

**IN THE MATTER OF AN ARBITRATION UNDER THE ARBITRATION RULES OF THE UNITED NATIONS COMMISSION ON INTERNATIONAL TRADE LAW 1976**

**AND**

**PURSUANT TO THE AGREEMENT BETWEEN THE GOVERNMENT OF THE REPUBLIC OF INDIA AND THE REPUBLIC OF MOZAMBIQUE FOR THE RECIPROCAL PROMOTION AND PROTECTION OF INVESTMENT**

**BETWEEN:**

**PATEL ENGINEERING LIMITED**

Claimant

**and**

**THE REPUBLIC OF MOZAMBIQUE**

Respondent

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**CONSOLIDATED INDEX OF FACTUAL EXHIBITS  
ORGANISED CHRONOLOGICALLY**

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No	Date	Number	Description	Submission
1	Undated	C-47	Undated letter from the Mozambican Ministry of Foreign Affairs and Cooperation to the Indian High Commission in Maputo	NOA
2	Undated	C-54	Punukollu, S. Curriculum Vitae	SOC
3	Undated	C-69	World Coal Association, Basic Coal Facts	SOC
4	Undated	C-70	World Coal Association, What is Coal	SOC
5	Undated	C-72	Harum Energy, Coal Specification	SOC
6	Undated	C-74	Argus, ARGUS/McCloskey's Coal Price Index Service	SOC
7	Undated	C-75	Argus, Coal API 4 Price Assessment	SOC
8	Undated	C-76	Global Coal, Financial Coal Trading	SOC
9	Undated	C-77	World Coal Association, Coal Market Pricing	SOC
10	Undated	C-81	Argus, Coal API4 FOB Richards Bay Futures Quotes Globex	SOC
11	Undated	C-86	ETC Consulting, Moatize to Zero Road	SOC
12	Undated	C-87	ICVL, Coal as Market Driver for Port and Rail Infrastructure Development	SOC
13	Undated	C-89	Mining Data, Major Mines and Projects, Moatize Mine	SOC
14	Undated	C-92	Vale, Coal	SOC
15	Undated	C-96	Jindal Africa, Mozambique	SOC
16	Undated	C-97	Africa Outlook Magazine, Jindal Mozambique	SOC
17	Undated	C-98	Mining Technology, Revuboe Coal Mine Tete	SOC
18	Undated	C-110	Vale, Railroads	SOC
19	Undated	C-118	TML, Port	SOC
20	Undated	C-119	TML, The Project	SOC
21	Undated	C-121	Thai Mocambique Logistica Website, The Project	SOC
22	Undated	C-123	Grindrod, About Grindrod Limited	SOC
23	Undated	C-124	Grindrod, Grindrod Terminals, Dry Bulk Terminals in Maputo, Richards Bay and Walvis Bay	SOC

