PCA CASE NO. 2026-30

IN THE MATTER OF AN ARBITRATION UNDER THE AGREEMENT ON ENCOURAGEMENT AND RECIPROCAL PROTECTION OF INVESTMENTS BETWEEN THE KINGDOM OF THE NETHERLANDS AND THE UNION OF SOVIET SOCIALIST REPUBLICS DATED 5 OCTOBER 1989

- and -

THE 1976 ARBITRATION RULES OF THE UNITED NATIONS COMMISSION ON INTERNATIONAL TRADE LAW (the "UNCITRAL Rules")

- between -

MR. MIKHAIL MARATOVICH FRIDMAN (RUSSIAN FEDERATION, ISRAEL)

(the "Claimant")

- and -

THE KINGDOM OF THE NETHERLANDS

(the "Respondent", and together with the Claimant, the "Parties")

PROCEDURAL ORDER NO. 1

RULES OF PROCEDURE

Arbitral Tribunal

Dyalá Jiménez (Presiding Arbitrator)
Professor Vladimir Pavić (Arbitrator)
J. Christopher Thomas, KC (Arbitrator)

Tribunal Secretary

Nathan Gervais

Registry

Permanent Court of Arbitration

23 May 2026

CONSIDERING:

(A) The Tribunal's invitation that the Parties provide their comments on procedural matters by 12 February 2026, extended by the Parties' agreement to 25 February 2026;

(B) The Parties' joint draft of the Procedural Order No. 1 sent to the Tribunal on 25 February 2026;

(C) The Tribunal's revised draft of the Procedural Order No. 1 transmitted to the Parties on 4 March 2026 for review in advance of the Case Management Conference;

(D) The Case Management Conference held by videoconference on 23 April 2026, at which the Parties were invited to confer on the outstanding procedural matters;

(E) The Parties' joint submission of a further revised draft of Procedural Order No. 1 transmitted to the Tribunal on 6 May 2026, identifying the Parties' remaining disagreement with respect to the Procedural Calendar;

(F) The Tribunal's proposed Procedural Calendar of 15 May 2026, transmitted to the Parties in light of the Parties' remaining disagreements, and agreed upon by the Parties on 20 May 2026;

(G) That this Procedural Order sets out the Tribunal's directions, having duly considered the positions advanced by the Parties;

THE TRIBUNAL HEREBY DECIDES AS FOLLOWS:

1. Continuation in Force of Prior Orders

1.1 The provisions of this and future orders shall apply in addition to the Terms of Appointment executed by the Parties and the Tribunal.

1.2 Procedural orders made by the Tribunal shall remain in force unless expressly amended or terminated.

2. Applicable Version of the UNCITRAL Rules

2.1 The Parties have agreed that the arbitration shall proceed under the 1976 version of the Arbitration Rules of the United Nations Commission on International Trade Law (the "**UNCITRAL Rules**").

3. Place of Arbitration

3.1 The Tribunal received the Parties' written submissions on the place of the arbitration and shall issue its decision by means of a separate procedural order.

3.2 The Tribunal, in consultation with the Parties, will determine in due course the location of any hearing. The location of the hearings shall not affect the choice of the place of the arbitration and *vice versa*.

4. Language and Translations

4.1 The language of the arbitration shall be English.

4.2 The Parties shall make their written submissions and other communications in English. Accompanying witness statements, expert reports, and other documents originally written in a language other than English shall be submitted to the Tribunal with a translation into English, submitted as a separate electronic file. Electronic files shall follow the naming convention contained in **Annex 1**.

4.3 Whenever the document is lengthy and is not relevant in its entirety, the translation may be limited to all relevant excerpts together with such other portions of the document as necessary to put such excerpts in proper context, provided that the Tribunal may require a fuller or complete translation at the request of a Party or upon the Tribunal's own initiative.

4.4 Documents produced in response to requests or orders for document production may be produced in their original language. However, if a Party submits any such document to the Tribunal, the provisions of the immediately preceding sections shall apply.

4.5 Translations shall be accepted as accurate unless contested by the other Party, in which case the Parties shall attempt to reach an agreement on the translation of the document and, if necessary, produce a certified translation. If no agreement is reached, the Parties shall be entitled to make submissions on the translation issue. The Tribunal shall take the corresponding decision taking into account the submissions and translations provided by the Parties, and may also appoint a certified translator to have the document(s) in question translated.

4.6 The Tribunal reserves the right, on application by a Party or on its own initiative, to order the translation of any document in whole or in part.

4.7 Witnesses and experts should in principle provide testimony in the procedural language of the arbitration.

4.8 Witness statements and expert reports in a language other than English shall be submitted with an informal translation in English, which will be accepted as accurate unless contested by the other Party, in which case the Parties will attempt to reach agreement on the translation.

