

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

INDEX OF LEGAL AUTHORITIES

Date	Exhibit No.	Title
Legal Authorities Submitted with Claimant's Notice of Arbitration		
	CLA-1	Agreement between the Government of the Republic of Mozambique and the Republic of India for the Reciprocal Promotion and Protection of Investment (the "Treaty")
2011	CLA-2	PPP Law (Law No. 15-2011 of 10 August 2011) Art 33.(1) paragraph (a).(i)
2012	CLA-3	PPP Law (Decree No. 16-2012 of 4 July 2012) Article 37(1)(a)
	CLA-4	Resolução n.º 54/2009, Boletim da República PUBLICAÇÃO OFICIAL DA REPÚBLICA DE MOÇAMBIQUE
1969	CLA-5	Vienna Convention on the Law of Treaties No.18232 23 May 1969 Art 31
2013	CLA-6	<i>Ioan Micula, Viorel Micula, S.C. European Food S.A., S.C. Starmill S.R.L. and S.C. Multipack S.R.L. v. Romania</i> , Award, 11 December 2013, para. 519, ICSID Case No. ARB/05/20
2008	CLA-7	R. Dolzer and C. Schreuer, <i>Principles of International Investment Law</i> , 2008, pg 133
2009	CLA-8	<i>Bayindir Insaat Turizm Ticaret Ve Sanayi A.S. v. Islamic Republic of Pakistan</i> , Award, 27 August 2009, ICSID Case No. ARB/03/29
	CLA-9	Agreement between the Government of the Republic of Mozambique and the Government of the Kingdom of the Netherlands Concerning the Encouragement and the Reciprocal Protection of Investments
1928	CLA-10	<i>Factory at Chorzów, Judgment No. 13</i> , 13 September 1928, <i>Series A, No. 17</i> , p. 47
Legal Authorities Submitted with Claimant's Statement of Claim		
2016	CLA-11	L Leitão, <i>Direito das Obrigações</i> (Coimbra 2016) (excerpt)
1987	CLA-12	S Correia, <i>Legalidade e Autonomia Contratual</i> (Coimbra 1987) (excerpt)
2011	CLA-13	M Kirkby, <i>Contratos sobre o Exercício de Poderes Públicos: o exercício contratualizado do poder administrativo de decisão contratual</i> (Coimbra 2011) (excerpt)
2000	CLA-14	A Varela, <i>Das Obrigações em Geral</i> (Vol. 1, 2000) (excerpt)
2017	CLA-15	J A. Correia, <i>Contrato e Poder Administrativo: o problema do contrato sobre o exercício de poderes públicos</i> (Coimbra 2017) (excerpt)
2007	CLA-16	A Cadilha, "A Atividade Administrativa Informal de Cooperação" in E Almedina (ed), <i>Revista da Ordem dos Advogados</i> , Year 67 (2007) (excerpt)
2010	CLA-17	B Diniz De Ayala, "Actividade contratual e negociações informais da administração: dois modos comuns de actuação administrativa com oscilações na tutela jurisdicional do particular particular", in Coimbra Editora (ed) <i>Estudos em Homenagem ao Prof. Doutor Sérvulo Correia</i> , (Vol. II, 2010) (excerpt)
1992	CLA-18	Law no. 5/92, of 21 May 1992
2011	CLA-19	Law no. 14/2011, of 10 August
2004	CLA-20	P C. Gonçalves, <i>O Contrato Administrativo – Uma Instituição do Direito Administrativo do Nosso Tempo</i> (Coimbra 2004) (excerpt)
2016	CLA-21	J A. Correia and A Isenberg, <i>Lei Alemã do Procedimento Administrativo: guias de leitura e anotações</i> (Coimbra 2008) (excerpt)
2008	CLA-22	J Taborda Da Gama, <i>Promessas Administrativas</i> (Coimbra 2008) (excerpt)
1998	CLA-23	H Lora, <i>Los Contratos sobre Actos y Las Potestades</i> (Madrid 1998) (excerpt)
2010	CLA-24	L Torgal and M Martins Fonseca, "Contributo para um regime de contratação de concessões de obras e de serviços públicos na sequência de propostas não solicitadas" in Coimbra Editora (ed) <i>Estudos em Homenagem ao Prof. Doutor Sérvulo Correia</i> , (Vol. II, 2010) (excerpt)
2011	CLA-25	Law no. 15/2011, of 10 August 2011

