise?

ABRAMS

It does, your honor.

KAPLAN

Does the New York Times expect its profile subjects to go out and round up contributions for the paper, Mr. Abrams?

ABRAMS

We're of the mind that the nature of the funding is unconnected to the issue of journalistic legitimacy, your honor.

KAPLAN

(looking straight at  
Donziger)

Yes. So was Pravda.

INT. MICHAEL'S RESTAURANT. NEW YORK CITY. DAY.

Mastro and ARTHUR SULZBERGER, 50, publisher of the New York Times, sit at a prime table.

Mastro holds a paper folded to the editorial page.

MASTRO  
(mouth full of shrimp)  
I respectfully and fervently  
disagree.

SULZBERGER  
We took a reasonable stand, Randy.

MASTRO  
Arthur, Arthur.  
(swallowing, then reading  
from the paper)  
"Chevron's chainsaw-wielding  
lawyers are, in short, attempting  
to cut two key planks out from  
under the Constitution." Isn't that  
a tad dramatic?

SULZBERGER  
The Times takes both press freedom  
and attorney-client privilege  
seriously.

MASTRO  
(chuckles)  
Press freedom.

SULZBERGER  
Look, we were quiet, hell, even  
supportive for your hardball stunts  
at City Hall. But you've lost your  
compass here.

Mastro's blackberry buzzes on the table. As he glances down --

SULZBERGER (CONT'D)  
You think I want to be paying Floyd  
Abrams by the hour for this? My  
family's always gone to court to  
uphold the First Amendment.  
Sullivan, the Pentagon Papers, the -

MASTRO  
(looking up from his  
phone)  
Yeah, well, you can stop paying  
Abrams.

SULZBERGER  
Why's that?

MASTRO  
Because I just won.

EXT. INTERSECTION OF CENTRAL PARK WEST AND 71ST STREET. DAY.

Donziger, David, and Laura hold hands on the corner. David holds a wrapped present.

Donziger starts to cross the street, but David holds back.

DAVID  
The little man isn't white yet.

DONZIGER  
We don't always have to do what the white man tells us, buddy.

LAURA  
Steven.

DAVID  
It's the rule.

DONZIGER  
I know sweetie. But what's my job?

DAVID  
Keep me safe.

DONZIGER  
Right. So would I let us walk into the street if it weren't safe?

David ponders this as his Dad pulls him into the empty intersection.

Laura is shaking her head.

DONZIGER (CONT'D)  
He's already late. It's fine.

EXT. CENTRAL PARK PLAYGROUND. 40 MINUTES LATER.

David is running all over with a group of other BOYS and GIRLS.

Donziger and Laura sit on a bench eating birthday cake.

LAURA  
So what does it mean then?

Donziger is looking past her to the street, a suspicious look on his face.

DONZIGER

It'll be okay. Maybe a little embarrassing. Some of the footage isn't helpful.

LAURA

Pablo warned you.

(shouting at the playground)

David, be gentle!

DONZIGER

I had some doubts.

(still eyeing the street)

I knew we let the cameras in too much some of the time.

Laura follows his gaze.

LAURA

There's no one there.

DONZIGER

They're there. Fuckers are always there.

LAURA

You let them in. The cameras.

DONZIGER

Worth the gamble. The movie is immeasurably important to the case.

LAURA

Your gamble.

A beat. She decides to press on.

LAURA (CONT'D)

Not enough for you to fight the good fight. The whole world has to see you soaring. Has to validate you. Never a private moment. That's what gets you into trouble, Steve.

DONZIGER

It was a *strategic* decision to benefit the *case*.

(beat)

And I'm not in trouble.

LAURA

You sure?

INT. GIBSON, DUNN AND CRUTCHER. NEW YORK CITY. MORNING.

We're watching a jumpy, filmed scene of Donziger drinking beer at an Ecuadorian restaurant, surrounded by Fajardo, Russell, and Raigosa.

ON THE SCREEN:

DONZIGER

The data has to be very clear about this. We need PAH readings on the upper end of the estimates.

RUSSELL

We should have those.

DONZIGER

I mean, if the readings are on the high end, maybe 10 times what Chevron has maintained --

The camera pans out to show two other men we've seen before at the table: Cabrera and Beristain.

RUSSELL

10 might be high --

DONZIGER

-- we can jack the verdict up past \$30 billion!

Cabrera belly laughs.

CABRERA

*Mi dio! Steven.*

DONZIGER

We can give you that, Richard! I think we can actually make the data support that recommendation! Then the verdict writes itself!

The screen freezes.

Pan out to see Mastro and a half dozen of his associates, watching in the fish bowl.

MASTRO

That's him?

STEIN

Richard Vega Cabrera. The court's independent engineering expert, sitting next to Dr. Beristain, the guy who was erased from the first movie.

MASTRO

(shakes his head)

They're telling him what his recommendation should be.

MIKE

After they tell him what the scientific data will show.

STEIN

(hitting a button on the remote)

Watch this.

Now we're watching the end of a scene we've seen before -- the chaotic melee in Judge Zambrano's office. Our POV, as before, is from outside the office, but this time we hear the audio.

STEIN (O.S.) (CONT'D)

(pointing at the screen)

This is Zambrano, the judge.  
Donziger's supposedly gone back in to 'get his jacket.'

DONZIGER

We owe you, Judge.

The screen freezes.

STEIN (O.S.)

This is where the movie cuts off.  
Now watch.

The screen unfreezes.

Donziger retrieves an envelope from the jacket pocket and hands it to a dubious Zambrano. The whole interaction takes less than a second.

Donziger whispers something unintelligible.

MASTRO

What does he say there?

TONY  
There's your bribe, amigo!

MASTRO  
I want to know what he says there.

MIKE  
You know, pretty much everyone down  
there pays 'consulting fees' to  
judges and witnesses. It's totally  
normal to --

They've all turned and are looking at Mike.

MIKE (CONT'D)  
What? Chevron did it hundreds of  
times.

(beat)  
I'm just saying.

MASTRO  
We have *Donziger* on tape.  
(nodding to Becca)  
Start it back up.

She does and Mastro is immediately grabbed by something on  
the screen.

We SEE what Mastro sees: footage of Donziger on a private  
jet, feet propped up, head down, scribbling thoughtfully in a  
leather-bound journal.

We hear people talking and laughing all around him, but  
Donziger is absorbed.

We HOLD on that for a few seconds.

MASTRO (O.S.) (CONT'D)  
What's he writing. What is that?

MIKE  
Some kind of ledger?

MASTRO  
(watches intently)  
Whatever it is, I want it.

EXT. TIMES SQUARE. NEW YORK CITY. DAY.

Donziger and Fajardo are joined by 15-20 MEMBERS OF THE COFAN  
TRIBE, in native garb, in the middle of Times Square.

A phalanx of cameras and reporters listen while Donziger holds forth.

DONZIGER

They can smear the integrity of the Ecuadorian legal system. They can try to destroy one of the most admired independent documentary filmmakers in America. But Chevron cannot sully the righteousness of the Cofan people, and it cannot bury the truth in some swampy pit. The verdict here stands, and we're confident it will be enforced. Any other questions?

MAN

Right here, Steve.

(as he hands an envelope to Donziger, who reflexively accepts it)

How's it feel to get served?

INT./EXT. DONZIGER'S UPPER WEST SIDE APARTMENT. MORNING.

We're inside a car looking at the outside of Donziger's building from across the street.

It takes a beat but we realize we're with the CHEVRON GOONS/G-MEN in the surveillance car watching Donziger's apartment building.

GOON 1 looks up from his Post to see Laura coming back down the sidewalk carrying a few bags of groceries.

She reaches the door to the apartment building, tries to get it open while holding her bags, but drops one.

She leans over to pick it up.

GOON 1

(lascivious)

Mm, mm, mm.

CLICK CLICK CLICK CLICK. We SEE 15 camera shots of Laura, her ass toward us.

INT. DONZIGER'S UPPER WEST SIDE APARTMENT. MORNING.

Chaos. David is holding two toy planes and appears to be re-enacting the Battle of Midway with about the same VOLUME.

Laura is sitting on the couch, surrounded by grocery bags, holding the subpoena, verging on tears.

LAURA  
Tell me what it means.

DONZIGER  
It won't happen. No court will ever  
allow them to just trample through--

LAURA  
Tell me Steven!

DONZIGER  
Correspondence. Emails.

VRROOM. ZOOM. ACK ACK ACK ACK!!

LAURA  
Our emails?

DONZIGER  
And some, uh, personal papers. You  
know. Things I've...uhh...

LAURA  
(realizing what he can't  
bring himself to say)  
*Diaries?!*

Beat while he stares at her and David SHOOTS a pilot out of  
the sky. CRASH!!

LAURA (CONT'D)  
(hard, but quietly for  
David's sake)  
Your fucking diaries?! Steven!

DONZIGER  
Calm down.

BOOM! GOT YOU PLANE 17! CRASH!

LAURA  
Did you write about us? About her?

DONZIGER  
(eyeing David)  
Of course not.

LAURA  
Oh my God, how humiliating.

DONZIGER  
There's nothing to write! It's a  
record of the case, that's all.

VREEEWWW...!

LAURA  
That's all?

DONZIGER  
(carefully)  
The judge won't let them walk in  
here and take my diaries, any more  
than they can walk in and take  
David.

David stops ZOOMING his planes and looks up, scared.

DAVID  
Who's taking me?