4.9 If the witness or expert does not speak English, a witness or expert may testify in a language other than the procedural language with simultaneous interpretation into the procedural language.

4.10 The Parties will notify the Tribunal, as soon as practicable and no later than one week prior to the pre-hearing organizational meeting (the "**Pre-Hearing Conference**"), which witnesses or experts require simultaneous interpretation. The costs of any such interpreter(s) will be paid from the deposit made by the Parties, without prejudice to the decision of the Tribunal as to the allocation of costs.

5. Procedural Calendar and Filings

5.1 The Procedural Calendar is set forth in **Annex 2** to this order. The Tribunal may modify the Procedural Calendar after consulting with the Parties.

5.2 On or before the deadline for any written submission, the submitting Party shall send an electronic version of its submission, together with witness statements, expert reports and consolidated lists of exhibits and legal authorities (if applicable), simultaneously to the Tribunal, the Permanent Court of Arbitration ("**PCA**") and opposing counsel by e-mail, or a secure file-sharing platform (in which case the submitting Party shall inform the Tribunal, the PCA and opposing counsel by e-mail of the upload to the file-sharing platform).

5.3 As a general matter, written submissions and other documents will be transmitted in electronic format only, unless hard copies are required for any purpose or specifically requested by any member of the Tribunal. The Parties shall, no later than six weeks prior to the hearing, send to the Tribunal (with the exception of the Presiding Arbitrator) a USB drive containing a joint electronic hearing bundle, including all written submissions and the evidentiary record. The Parties shall comply with the same requirement in respect of any post-hearing submissions.

5.4 Unless otherwise provided, all time limits shall refer to midnight on the day of the deadline at The Hague time. Whenever possible, deadlines should be set at the end of the week before the weekend, and Mondays should be avoided. Whenever possible, deadlines should be set taking into account major public holidays. Nonetheless, if a deadline falls on a public holiday or a weekend, it shall be extended to the next working day. A list of public holidays is set out in **Annex 4**.

5.5 Extensions may be agreed between the Parties or granted by the Tribunal for justifiable reasons provided that the request for an extension is submitted as soon as practicable after a Party becomes aware of the circumstances which prevent it from complying with the deadline and taking into account the possible impact of the extension on the dates fixed for any hearing or other meeting.

5.6 The early filing of any submission shall not, by itself, advance any of the other deadlines in the Procedural Calendar.

5.7 For any simultaneous submissions, each Party shall submit all electronic copies only to the PCA. The PCA will then distribute copies to the Tribunal and opposing counsel once both submissions have been received.

6. Written Submissions

6.1 The number and sequence of written submissions shall follow the Procedural Calendar.

6.2 In any of pleadings following the first pleadings of each respective Party, the Parties shall limit themselves to responding to the factual allegations and legal arguments made by the other Party in its prior written submission, unless the relevance of additional evidence emerges after the first exchange of pleadings and document production, justifying new allegations of fact or legal arguments. The Tribunal shall be permitted, but not bound, to exclude from the record any materials that do not conform with the standard established by this provision.

6.3 For each allegation of fact, the Parties shall identify the evidence presented or to be presented in support of that allegation, whenever possible. For each legal argument, the Parties shall identify the legal authority asserted or to be asserted in support of that argument, whenever possible.

6.4 To facilitate filing, citations, and word processing, all written submissions, including pleadings, witness statements and expert reports or opinions, shall:

6.4.1 have their paragraphs numbered;

6.4.2 be provided as searchable Adobe Portable Document Format (PDF) files, however, Excel spreadsheets or other calculations performed by experts shall be provided in their native electronic format (*i.e.*, in Excel or similar format rather than PDF);

6.4.3 be readable and searchable on PC and Mac devices and each page appropriately rotated

so that it can be read on a computer screen;

6.4.4 be preceded by a hyper-linked table of contents; and

6.4.5 be accompanied by two lists in the form of a table (one for exhibits and one for legal authorities), both of which should be submitted in searchable PDF format, describing each document by exhibit number, description, and date (in format day month year). Such lists should be updated and consolidated as new submissions are filed, in which case the list should identify which exhibits and legal authorities were provided with each submission.

7. Evidence

7.1 The Tribunal shall determine the admissibility, relevance, materiality and weight of evidence.

7.2 No evidence may be submitted by the Parties outside the time limits set forth in the Procedural Calendar without prior leave of the Tribunal.

7.3 At any time during the proceedings, the Tribunal may request any party to provide additional evidence.

8. Documentary Evidence and Legal Authorities

8.1 In addition to the relevant articles of the UNCITRAL Rules and the provisions on document production below, the Tribunal may use, as an additional guideline, the *2020 IBA Rules on the Taking of Evidence in International Arbitration* ("**IBA Rules"**), subject to the provisions below, when considering matters of evidence. Where the IBA Rules are silent on a procedural matter, the Tribunal shall determine the appropriate procedure in consultation with the Parties.

