

EUROGAS INC.

and

BELMONT RESOURCES INC.

(CLAIMANTS)

v.

SLOVAK REPUBLIC

(RESPONDENT)

ICSID Case No. ARB/14/14

Claimants' Reply
Index of Legal Authorities

September 29, 2015

Exhibit No.	Description
CL-196	<i>Brill v. Dvorak</i> (In re Dvorak), 118 B.R. 619 (N.D. Ill. 1991) dated July 3, 1991
CL-197	Utah Revised Business Corporation Act, hereafter "Current Act" (excerpts), § 1701 of the Current Act, § 1405(1) of the Current Act, § 1405(1)(e) of the Current Act, § 1405(2)(b) of the Current Act, §102(11), §1105(2) of the Current Act.
CL-198	<i>Gottling v. P.R. Inc.</i> , 2002 UT 95 dated September 17, 2002
CL-199	<i>Terry v. Wilkinson Farm Service Co.</i> , 173 P.3d 204 (Utah App. 2007) dated November 16, 2007
CL-200	Delaware Code Ann. tit. 8 § 278R.I. Ge. Laws, § 7-1.2-1325
CL-201	Kansas Stat. Ann. § 17-6807

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CL-202	Oklahoma. Stat. tit. 18 § 1099.
CL-203	R.I. Ge. Laws, § 7-1.2-1325 (2009)
CL-204	<i>Ohio v. Kovacs</i> , 469 U.S. 274, 286, 105 S. Ct. 705, 711, 83 L. Ed. 2d 649 (1985) dated January 9, 1985
CL-205	<i>Catamount Const. v. Timmis Enterprises</i> , 2008 WY 122 dated October 9, 2008
CL-206	Texas Bus. Corp. Act, Art. 712 (1) – (2)
CL-207	<i>In re Sullivan</i> , 198 B.R. 417 (Bankr. D. Mass 1996) dated November 15, 2006
CL-208	<i>In re Koper</i> , 284 B.R. 747 (Bankr. D. Conn. 2002) dated December 12, 2002
CL-209	<i>In re Stafford Pool & Fitness Center</i> , 252 B.R. 627 (Bankr. D.N.J. 2000) dated August 24, 2000
CL-210	<i>In re Romano</i> , 350 B.R. 276, 279 (Bankr. E.D. La. 2005) dated May 18, 2005
CL-211	<i>In re Pace</i> , 146 B.R. 562, 566 (B.A.P. 9th Cir. 1992)
CL-212	<i>In re DeGroot</i> , 484 B.R. 311, 312 (B.A.P. 6th Cir. 2012) dated December 27, 2012
CL-213	<i>In re Vanhook</i> , 468 B.R. 694, 700 (Bankr. D.N.J. 2012) dated February 21, 2012
CL-214	<i>Starrett v. Starrett</i> , 225 N.J. Super. 150, 156-57, 541 A.2d 1119, 1121-22 (App. Div. 1988) dated May 24, 1988
CL-215	11 U.S.C. § 704
CL-216	<i>Hutchins v. I.R.S.</i> , 67 F.3d 40, 44 (3d Cir. 1995) dated October 3, 1995
CL-217	<i>In Re Kane</i> , 628 F.3d 631 (3d Cir. 2010) dated December 21, 2010
CL-218	<i>In re K.C. Mach. & Tool Co.</i> , 816 F.2d 238, 246 (6th Cir. 1987) dated April 14, 1987
CL-219	<i>Fed. Land Bank of Berkeley v. Nalder</i> , 116 F.2d 1004, 1007 (10th Cir. 1941) dated January 2, 1941
CL-220	<i>Wilsey v. Jewett Bros. & Co.</i> , 122 Iowa 315, 98 N.W. 114, 115 (1904),
CL-221	<i>Steevens v. Earles</i> , 25 Mich. 40, 41 (1872)
CL-222	<i>Morlan v. Universal Guar. Life Ins. Co.</i> 298 F.3d 609, 617 (7th Cir. 2002)
CL-223	<i>Middleton-Coulibaly v. Danco, Inc</i> , 919 N.Y.S.2d 305, 308 (N.Y. Civ. Ct. 2011)