1983	CLA-26	A Laubadere, F Moderne and Pi Delvolve, <i>Traité des contrats administratifs, Tomo I</i> (R. Pichon et R. Durand-Auzias 1983) (excerpt)
1985	CLA-27	M Pinto, <i>Teoria Geral do Direito Civil</i> (Coimbra 1985)
2014	CLA-28	A Menezes Cordeiro, <i>Tratado de Direito Civil II</i> (Coimbra 2014) (excerpt)
2014	CLA-29	P Pais De Vasconcelos, <i>Teoria Geral do Direito Civil</i> (Coimbra 2014) (excerpt)
2007	CLA-30	M Rebelo De Sousa e A Salgado De Matos, <i>Direito Administrativo Geral III</i> (Dom Quixote 2007) (excerpt)
1967	CLA-31	Civil Code (1967)
2002	CLA-32	C Lacerda Barata, <i>Da Obrigação de Preferência</i> (Coimbra Editoria 2002) (excerpt)
1958	CLA-33	A V. Serra, <i>Obrigação de Preferência</i> (Coimbra Editoria 1958) (excerpt)
2006	CLA-34	M A. Perez, <i>O risco no contrato de concessão de serviço público, apud Lino Torgal and João de Oliveira Geraldés, Concessões de Atividades Públicas e Direito de Exclusivo</i> (Belo Horizonte 2006) (excerpt)
2007	CLA-35	G Cordero Moss, "International Contracts between Common Law and Civil Law: Is Non-state Law to Be Preferred? The Difficulty of Interpreting Legal Standards Such as Good Faith" in De Gruyter (ed) <i>Global Jurist</i> (Vol. 7, 2007) (excerpt)
1979	CLA-36	E Allan Farnsworth, <i>The Pitfalls of Making International Contracts in N.C.J. Int'l L. & Com. Reg</i> (Vol. 4, 1979) (excerpt)
2001	CLA-37	M Caetano, <i>Manual de Direito Administrativo</i> (Vol. 1, 2001) (excerpt)
2016	CLA-38	D Freitas Do Amaral, <i>Curso de Direito Administrativo</i> (Vol. II, 2017) (excerpt)
2011	CLA-39	M Esteves De Oliveira and R Esteves De Oliveira, <i>Concursos e Outros Procedimentos de Contratação Pública</i> (Almedina 2011) (excerpt)
1999	CLA-40	M Olazabal Cabral, <i>O Concurso Público nos Contratos Administrativos</i> (Coimbra 1999) (excerpt)
2010	CLA-41	Decree no 15/2010, of 24 May 2010
1913	CLA-42	W N. Hohfeld, "Fundamental Legal Conceptions as Applied in Judicial Reasoning" in The Yale Law Journal Company Inc (eds) <i>The Yale Law Journal</i> (Vol. 23, 1913) (excerpt)
2013	CLA-43	M Teixeira De Sousa, <i>Introdução ao Direito</i> (Coimbra 2013) (excerpt)
2005	CLA-44	D Duarte, <i>A Norma de Legalidade</i> (Almedina 2006) (excerpt)
2008	CLA-45	S Correia, "Cadernos de Justiça Administrativa No. 70, Conceitos jurídicos indeterminados e âmbito do controlo jurisdicional" in <i>Cadernos de Justiça Administrativa</i> (No. 70, 2008) (excerpt)
2019	CLA-46	P Moniz Lopes, <i>Derrotabilidade Normativa e Normas Administrativas, Parte II</i> (AAF DL Lisbon Law Editions 2019) (excerpt)
2017	CLA-47	B Pequenino, <i>O Contrato de Parceria Público-Privada em Moçambique</i> (Escolar Editora 2017) (excerpt)
2005	CLA-48	The Constitution of the Republic of Mozambique (1990)
1996	CLA-49	P Costa Gonçalves, "Revogação" in <i>Dicionário Jurídico da Administração Pública</i> (Vol. VII, 1996) (excerpt)
2014	CLA-50	Law 7/2014, of 28 February 2014
2011	CLA-51	R Machete, "Sanação" in <i>Dicionário Jurídico da Administração Pública</i> (Vol. VII, 1996) (excerpt)
1992	CLA-52	V De Andrade, "Validade" in <i>Dicionário Jurídico da Administração Pública</i> (Vol. VII, 1996) (excerpt)
2009	CLA-53	V Pereira Da Silva, <i>O Contencioso Administrativo no Divã da Psicanálise</i> (Almedina, 2009) (excerpt)
2008	CLA-54	C Amado Gomes, "O caso decidido: uma instituição (ainda) do nosso tempo? – Reflexões a propósito do art. 161.º do CPTA" in <i>Cadernos de Justiça Administrativa</i> (No. 70, 2008) (excerpt)