8.2 The Parties shall include with their written submissions all evidence and authorities on which they intend to rely in support of the factual and legal arguments advanced therein, including witness statements, expert reports, exhibits, legal authorities, and all other evidence and authority in whatever other form.

8.3 The Parties shall identify each exhibit, legal authority, witness statement, and expert report submitted to the Tribunal following the naming convention contained in **Annex 1**. The Parties shall use sequential numbering throughout the proceedings. To avoid multiple copies of the same exhibit in the record, a document shall be submitted as an exhibit only once. Subsequent references to that exhibit shall use the same "C" or "R" numbering originally applied to the exhibit (for example, Respondent's reference to an exhibit or authority filed by Claimant as "C-x" or "CLA-x" shall bear the same "C-x" or "CLA-x" designation, and *vice versa*).

8.4 All evidence submitted to the Tribunal, including evidence submitted in the form of copies, shall be deemed authentic and complete, unless a Party disputes within a reasonable time its authenticity or completeness, or the Party submitting the relevant evidence indicates the respects in which any document is incomplete.

9. Document production

9.1 Each Party may make requests in accordance with the Procedural Calendar for the production of documents from the other Party (each a "**Request to Produce**"), which shall be limited to documents relevant to the case and material to its outcome.

9.2 Each Request to Produce shall be in writing and comply with the requirements of Article 3(3) of the IBA Rules.

9.3 Unless the requested Party objects to production, it shall produce the requested documents within the time limit set forth in the Procedural Calendar. If a Party objects to only a certain aspect of a request, it shall produce documents that are responsive to the non-objected portion of the request within the time limit set forth in the Procedural Calendar.

9.4 If the requested Party objects to production, the following procedure shall apply in accordance with the time limits set forth in the Procedural Calendar:

9.4.1 The requested Party shall submit a response stating which documents or category of documents it objects to producing. The response shall state the reasons for each objection (by reference to the objections set forth in Articles 9(2) and 9(3) of the IBA Rules or to a failure to satisfy any of the requirements in Article 3(3) of the IBA Rules, or to any other basis it may deem relevant). The requested Party may also indicate the documents, if any, that the Party would be prepared to produce instead of those requested. The Parties shall seek agreement on production requests to the greatest extent possible.

9.4.2 To the extent that agreement cannot be reached, the requesting Party shall submit all of its outstanding requests (with replies to the other Party's objections) to the Tribunal for decision. All other correspondence or documents exchanged in the course of this process shall not be copied to the Tribunal.

9.4.3 Document production requests submitted to the Tribunal for decision, together with objections and responses, must be in tabular form pursuant to the model appended to this Procedural Order as **Annex 3**. The Parties shall use the model format throughout their exchange of requests, objections, and responses.

9.4.4 The Tribunal shall rule on any such application. Documents ordered by the Tribunal to be disclosed shall be produced within the time limit set forth in the Procedural Calendar.

9.4.5 At the time a Party produces documents responsive to a request, it shall also indicate where it has withheld documents by reason of privilege or otherwise, and state the legal basis for each claim.

9.4.6 After the first exchange of written memorials, the Tribunal shall convene a case management conference, as provided in Annex 2 (Procedural Schedule), following which it shall, after consultation with the Parties, issue a detailed procedural order on document production, including rules on privilege.

9.5 Documents produced according to the above procedure shall not be considered part of the evidentiary record unless and until a Party subsequently submits them to the Tribunal in accordance with the Procedural Calendar.

9.6 Pursuant to the UNCITRAL Rules, the Tribunal may also, on its own motion, request the production of documents.

10. Witnesses

10.1 Any person may present relevant evidence as a witness, including a Party or a Party's officer, employee, or other representative.

10.2 For each witness, a written and signed witness statement shall be submitted to the Tribunal. Neither Party shall be permitted to submit any testimony that has not been filed in accordance with the procedure established by the Tribunal unless the Tribunal determines that exceptional circumstances exist based on a reasoned request followed by observations from the other party.

10.3 Each witness statement shall contain at least the following:

10.3.1 the name, date of birth, and present address of the witness;

10.3.2 a description of the witness's position and qualifications, if relevant to the dispute or to the contents of the statement;

10.3.3 a description of any past and present relationship between the witness and the Parties, counsel, or members of the Tribunal;

10.3.4 a description of the facts on which the witness's testimony is offered and, if applicable, the source of the witness's knowledge, in a narrative form containing the full substance of the witness's testimony;

10.3.5 an affirmation of the truth of the statement;

10.3.6 a statement as to the language in which the witness statement was originally prepared and the language in which the witness will testify if called to do so;

10.3.7 the date and place of testimony; and

10.3.8 the signature (physical or electronic) of the witness.