No	Date	Number	Description	Submission
24	Undated	C-128	TML, Railway Performance Parameters	SOC
25	Undated	C-133	Capital Markets in Africa, Mota-Engil, CMEC of China Win \$2.3 Billion Mozambique Project	SOC
26	Undated	C-142	Thomson Reuters, MACRS Asset Table Life	SOC
27	Undated	C-149	China Africa Research Initiative Loans Database, China Africa Loan Data	SOC
28	Undated	C-151	Thomson Reuters Eikon, List of Publicly Traded Freight, Rail, and Port Operators	SOC
29	Undated	C-156	The PRS Group, Guide to Data Variables	SOC
30	Undated	C-161	Jindal Africa, Home	SOC
31	Undated	C-162	Patel Engineering, Corporate Brochure	SOC
32	Undated	C-163	Patel Engineering, Durgapur Steel Project	SOC
33	Undated	C-164	Patel Engineering, Railway Tunnel, Single Line B. G Tunnel	SOC
34	Undated	C-165	Patel Engineering, Varanasi-Shaktinagar Road	SOC
35	Undated	C-175	Patel Engineering, Canada India Reactor	SOC
36	Undated	C-191	Port and Rail Report, Part 1	SOC
37	Undated	C-196	Mozambique Coal Export Spreadsheet prepared by Kishan Daga	Reply
38	Undated	C-281	Grindrod Website, History Page: <a href="http://www.grindrod.co.za/Pages/History">http://www.grindrod.co.za/Pages/History</a>	Reply
39	Undated	C-282	Port Maputo Website, Coal Terminal Page: <a href="https://www.portmaputo.com/terminal/coal-terminal/">https://www.portmaputo.com/terminal/coal-terminal/</a>	Reply
40	Undated	C-283	Grindrod Website, Grindrod Terminals Page: <a href="https://grindrod.co.za/Company/39/Grindrod-Terminals-">https://grindrod.co.za/Company/39/Grindrod-Terminals-</a>	Reply
41	Undated	C-285	Grindrod Limited, Geographic Profile	Reply
42	Undated	C-334	Comparison of the UNCITRAL Jurisdictional Objections & Statement of Defence and the ICC Statement of Claim	Reply
43	2 April 1949	C-1	Certificate of Incorporation No. 7089 dated 2 April 1949, certifying the incorporation of Patel Engineering Company Limited pursuant to the Indian Companies' Act, VII of 1913	NOA
44	26 January 1994	C-280	Quality Construction Award 1994	Reply
45	1996-2019	C-300	PRS, International Country Risk	Reply
46	1998	C-273	Michel Kerf et al., Concessions for Infrastructure: a guide to their design and award (1998) (excerpt)	Reply

No	Date	Number	Description	Submission
47	9 December 1999	C-2	Certificate of Incorporation No. 7039 Consequent on Change of Name in the Office of the Registrar of Companies, Maharashtra, Mumbai, dated 9 December 1999	NOA
48	2 December 2001	C-68	Tweedy, J., "Class Characteristics of Counterfeit Protection System Codes of Color Laser Copiers," Journal of the American Society of Questioned Document Examiners, Vol 4, No. 2, Dec. 2001	SOC
49	2002-2018	C-150	CARI, China Loans to Africa, 2002-2018	SOC
50	2008	C-274	ASIAN DEVELOPMENT BANK, Public-Private Partnership Handbook (2008) (excerpt)	Reply
51	2008	C-134	American Society of Appraisers, Business Valuation Standards, 2008	SOC
52	2008-2019	C-176	Federal Reserve Economic Database (FRED), Annual US Inflation, 2008-2019	SOC
53	2008-2019	C-177	U.S. Energy Information Administration, Average Nominal Transportation and Delivered Costs of Coal, By Year and Primary Transport Mode, 2008-2019	SOC
54	2008-2020	C-79	Bloomberg, Australia Coking Coal FOB Export Prices to India, 2008-2020	SOC
55	2008-2020	C-78	Thomson Reuters Eikon, API 4 Coal Prices, 2008-2020	SOC
56	2008-2021	C-286	Thomson Reuters Eikon, API 4 Richards Bay (CO-FOBRBY-SA)	Reply
57	2008-2021	C-287	Bloomberg, Australia Coking Coal FOB Export Prices to India	Reply
58	2008-2021	C-319	Bloomberg, EBITDA Margins 2008-2012	Reply
59	31 March 2008, 30 June 2008	C-316	Transnet Annual Financial Results	Reply
60	2009	C-303	Dimson E., Marsh P., Staunton M., Triumph of the Optimists	Reply
61	16 March 2009	C-260	National Treasury, Republic of South Africa, <i>National Treasury Practice Note No. 11 of 2008 / 2009 – Unsolicited Proposals</i>	Reply
62	December 2009	C-295	Bent Flyvbjerg, Survival of the Unfittest, Why the Worst Infrastructure Gets Built and What We Can Do About It	Reply
63	2010	C-317	Transnet, Annual Report	Reply
64	November 2010	C-262	European PPP Expertise Centre, <i>Procurement of PPP and the use of Competitive Dialogue in Europe</i>	Reply
65	24 January 2011	C-326	Letter from PEL to the NHAI regarding Letter of Award	Reply
66	1 February 2011	C-327	Letter from PEL to the NHAI regarding bid security	Reply
67	3 February 2011	C-328	Letter from PEL to the NHAI regarding Non-acceptance of Letter of Award	Reply
68	11 February 2011	C-198	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Kishan Daga of PEL regarding meeting	Reply