1997	CLA-55	M Luísa Duarte, <i>A Teoria dos Poderes Implícitos e a Delimitação de Competências entre a União Europeia e os Estados-Membros</i> (Lex 1997) (excerpt)
2003	CLA-56	P Otero, <i>Legalidade e Administração Pública – O Sentido da Vinculação Administrativa à Jurisdição</i> (Coimbra 2003) (excerpt)
1997	CLA-57	Presidential Decree no. 3/97, of 11 November 1997
2001	CLA-58	Decree no. 30/2001, of 15 October 2001
2012	CLA-59	Jorge Andrade Da Silva, <i>Regime Jurídico da Contratação Pública de Moçambique</i> (Coimbra 2012) (excerpt)
1992	CLA-60	E Bulygin, "On Norms of Competence" <i>Law and Philosophy</i> (Springer 1992) (excerpt)
1994	CLA-61	H. L. A. Hart, <i>The Concept of Law</i> (OUP 1994) (excerpt)
1987	CLA-62	João Baptista Machado, <i>Introdução ao Direito e ao Discurso Legitimador</i> (Almedina 1987) (excerpt)
2014	CLA-63	Karl Larenz, <i>Metodologia da Ciência do Direito</i> (Springer 2014) (excerpt)
2012	CLA-64	Decree no. 16/2012, of 4 June 2012.
2011	CLA-65	Law No. 15-2011 of 10 August 2011.
2017	CLA-66	C McLachlan, L Shore and M Weiniger, <i>International Investment Arbitration: Substantive Principles</i> (OUP 2017) (excerpt)
2010	CLA-67	Decree No. 15/2010 of 24 May 2010 (the "Public Works Decree").
	CLA-68	Intentionally Left Blank
2012	CLA-69	R Dolzer and C Schreuer, <i>Principles of International Investment Law</i> (OUP 2012) (excerpt)
2009	CLA-70	A Newcombe & L Paradell, <i>Law and Practice of Investment Treaties: Standards of Treatment</i> (Kluwer Law International B.V. 2009) (excerpt)
2004	CLA-71	C Schreuer, "Travelling the BIT Route—Of Waiting Periods, Umbrella Clauses and Forks in the Road" in <i>The Journal of World Investment and Trade</i> (Vol. 5, 2004) (excerpt)
2004	CLA-72	Note on the Interpretation of Article 11 of the Bilateral Investment Treaty between Switzerland and Pakistan in the light of the Decision of the Tribunal on Objections to Jurisdiction of ICSID in <i>SGS Société Générale de Surveillance S.A. v. Islamic Republic of Pakistan</i> ARB/01/13 attached to the Letter of the Swiss Secretariat for Economic Affairs to the ICSID Deputy Secretary-General dated 1 October 2003, (Mealey's International Arbitration Report 2004)
2019	CLA-73	J M. Cox, <i>Expropriation in Investment Treaty Arbitration</i> (OUP 2019) (excerpt)
2002	CLA-74	J Crawford, "The ILC's Articles on Responsibility of States for Internationally Wrongful Acts: A Retrospect" in <i>American Journal of International Law</i> (CUP 2002) (excerpt)
2008	CLA-75	S. Ripinsky and K Williams, <i>Damages in International Investment</i> (BIICL 2008) (excerpt)
2007	CLA-76	C N. Brower & M Ottolenghi, "Damages in Investor-State Arbitration", in <i>Compensation and Damages in International Investment Arbitration</i> (TDM 2007) (excerpt)
1978	CLA-77	"Draft Articles on Most-Favoured-Nations Clauses with Commentaries 1978" in <i>Yearbook of the International Law Commission</i> , Vol. II, 1978, Part Two, p.23
2016	CLA-78	J Alberro & P Zurek, "Market Approach or Comparables", in J Trenor (ed) <i>Global Arbitration Review: The Guide to Damages in International Arbitration</i> (David Samuels 2016)
2005	CLA-79	<i>Noble Ventures, Inc. v. Romania</i> , ICSID Case No. ARB/01/11, Award, 12 October 2005.
1999	CLA-80	<i>Ceskoslovenska Obchodni Banka, A.S. v. The Slovak Republic</i> , ICSID Case No. ARB/97/4, 24 May 1999.
2010	CLA-81	<i>Inmaris Perestroika Sailing Maritime Services GmbH and Others v. Ukraine</i> , ICSID Case No. ARB/08/8, 8 March 2010.