10.4 The witness statement of a witness shall constitute that witness's direct testimony.

10.5 Before any oral hearing, and within the deadline set forth in the Procedural Calendar, a Party may be called upon by the Tribunal or the other Party to produce at the hearing for cross-examination any witness or expert whose written testimony has been submitted with the written submissions.

10.6 If a Party has not called another Party's witness or expert for examination, that fact will not be deemed as an admission by that Party nor will it imply that the Party accepts that the substance of their witness statement(s) or expert report(s) is correct or proven. The Tribunal will, in its discretion, assess the weight of the written evidence of a witness or expert who is not called to testify at the hearing.

10.7 Each Party shall be responsible for the appearance of its own witnesses, except when the other Party has waived cross-examination of a witness and the Tribunal does not direct their appearance.

10.8 The Tribunal may grant leave for a witness to testify by video-conferencing in appropriate circumstances or if the Parties so agree.

10.9 If a witness or expert who has been called to testify by the Tribunal or the other Party does not appear to testify at the hearing, the witness's or expert's testimony shall, upon the application of the other Party, be stricken from the record, unless the Tribunal determines that a valid reason has been provided for failing to appear. In such case, the Tribunal may summon the witness to appear a second time if satisfied that the testimony of the witness is relevant and material.

10.10 Each Party shall cover the costs of appearance of its own witnesses, including video-conferencing costs if any. The Tribunal will decide upon the appropriate allocation of such costs in its final award.

10.11 At any hearing, the examination of each witness shall proceed as follows:

10.11.1 the witness shall make a declaration of truthfulness;

10.11.2 the Party who has presented the witness may briefly examine the witness. Such direct examination shall be limited to confirming the accuracy and completeness of the witness's written statements, offering any corrections to be made thereto, and addressing matters which have arisen after that witness's last written statement was signed, the principle being that written witness statements serve as the witness's evidence-in-chief;

10.11.3 the adverse Party may then cross-examine the witness on relevant matters within the witness's knowledge;

10.11.4 the Party summoning the witness may then re-examine the witness with respect to any matters or issues arising out of the cross-examination; and

10.11.5 the Tribunal may examine the witness at any time, either before, during or after examination by any of the Parties. The Parties may examine the witness regarding any matters or issues arising from the Tribunal's examination.

10.11.6 Prior to any hearing, the Tribunal shall convene a case management conference, as provided in Annex 2 (Procedural Schedule), to determine the further rules and modalities of witness examination, which shall be reflected in a subsequent procedural order.

11. Experts

11.1 Each Party may retain and submit the evidence of one or more experts to the Tribunal.

11.2 Each expert report shall contain:

11.2.1 the full name and address of the expert;

11.2.2 a description of their background, qualifications, training and experience;

11.2.3 a statement regarding their present and past relationship (if any) with any of the Parties, their counsel and the members of the Tribunal;

11.2.4 a statement of their independence from the Parties, their counsel and the members of the Tribunal;

11.2.5 a description of the instructions pursuant to which they are providing their opinions and conclusions;

11.2.6 a statement of the facts on which they are basing their expert opinions and conclusions;

11.2.7 their expert opinions and conclusions, including a description of the methods, evidence,

and information used in arriving at the conclusions;

11.2.8 an affirmation of their genuine belief in the opinions expressed in the expert report;

11.2.9 a statement as to the language in which the expert report was originally prepared and the language in which they will testify if called to do so;

11.2.10 the signature of the expert and its date and place; and

11.2.11 if the expert report has been signed by more than one person, an attribution of the entirety or specific parts of the expert report to each author.

11.3 Expert reports shall be accompanied by any documents or information upon which they rely, unless such documents or information have already been submitted with the Parties' written submissions, in which case the reference to the number of the Parties' exhibit will be enough.

11.4 Prior to any hearing, the Tribunal shall convene a case management conference, as provided in Annex 2 (Procedural Schedule), to determine the further rules and modalities of expert examination, which shall be reflected in a subsequent procedural order.

12. Hearings

12.1 The Tribunal shall be in full charge of the hearings.

12.2 After consultation with the Parties and/or a Pre-Hearing Conference, the Tribunal shall issue a procedural order convening the meeting, establishing its format, place, time, agenda, procedures, and all other technical and ancillary aspects.

12.3 The Tribunal may order that any hearing take place by video conference in lieu of in person, if the circumstances so require, following consultation with the Parties.

12.4 No new evidence may be presented at the hearing, except with leave of the Tribunal.

12.5 PowerPoint slides and demonstrative exhibits may be used by any Party during the hearing, provided that those materials reflect evidence on the record and do not introduce new evidence, directly or indirectly, and that the exhibit or authority from which the referred information originates is clearly identified in each presentation and/or demonstrative exhibit. The Party submitting demonstrative exhibits shall provide electronic copies to opposing counsel, the members of the Tribunal, the PCA, the court reporter and, if applicable, the interpreters, at a time to be decided in a procedural order relating to the hearing. For the avoidance of doubt, not all PowerPoint slides constitute demonstrative exhibits. A demonstrative exhibit is an exhibit that summarises or presents existing evidence in the record in a different way (e.g., charts, graphs, tabulations, maps), but it does not refer to simple extracts of documents in the record or to simple text (including if organised in numbered and bulleted lists, etc.) on the slides.