No	Date	Number	Description	Submission
69	15 February 2011	C-199	Email from Kishan Daga of PEL to Rupen Patel of PEL regarding meeting with the Minister of Planning and Development	Reply
70	17 February 2011	C-3	Letter dated 17 February 2011 from Kishan Daga of PEL to Minister Zucula of MTC regarding " <i>Expression of Interest for Infrastructure Projects in Mozambique: Rail Corridor from Tete to Chinde</i> "	NOA
71	17 February 2011	C-55	Letter dated 17 February 2011 from PEL to Ministry of Planning and Development, regarding " <i>Expression of Interest for Infrastructure Projects in Mozambique: Rail Corridor from Tete to Chinde</i> "	SOC
72	24 February 2011	C-329	Show Cause Notice issued by the NHAI	Reply
73	26 February 2011	C-200	Email from Isaias Muhate of the MTC to Kishan Daga of PEL attaching work plan and fee proposal	Reply
74	March 2011	C-4	Preliminary Study to Assess Potential Port Locations in Zambezia, to Connect the Moatize Coal Mines By Rail, March 2011	NOA
75	March 2011	C-4a	Preliminary Study to Assess Potential Port Locations in Zambezia to Connect the Moatize Coal Mines by Rail	Reply
76	1 March 2011	C-330	Letter from PEL to the NHAI regarding Reply to Show Cause Notice	Reply
77	13 March 2011	C-201	Email exchange between Kishan Daga of PEL and Ashish Patel of PEL attaching draft of the MOI	Reply
78	21 March 2011	C-223	Email from Rahul Mundada of PEL to Kishan Daga of PEL attaching draft of the MOI	Reply
79	24 March 2011	C-220	Email from Ashish Patel of PEL to Kishan Daga of PEL regarding the MOI	Reply
80	5 April 2011	C-224	Email from Sandeep Shetty to Kishan Daga of PEL attaching draft of the MOI	Reply
81	5 April 2011	C-225	Email from Ashish Patel of PEL to Rupen Patel of PEL and Sandeep Shetty with copy to Kishan Daga of PEL attaching draft of the MOI	Reply
82	12 April 2011	C-272	Email from Sandeep Shetty to Kishan Daga of PEL attaching draft of the MOI	Reply
83	14 April 2011	C-222	Email from Isaias Muhate of the MTC to Kishan Daga of PEL attaching draft of the MOI	Reply
84	18 April 2011	C-202	Email from Arquimedes Nhacule of Aries to Kishan Daga of PEL attaching Portuguese translation of the MOI	Reply
85	18 April 2011	C-221	Email exchange between Kishan Daga of PEL and Ashish Patel of PEL regarding the MOI	Reply
86	3 May 2011	C-203	Email from Judite Mula of Aries to Kishan Daga of PEL attaching the Portuguese version of the MOI	Reply
87	4 May 2011	C-271	Email from Jose Manuel Caldeira to Kishan Daga and others attaching MOI	Reply
88	6 May 2011	C-204	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Fausto Mabota of Aries copying Kishan Daga of PEL attaching the Portuguese version of the MOI	Reply
89	6 May 2011	C-5	Memorandum of Interest between the Ministry of Transport and Communications and Patel Engineering Ltd.	NOA