LAURA  
No sweetie. No one is ever taking  
you. Daddy's being an a--  
(shoots Donziger a 'what  
the fuck' look)  
It's a figure of speech,  
sweetheart.  
(to Donziger)  
The judge hates you. You said that.

DONZIGER  
There are limits.

LAURA  
This is our life, Steven.

INT. U.S. DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK. DAY.

DONZIGER  
It's unprecedeted!

He's walking briskly down a hallway, practically chasing  
after Judge Kaplan.

KAPLAN  
There will be plenty of time later  
to determine what's germane and  
what isn't.

DONZIGER  
(still trying to keep up)  
It's a gross violation of attorney-client privilege and my privacy,  
Your Honor. They're private papers!

KAPLAN  
In which you apparently recorded information relevant to the case.

DONZIGER  
In my *private* moments!

KAPLAN  
In a movie, Mr. Donziger! Your drama for the ages!  
(reaching his chambers)  
You want to talk about unprecedented? How about counsel waiving any privilege by letting a film crew follow him everywhere but the toilet?  
(beat)  
What choice did you leave me?

DONZIGER  
(taking hold of the judge's arm)  
Judge. They're trying to destroy my life here.

KAPLAN  
(removing Donziger's hand)  
You will behave as an officer of the court, Mr. Donziger.  
(beat)  
You're not in Ecuador now.

INT. DONZIGER'S UPPER WEST SIDE APARTMENT. NIGHT.

Donziger's in the basement, lit by a single hanging light bulb.

A brazen, determined look in his eyes, he's surrounded by black trash bags full of papers, file boxes, and two computer hard drives.

He's stoking the big old incinerator by crumpling and tossing in old pieces of newspaper while he pumps the hand blower.

The incinerator ROARS.

TIME CUT TO FIFTEEN MINUTES LATER:

Donziger stands there, staring straight ahead into the fire, which is now dwindling, a vacant look on his face. The bags and boxes next to him untouched.

INT. DONZIGER'S UPPER WEST SIDE APARTMENT. NIGHT.

Donziger, defeated, sweating and breathing heavily, lugs the still-full bags and boxes back up the service stairwell.

INT. DONZIGER'S UPPER WEST SIDE APARTMENT. THE NEXT EVENING.

Two FEDERAL MARSHALS in the foyer lift massive boxes -- the same ones we saw in the opening sequence -- and disappear out the front door.

Donziger examines a writing journal ruefully, then puts it into the one remaining box and closes the lid.

He lifts the box and hands it to a third MARSHAL, who's waiting.

DONZIGER

Last one.

The marshal is staring at something over Donziger's shoulder.

MARSHAL

What's that one?

We SEE David playing an Elmo game on an IMac in the still-unfinished kitchen.

DONZIGER

That belongs to my wife and son.

MARSHAL

(stepping toward the  
kitchen)

Afraid we'll need it.

DONZIGER

Now hold on. It's for games!  
Recipes! I don't even know the  
password.

MARSHAL  
Sorry. That's the order.

DONZIGER  
Hold on!

MARSHAL  
(to David)  
Sorry, son.

The marshal pulls the plug from the wall and lifts the computer.

DAVID  
Daddy!

DONZIGER  
You've got to be kidding me! You  
can't do that!

As he looks pained and helpless --

DONZIGER (V.O.) (CONT'D)  
Of course I know about his call  
girls.  
(beat)  
Zambrano knows we know about the  
girls, because we're the ones who  
paid for them.

FADE TO BLACK, as the voice continues --

DONZIGER (V.O.) (CONT'D)  
He knows he has to appoint  
whichever independent expert we  
choose. Which means Cabrera will  
get the job eventually. We just  
have to get Zambrano to stop  
dragging his feet and do what we  
tell him.

INT. GIBSON, DUNN AND CRUTCHER. NEW YORK CITY. DAY.

Donziger's leather-bound journals are being unpacked one at a time from the box we saw in the opening sequence, as we HEAR him speak.

The next entry we hear in Donziger's voice layers over the first, which continues on in the background, so that we are now hearing two entries at once.

DONZIGER (V.O.)

Cabrera knows as much about  
remediating oil pits as I do about  
opera. I keep telling him to just  
calm down until we have the --

Now a TYPIST, 30s, is transcribing one of the journals at a computer, as we begin to hear yet another diary entry layered on top of the other two --

DONZIGER (V.O.)

-- and this new president is with us, but as long as Chevron is paying off the military and the courts, we can't know how steady --

And another.

DONZIGER (V.O.)

-- thank god she tells me whenever they show up for a clandestine meeting. Is it still prostitution if it's for a good cause --

And now we SEE a dozen transcribers, all of them typing in text from Donziger's journals and notebooks.

And our ears are assaulted with everything they're typing all at once -- a CACOPHONY of DONZIGER'S VOICE, 10, 12, 15 diary entries being read all at once -- his thoughts and confessions spilling out in every direction.

INT. THE YALE CLUB. NEW YORK CITY. EVENING.

Mastro sits in a leather clubman chair sipping a scotch and reading a legal brief.

Kaplan sits down next to him.

KAPLAN

(leaning in quietly)

I've gotten no less than three  
dirty looks in here already  
tonight.

MASTRO

(looking around)

You're blaming me?

KAPLAN  
I'm a Clinton appointee, remember?  
I don't like letting corporate  
behemoths run around ransacking  
lawyers' homes.

MASTRO  
(conspiratorially)  
You're on the side of the angels,  
Lew.

KAPLAN  
Am I.

MASTRO  
You won't believe it. I can hardly  
believe it.

KAPLAN  
(holding up a hand)  
I don't want to hear anymore. Save  
it for court.

EXT. AMSTERDAM AVENUE 24-HOUR PARKING. NIGHT.

Outside a parking garage, Donziger and Laura stand, bundled up, by an idling old Honda Accord, packed with bags and belongings.

David's in his car seat.

DONZIGER  
You sure the transmission isn't  
going to go out again?

LAURA  
They said it has another seven or  
eight hundred miles on it.

DONZIGER  
Because it's going to be cold  
tonight and I don't want you guys  
stuck on the side of the Palisades  
Parkway.

LAURA  
We'll be fine. But we really do  
have to go. I can't wake up my  
parents too late.

Donziger nods, goes around to David's window, knocks on it.

DAVID  
(smiling through the  
window)  
Come in!

Donziger opens the door.

DONZIGER  
OK little man. What's your job?

DAVID  
Keep Mommy safe.

DONZIGER  
That's right buddy. That's right.

David throws his arms around his dad. Donziger squeezes him, buries his face in his little neck and closes his eyes.

They hold each other for a long time, then David lets go and Donziger tries to buckle him back in his car seat.

But he can't make the buckle work.

Laura walks around the car, buckles it in two seconds.

She kisses Donziger on the cheek.

LAURA  
Good luck babe.

DONZIGER  
I love you.

A long beat as she walks back around the car.

LAURA  
You too.

INT. DONZIGER'S UPPER WEST SIDE APARTMENT. NIGHT.

Donziger sits on the floor of his SON'S ROOM with a sad, beaten stare.

He grabs the stuffed giraffe on the floor. He looks at it, holds it up to his face and smells it for a long beat.

He drops his forehead onto his knees. We hold on him for a beat.

Then his head suddenly pops up.

CUT TO: DONZIGER'S OFFICE. AN HOUR LATER.

Donziger's working at a frenzied pace at his desk. He drinks coffee while he flips back and forth between an atlas and a spreadsheet -- jotting down numbers, notes, country abbreviations.

He picks up the phone to dial.

INT. GIBSON, DUNN AND CRUTCHER. NEW YORK CITY. NIGHT.

Becca, Tony and Stein are laughing and eating pizza and beer in the fishbowl.

Mike notably sits a little removed from the group.

TONY  
You would not.

BECCA  
I would! He's such a dog.

TONY  
Make your husband wear a condom?

STEIN  
If he were my husband, I would.  
Cocktail waitresses in Quito? Yes.

TOM  
Remember that old SNL skit -- why  
wear a condom, when am I ever going  
to be in *Haiti* again??

They all HOWL, except Mike.

MIKE  
(shaking his head)  
All right already.

TONY  
(to Becca)  
But would you do a three-way with  
him and  
(affecting a German  
accent)  
...zee heiress Morgan?

BECCA

I've seen pictures. She's hot for  
50.

MIKE

Just stop.

BECCA

What, you don't think you can be 50  
and hot?

TONY

She's hot. For sure.  
(swiveling to look at  
Becca's laptop)  
Find me those pictures.

Off Mike looking depressed.

INT. GIBSON, DUNN AND CRUTCHER. NEW YORK CITY. EVENING.

Mastro is reading by lamp light at his desk when there's a knock at the door.

MASTRO

Help you?

MIKE

(sheepishly)  
Yeah.  
(beat)  
I'm gonna go back to school.

MASTRO

(not looking up)  
See you tomorrow.

MIKE

No. I mean, I think I'm leaving.  
The case.

MASTRO

(surprised)  
I can get you guys a little more  
money.

MIKE

It's not the money.

MASTRO

School can wait, trust me. You're  
learning more here --

MIKE

I know.

(beat)

Learning some about myself, too.

MASTRO

What's that mean, Mike?

MIKE

It means that when I broke my back  
doing pipe fitting for three years  
so I could squirrel away the money  
for law school, this isn't what I  
thought it'd be like.

Mastro gives him a look like 'go on.'