12.6 Hearings shall be recorded and shall be transcribed using LiveNote or similar software so that the transcript is available on a real-time basis. At the end of each day of hearing, the Parties shall be provided with the transcript of that day. The Parties shall have access to the audio and, where applicable, video recordings of the hearing.

12.7 At the conclusion of a hearing, and after consultation with the Parties, the Tribunal shall fix a timetable within which the Parties may review the transcripts and submit a schedule of joint agreed amendments, together with any proposed amendments that are not agreed. In case of any

disagreement between the Parties, the disputed words shall be submitted to the relevant interpreter or court reporter, who will review the sound recordings. The interpreter and court reporter shall report their conclusion to the Tribunal, whose decision shall be final.

13. Disability Accommodation

At any point during the proceedings, but ideally as soon as practicable, either Party may advise the Tribunal of a person who, by reason of disability, requires reasonable accommodation to facilitate their full participation in the arbitration, including site visits and oral hearings. In considering such requests, the Tribunal will take account of the privacy rights of such persons against the unnecessary disclosure of their disability. For the purposes of this provision, disability means any physical or mental health condition that – without accommodation – would impair a person's ability to participate in work related to an arbitration.

14. Third-Party Funding

14.1 Each Party shall disclose if, at any point in the proceedings, it or its counsel benefit from the provision of funds or other material support for the pursuit or defense of its case in these proceedings, in return for remuneration dependent on the outcome of the proceeding, by a natural or juridical person that is not a party to the dispute, and the name of such third-party funder. If the non-party providing funding is a juridical person, the notice shall include the name(s) of the persons and entities that own and control that juridical person.

14.2 Each Party shall have a continuing obligation to disclose any changes to the information relating to the third-party funding occurring after the initial disclosure, including its termination. Each Party shall promptly notify the Tribunal of any changes to the information.

15. Transparency and Confidentiality

15.1 The Parties agree that the UNCITRAL Rules on Transparency in Treaty-based Investor-State Arbitration (2014) (the "**UNCITRAL Transparency Rules**"), subject to the provisions below, shall apply to this arbitration.

15.2 Any confidential information shall be protected from disclosure in accordance with Article 7(3) and (7) of the UNCITRAL Transparency Rules, as follows:

15.2.1 Any Party claiming that certain information in a document constitutes protected information shall clearly designate the information within 14 days after it submits it to the Tribunal, together with a redacted version of the document that does not contain such information. Only the redacted version shall be made public;

15.2.2 Within three weeks of receiving the redacted version of the document, the other Party may object to the designation of information claimed to be protected.

15.2.3 The Tribunal shall decide any objection regarding the designation of information claimed to be protected information. If the Tribunal determines that such information was not properly designated, the Party that submitted the information may:

- Withdraw all or part of its submission containing such information; or

- Agree to resubmit complete and redacted documents with corrected designations in

accordance with the Tribunal's determination.

16. Data Protection and Use of AI

16.1 Nothing shall require any of the Parties and the Tribunal to withhold from the public information required to be disclosed by its laws. The Parties and the Tribunal shall apply those laws in a manner sensitive to protecting from disclosure to the public information that has been designated as confidential or protected information. This provision should not affect the Parties' obligation to provide disclosure pursuant to orders by the Tribunal.

16.2 The Parties and the Tribunal may only use AI tools in accordance with their confidentiality obligations and shall take into consideration factors such as the license, location, data retention and other factors of the AI tools.

16.3 The Parties and the Tribunal shall at all times be accountable for any documents, evidence or other material used in connection with this case and in accordance with other provisions of this section. It is the responsibility of each Party and the Tribunal to verify the accuracy of any output of AI tools, and they shall remain accountable for any such output.

16.4 The Parties may use AI tools for legal research, document review, translation, transcription, proofreading, citation checking, and administrative tasks.

16.5 The Parties shall not:

16.5.1 Upload confidential case materials to public AI systems without adequate data protection.

16.5.2 Submit fabricated or AI-generated legal authorities.

16.5.3 Use AI to generate unverified expert opinions or witness testimony.

16.6 Any AI tools used with confidential case materials must comply with GDPR and provide that uploaded data:

16.6.1 Remains confidential and is not used for AI training.

16.6.2 Is encrypted in transit and at rest.

16.6.3 Is not retained after processing.

16.6.4 Is not accessible to unauthorised third parties.

16.7 The Parties need not disclose routine use of AI for legal research, administrative tasks, or proofreading.

16.8 The Tribunal may use AI tools for proofreading, citation checking, and administrative tasks.

16.9 The Tribunal may use AI tools subject to the same data security and verification requirements.

Signature page follows.