No	Date	Number	Description	Submission
90	6 May 2011	C-5A	English Version of the Memorandum of Interest between the Ministry of Transport and Communications and Patel Engineering Ltd, dated 6 May 2011	SOC
91	6 May 2011	C-5B	Portuguese Version of the Memorandum of Interest between the Ministry of Transport and Communications and Patel Engineering Ltd, dated 6 May 2011	SOC
92	6 May 2011	C-52	English Version of the Memorandum of Interest submitted by Mozambique	SOC
93	6 May 2011	C-53	Portuguese Version of the Memorandum of Interest submitted by Mozambique	SOC
94	7 May 2011	C-205	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Kishan Daga and Ashish Patel of PEL, attaching photo of the signing ceremony	Reply
95	7 May 2011	C-206	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Kishan Daga and Ashish Patel of PEL, attaching photo of the signing ceremony	Reply
96	7 May 2011	C-207	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Kishan Daga and Ashish Patel of PEL, attaching photo of the signing ceremony	Reply
97	7 May 2011	C-208	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Kishan Daga and Ashish Patel of PEL, attaching photo of the signing ceremony	Reply
98	7 May 2011	C-209	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Kishan Daga and Ashish Patel of PEL, attaching photo of the signing ceremony	Reply
99	7 May 2011	C-210	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Kishan Daga and Ashish Patel of PEL, attaching photo of the signing ceremony	Reply
100	7 May 2011	C-211	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Kishan Daga and Ashish Patel of PEL, attaching photo of the signing ceremony	Reply
101	7 May 2011	C-212	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Kishan Daga and Ashish Patel of PEL, attaching photo of the signing ceremony	Reply
102	7 May 2011	C-213	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Kishan Daga and Ashish Patel of PEL, attaching photo of the signing ceremony	Reply
103	7 May 2011	C-214	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Kishan Daga and Ashish Patel of PEL, attaching photo of the signing ceremony	Reply
104	7 May 2011	C-215	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Kishan Daga and Ashish Patel of PEL, attaching photo of the signing ceremony	Reply
105	7 May 2011	C-216	Email from Rafique Jusob of Mozambique's Investment Promotion Centre to Kishan Daga and Ashish Patel of PEL, attaching photo of the signing ceremony	Reply
106	9 May 2011	C-217	Email from canon scan to Charan Singh and Kishan Daga of PEL attaching scan of the MOI in English	Reply
107	9 May 2011	C-218	Email from canon scan to Charan Singh and Kishan Daga of PEL attaching scan of the MOI in Portuguese	Reply
108	7 June 2011	C-247	M Riofrio, Why You Can't Print Counterfeit Money on Your Color Laser	Reply
109	12 July 2011	C-263	Legally India, PPP Contracts Swiss Challenge Method and the Indian Law	Reply
110	September 2011	C-136	Vale, Feasibility Study for Nacala Rail Corridor, September 2011	SOC