MIKE (CONT'D)

Look, he's not the pope, I get  
that. It's just, we're gonna  
destroy this guy's whole life. I'm  
doing that.

(beat)

And I'm doing it for a fucking oil  
company that did some really awful  
shit to truly innocent people.

MASTRO

(containing himself)

Why then?

MIKE

Why what?

MASTRO

Why'd you want to become an  
attorney?

MIKE

You'll think it's cheesy.

MASTRO

Try me.

MIKE

To give people a voice. People like  
I grew up with. Who didn't know  
lawyers and always got fucked over.

A beat.

MASTRO

You're wrong.

MIKE

OK.

MASTRO

You're not doing this for Chevron.

MIKE

OK.

MASTRO

Mike, all these things you *think* make you want to be a lawyer. Holding power accountable. Leveling the playing field. All of it rests on rules, and the idea that the rules apply the same to everyone. Whether you're a venal oil company or some farmer in the Amazon with a bone through your nose. It doesn't work if the guy with the good cause can use that cause to lie. Manipulate. Smear. Now I don't happen to think Steven Donziger has a good cause, and I don't think he's a good man. But what matters is the same law that applies to us has to apply to him. Or else no one can believe in it, and nothing good can come of it.

Mike looks surprised -- he hadn't considered the argument.

MIKE

(wavering)

Maybe. I mean, maybe you're right.

MASTRO

Now go back to law school. And when you graduate go join the Southern Poverty Law Center or whatever.

MIKE

(trying to backtrack)

Maybe I just need --

MASTRO

But when you do, remember that your ability to take up causes rests on the back of attorneys like me who believe everyone -- the poor black murder defendant and the rich white CEO -- everyone deserves the same code of law.

A long beat.

MASTRO (CONT'D)  
(hard)  
Now get out.

INT. SUITE 4411, THE PLAZA ATHENEE HOTEL. NEW YORK CITY.  
EVENING.

A BELLMAN sets down a tray of tea in front of Donziger, who sits on a floral couch.

MORGAN (O.S.)  
It's a Gestapo tactic. And I know something about Gestapo.

DONZIGER  
(to the bellman)  
Thank you.  
(to Morgan)  
They've given up on the merits of the case. The strategy now is to ruin me personally.

MORGAN  
(sitting down next to him)  
How embarrassing?

DONZIGER  
It's petty shit. Mostly about the case. But some mentions of Laura, our marriage.  
(glances at her sheepishly)  
Women.

MORGAN  
Oh, Steven.

She puts her hand on his arm, he perks up.

DONZIGER  
I have a plan.

MORGAN  
I'm listening.

DONZIGER  
Chevron operates in 84 countries. It produces 300 million gallons of crude oil every day. 10 million in reserves.

MORGAN  
OK.

DONZIGER  
43 billion dollars sunk into  
Australia alone. 13 projects in the  
Niger Delta.

MORGAN  
OK.

DONZIGER  
So we go after the assets  
separately. If the U.S. Courts  
won't force them to pay, then find  
countries that will. We file  
everywhere. We tell the governments  
in those countries if Chevron can't  
be compelled to honor Ecuadorian  
law, it won't honor your laws  
either. Or anyone else's. The  
corporation becomes a kind of  
superstate unto itself.

MORGAN  
(intrigued)  
Will that work?

DONZIGER  
All we need are a couple of  
countries willing to shut down  
operations or seize the rigs.  
That'll drop their stock price  
massively, and if it goes down  
enough, paying us will seem cheap.  
(beat)  
But for us...it's expensive. We  
have to file in at least half a  
dozen countries right now, just to  
be credible.

MORGAN  
(after a long pause)  
It's brilliant Steve. I'll take  
care of you.

DONZIGER  
(grateful)  
You always do.

INT. RANDY MASTRO'S HOME, SUMMIT, NEW JERSEY. NIGHT.

Mastro is on the phone with an agitated O'Reilly.

We INTERCUT between Mastro's home (where he is watching a Devils game with his sons) and O'Reilly's office.

MASTRO  
I'm not following, Dave.

O'REILLY  
Hew and I just got off the phone  
with our counsel in Stockholm.  
Donziger's filing to collect.

MASTRO  
In Sweden?

O'REILLY  
And God knows where else. He's  
expanding the playing field.

MASTRO  
He's desperate.

O'REILLY  
You told us we had him on the run,  
Randy.

MASTRO  
You've seen the diary excerpts.  
Kaplan's not going to honor that  
verdict.

O'REILLY  
Maybe not. But you're talking about  
a case. I'm talking about what  
happens when the markets open. You  
understand?

Off Mastro closing his eyes in frustration.

O'REILLY (CONT'D)  
I need you to fix this.

An announcer on the TV screams --

ANNOUNCE (O.S.)  
He shoots...SAVE!

EXT. YANKEE STADIUM. OWNER'S BOX. NIGHT.

We're seated behind two MEN who are on the front row, right off the field. They frame our screen for this entire scene, though we don't see their faces.

Mastro is on our left, RUDY GIULIANI is on our right.

They're wearing heavy coats.

Giuliani finishes chewing a bite of hot dog.

GIULIANI

Can't expect a guy like that to just melt away, Randy. He's delusional.

(shuddering)

Shouldn't play night games in April. I've told them that.

MASTRO

It's about the TV, Rudy.

GIULIANI

He's on TV?

MASTRO

No, the games. It's about the revenue.

GIULIANI

Did you learn nothing working for me? Guy like this, you got to kick him till he's dead, then kick him again. Remember the longshoremen?

MASTRO

(laughing)

Can't forget. A war.

GIULIANI

That's what you're dealing with. A fucking mobster.

Beat while Mastro has an idea. He looks at Giuliani as if he's never seen him before.

GIULIANI (CONT'D)

(re Mastro's look)

What?

FAN (O.S.)

Ru-dy! Ru-dy!

Giuliani smiles and waves at someone.

GIULIANI  
(under his breath)  
Jackass.

INT. BLUE WATER GRILL. UNION SQUARE. NEW YORK CITY. DAY.

Two reporters, WILL and PATRICK, both 30s, sit across from an animated Donziger, a massive seafood platter and a bottle of white wine separating them.

DONZIGER  
(slurping oysters)  
Have you ever been to Estonia?

They shake their heads.

DONZIGER (CONT'D)  
Married?

WILL  
Nope.

PATRICK  
Me either.

DONZIGER  
(motioning to the platter)  
Eat something for Chrissake. You  
should go, because that's the place  
to find yourself a wife. Good lord.  
(beat while he eats)  
In Estonia alone, tiny little  
Estonia, Chevron has \$112 million  
in assets. \$112 million. That's not  
\$19 billion, but it's not nothing  
either.

The reporters nod.

DONZIGER (CONT'D)  
I spoke to President Ilves myself --  
we spent some time at Harvard  
together. He hates big oil. We're  
going to beat them there, you  
watch.

(beat, a gulp of wine)  
For 20 years this has been the  
story. They think they got us, and  
then we come back.

(MORE)

DONZIGER (CONT'D)  
Have you seen their stock price  
since we announced the new filings?  
Down 16%.

(beat, another gulp)  
We've still got the better hand.  
Truthfully, I've always found, when  
you're fighting for the good guys,  
you always have the better hand.

Almost simultaneously all three iphones on the table begin to vibrate. The reporters silence theirs.

Donziger checks the number on his, surprised.

DONZIGER (CONT'D)  
(to the reporters)  
You guys mind?

PATRICK  
Not at all.

DONZIGER  
(into the phone)  
I'm wrapping up an interview here.  
What's up?  
(beat)  
Say again?

The reporters have used the rare break in Donziger's soliloquy to check their email.

Their eyes grow wide and they look at each other.

DONZIGER (CONT'D)  
(struggling to keep his  
composure)  
I'll be right there.

As he hangs up he's already sliding out of the booth.

WILL  
Um...RICO stands for...?

PATRICK  
Racqueteering and organized crime.

DONZIGER  
(ignoring them)  
Sorry to run, gentlemen.

WILL  
Isn't that how they charge drug  
runners? Mobsters?

DONZIGER  
(flustered)  
Nobody's charging anybody. Don't  
write that.

PATRICK  
Ok, but I'm gonna need a quote,  
Steve.

DONZIGER  
(turning to leave)  
Later. I'll call you.

PATRICK  
(shouting at Donziger's  
back as he leaves)  
Still think you've got the better  
hand?!

As Donziger races out, Patrick and Will look down ruefully at  
the expensive food as the check arrives.

INT. THE YALE CLUB. DAY.

Mastro sits at a white tablecloth table as the MAITRE'D,  
proper, 50s, arrives at the table with an actual phone.

MAITRE'D  
Sorry to interrupt, Mr. Mastro.  
Urgent call for you.

MASTRO  
(taking the phone, to the  
Maitre'd)  
This is why the no cell phone thing  
is really impractical, Terry.  
(into the phone)  
Randy Mastro.  
(beat)  
Always for you, Diego.  
(long beat while he looks  
intrigued)  
To me? About what?  
(beat)  
Fuck, yes.

The maitre'd's eyes say here's clearly a no cursing policy as  
well.

MASTRO (CONT'D)  
Tell Senor Cabrera I'll get the  
first flight out tomorrow.

EXT. QUITO INTERNATIONAL AIRPORT.

Quick POP of a United Airlines plane landing at the airport, which is at 10,000 feet, surrounded by mountains. It's arresting.