Prof. Vladimir Pavić

Christopher Thomas KC

Annex 1: Electronic File Naming Guidelines

Please follow these guidelines when naming electronic files and for the accompanying Consolidated Index. The examples provided (in *italics*) are for demonstration purposes only and should be adapted to the relevant phase of the case.

All accompanying documentation that is not in English and is submitted with a corresponding translation shall indicate the LANGUAGE in which it is submitted (e.g. DUT=Dutch, RUS=Russian). Such indication should be reflected both i) in the name used to identify each individual electronic file and ii) in the Consolidated Index (which shall be attached to each submission).

SUBMISSION TYPE	ELECTRONIC FILE NAMING GUIDELINES
MAIN PLEADINGS	**Title of Pleading**
	Statement of Claim
	Statement of Defence
	Motion to Bifurcate
	Response to Motion to Bifurcate
SUPPORTING DOCUMENTATION Exhibits	**C–####–LANGUAGE (if other than English)** **R–####–LANGUAGE (if other than English)** To be produced sequentially throughout the case.
	CLAIMANT'S FACTUAL EXHIBITS
	C-001
	C-002
	RESPONDENT'S FACTUAL EXHIBITS
	R-001
	R-002
Legal Authorities	**CLA–####–LANGUAGE (if other than English)** **RLA–####–LANGUAGE (if other than English)** To be produced sequentially throughout the case.
	CLAIMANT'S LEGAL AUTHORITIES
	CLA-001
	CLA-002
	RESPONDENT'S LEGAL AUTHORITIES
	RLA-001
	RLA-002
Witness Statements	**Witness Statement-Name of Witness-Name of Submission-LANGUAGE (if other than English)**
	Witness Statement-Maria Jones-Memorial on Jurisdiction
	Witness Statement-Maria Jones-Reply on Jurisdiction-[Second Statement]
Expert Reports	**Expert Report-Name of Expert-Type-Name of Submission-LANGUAGE (if other than English)**
	Expert Report-Lucia Smith-Valuation-Memorial on Quantum
	Expert Report-Lucia Smith-Valuation-Reply on Quantum-[Second Report]

Legal Opinions	**Legal Opinion-Name of Expert-Name of Submission-LANGUAGE (if other than English)**
	Legal Opinion-Tom Kaine-Counter-Memorial on the Merits
	Legal Opinion-Tom Kaine-Rejoinder on the Merits-[Second Opinion]
Exhibits to Expert Reports, Legal Opinions	**EXPERT INITIALS-###**
	For exhibits filed with the Legal Opinion of [Tom Kaine]
	TK-001
	TK-002
	For exhibits filed with the Expert Report of [Lucia Smith]
	LS-001
	LS-002
INDICES	**Consolidated Index**
	Index of Exhibits-C-#### to C-####
	Index of Exhibits-C-0001 to C-0023
	Index of Legal Authorities-RLA-### to RLA-###
	Index of Legal Authorities-RLA-0001 to RLA-0023
OTHER APPLICATIONS	**Name of Application-[Party]-LANGUAGE**
	Request for Provisional Measures-[Respondent]
	Request for Bifurcation-[Respondent]
	Request for Production of Documents-[Claimant]
	Request for Discontinuance-[Claimant]
	Post-Hearing Brief-[Claimant]
	Costs Submissions-[Respondent]
	Observations to Request for [XX]-[Claimant]

Annex 2: Procedural Calendar

Procedural action	Party required to act	Time intervals	Date
Case Management Conference	All	Fixed date	23 April 2026
Statement of Claim	Claimant	Fixed date	14 August 2026
Motion to Bifurcate	Respondent	Within 6 weeks of Statement of Claim	25 September 2026
Response to the Motion to Bifurcate	Claimant	Within 4 weeks of Motion to Bifurcate	23 October 2026
Reply to Motion to Bifurcate	Respondent	Within 2 weeks of Response to the Motion to Bifurcate	6 November 2026
Rejoinder to Motion to Bifurcate	Claimant	Within 2 weeks of Reply	20 November 2026
Decision on Bifurcation	Tribunal	Within 8 weeks of Rejoinder	15 January 2027

SCENARIO A – BIFURCATED PROCEEDINGS			
Procedural action	**Party required to act**	**Time intervals**	**Date**
First round of written submissions on Jurisdiction			
Memorial on Jurisdictional Objections	Respondent	Within 3 months of Decision on Bifurcation	15 April 2027
Counter-Memorial on Jurisdictional Objections	Claimant	Within 3 months of the Memorial on Jurisdictional Objections	15 July 2027
Mid-stream CMC	All	Fixed date	29 July 2027
Document Production			