No	Date	Number	Description	Submission
111	8 September 2011	C-279	ICI Outstanding Concrete Structure Award 2011	Reply
112	29 October 2011	C-304	Crain, Michael A., A Literature Review of the Size Effect	Reply
113	21 November 2011	C-85	Thomson Reuters, Mozambique Gears Up to Become Coking Coal Hub, 21 November 2011	SOC
114	24 December 2011	C-56	Email dated 24 December 2011 from S Prabhu to Kishan Daga	SOC
115	2012	C-318	Transnet, Annual Financial Statements	Reply
116	2012	C-332	IEA, Medium Term Coal Market Report	Reply
117	2012	C-155	The PRS Group, International Country Risk Guide Methodology, 2012	SOC
118	14 February 2012	C-57	Letter dated 14 February 2012 from PEL to Rio Tinto	SOC
119	15 February 2012	C-58	Letter dated 15 February 2012 from PEL to JSPL	SOC
120	21 February 2012	C-59	Letter dated 21 February 2012 from Rio Tinto to PEL	SOC
121	March 2012	C-6	Pre-Feasibility Study and Annexures 1 – 18	NOA
122	April 2012	C-6b	Pre-Feasibility Study (Final and Complete)	NOA
123	2 May 2012	C-193	Letter from Kishan Daga of PEL to Paula Zucula of MTC	SOC
124	9 May 2012	C-7	Power Point Presentation dated 9 May 2012	NOA
125	9 May 2012	C-226	Chat between Kishan Daga of PEL and Arlanda Reis Cuamba of the MTC regarding presentation of the PFS	Reply
126	11 May 2012	C-195	Judgment of the Supreme Court of India in the case of <i>Patel Engineering Ltd. v. Union of India &amp; Anr</i>	SOC
127	15 May 2012	C-8	Letter dated 15 May 2012 from Kishan Daga of PEL to Minister Zucula of MTC regarding "Additional information to the Prefeasibility Report for Development of Rail Corridor from Moatize to Macuse and Port at Macuse, Statement of fund utilisation and projected/estimated cash flow for the entire project"	NOA
128	17 May 2012	C-227	Email from Jafar Ruby of the MTC to Kishan Daga of PEL attaching the presentation to the CFM	Reply
129	1 June 2012	C-9	Letter dated 1 June 2012 from Kishan Daga of PEL to Minister Zucula of MTC regarding "The source of information used for preparation of this report"	NOA
130	11 June 2012	C-10	Letter dated 11 June 2012 from Kishan Daga of PEL to Minister Zucula of MTC regarding "The discussion held on 11.05.2012 in regards to Rail corridor at CFM office"	NOA
131	15 June 2012	C-11	Letter dated 15 June 2012 from Minister Zucula of MTC to Kishan Daga of PEL accepting the Pre-Feasibility Study	NOA
132	18 June 2012	C-12	Letter dated 18 June 2012 from Kishan Daga of PEL to Minister Zucula of MTC regarding implementation of the project	NOA

No	Date	Number	Description	Submission
133	22 June 2012	C-13	Letter dated 22 June 2012 from Kishan Daga of PEL to Minister Zucula of MTC regarding its contact with CFM	NOA
134	26 June 2012	C-229	Email from Arlanda Reis Cuamba of the MTC to Kishan Daga of PEL regarding meeting with Odebrecht	Reply
135	13 July 2012	C-228	Chat between Kishan Daga of PEL and Arlanda Reis Cuamba of the MTC regarding PEL's logo	Reply
136	August 2012	C-137	USAID, Technical Report, Logistics Review of the Beira and Nacala Corridors, August 2012	SOC
137	1 August 2012	C-230	Memorandum for the Investment Council under the Framework of the Rio Tinto Project for the Development of an Integrated Transportation Corridor	Reply
138	3 August 2012	C-238	Memorandum of Understanding between Patel and SPI	Reply
139	7 August 2012	C-14	Letter dated 7 August 2012 from Kishan Daga of PEL to Rosario Mualeia, President and Chairman of the Board, regarding how PEL should proceed with the project	NOA
140	7 August 2012	C-239	Email from Kishan Daga of PEL to Arlanda Reis Cuamba of the MTC regarding meeting with Odebrecht	Reply
141	15 August 2012	C-15	Letter dated 15 August 2012 from Kishan Daga of PEL to Minister Zucula of MTC requesting access to the concession agreement template for CFM in order to help expedite the process	NOA
142	27 August 2012	C-16	Letter dated 27 August 2012 from Minister Zucula of MTC to Kishan Daga of PEL regarding CFM negotiations not being prohibited and providing contact details for the purpose of negotiating the concession	NOA
143	5 October 2012	C-17	Letter dated 5 October 2012 from Kishan Daga of PEL to Minister Zucula of MTC regarding PEL's request for a copy of the template Concession Agreement for Ports and Railways	NOA
144	22 November 2012	C-235	Article " <i>Mozambique Launches US\$2 billion international tender for railroad project</i> ", Macauhub Rail-port News	Reply
145	24 November 2012	C-231	Email exchange between Jose Manuel Caldeira of Sal & Caldeira to Kishan Daga of PEL regarding tender for railway and port in Macuse	Reply
146	28 November 2012	C-18	Letter dated 28 November 2012 from Kishan Daga of PEL to Minister Zucula of MTC citing real examples of authorisations for direct awards	NOA
147	2013	C-197	Map of Mozambique's Rail Corridors	Reply
148	2013	C-320	US Department of the Treasury, Daily Treasury Yield Curve Rates	Reply
149	2013	C-323	Bloomberg, Unlevered Betas	Reply
150	2013-2021	C-325	FRED, US Bank Prime Loan Rate	Reply
151	11 January 2013	C-19	Letter dated 11 January 2013 from Minister Zucula of MTC to Kishan Daga of PEL reneging on MTC's commitment to award the concession to PEL	NOA
152	11 January 2013	C-232	Letter from Kishan Daga of PEL to Minister Zucula of the MTC regarding the meeting	Reply
153	22 January 2013	C-20	Letter dated 22 January 2013 from Kishan Daga of PEL to Minister Zucula of MTC disputing the Government's decision to conduct a public tender	NOA