INT. PARADISO JARDIM HOTEL. QUITO, ECUADOR. DAY.

Mastro sits on a couch next to Larrea. They say nothing. A tape recorder sits on the table.

They look at each other, perplexed.

Cabrera sits in an armchair opposite them. His legs are crossed and he seems to be enjoying himself.

MASTRO

Say that again?

CABRERA

Donziger told me he could get me the job as the court expert. He had some, how do you say...influence. With the judge.

MASTRO

Influence.

CABRERA

Yes. A relationship.

MASTRO

And in return for the job. He had some expectation from you?

CABRERA

(unbothered)

Oh yes. He and his engineering firm. The one from Colorado.

MASTRO

Stratus.

CABRERA

Yes, Stratus. They would write the report.

He lets this sink in.

MASTRO

He paid you. To accept his own report.

CABRERA  
There was a consulting fee  
involved.

MASTRO  
And the verdict. Did Zambrano come  
up with the ruling himself?

Cabrera stifles a laugh.

MASTRO (CONT'D)  
So Donziger wrote the opinion? And  
paid Judge Zambrano as well?

CABRERA  
Senor Mastro. You must understand.  
This is not your federal court. We  
have our own...methodology?

MASTRO  
Which is to rent out justice to  
wealthy foreigners.

Cabrera LAUGHS heartily.

CABRERA  
For many years, Chevron did not  
complain about that.

Larrea shifts uncomfortably in his seat.

MASTRO  
I appreciate you're reaching out.  
This is very important perspective.  
You'll agree to be deposed and  
testify in New York?

Cabrera pauses, looks down at the recorder.

CABRERA  
(cagily)  
Oh. Well. I don't know. Things gets  
confused.

MASTRO  
Confused.

CABRERA  
This is why I wanted to see you  
personally. I am very busy. I  
forget things.

MASTRO

(realizing the play now)

I think I see. You want...you're proposing we compensate you for your testimony.

Cabrera looks hard now at Larrea who shifts around uncomfortably and won't meet Cabrera's look.

MASTRO (CONT'D)

That's not going to happen.

CABRERA

(disappointed)

Ah.

MASTRO

That business ends today.

EXT. LAURA'S PARENT'S HOUSE. BINGHAMTON, NY. NIGHT.

Donziger and Laura sit in a small sitting room, next to an electric heater.

They look down at their steaming mugs of coffee.

The room is decorated like an old person's house -- doilies on the table, different flower patterns on the sofa, chair, curtains.

LAURA

(quiet, chastened)

They offered to settle once before, is all I'm saying. You could approach them and see.

DONZIGER

That was years ago. And it was paltry. A joke.

LAURA

Was it less than zero?

(looking at him hard)

Because that's what you have now.

DONZIGER

Our new strategy will work.

LAURA

Pablo says it could be years before any other country acts against Chevron.

DONZIGER  
Pablo went to night school in  
Ecuador.

She looks at him differently, appalled.

LAURA  
And meanwhile. My personal computer  
belongs to Chevron. You've been hit  
with a RICO suit. You personally,  
like some mob boss.

DONZIGER  
That's just --

LAURA  
Our home has been raided, probably  
bugged. These thugs follow you  
around. David is scared, and so am  
I. I'm living with our son *at my*  
*parents house*. And just by the way,  
we are *completely* out of money. Not  
even your fantasy-land accounting  
can change that.

(beat)  
You, we, are patently *not* in a  
*strong position, goddamit.*

(long beat)  
I love your ability to see the  
silver lining, but sometimes  
there's just reality, Steven.

DONZIGER  
This is my life's work. Literally.  
Bigger than Big Tobacco. And I  
promised the Cofan, and I promised  
Pablo, after those bastards took  
his brother --

LAURA  
(incredulous)  
Don't you think I've heard this  
before? I know it's big, Steven!  
You're big. You always have been,  
and it's probably why I fell in  
love with you. Everything about you  
is big. Your appetites. Your  
personality -- my God. Everything  
you do. The world needs that kind  
of bigness.

DONZIGER  
Then --

LAURA

But we need something else sometimes. Life can't just be big. It's the small things, Steven, the accretion of small things that make a life.

We HEAR a crying sound down the hallway.

LAURA (CONT'D)

Sometimes destroying a huge corporation isn't the most important thing. Sometimes it's just picking your son up from school on time.

(getting up)

Do whatever you want. You always do. But don't come back up here until you've got a handle on things. It's too upsetting for him.

(beat)

And for me.

She walks out.

INT./EXT. DONZIGER'S OLD CAR. NIGHT.

Donziger drives back to the city in the blinding snow. The car is silent, save for the sound of the mostly-frozen windshield wipers working overtime.

He looks down at the dashboard, where the fuel light has been illuminated for awhile. He's running on fumes.

On the dark back road it's not clear when he'll next pass any civilization.

He slows down and turns off the heater to conserve gas.

Then, over the hill he sees a light. A four-way stop with a gas station. Halle-fucking-lujah!

As he gets closer we can read the glowing sign through the snow: *AL'S CHEVRON, CHEAP GAS, COLD BEER, LIVE BAIT*. And under it: *Last GAS for 32 Mi.*

DONZIGER

Jesus christ.

EXT. AL'S CHEVRON. NIGHT.

With snow and wind whipping around him, Donziger fills up his car, the big CHEVRON sign illuminating the whole parking lot.

INT./EXT. THE JUNGLE OUTSIDE LAGO AGRIO, ECUADOR. DAY.

Mastro bumps along in the back seat of a jeep. Larrea sits in the front passenger seat.

Mastro is studying the same scenery out the window we've seen before with Donziger.

Again we see the tiny wooden houses on stilts, chickens, poor skinny KIDS, the endless oil pipeline.

LARREA  
Not exactly an ecological  
holocaust, is it.

EXT. WELL NUMBER 33. OUTSIDE LAGO AGRIO, ECUADOR. DAY.

In a clearing in the jungle, Mastro, Larrea and the CHEVRON DRIVER, 30s, American, stand on the edge of a medium-sized pond.

The pond appears to have moss or algae growing across it.

LARREA  
Beautiful spot, no?

CHEVRON DRIVER  
(to Mastro)  
So this is one of the places where  
the tree-huggers claim the water is  
too toxic to clean yourself. They  
claim it hardens on the surface.  
(picking up a small rock)  
Look at this.

He throws the rock out at the pond. It hits the top of the "water" and skitters to a stop, still on the surface.

CHEVRON DRIVER (CONT'D)  
(embarrassed)  
Picked one too small.

He picks up another rock, this one about twice the size. He throws it out at the pond, harder this time.

It lands with a thud, the surface cracks, but does not break.  
The rock slides to a stop.

LARREA  
(pointing at a much bigger  
stone)  
Try that one.

The driver tries to pick it up, but it's stuck in the earth.  
Larrea helps him dig it out.

They lift it up and it makes a sucking SOUND as they pull it  
from the muck.

A filmy water oozes out near Mastro's feet.

MASTRO  
What's that?

CHEVRON DRIVER  
Bog water. It's a rainforest. Place  
is oozing with weird shit. All  
natural though, been this way for a  
million years.

Mastro kneels down, looks more closely.

He dips his fingers into the hole, comes out with the same  
tar-like substance we saw earlier stuck to his fingers.

MASTRO  
(smelling his fingers)  
My car would run on this.

CHEVRON DRIVER  
(holding the large stone)  
Lemme just show you here how this  
one goes through, so you can see  
what I mean.

Off Mastro looking disgusted.

INT. FAJARDO'S OFFICE. EVENING.

Fajardo, in the office we saw earlier, answers the phone. We  
notice the office is nicer, redecorated.

FAJARDO  
La Frente.  
(beat)  
This is he.

His face changes from calm to very nervous.

FAJARDO (CONT'D)  
I don't think I should be --  
(long beat)  
OK. OK.  
(beat)  
I suppose I could. What hotel?  
(jotting a note)  
OK. In the morning.

Fajardo hangs up the phone. He still looks concerned. He picks up the phone to dial an international number with a 212 prefix, but he stops halfway, pauses for a beat...hangs up the phone.

EXT. COFAN VILLAGE, 30 MILES OUTSIDE LAGO AGRIO. MORNING.

Fajardo and Mastro stand together near a creek.

Kids are bathing in the creek, mothers are washing clothes in it. An old man fishes nearby.

Fajardo is kneeling by the water.

FAJARDO  
Just smell it.

Mastro leans over, sniffs the water. His face tells us all we need to know.

FAJARDO (CONT'D)  
It has 40k times the level of TPH in it than what the State of Texas would deem healthy. That's 100,000 times more than what your EPA would say is ok.  
(beat)  
It's poison.

EXT. COFAN VILLAGE, 30 MILES OUTSIDE LAGO AGRIO. MORNING.

Fajardo is pulling a stick out of a pond. It's covered in thick black sludge. He slathers it on a piece of paper so Mastro can see it better.

FAJARDO  
Highly toxic tar. It's in the water table.  
(MORE)

FAJARDO (CONT'D)

You drink or eat anything around here, you're drinking and eating this.

EXT. COFAN VILLAGE, 30 MILES OUTSIDE LAGO AGRIO. MORNING.

Mastro and Fajardo walk silently down a narrow dusty dirt road past ramshackle houses. The people are poor in a way you just don't see in the US.

They stop near a stoop where two kids, RAMON, 8 and EDUARDO, 12 are sitting.