Request for Production of Documents	Both Parties	Within 5 weeks of Counter-Memorial on Jurisdictional Objections	19 August 2027
Responses and/or Objections to the Request for Production of Documents	Both Parties	Within 3 weeks of Request for Production of Documents	9 September 2027
Reply to Objections to the Request for Production of Documents sent to Tribunal	Both Parties	Within 3 weeks of Responses and/or Objections to the Request for Production of Documents	30 September 2027
Decision on Objections to Request for Production of Documents	Tribunal	Within 4 weeks of Reply to Objections to the Request for Production of Documents sent to Tribunal	28 October 2027
Production of Documents Ordered by the Tribunal and Non-Contested Documents	Both Parties	Within 4 weeks of Decision on Objections to Request for Production of Documents	25 November 2027
Second round of written submissions on Jurisdiction			
Reply Memorial on Jurisdictional Objections	Respondent	Within 6 months and 10 days of Counter-Memorial on Jurisdictional Objections / Within 2 months since document production	25 January 2028
Rejoinder on Jurisdictional Objections	Claimant	Within 4 months of Reply Memorial on Jurisdictional Objections	25 May 2028
Hearing			
Notification of Witnesses and Experts	Both Parties	4 weeks before the pre-hearing procedural conference	2 August 2028
Pre-Hearing Procedural Conference	All	8 weeks before the hearing	30 August 2028
Hearing on Jurisdictional Objections	All	5 months after Rejoinder on Jurisdictional Objections	25-26 October 2028 (27 October 2028 in reserve)
Decision on Jurisdictional Objections	Tribunal	TBD	TBD
Post-Hearing Phase			

Transcript Revision	Both Parties	TBD at the end of the hearing	TBD
Post-Hearing Briefs	Both Parties	TBD at the end of the hearing	TBD
Statement of Costs	Both Parties	TBD at the end of the hearing	TBD

SCENARIO B – NO BIFURCATION			
Procedural action	**Party required to act**	**Time intervals**	**Date**
First round of written submissions			
Statement of Defence, including Jurisdictional Objections	Respondent	Within 8 months of the Statement of Claim	14 April 2027
Mid-stream CMC	All	Fixed date	26 April 2027
Document production			
Request for Production of Documents	Both Parties	Within 6 weeks of Statement of Defence	26 May 2027
Responses and/or Objections to the Request for Production of Documents	Both Parties	Within 6 weeks of Request for Production of Documents	7 July 2027
Reply to Objections to the Request for Production of Documents sent to Tribunal	Both Parties	Within 6 weeks of Responses and/or Objections to the Request for Production of Documents	18 August 2027
Decision on Objections to Request for Production of Documents	Tribunal	Within 8 weeks of Reply to Objections to the Request for Production of	13 October 2027

		Documents sent to Tribunal	
Production of Documents Ordered by the Tribunal and Non-Contested Documents	Both Parties	Within 8 weeks of Decision on Objections to Request for Production of Documents	8 December 2027
Second round of written submissions			
Statement of Reply on the Merits and Response to Jurisdictional Objections	Claimant	Within 5 months from the date of production	8 May 2028
Statement of Rejoinder on the Merits and Reply on Jurisdictional Objections	Respondent	Within 5 months of Statement of Reply and Response to Jurisdictional Objections	8 October 2028
Rejoinder on Jurisdiction	Claimant	Within 3 months from the Statement of Rejoinder on the Merits and Reply on Jurisdictional Objections	8 January 2029
Hearing			
Notification of Witnesses and Experts	Both Parties	4 weeks before the pre-hearing procedural conference	29 January 2029
Pre-Hearing Procedural Conference	All	8 weeks before the hearing	26 February 2029
Hearing on Jurisdiction and Merits	All	Approx. 6.5 months after the Statement of Rejoinder on the Merits and Reply on Jurisdictional Objections / 3.5 months after Rejoinder on Jurisdiction	Weeks of 23 and 30 April 2029
Post-Hearing Phase			

Transcript Revision	Both Parties	TBD at the end of the hearing	TBD
Post-Hearing Briefs	Both Parties	TBD at the end of the hearing	TBD
Statement of Costs	Both Parties	TBD at the end of the hearing	TBD
Final Award	Tribunal	TBD	TBD

Annex 3: Redfern Schedule for Document Requests

Request No.	Item	Parties/Tribunal to complete
Request No. 1	Requesting Party's description of the requested document(s) or category of document(s)	
	Requesting Party's submission on relevance and materiality of the requested document(s) including references to submissions	
	Requested Party's response / reasoned objection(s) if any to requesting Party's request	
	Requesting Party's reasoned reply to any objection(s)	
	Tribunal's decision	
Request No. 2	Requesting Party's description of the requested document(s) or category of document(s)	
	Requesting Party's submission on relevance and materiality of the requested document(s) including references to submissions	
	Requested Party's response / reasoned objection(s) if any to requesting Party's request	
	Requesting Party's reasoned reply to any objection(s)	
	Tribunal's decision	