Exhibit No.	Description
CL-224	<i>Deitz v. U. of Denver</i> , 95-CV-02756-WDM-OES, 2011 WL 723118, at *8 (D. Colo. Feb. 22, 2011)
CL-225	<i>Orvis v. Johnson</i> , 2006 WL 1917915 *2 (UT App. 2006)
CL-226	Utah Code Ann. § 48-2c-1203(1)
CL-227	<i>Macris & Associates, Inc. v. Neways, Inc.</i> 986 P.2d 748, 751-52, aff'd, 2000 UT 93 dated December 5, 2002
CL-228	<i>Florom v. Elliott</i> , 867 F.2d 570, 575 n. 2 (10th Cir.1989) dated July 12, 1989
CL-229	<i>Nettis v. Levitt</i> , 241 F.3d 186 (2nd Cir. 2001)
CL-230	<i>Decius v. Action Collection Serv., Inc.</i> , 2004 UT App 484 dated December 23, 2004
CL-231	<i>Shannon v. Samuel Langston Co.</i> , 379 F. Supp. 797, 800-01, (W.D. Mich. 1974) dated May 31, 1974
CL-232	<i>Ekotek Site PRP Comm. v. Self</i> , 948 F. Supp. 994, 1001-02 (D. Utah 1996) dated September 27, 1996
CL-233	<i>Oklahoma ex rel. Doak v. Acrisure Business Outsourcing Services, LLC</i> 529 Fed.Appx. 886, 894 (10th Cir. 2013)
CL-234	<i>Dayton v. Peck, Stow and Wilcox Co. (Pexto)</i> , 739 F.2d 690 (1st Cir. 1984)
CL-235	<i>Polius v. Clark Equipment Co.</i> , 802 F.2d 75, 85 (3rd Cir. 1986)
CL-236	<i>Decius v. Action Collection Serv., Inc.</i> , 2004 UT App 484
CL-237	Utah R. App. P. 30
CL-238	<i>Cincinnati Ins. Co. v. AMSCO Windows</i> , 921 F.Supp.2d 1226, 1252, (D. Utah 2013)
CL-239	11 U.S.C. § 362 (c)
CL-240	Official commentary to section 1101 of the Current Act
CL-241	<i>Pac Rim Cayman LLC v. Republic of El Salvador</i> , ICSID Case No. ARB/09/12
CL-242	<i>Starrett Housing Corp., Starrett Systems, Inc. Starrett Housing Int'l Inc. v. Gov't of the Islamic Rep. of Iran, Bank Markazi Iran, Bank Omran, Bank Mellat</i> , Interlocutory Award No. ITL – 32-24-1, Case No. 24 (Dec. 19, 1983) 4 Iran – U.S. Cl. Trib. Rep. 122, in Karen Lee, ICSID Reports, Volume 11, p. 55, footnote 65
CL-243	Mummery, The Content of the Duty to Exhaust Local Remedies, 58 Am. J. Int'l L.

Exhibit No.	Description
CL-244	International Law Commission Draft Articles on Diplomatic Protection (2006), adopted by General Assembly Resolution 62/27
CL-245	<i>Certain Norwegian Loans</i> [1957] ICJ Reports 9, dated July 6, 1957
CL-246	<i>U.S. v Great Britain (Robert E. Brown Case)</i> , Vol VI UNRIAA 120 (1923) November 13, 1923
CL-247	<i>Finnish Ships Arbitration Claim of Finnish shipowners against Great Britain in respect of the use of certain Finnish vessels during the war (Finland, Great Britain)</i> , (1934) 3 RIAA, May 9, 1934
CL-248	<i>Panevezys – Saldutiskis Railway Case</i> , PDIJ Series, A/B, No 76 (1939), dated February 28, 1939
CL-249	<i>Ambatielos Claim (Greece v United Kingdom)</i> , Vol XII UNRIAA 83 (1956), dated March 6, 1956
CL-250	<i>Interhandel Case (Preliminary Objections)</i> [1959] ICJ Reports 6, dated March 21, 1959
CL-251	<i>Chevron Corporation v. The Republic of Ecuador</i> , Opinion of Jan Paulsson, dated March 12, 2012
CL-252	Dugan, Wallace, Rubins & Sabahi, <i>Investor-State Arbitration</i> , Oxford University Press, 2008
CL-253	<i>Las Palmeras Case</i> , Judgment on Preliminary Objections of February 4, 2000, Inter-Am. Ct. H.R. (Ser. C) No. 67 (2000), dated December 6, 2001
CL-254	<i>Ambiente Ufficio S.p.A. and others v. Argentine Republic</i> , ICSID Case No. ARB/08/9, Decision on Jurisdiction and Admissibility, February 8, 2013
CL-255	<i>ST-AD GmbH v. Republic of Bulgaria</i> , UNCITRAL, PCA Case No. 2011-06
CL-256	Christoph Schreuer, <i>Full Protection & Security</i> , Journal of International Dispute Settlement, (2010)