They're the same age as Mastro's kids, but they're much smaller, sickly looking, in discarded American clothes.

They're sitting on the dirty floor playing a game with rocks and a string.

As Mastro and Fajardo approach, Eduardo looks over at them and we see what has been obscured from view -- a huge goiter on the left side of his neck.

It's shocking, but Mastro manages to keep his composure.

FAJARDO

The Gutierrez kids. Mom's had four miscarriages. They've lost two siblings. Also the dad, a fisherman. 41.

(beat)

All to cancer.

The boys, who gave a polite smile, have gone back to playing their game.

Mastro lets out a long SIGH. The boys clock it, they turn and give him a warm, if slightly wary smile.

He smiles back. It's as genuine a smile as we've ever seen from him.

Fajardo turns and begins to walk away, but Mastro stands there for a long beat, just staring.

Then he SNAPS a photo.

INT. UNITED AIRLINES 777 FLIGHT. QUITO, ECUADOR TO JFK.  
NIGHT.

On the plane in a huge first class seat, Mastro, with a huge  
have steaming steak dinners in front of him, stares across  
the aisle at a BOY, about 10, white.

The boy scrolls through movies on his big seat-back screen,  
barely picking at the steak in front of him.

INT. GIBSON, DUNN AND CRUTCHER. NEW YORK CITY. MORNING.

Mastro is hurriedly gathering some files together.

Stein and Becca step in.

STEIN

Judge Zambrano is now happily  
ensconced at the Plaza.

MASTRO

(heading for the door)  
Not what it used to be.

BECCA

He'll never know. It's the only way  
we got him here.

MASTRO

I've got a partners meeting. Make  
sure you tell him about the pay-per-  
view.

INT. GIBSON, DUNN AND CRUTCHER. FIVE MINUTES LATER.

Mastro enters the conference room where 30-35 partners are  
already meeting and takes a seat.

WEATHERFORD

And we're looking at some  
additional space across the street  
from there, but yes, we all agree  
that's not a long-term solution.

(to Mastro, as he sits)  
The man of the hour! Ready for  
battle?

MASTRO

(lifting a file folder  
onto the table)  
(MORE)

MASTRO (CONT'D)  
Sorry I'm late, Roland. We're good  
to go. Start taking testimony  
tomorrow.

MALE PARTNER  
I almost feel bad for that  
sonofabitch.

MALE PARTNER 2  
I sure as hell don't.

LAUGHTER all around.

WEATHERFORD  
This is one of those cases we talk  
about. Bedrock cases. You  
understand?

(looking around the room)  
Thanks to Randy, we've already got  
a reputation as the go-to firm for  
companies that don't know where  
else to turn. But when we dismantle  
the largest class action verdict in  
the history of the planet. Well,  
we're going to own this space.

(looking hard at Mastro)  
You're gonna make this firm a lot  
of money, Randy.

MALE PARTNER  
It's about time.

More laughter.

MASTRO  
(unsmiling, opening his  
file)  
We'll see how it goes.

He's looking down at a sheet of paper as Weatherford  
continues --

WEATHERFORD  
Now back to the real estate issue,  
which never seems to go away. Our  
original plan had been --

He fades into the BG as we watch Mastro studying the paper.

And finally we SEE what he's looking at: his snapshot of the  
sick boy in Lago Agrio, smiling at the lens.

INT. NOBU DOWNTOWN. DAY.

Donziger approaches the maitre'd's table, scanning the dining room.

His face lights up and he relaxes. He waves.

Morgan, seated in the corner, does not wave back. She stares at him coolly.

INT. NOBU DOWNTOWN. CONTINUOUS.

At the corner table, the flirtiness between them is gone.

MORGAN  
I asked you if it was true.

DONZIGER  
(defensive)  
I can't keep track of their lies.

MORGAN  
Well I can. The article said  
Chevron has your expense ledgers.  
More than a million in lavish meals  
and first class travel, which they  
will submit to the court.

DONZIGER  
For what. Taking out reporters and  
consultants isn't a crime. And  
flying to Ecuador isn't cheap.

MORGAN  
A million, Steven. My money. Or  
worse yet, our investors'. Pissed  
away on squid, foie gras and first  
class travel. To whom is it not a  
crime?

DONZIGER  
(reaching for her hand)  
Gretchen.

MORGAN  
Another \$1.4 million we now owe to  
your lawyer in San Francisco.

DONZIGER  
I'll talk to him tomorrow --

MORGAN

He won't be there, Steven. He  
insists on getting paid first.

(beat while Donziger  
absorbs what she's  
saying)

I'm done, Steven. I'm out.

She pulls her hand away.

MORGAN (CONT'D)

I don't care what you did in  
Ecuador. I don't. Maybe it matters  
to the judge, but I always knew you  
would do what it took to even the  
playing field. I always knew it was  
a sordid business.

(beat while she studies  
his face)

What I mind is that in return for  
our loyalty, you played me.

DONZIGER

You see how I live, Gretchen. You  
know these are lies.

MORGAN

That's the problem with this whole  
case now, Steven. There are just  
too many lies to keep straight.

Off Donziger, stung.

INT. JUDGE LEWIS KAPLAN'S COURTROOM. U.S. DISTRICT COURT,  
SOUTHERN DISTRICT OF NEW YORK. DAY.

The scene is crowded and chaotic. The seats are filled by  
press, and a small army of lawyers mill around with  
briefcases.

KAPLAN

(to Mastro)

You have an amended pleading?

MASTRO

Your honor, we are dropping our  
claim for damages. At this time my  
client seeks only to nullify the  
verdict in American courts.

KAPLAN

I see. No damages.

MASTRO  
That's correct.

KAPLAN  
By doing this, Mr. Mastro, I presume you know you are bypassing a jury verdict and will accept a ruling from the bench?

MASTRO  
We will, your Honor.

DONZIGER  
(interrupting)  
Your honor! If I may, this changes the substance of --

KAPLAN  
You may not. Where is your counsel, Mr. Donziger?

DONZIGER  
(stricken)  
My counsel has withdrawn. Chevron has succeeded in bankrupting me.

KAPLAN  
(mystified)  
You have no counsel.

DONZIGER  
And as you know, Your honor, I have never litigated a case in federal court. This is not in any way a fair fight.

KAPLAN  
So in this small nation of suits I see before me, is there no counsel here representing the interests of the original plaintiffs in this case?

Crickets. Donziger lets out a long SIGH.

INT. JUDGE LEWIS KAPLAN'S COURTROOM. LATER.

Donziger is on the stand.

MASTRO  
I'd like to show you another of your emails.

DONZIGER

You have them all. I guess we could do this all night.

KAPLAN

We can do without the sarcasm, Mr. Donziger.

MASTRO

(handing Donziger a paper)

Can you read this out loud please?

DONZIGER

You can't read?

(before he can be reprimanded)

It says, "The puppeteer has talked to the puppet, and the puppet will withdraw the package if suitable arrangements aren't made."

MASTRO

This is an email you sent to Mr. Fajardo.

Quick pop of Fajardo in the gallery, looking uncomfortable.

DONZIGER

If you say so. I sent Pablo thousands of emails.

MASTRO

And the 'puppet' here refers to Judge Zambrano, in whose court the Chevron case was being tried. And the puppeteer is Mr. Guerra, the man you sent to arrange a bribe.

DONZIGER

That's a distortion! I never bribed

--

MASTRO

No, it's clear from the context of the correspondence in the court record. Mr. Guerra arranged for you to pay Judge Zambrano so that he would hire your friend Mr. Cabrera as his independent expert and allow you to write your own verdict in the Chevron case.

DONZIGER

That's a fantasy.

MASTRO  
Who then does it refer to?

DONZIGER  
How should I know.

MASTRO  
You wrote it, did you not?.

DONZIGER  
You couldn't understand the nuance  
in these emails.

MASTRO  
The nuance?

DONZIGER  
Have you ever done business in  
Ecuador, Mr. Mastro? Ever litigate  
a case there? The rules are not the  
same. There's no such thing as 'ex-  
parte communications. Everyone  
tried to influence everyone.

Mastro shakes his head, looks offended by the very notion.

DONZIGER (CONT'D)  
For the sake of my clients, I  
learned to play the game as well as  
Chevron did.

KAPLAN  
(visibly disgusted)  
You're not helping yourself, Mr.  
Donziger.

DONZIGER  
I don't know how I would, Your  
Honor. This is a set-up.

KAPLAN  
I beg your pardon.

MASTRO  
If I may --

DONZIGER  
(animated, rising)  
Why don't we talk about the way  
Chevron wielded influence in  
Ecuador, Mr. Mastro? I've been  
there for 20 years. Did you ask  
your client about its long alliance  
with the military?

(MORE)

DONZIGER (CONT'D)

How it paid soldiers to move in under darkness and evict villagers from their huts without so much as a plastic bag full of things? Are you aware of the millions Chevron has paid in 'consulting fees' which are, if anything, more suspicious than any fees I --

KAPLAN

(hard)

You'll answer the questions, not ask them.

DONZIGER

Why don't we dig up the memos and cables from all the years when Chevron had the president of Ecuador in its hip pocket?

KAPLAN

Mr. Donziger!

DONZIGER

The case against me is purely a distraction! It is fabricated out of whole cloth to try to make me, an environmental activist and attorney, into the bad guy, when in fact, it is Chevron who have bribed, it is Chevron who have killed thousands upon thousands --

KAPLAN

In my courtroom, sir, you're not an activist. Do you understand?