Annex 4: Public Holidays

Respondent's List of Public Holidays

Overview of public holidays in the Kingdom of the Netherlands for 2026 - 2029				
New Year's Day	1 January 2026	1 January 2027	1 January 2028	1 January 2029
Good Friday	3 April 2026	26 March 2027	14 April 2028	30 March 2029
Easter Sunday	5 April 2026	28 March 2027	16 April 2028	1 April 2029
Easter Monday	6 April 2026	29 March 2027	17 April 2028	2 April 2029
King's Day	27 April 2026	27 April 2027	27 April 2028	27 April 2029
Liberation Day	5 May 2026	5 May 2027	5 May 2028	5 May 2029
Ascension Day	14 May 2026	6 May 2027	25 May 2028	10 May 2029
Whit Sunday	24 May 2026	16 May 2027	4 June 2028	20 May 2029
Whit Monday	25 May 2026	17 May 2027	5 June 2028	21 May 2029
Christmas Day	25 December 2026	25 December 2027	25 December 2028	25 December 2029
Boxing Day	26 December 2026	26 December 2027	26 December 2028	26 December 2029

Claimant's List of Public Holidays

Russia

2026

11 May 2026	Monday	Additional holiday (in lieu of 9 May – Victory Day)	Substitute day off
12 June 2026	Friday	Russia Day	Public holiday
4 November 2026	Wednesday	National Unity Day	Public holiday
31 December 2026	Thursday	Additional holiday (in lieu of New Year Holidays)	Substitute day off

2027

1-8 January 2027	Friday-Friday	New Year Holidays & Christmas	Public holiday
22 February 2027	Monday	Additional holiday (in lieu of 23 February, day off transferred from Saturday 20 February)	Substitute day off
23 February 2027	Tuesday	Defender of the Fatherland Day	Public holiday

8 March 2027	Monday	International Women's Day	Public holiday
3 May 2027	Monday	Additional holiday (in lieu of 1 May – Spring and Labour Day)	Substitute day off
10 May 2027	Monday	Additional holiday (in lieu of 9 May – Victory Day)	Substitute day off
14 June 2027	Monday	Additional holiday (in lieu of 12 June – Russia Day)	Substitute day off
4-5 November 2027	Thursday-Friday	National Unity Day	Public holiday
31 December 2027	Friday	Additional holiday (in lieu of New Year Holidays)	Substitute day off

2028

1-8 January 2028	Saturday-Saturday	New Year Holidays & Christmas	Public holiday
23 February 2028	Wednesday	Defender of the Fatherland Day	Public holiday
8 March 2028	Wednesday	International Women's Day	Public holiday
1 May 2028	Monday	Spring and Labour Day	Public holiday
9 May 2028	Tuesday	Victory Day	Public holiday
12 June 2028	Monday	Russia Day	Public holiday
4 November 2028	Saturday	National Unity Day	Public holiday

2029

1-8 January 2029	Monday-Monday	New Year Holidays & Christmas	Public holiday
23 February 2029	Friday	Defender of the Fatherland Day	Public holiday
8 March 2029	Thursday	International Women's Day	Public holiday
1 May 2029	Tuesday	Spring and Labour Day	Public holiday
9 May 2029	Wednesday	Victory Day	Public holiday
12 June 2029	Tuesday	Russia Day	Public holiday
4 November 2029	Sunday	National Unity Day	Public holiday

Note on 2028-2029: Public holidays are established by Article 112 of the Russian Federation Labour Code and remain fixed (some fall on weekends). Substitute days off (transfers) for 2028 and 2029 will be confirmed by annual Government Decrees, and will be updated accordingly.

United Kingdom

2026		
Date	**Day of the week**	**Bank holiday**
25 May	Monday	Spring bank holiday
31 August	Monday	Summer bank holiday
25 December	Friday	Christmas Day
28 December	Monday	Boxing Day (substitute day)
2027		
1 January	Friday	New Year's Day
26 March	Friday	Good Friday
29 March	Monday	Easter Monday
3 May	Monday	Early May bank holiday
31 May	Monday	Spring bank holiday
30 August	Monday	Summer bank holiday
27 December	Monday	Christmas Day (substitute day)
28 December	Tuesday	Boxing Day (substitute day)
2028		
3 January	Monday	New Year's Day (substitute day)
14 April	Friday	Good Friday
17 April	Monday	Easter Monday
1 May	Monday	Early May bank holiday
29 May	Monday	Spring bank holiday
28 August	Monday	Summer bank holiday
25 December	Monday	Christmas Day
26 December	Tuesday	Boxing Day