2013	CLA-82	<i>Ambiente Ufficio S.p.A. and others v. Argentine Republic</i> , ICSID Case No. ARB/08/9, Decision on Jurisdiction and Admissibility, 8 February 2013.

2006	CLA-83	<i>ADC Affiliate Ltd. v. Republic of Hungary</i> , ICSID Case No. ARB/03/16, Award, 27 September 2006.
2012	CLA-84	<i>Electrabel S.A. v. Republic of Hungary</i> , ICSID Case No. ARB/07/19, Decision on Jurisdiction, Applicable Law and Liability, 30 November 2012.
2011	CLA-85	<i>Chevron Corp. (USA) v. Republic of Ecuador</i> , UNCITRAL, Final Award, 31 August 2011.
2017	CLA-86	<i>Koch Minerals Sarl and Koch Nitrogen International Sarl v. Bolivarian Republic of Venezuela</i> , ICSID Case No. ARB/11/19, Award, 30 October 2017.
2006	CLA-87	<i>Mytilineos Holdings SA v. The State Union of Serbia & Montenegro and Republic of Serbia</i> , UNCITRAL, Partial Award on Jurisdiction, 8 September 2006.
2005	CLA-88	<i>Bayindir Insaat Turizm Ticaret Ve Sanayi A.S. v. Islamic Republic of Pakistan</i> , ICSID Case No. ARB/03/29, Decision on Jurisdiction, 14 November 2005.
2012	CLA-89	<i>Deutsche Bank AG v. Democratic Socialist Republic of Sri Lanka</i> , ICSID Case No. ARB/09/2, Award, 31 October 2012.
2015	CLA-90	<i>Société Civile Immobilière de Gaëta v. Republic of Guinea</i> , ICSID Case No. ARB/12/36, Award, 21 December 2015.
2017	CLA-91	<i>Capital Financial Holdings Luxembourg S.A. v. Republic of Cameroon</i> , ICSID Case No. ARB/15/18, Award, 22 June 2017.
2009	CLA-92	<i>RSM Production Corporation v. Grenada I</i> , ICSID Case No. ARB/05/14, Award, 13 March 2009.
2014	CLA-93	<i>Nova Scotia Power Incorporated v. Bolivarian Republic of Venezuela II</i> , ICSID Case No. ARB(AF)/11/1, Excerpts of Award, 30 April 2014.
2009	CLA-94	<i>Romak S.A. (Switzerland) v. The Republic of Uzbekistan</i> , UNCITRAL, PCA Case No. AA280, Award, 26 November 2009.
2009	CLA-95	<i>Malaysian Historical Salvors, SDN, BHD v. The Government of Malaysia</i> , ICSID Case No. ARB/05/10, Decision on the Application for Annulment, 16 April 2009.
2008	CLA-96	<i>Biwater Gauff (Tanzania) Ltd. v. United Republic of Tanzania</i> , ICSID Case No. ARB/05/22, Award dated 24 July 2008.
2010	CLA-97	<i>RosInvestCo UK Ltd. v. The Russian Federation</i> , SCC Case No. V079/2005, Final Award, 12 September 2010.
1924	CLA-98	<i>Mavrommatis Palestine Concessions, P.C.I.J., Series A, No. 2</i> , Objection to the Jurisdiction of the Court, 30 August 1924.
1995	CLA-99	Case Concerning East Timor (Portugal v. Australia), International Court of Justice, ICJ, 30 June 1995.
2014	CLA-100	<i>Achmea B.V. v. Slovak Republic II</i> , PCA Case No. 2013-12, Award on Jurisdiction and Admissibility, 20 May 2014.
2020	CLA-101	Bilateral Investment Treaties, Department of Economic Affairs, viewed 30 October 2020 < https://dea.gov.in/bipa?page=6 >.