DONZIGER

But I am denied, Your Honor, the right to question Chevron's attorney on his client's long record of corruptions and intimidation. And --

KAPLAN

(hard, final)

Chevron isn't on trial here, sir.

INT. MONKEY BAR, MIDTOWN MANHATTAN. NIGHT.

Donziger, looking tired, defeated, a little drunk, sits at the bar.

President Obama is on the TV behind the bar giving a speech. The BARTENDER walks over with the check folio and a credit card.

BARTENDER  
I'm sorry. This one didn't work  
either.

Off Donziger, searching his wallet for another card.

INT. RANDY MASTRO'S HOME, SUMMIT, NJ. MORNING.

In a suit, Mastro cracks his sons' bedroom door and tiptoes in. It's an early morning routine -- he tucks Raymond in, kisses his forehead. He does the same with Ryan.

He pauses for an extra long beat before walking out.

INT. MASTRO'S OFFICE, GIBSON, DUNN AND CRUTCHER. NEW YORK CITY. MORNING.

BECCA  
(reading from an online  
news site)  
'Mr. Mastro, on the other hand,  
appeared unflappable. The man Mayor  
Giuliani often relied on to be the  
hammer in tough situations --'  
(to Mastro)  
The *Hammer*! That is definitely your  
nickname from now on.

TONY  
Putting Zambrano on the stand will  
shred whatever's left of this guy.  
The pigeons will be eating him off  
the sidewalk.

STEIN  
Hew says they're celebrating in San  
Ramon.

MASTRO  
(pensive)  
Yeah.

STEIN  
You okay, boss?

TONY  
*Hammer?*

MASTRO  
Yeah.  
(beat)  
Yeah. Fine...Good.

INT. U.S. DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK. DAY.

In the men's room, Donziger's staring into the mirror as he washes his hands looking tired, scared.

A stall door opens behind him and Dave Russell walks out.

He's surprised, and not happy, to see Donziger, though he quickly hides it as Donziger spots him in the mirror.

DONZIGER  
(brightening as he pivots)  
Dave! Good to see you. I could use  
the reinforcements.

Dave looks nervous again, begins washing his hands while Donziger stands a little too close.

DONZIGER (CONT'D)  
Your data is the bedrock of all  
this. They can attack me for the  
way business gets done in Ecuador,  
but they can't attack the science,  
not when you've --

Another stall door opens and BOB ELIAS, 50s, rushes out,  
still zipping his fly and tucking in his shirt, moving  
quickly for Russell.

DONZIGER (CONT'D)  
(slowly, confused)  
-- crunched the hard data.

ELIAS  
David, don't say a word. Dry your  
hands and let's go.

Donziger looks at Elias like 'what the fuck?' Russell never says a word.

Off Donziger, jolted.

INT. JUDGE LEWIS KAPLAN'S COURTROOM. U.S. DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK. DAY.

Close in on a fidgety Russell, who's on the stand. Mastro looks as focused and determined as ever.

RUSSELL  
(carefully)  
I...wouldn't call it data. Exactly.

MASTRO  
I don't understand. You're an engineer. You ran hundreds of empirical calculations at Stratus, no?

RUSSELL  
(eyeing Elias)  
Yes. I did. But the conclusions. They were not...um...

MASTRO  
They weren't what, Mr. Russell?

RUSSELL  
(cathartically)  
Scientific. They weren't empirical. Steve told us what the findings should say.

Donziger shakes his head emphatically.

RUSSELL (CONT'D)  
He said the expert, Cabrera, had been hired as a kind of go-between, and he needed us to give Cabrera the data that would justify a huge verdict, so he could give it to the judge, Zambrano, who was in our pocket.

A beat. Russell takes a deep breath.

RUSSELL (CONT'D)  
I never liked it. I don't know why I went along. Steve said that's just the way it worked in Ecuador. We were a small firm, and it was a giant case. A big break for us.

Donziger fumes.

MASTRO

So the independent, scientific report on which the entire verdict was based, a report that relied on your engineering expertise, was basically made up.

RUSSELL

(emotional)

Not made up, exactly. Cherry-picked. Jesus.

(glaring at Donziger)

I never want to see Steve Donziger again, OK? I'm sorry for all of it.

DONZIGER

Your honor? Some boundaries?

Kaplan glances over at Donziger but pointedly ignores his plea.

INT. FRANKIE'S CLOCK AND WATCH REPAIR. UPSTATE NY. DAY.

The door chimes JINGLE as Laura walks in with a yellow stub.

A FAT MAN sits at the counter by a small TV. A WIRY MAN mans the register.

LAURA

(to the wiry man)

Do you have my mom's clock yet?

He looks confused.

LAURA (CONT'D)

Rooster clock. Two days ago you said it would be ready yesterday. Yesterday you said it would be ready today?

The wiry man nods, takes her stub, and wanders toward the back.

We realize the midday news is on the TV about the time we HEAR --

NEWS ANCHOR

-- in the racketeering trial of environmental attorney, Steven Donziger, who stands accused of corruption in a historic class action suit against Chevron.

(MORE)

NEWS ANCHOR (CONT'D)  
As Marley Smith tell us, Donziger  
withered under intense questioning  
over alleged bribes that were paid--

Laura reaches over and changes the channel. Wheel of Fortune.

FAT MAN  
(clicking it back to the  
news)  
I was watching that.

LAURA  
Forget it. I'll get another clock.

INT. JUDGE LEWIS KAPLAN'S COURTROOM. U.S. DISTRICT COURT,  
SOUTHERN DISTRICT OF NEW YORK. DAY.

Close up on Zambrano's head.

He's wearing a comical "Angry Birds" snow hat with a pom-pom  
on top, the eyes of the bird positioned directly above his.

He looks miserable.

A loud THUD of paper.

We pan out to see that Zambrano is on the stand.

In front of him now is a few-thousand-page bound document.

He stares at it but does not pick it up.

MASTRO (O.S.)  
You know what this is, Judge  
Zambrano?

Zambrano nods uncertainly.

MASTRO (CONT'D)  
Your historic opinion in the case  
of the Ecuadorian tribes against  
Chevron.

KAPLAN  
Sorry to interrupt, Mr. Mastro.  
Judge Zambrano, is the hat really  
necessary?

ZAMBRANO  
(quiet, stammering)  
This climate. I have been cold for  
four days.

KAPLAN

So be it.

MASTRO

Judge Zambrano. I'd like to try a little exercise. Please don't open the document before you.

(beat, Zambrano nods)

Sir, what is this abbreviation, TPH?

ZAMBRANO

I am not sure.

MASTRO

I don't mean the scientific explanation. Just tell us what it stands for, please.

Zambrano reaches for the bound verdict.

MASTRO (CONT'D)

Total petroleum hydrocarbons.

(pointedly closing the bound verdict)

Please do not consult the opinion. I made that very clear.

Zambrano looks helpless. Donziger rolls his eyes, frustrated.

MASTRO (CONT'D)

Do you know how often you used that abbreviation in your verdict, as a key piece of evidence?

ZAMBRANO

Well, if I could look at it --

MASTRO

35 times, Judge Zambrano. That's how often it appears in your massive opinion. And yet you have no idea what it means.

ZAMBRANO

There were many such abbreviations.

(shivering, rubbing his hands)

Is there a...uh...thermodial in here? To make more heat?

MASTRO  
(ignoring him)  
Judge, how many languages do you speak?

ZAMBRANO  
Huh? Two. Spanish and English, as you see.

MASTRO  
Not French.

ZAMBRANO  
No.

MASTRO  
And yet you cited legal precedents for your verdict from French case law. Which you somehow translated.

ZAMBRANO  
Yes, well. I had a very good secretary. She speaks many languages.

MASTRO  
Did this secretary also pull down the voluminous case law from American and Australian courts?

ZAMBRANO  
Volumin...?

MASTRO  
How did you find all these cases?

A long beat.

ZAMBRANO  
Eh. You see, I am embarrassed to say...  
(beat)  
They would arrive. Under my door. Someone put them there, I don't know who. I always assumed my staff...my colleagues...

MASTRO  
(to himself)  
Elves, maybe.

ZAMBRANO  
I'm sorry?

MASTRO

You didn't have anything to do with writing this verdict, did you, Judge?

ZAMBRANO

(to Kaplan)

This is not so!

MASTRO

Did Steven Donziger write that opinion?

ZAMBRANO

I...I don't know.

MASTRO

And pay you to issue it?

ZAMBRANO

No. That's not what --

MASTRO

You were bribed, Judge Zambrano. Isn't that so?

ZAMBRANO

This is slander.

(comically pulling the hat down over his ears, as if trying to disappear)

You try to impose your rules, your culture. Then you try to make a fool of me. This is what you do.

MASTRO

I'm simply asking you --

ZAMBRANO

Ask your Mr. Larrea. Ask Chevron how legal business is conducted in my country. It's not remarkable.

(looks at Larrea pointedly)

Ask him.

INT. GURIAN'S DELI. NEW YORK CITY. LATER.

Mastro stands against the wall holding a small ticket with a number on it.

DELI CLERK  
82! Number 82!

Mastro looks down at his number and shakes his head. He checks his watch. Ugh.

DELI CLERK (CONT'D)  
82!? Last call for 82! OK. And now  
I got 83!

Mastro feels a tap on his shoulder. Fajardo.

MASTRO  
Pablo! Join me. At this rate I'll  
be another half an hour.