No	Date	Number	Description	Submission
154	29 January 2013	C-21	Request for Proposal published by the MTC in <i>Noticias</i> newspaper on 29 January 2013	NOA
155	30 January 2013	C-236	MTC's Notice inviting to submit the expression of interest	Reply
156	14 February 2013	C-22	Letter dated 14 February 2013 from Minister Zucula to PEL regarding the decision of Mozambique to hold a public tender	NOA
157	18 February 2013	C-106	Thomson Reuters, Dredging Biggest Headache for Mozambique's Beira Port, 18 February 2013	SOC
158	March 2013	C-24	Tender Notice entitled " <i>Application of Participants and Fulfillment</i> "	NOA
159	1 March 2013	C-194	Chairman of CFM Board of Directors Puts His Finger in the Wound " <i>The Sena Line is Not Adapted to Transport Coal</i> ", published in <i>O Pais Economico</i>	SOC
160	4 March 2013	C-23	Letter dated 4 March 2013 from Kishan Daga of PEL to Minister Zucula of MTC enclosing published newspaper article on 1 March 2013 where CFM stated publicly that it would not participate in the Project	NOA
161	8 March 2013	C-26	Letter dated 8 March 2013 from Kishan Daga of PEL to Minister Zucula of MTC submitting an Expression of Interest for the Project	NOA
162	8 March 2013	C-233	Side Letter between PEL, SPI, and Grindrod	Reply
163	8 March 2013	C-60	Memorandum of Understanding between PEL, Grindrod and SPI, dated 8 March 2013	SOC
164	9 March 2013	C-51	Legal Memorandum from Sal & Caldeira Avogados Lda. dated 9 March 2013 regarding Award of a Concession for the Macuse Project	NOA
165	12 March 2013	C-28	Letter dated 12 March 2013 from Kishan Daga of PEL to Minister Zucula of MTC setting out rationale for a direct award of the concession pursuant to the MOI	NOA
166	20 March 2013	C-322	Duff & Phelps, Duff & Phelps Decreases U.S. Equity Risk Premium to 5.0%, Effective February 28 2013	Reply
167	12 April 2013	C-27	Tender Documents issued to six pre-qualified companied on 12 April 2013	NOA
168	16 April 2013	C-266	Letter from Mr Jose Maria Morais, High Commissioner of Mozambique in India, to Ms Maria Gustava of the Ministry of Foreign Affairs and Cooperation of Mozambique with attachments	Reply
169	18 April 2013	C-29	Letter dated 18 April 2013 from Minister Zucula of MTC to PEL whereby the MTC invited PEL to begin to negotiations for a concession agreement for the Project	NOA
170	23 April 2013	C-30	Letter dated 23 April 2013 from Kishan Daga of PEL to MTC Minister Zucula concerning PEL's acceptance of the MTC's offer to commence negotiations for a concession agreement for the Project	NOA
171	24 April 2013	C-31	Letter dated 24 April 2013 from Kishan Daga of PEL to Luis Amandio Chauque of MTC regarding draft concession agreement and negotiation meetings	NOA
172	24 April 2013	C-32	Letter dated 24 April 2013 from Luis Amandio Chauque of MTC to PEL providing a date, time and venue for the meeting to negotiate a concession	NOA
173	3 May 2013	C-61	Letter from MTC to tender participants, dated 3 May 2013	SOC