2002	CLA-102	<i>Compañía de Aguas del Aconquija S.A. and Vivendi Universal S.A. v. Argentine Republic</i> , ICSID Case No. ARB/97/3, Decision on Annulment, 3 July 2002.
2020	CLA-103	<i>SunReserve Luxco Holdings S.À.R.L, SunReserve Luxco Holdings II S.À.R.L and SunReserve Luxco Holdings III S.À.R.L v. Italian Republic</i> , SCC Case No. V2016/32, Final Award, 25 March 2020.
2020	CLA-104	<i>Lidercón, S.L. v. Republic of Peru</i> , ICSID Case No. ARB/17/9, Award, 6 March 2020.
2016	CLA-105	<i>Crystallex International Corporation v. Bolivarian Republic of Venezuela</i> , ICSID Case No. ARB(AF)/11/2, Award, 4 April 2016.
2010	CLA-106	<i>Société Générale de Surveillance S.A. v. Republic of Paraguay</i> , ICSID Case No. ARB/07/29, Decision on Jurisdiction, 12 February 2010.
2009	CLA-107	<i>Waguïh Elie George Siag and Clorinda Vecchi v. The Arab Republic of Egypt</i> , ICSID Case No. ARB/05/15, Award, 1 June 2009.
2008	CLA-108	<i>Jan de Nul N.V. and Dredging International N.V. v. Arab Republic of Egypt</i> , ICSID Case No. ARB/04/13, Award, 6 November 2008.

2012	CLA-109	<i>Jan Oostergetel and Theodora Laurentius v. Slovak Republic</i> , UNCITRAL, Final Award, 23 April 2012.
2004	CLA-110	<i>Waste Management, Inc. v. United Mexican States</i> , ICSID Case No. ARB(AF)/00/3, Award, 30 Apr. 2004.
2001	CLA-111	<i>Ronald S. Lauder v. Czech Republic</i> , UNCITRAL, Final Award dated 3 September 2001.
2006	CLA-112	<i>Saluka Investments B.V. v. The Czech Republic</i> , UNCITRAL, Partial Award, 17 March 2006.
2008	CLA-113	<i>Duke Energy Electroquil Partners & Electroquil S.A. v. Republic of Ecuador</i> , ICSID Case No. ARB/04/19, 18 August 2008.
2018	CLA-114	<i>Antaris Solar GmbH and Dr. Michael Göde v. Czech Republic</i> , PCA Case No. 2014-01, Award, 2 May 2018.
2016	CLA-115	<i>Devas Employees Mauritius Private Limited and Telcom Devas Mauritius Limited v. Republic of India</i> , PCA Case No. 2013-09, Award on Jurisdiction and Merits, 25 July 2016.
2000	CLA-116	<i>Metalclad Corporation v. The United Mexican States</i> , ICSID Case No. ARB(AF)/97/1, Award, 30 August 2000.
2003	CLA-117	<i>Técnicas Medioambientales Tecmed, S.A. v. The United Mexican States</i> , ICSID Case No. ARB(AF)/00/2, Award, 29 May 2003.
2005	CLA-118	<i>CMS Gas Transmission Company v. Argentina</i> , ICSID Case No. ARB/01/8, Award, 12 May 2005.
2009	CLA-119	<i>Mohammad Ammar Al-Bahloul v. Republic of Tajikistan</i> , SCC Case No. V064/2008, Partial Award on Jurisdiction and Liability, 2 September 2009.
2016	CLA-120	<i>Murphy Exploration and Production Company International v. Republic of Ecuador II</i> , PCA Case No. 2012-16 (formerly AA 434), Partial Final Award, 6 May 2016.
2004	CLA-121	<i>MTD Equity Sdn. Bhd. and MTD Chile S.A. v. Republic of Chile</i> , ICSID Case No. ARB/01/7, Award, 25 May 2004.
2010	CLA-122	<i>Frontier Petroleum Services Ltd. v. The Czech Republic</i> , Final Award, 12 November 2010.
2007	CLA-123	<i>Siemens A.G. v. The Argentine Republic</i> , ICSID Case No. ARB/02/8, Award, 17 January 2007.
2018	CLA-124	<i>Casinos Austria International GmbH and Casinos Austria Aktiengesellschaft v. Argentine Republic</i> , ICSID Case No. ARB/14/32, Decision on Jurisdiction, 29 June 2018.