FAJARDO  
I can persuade him.

MASTRO  
(shaking his head)  
You see what's going on in there,  
Pablo. You're getting crushed. My  
client would think I was crazy to  
talk about a deal now.

DELI CLERK  
84! Number 8 - 4!

FAJARDO  
There must be something you can do.  
Something I can take back to him.

MASTRO  
That time passed long ago.

FAJARDO  
I know what you think of Steve. But  
I don't think you understand what  
this took --the years. The  
sacrifice. The stubbornness.

DELI CLERK  
I got 85 and 86 here!

MASTRO  
I know what it took to bribe a --

FAJARDO  
Randy, please. Your side of the  
street isn't clean on that issue  
and you know it. But that isn't  
even what matters.

(beat)  
(MORE)

FAJARDO (CONT'D)  
The people matter. Chevron's  
obligation matters. You saw that  
with your own eyes.

(beat)  
It's bigger than Steve.

DELI CLERK  
87!

MASTRO  
(affected, but comes back  
hard)  
Steve made this about Steve. Don't  
you see that? I'm not doing this to  
you. He is. He's costing you and  
your people. He's the problem. And  
he's going to lose his law license  
in there. And then he's quite  
possibly going to jail --

DELI CLERK  
87 anyone!

MASTRO  
Where he belongs. So don't put this  
on me Pablo. He lied, cheated and  
bribed.

DELI CLERK  
Last call on 87! ...OK, 88!

MASTRO  
I'm doing my job. He's the reason  
you and your people aren't getting  
what you deserve.

Did he just say that? They both just stand there.

FAJARDO  
I thought you'd want to know.  
(beat)  
He died.

MASTRO  
(still agitated)  
What are we talking about now?

DELI CLERK  
89's up!

FAJARDO  
The Gutierrez boy. The one you met.  
A few weeks ago.

Mastro nods.

FAJARDO (CONT'D)  
I thought you'd want to know.

Fajardo turns and walks away.

DELI CLERK  
Number 89! What're you having?

Mastro, a pained expression on his face, watches Fajardo's back as he exits.

Then he clocks the deli clerk, looks down at his number: 87.

Fuck me.

INT./EXT. MASTRO'S CAR. PALISADES PARKWAY. NEW JERSEY.  
EVENING.

Dirty, marshy water flows calmly in the ravine below the parkway as the sun sets.

Mastro's driving, listening to the end of the Brandenburg Concertos on the radio.

He looks out at the polluted marshland on the passenger side, thick with green sludge. He sees the lights of New York out the other side.

The music stops and a calm, public radio kind of voice comes on.

We watch his expressionless face as he listens --

ANNOUNCER  
You've been listening, of course, to the masterful J.S. Bach. Brought to you by the American Petroleum Institute. Dedicated to creating a greener, more sustainable energy future. Read more at A.P.I. Dot --

Mastro clicks off the radio. He stares straight ahead.

We SEE a sign: SCENIC LOOKOUT AHEAD 500 Yards.

Mastro clocks it, suddenly veers dangerously in tight traffic from the far left lane to the right lane and then he exits into the empty Lookout parking lot.

He stops the car, gets out, turns up his suit jacket collar at the bitter wet wind. Sleet stings his face.

His car is still running and we HEAR the "door open" chime. He walks over to the railroad tie fence at the edge of the cliff.

He leans against the fence, as he breathes deeply and stares down at the Hudson river flowing darkly by.

Mastro lets out a long SIGH. A moment of decision.

INT. GIBSON, DUNN AND CRUTCHER CONFERENCE ROOM. NEW YORK CITY. THE NEXT MORNING.

TIGHT on Donziger's face. He looks like he hasn't slept.

He's scrutinizing a document.

He's deep in silent concentration. He winces at something on the page, then reads through the last few pages impatiently.

He pulls a pen out of his pocket, scratches out clause after clause --

MASTRO

It's our best and final. No edits.

Donziger scoffs and sketches something we don't see on the last page, as if doodling.

He slides it across the table. He looks up -- right at us. His gaze is even. His look, belligerent.

Mastro flips through Donziger's edits. He gets to the last page: drawn in blue ink is an impressive likeness of an oil derrick. Except this oil derrick has a penis, and it's urinating on the signature line.

MASTRO (CONT'D)

Very nice.

Donziger nods.

MASTRO (CONT'D)

Seventy-five million dollars isn't anybody's idea of a joke. Not even Chevron.

Long beat while Donziger eyes something on the table.

DONZIGER  
You mind?

Mastro shrugs, and Donziger grabs a pastry, takes a big messy bite.

A long beat while he chews.

DONZIGER (CONT'D)  
It's not half a percent of my verdict.

MASTRO  
It's not *your* verdict, Steve.

DONZIGER  
(mouth full)  
Semantics.

MASTRO  
Seventy-five million is enough to remediate the waste pools in Lago Agrio with money left over to seed a network of health clinics. Maybe some schools.

(beat)  
Helps out the people you've worked so hard to help.

Donziger's face says, 'No it won't. Not even close.'

MASTRO (CONT'D)  
Your fee is vastly reduced, and you will have to accept some disciplinary action. But you get to go on being a lawyer.

DONZIGER  
(motioning to something)  
Any more?

Mastro grabs something, shakes it, we hear a tiny amount of liquid slosh back and forth. Mastro shakes his head.

DONZIGER (CONT'D)  
Maybe you're just worried about losing in there.

MASTRO  
*Losing.*  
(checking his watch)  
(MORE)

MASTRO (CONT'D)

In about 45 minutes, I'm going to walk back across the street to Kaplan's courtroom for the verdict. There's a higher chance I get hit by a bus crossing Chambers Street than there is he rules in your favor.

DONZIGER

Either works for me.

INT. GIBSON, DUNN AND CRUTCHER. NEW YORK CITY. CONTINUOUS.

A nervous Fajardo, Tony, Becca and Stein stand in the corridor outside the conference room.

Weatherford arrives with two other PARTNERS in tow and peers through the conference room shades.

WEATHERFORD

What the hell's going on in there?

TONY

Appomattox, basically.

STEIN

They're discussing a deal.

WEATHERFORD

(to himself)

What the fuck for?!

INT. GIBSON, DUNN AND CRUTCHER CONFERENCE ROOM. CONTINUOUS.

DONZIGER

You despise me.

MASTRO

It's not personal.

DONZIGER

(barely stifling a laugh)

Oh yeah it is. How long we been at this? I don't even know you.

MASTRO

I'll have a Fourth of July barbecue.

DONZIGER

You obviously know everything there is to know about *me*. My work, my marriage. All of it. You've read my fucking diaries.

Mastro nods.

DONZIGER (CONT'D)

But what do I know about you?  
You're from New York?

MASTRO

New Jersey.

DONZIGER

Right. Your dad a lawyer too?

MASTRO

We have time for this?  
(beat)  
My father was a professor.  
Political science.

DONZIGER

There's an oxymoron.

Mastro laughs despite himself.

DONZIGER (CONT'D)

Here's what you don't understand, Randy. The system works for you. But it doesn't do shit if you live in some rainforest in Ecuador with black gold under your feet.

MASTRO

(getting agitated now)  
So you saved the day by bribing a judge.

DONZIGER

I didn't bribe anybody! I did what I had to do to make morality plausible! To even the playing field. Your clients did worse for decades.

MASTRO

(angrily)  
You're going to talk to *me* about morality now? The facts tell a different story.

DONZIGER

You don't care about the facts.

MASTRO

I care about the law.

DONZIGER

You care about your version of the law.

MASTRO

The truth has versions. The law does not.

DONZIGER

That's where you're wrong. See, that's the real difference between us. You actually believe the law is this thing that treats everyone equally. You ever hear of CLS?

MASTRO

What?

DONZIGER

At Harvard we had something called CLS. Critical Law Studies. The point was to understand that the law wasn't impartial. That the law was set up -- rigged -- to benefit the wealthy and the entitled. Companies like Chevron, that could do whatever they want. You have to fight back. If you're poor or underprivileged, if you live in the jungle in Ecuador say and the water is burning your throat and killing your kids, then you can use the law, sure, but you can never rely on it. You have to change the rules. Change the stakes. The law operates in a context, Randy. Do you get that? There is no justice if I don't change the context.

MASTRO

The end justifies the means.

DONZIGER

The end demands the means. The end is death and suffering and broken generations. Poisoned lakes and cancer clusters. Dead kids. That's the only end in Lago Agrio.

(MORE)

DONZIGER (CONT'D)  
Unless I don't just think like a  
lawyer. Unless I act like a  
disruptor.

MASTRO  
A disruptor. Listen to yourself.  
You know what I learned in law  
school, Steve? That the law only  
works because it has codes. And you  
went over the line. You went way  
over the line.

DONZIGER  
(waving the offer sheet)  
But you'll give me a way out, huh.  
Even though I'm a cheater. Even  
though I'm going to lose. You'll  
throw me a lifeline. Why?

MASTRO  
Because you'll appeal, and this  
case will drag on --

DONZIGER  
No. You're full of shit.  
(beat)  
You Catholic, Randy?

MASTRO  
Lapsed.

DONZIGER  
But not *so* lapsed, right? Guy like  
you doesn't even let a gym  
membership lapse.  
(beat)  
This is about salvation. This is  
Randy Mastro and his giant sinner  
of a client buying back their  
conscience. You were there.

Mastro says nothing.