No	Date	Number	Description	Submission
174	9 May 2013	C-33	Letter dated 9 May 2013 from Kishan Daga of PEL to Minister Zucula of MTC regarding the bank guarantee	NOA
175	13 May 2013	C-34	Letter dated 13 May 2013 from Luis Amandio Chauque of MTC to Kishan Daga of PEL reversing the MTC's regarding direct negotiations with PEL	NOA
176	June 2013	C-321	Pablo Fernandez, Market Risk Premium and Risk Free Rate Used for 51 Countries in 2013	Reply
177	1 June 2013	C-309	PwC, Worldwide Tax Summaries, Corporate Taxes 2013-14	Reply
178	4 June 2013	C-35	Letter dated 4 June 2013 from Kishan Daga of PEL to Minister Zucula of MTC responding to the MTC's change in position regarding direct negotiations	NOA
179	10 June 2013	C-36	Letter dated 10 June 2013 from the MTC to PEL and the other five tender bidders regarding query clarifications	NOA
180	27 June 2013	C-37	Letter dated 27 June 2013 from Kishan Daga of PEL to the MTC attaching the PEL Consortium's Financial and Technical Proposal for the Project	NOA
181	27 June 2013	C-190	Technical Proposal, dated 27 June 2013 (split into sections A-I)	SOC
182	28 June 2013	C-62	Prequalification Tender for Acquisition of Concession, Rights to Conceive, Design, Draw, Finance, Build, Operate and Transfer the Railway line and the Port of Macuse, dated 28 June 2013 (Portuguese and English)	SOC
183	July 2013	C-324	Damodaran, Equity Risk Premiums, Looking Backwards and Forwards	Reply
184	July 2013	C-333	EIA, International Energy Outlook 2013	Reply
185	15 July 2013	C-234	Technical Evaluation Report issued by the MTC Acquisition Management and Execution Office	Reply
186	19 July 2013	C-38	Minutes of the Opening Session of Economic Proposals dated 19 July 2013	NOA
187	19 July 2013	C-63	Letter dated 19 July 2013 from Kishan Daga of PEL to the MTC	SOC
188	26 July 2013	C-39	Letter dated 26 July 2013 from Pedro Augusto Ingles to PEL Consortium regarding proposal evaluation	NOA
189	26 July 2013	C-240	Financial Evaluation Report issued by the MTC Acquisition Management and Execution Office	Reply
190	29 July 2013	C-25	Translation of MTC Document entitled " <i>Contest to Acquiring of Rights of Concession to Conceive, Design, Finance, Build, Operate and Transfer the Railway and Macuse Port</i> "	NOA
191	29 July 2013	C-40	Letter dated 29 July 2013 from Kishan Daga to Minister Zucula expressing concern over the MTC's handling of the tender	NOA
192	29 July 2013	C-241	Letter from Kishan Daga of the PGS Consortium to the MTC expressing concerns over the MTC's handling of the tender	Reply
193	1 August 2013	C-41	Letter dated 1 August 2013 from Kishan Daga of PEL to the MTC and Ms Odete, President of Jury lodging a guarantee with the MTC to officially contest the award of the concession to ITD	NOA
194	1 August 2013	C-64	Letter dated 1 August 2013 from Kishan Daga of PGS Consortium to Ms Odete of the MTC	SOC