DONZIGER (CONT'D)  
I know what you saw.  
(beat)  
And you don't get to buy back your  
soul. Chevron does not get to build  
a few health clinics and put it in  
some bullshit brochure about  
sunshine and corporate citizenship.  
I've spent 20 years making sure  
redemption doesn't come that cheap.  
I'll spend 20 more if I have to.

Donziger turns his back and looks out at Manhattan below.

A long beat. A SIGH from Mastro.

MASTRO  
All right then.

We HEAR Mastro packing his papers and the click of his briefcase.

MASTRO (CONT'D)  
(rising to leave,  
buttoning his jacket)  
I'll see you in there.  
(beat)  
Steve?

Donziger turns around as Mastro pauses by the door.

MASTRO (CONT'D)  
You should have paid more attention  
in the other classes.

INT. ELEVATOR AT GIBSON, DUNN AND CRUTCHER. 15 MINUTES LATER.

As the elevator descends --

DONZIGER  
We'll get Kaplan out of the way and  
we'll regroup. Tonight at my place.  
We'll need to get to some reporters  
in Quito.

FAJARDO  
*Estoy tomando al trato.*

DONZIGER  
You're...what?

FAJARDO  
I'm taking the deal.

DONZIGER  
I understood the words.

FAJARDO  
I'm sorry. But the rest of the  
team. We can't pass on the  
settlement.

DONZIGER  
(gut-punched)  
Pablo?

DING. The door opens.

FAJARDO  
It's over, hermoso.

A woman steps in and the door closes.

DONZIGER  
(lowering his voice)  
I'll be fine. They can't disbar me.  
Even if they do --

FAJARDO  
(whispering fiercely)  
It's not for you, Steve! It's for  
Lago Agrio. Do you know what  
seventy-five million can do?

The woman glances at them uncomfortably.

DONZIGER  
Pablo, we stand to collect *nineteen billion*.

FAJARDO  
No, we don't. Not anymore!

DING. A man steps on.

DONZIGER  
But we do Pablo. They've just  
gotten in your head. They've made  
you think they care. They don't.

DING. The step out into the lobby and face each other.

People rush by and step around them intermittently as they talk.

DONZIGER (CONT'D)  
It's guilt money. Absolution for  
pennies on the dollar. Stay strong  
with me, Pablo. Your people deserve  
better. And Chevron deserves worse.

A long beat.

FAJARDO

(taking a breath)

I'm sorry Steven. I have to take  
this deal.

A long beat. Donziger looks surprised, and then he hardens.

DONZIGER

You can't.

FAJARDO

I know it's hard to let go.

DONZIGER

I mean, you can't.

(staring at Pablo coldly)

You don't have the power. You're  
not the attorney of record here. I  
am. At least for the moment. And I  
won't do it. For your sake I won't  
do it. I won't let the people of  
the Oriente settle for scraps, and  
I won't send the signal to other  
companies everywhere --

FAJARDO

(taken aback)

Steven. Don't do this. We've  
trusted you. But I'm tired of the  
martyrdom. I'm tired of holding  
out.

DONZIGER

You're tired? You want to just  
surrender now? After they've ruined  
your land. Poisoned your people.  
Murdered your brother in cold  
blood, for Christ's sake!

FAJARDO

(exasperated)

Steve! Enough! We both know Wilson  
was killed by drug dealers! Enough  
lies. I should never have let you  
keep telling this story. But I went  
along.

(a long beat)

I always went along.

DONZIGER

That's not true! We were there --

FAJARDO

He complained too loudly about the Colombians. He wouldn't pay them off. My sister-in-law told us that night. *Estabas escuchando?* She cried to us in her kitchen, remember? But you, Steve. You always hear what you want. Believe what you must. You bend the world to your lens.

DONZIGER

The moral arc of the universe bends toward justice! That's what Dr. King said! We're not bending anything. We're following it, Pablo!

FAJARDO

No, hermoso. You say that, but it's not justice you seek. I see that now. It's not justice you can't live without.

Beat while Donziger looks at Pablo, confused.

FAJARDO (CONT'D)

(hard)  
It's the fight.

OFF Donziger crushed by this accusation from his old friend.

INT. JUDGE LEWIS KAPLAN'S COURTROOM. U.S. DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK. DAY.

Kaplan is addressing a rapt courtroom.

Donziger and Mastro sit at their opposing tables, both expressionless.

KAPLAN

I'll let my written opinion speak to the details of the ruling. But let's just say that if ever there were a case warranting equitable relief with respect to a judgment procured by fraud, this is it. To that end, I am barring the enforcement of the verdict in Ecuador in this or any American court.

(MORE)

KAPLAN (CONT'D)

And I will strongly urge the courts  
in any other country to follow  
suit. Mr. Donziger --

(Donziger snaps to)

You may or may not be on the side  
of the angels here. I don't know.  
But the courts cannot be held to  
account for justice achieved by  
fraud or deception. I'm herein  
referring your record to the state  
bar's grievance committee, which is  
as much as I can do. You should be  
prepared to defend yourself. You  
have dishonored your profession.

(a long beat)

We are adjourned.

And he RAPS his gavel.

The room ERUPTS. Mastro, expressionless, begins methodically  
packing his belongings, closing his briefcase.

With chaos around him, Donziger just sits there, unmoving.  
His facial expression doesn't even shift.

Mastro heads for the side exit, avoiding the waiting PRESS  
and CROWD.

As he pushes the door open he looks back and catches  
Fajardo's eye.

Mastro and Fajardo exchange a sad glance. And Mastro walks  
out.

INT. JUDGE LEWIS KAPLAN'S COURTROOM. FIVE MINUTES LATER.

Donziger is still sitting in his chair, shoulders slumped,  
dazed, totally alone.

Then -- a woman's hand on his shoulder.

LAURA

Hey.

He's surprised to see her and tears form in his eyes.

LAURA (CONT'D)

(soothingly)

Hey, hey.

DONZIGER

I'm sorry.

LAURA

Don't be.

DONZIGER

I don't know what happens now.

LAURA

(hugging him)

Now we get lunch.

DONZIGER

I don't think we can afford lunch.

LAURA

We can. And we'll figure out the rest tomorrow.

DONZIGER

Tomorrow. OK.

LAURA

(putting her face in front of his)

Listen to me, babe.

(nodding toward the side of the courtroom)

You see that door?

DONZIGER

Yeah.

LAURA

We're going to walk through it and down the stairs and into a cab. Arm in arm. And then David and I are going to come home. We're going to finish that damn kitchen ourselves. I bought a book and it doesn't look that hard. Mostly. You're going to take some time, and we're going to play Monopoly and Risk and go to the zoo, and then you'll find one of the thousand things you can do to make the world better. OK?

(beat while he tries to keep it together)

OK?

He nods and stands, steadies himself as she smiles at him.

INT. U.S. DISCTRICT COURT HALLWAY. CONTINUOUS.

Donziger and Laura walk arm in arm down the hallway, leaning on each other, and then they exit outside onto:

THE COURTHOUSE STEPS.

They descend the stairs and we HEAR another diary entry.

DONZIGER (V.O.)

I remember the day Dad closed the store. We stood and watched as they took down the sign. It almost killed him...

As they exit out onto the plaza --

EXT. NEW YORK STATE SUPERIOR COURT. NEW YORK CITY.  
CONTINUOUS.

They emerge onto the edge of the big sweeping front stairs. At least 100 REPORTERS are cordoned off 30 yards away.

The reporters spot Donziger and begin to SCREAM his name, shouting out questions.

REPORTER 1

Mr. Donziger, will you appeal? Can you comment on the verdict?

DONZIGER (V.O.)

But you couldn't compete with Circuit City and Crazy Eddie.

REPORTER 2

Do you feel you dishonored your profession, Steve?

DONZIGER (V.O.)

I thought, My God, how quickly they erase you. How fast they make your life's work invisible, when you're just in the way.

They walk down the stairs, both staring straight ahead.

The reporters' VOLUME and the combative nature of their questions increases.

Donziger and Laura keep walking down the stairs toward the taxi stand. Donziger is dead-eyed.

LAURA  
(low, reassuring)  
David can't wait to see you. He  
thinks there's enough money in the  
swear jar for a real giraffe.

They reach the bottom of the stairs, put a hand out to hail a  
taxi. One stops as they hear --

REPORTER 1  
Did the judge essentially say  
you're a *criminal*?

Laura gets in the cab, Donziger hesitates, looks at Laura.  
She looks back at him.

DONZIGER (V.O.)  
He just gave up...The bigger guys  
pushed him around, and he just gave  
up. He didn't fight. Or adapt. Or  
grow.

REPORTER 1  
Steve, are you going to defend  
yourself?

He winces. Laura sees it.

This is who she loves, for better and worse.

DONZIGER (V.O.)  
Maybe he was just tired of  
fighting. Maybe there's only so  
much you can do.

LAURA  
Go.

DONZIGER  
I can just...

LAURA  
Go. It's OK.

DONZIGER (V.O.)  
-- but I think he just quit.

He squeezes her hand, gives her a look that says 'thank you.'

And he turns and strides across the steps toward the SCRUM,  
who begin churning like a pack of hungry hyenas.

He stands before the assemblage, a matador in the ring with  
many angry bulls.

And we are TIGHT ON his face now -- we see his eyes wild with the fight, he almost has a smile on his face. He looks energized again.

He points a long index finger at them and opens his mouth --

CUT TO BLACK.

END OF SCREENPLAY.