No	Date	Number	Description	Submission
195	6 August 2013	C-242	Letter from Kishan Daga of the PGS Consortium to Minister Zucula of the MTC lodging information request on tender process	Reply
196	12 August 2013	C-42	Letter dated 12 August 2013 from the MTC to PEL Consortium responding to PEL's complaint about the tender process	NOA
197	19 August 2013	C-43	Letter dated 19 August 2013 from Kishan Daga of PEL to the MTC regarding the failure of the MTC to carry out the tender in accordance with Mozambican Law	NOA
198	21 August 2013	C-243	Letter from Pedro August Ingles of the MTC to the PGS Consortium explaining complaints and appeals process	Reply
199	27 August 2013	C-44	Letter dated 27 August 2013 from the MTC to PEL Consortium confirming its award of the concession to ITD	NOA
200	28 August 2013	C-45	Letter dated 28 August 2013 from Kishan Daga to the MTC contesting the award of the concession to ITD	NOA
201	29 August 2013	C-65	Letter from PGS Consortium to the MTC, dated 29 August 2013	SOC
202	2 September 2013	C-244	Letter from Kishan Daga of the PGS Consortium to the MTC regarding amendment of the typographical errors	Reply
203	3 September 2013	C-245	Letter from Sal & Caldeira to President of Republic of Mozambique regarding tender for the concession of the Macuse railway and port project	Reply
204	23 September 2013	C-246	Letter from Kishan Daga of PEL to Mr Gabriel Serafim Muthisse of the MTC regarding the MOI	Reply
205	28 October 2013	C-66	Letter from the MTC to PGS Consortium, dated 28 October 2013 (English and Portuguese)	SOC
206	19 December 2013	C-126	Railway Gazette, Concession Signed for Construction of 525 km Coal Railway, 19 December 2013	SOC
207	20 December 2013	C-219	Letter from Kishan Daga of PEL to Gabriel Muthisse of the MTC regarding Macuse Rail and Port Project	Reply
208	2014	C-71	Science Direct, Calorific Value, Treatise on Process Metallurgy, 2014	SOC
209	2014-2019	C-174	Federal Reserve Economic Database (FRED), Baht to USD Annual Exchange Rate, 2014-2019	SOC
210	22 January 2014	C-306	Bryan, Alex, Does the Small-Cap Premium Exist? Morningstar	Reply
211	18 February 2014	C-46	Letter dated 18 February 2014 from Sal & Caldeira Advogados LDA on behalf of PEL to the MTC regarding rejecting of PEL's claims for compensation	NOA
212	14 March 2014	C-67	Letter from the MTC to Sal & Caldeira, dated 14 March 2014 (English and Portuguese)	SOC
213	June 2014	C-305	Advisory Research, The Value and Size Effects in Emerging Markets, Advisory Research	Reply
214	31 July 2014	C-94	The Economic Times, ICVL Buys Coal Mines in Mozambique for a Bargain-basement Price of 50 million from Rio Tinto, 31 July 2014	SOC
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306	27 July 2020	C-182	Email dated 27 July 2020 from Dorsey & Whitney to Addleshaw Goddard	SOC
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330	27 May 2021	C-265	Article " <i>Mozambique: Appeals Court Order Release of Former Transport Minister</i> ", All Africa	Reply
331	5 June 2021	C-267	Email from Nathalie Allen of Addleshaw Goddard LLP to Juan Basombrio and Lincoln Loehrke of Dorsey & Whitney LLP regarding Document Inspection Protocol	Reply
332	7 June 2021	C-299	Pablo Fernandez, Market Risk Premium and Risk Free Rate used for 88 countries in 2021	Reply
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337	1 July 2021	C-270	Letter from Juan Basombrio of Dorsey & Whitney LLP to the Tribunal, regarding originals of the MOI	Reply
338	1 July 2021	C-313	Bloomberg, Unlevered Betas	Reply
339	15 July 2021	C-301	Transnet SOC LTD Request for Proposal	Reply
340	2 August 2021	C-248	Letter from Vinod Chandnani of PEL regarding Kishan Daga's mailbox	Reply
341	3 August 2021	C-276	Letter from Vinod Chandnani of PEL regarding PEL's digital transformation	Reply