2001	CLA-125	<i>Genin and others v. Estonia</i> , ICSID Case No. ARB/99/2, Award, 25 June 2001.
2007	CLA-126	<i>PSEG Global Inc. et al. v. Republic of Turkey</i> , ICSID Case No. ARB/02/5, Award, 19 Jan. 2007.
2009	CLA-127	<i>Glamis Gold, Ltd. v. United States of America</i> , UNCITRAL, Award, 8 June 2009.
2005	CLA-128	<i>Eureko B.V. v. Republic of Poland</i> , Partial Award, 19 August 2005.
2006	CLA-129	<i>International Thunderbird Gaming Corporation v. The United Mexican States</i> , UNCITRAL, Award, 26 Jan. 2006.
2001	CLA-130	<i>CME Czech Republic B.V. v. The Czech Republic</i> , UNCITRAL, Partial Award, 13 September 2001.
2020	CLA-131	<i>Cavalum SGPS, S.A. v. Kingdom of Spain</i> , ICSID Case No. ARB/15/34, Decision on Jurisdiction, Liability and Directions on Quantum, 31 August 2020.
2019	CLA-132	<i>Photovoltaik Knopf Betriebs-GmbH v. Czech Republic</i> , PCA Case No. 2014-21, Award, 15 May 2019.
2008	CLA-133	<i>National Grid plc v. Argentina</i> , IIC 361, UNCITRAL, 2008, Award, 3 November 2008.
2017	CLA-134	<i>Tethyan Copper Company Pty Limited v. Islamic Republic of Pakistan</i> , ICSID Case No. ARB/12/1, Decision on Jurisdiction and Liability, 10 November 2017.
2017	CLA-135	<i>UAB E Energija (Lithuania) v. Republic of Latvia</i> , ICSID Case No. ARB/12/33, Award, 22 December 2017.
2012	CLA-136	<i>Bureau Veritas, Inspection, Valuation, Assessment and Control, BIVAC B.V. v. Republic of Paraguay</i> , ICSID Case No. ARB/07/9, Further Decision on Objections to Jurisdiction, 9 October 2012.

2020	CLA-137	<i>Global Telecom Holding S.A.E. v. Canada</i> , ICSID Case No. ARB/16/16, Award, 27 March 2020.
2016	CLA-138	<i>Garanti Koza LLP v. Turkmenistan</i> , ICSID Case No. ARB/11/20, Award, 19 December 2016.
2009	CLA-139	<i>Nordzucker AG v. The Republic of Poland</i> , Ad Hoc, Second Partial Award, 28 Jan. 2009.
2014	CLA-140	<i>Gold Reserve Inc. v. Bolivarian Republic of Venezuela</i> , Award, ICSID Case No. ARB(AF)/09/1, 22 September 2014.
2011	CLA-141	<i>El Paso Energy International Company v. The Argentine Republic</i> , ICSID Case No. ARB/03/5, Award, 31 Oct. 2011.
2003	CLA-142	<i>ADF Group Inc. v. United States of America</i> , ICSID Case No. ARB(AF)/00/1, Award, 9 Jan. 2003.
2008	CLA-143	<i>Rumeli Telekom A.S. and Telsim Mobil Telekomunikasyon Hizmetleri A.S. v. Republic of Kazakhstan</i> , ICSID Case No. ARB/05/16, Award dated 29 July 2008.
2010	CLA-144	<i>Merrill & Ring Forestry L.P. v. The Government of Canada</i> , UNCITRAL, ICSID Administered Case, Award, 31 Mar. 2010.
2010	CLA-145	<i>Joseph Charles Lemire v. Ukraine</i> , ICSID Case No. ARB/06/18, Decision on Jurisdiction and Liability, 14 January 2010.
2011	CLA-146	<i>White Industries Australia Limited v. The Republic of India</i> , Final Award, 30 November 2011.
2014	CLA-147	<i>Hesham T. M. Al Warraq v. Republic of Indonesia</i> , UNCITRAL, Final Award, 15 December 2014.
2012	CLA-148	<i>EDF International S.A., SAUR International S.A. and León Participaciones Argentinas S.A. v. Argentine Republic</i> , ICSID Case No. ARB/03/23, 11 June 2012.
2013	CLA-149	<i>Mr. Franck Charles Arif v. Republic of Moldova</i> , ICSID Case No. ARB/11/23, Award, 8 April 2013.
2011	CLA-150	<i>Sergei Paushok, CJSC Golden East Company and CJSC Vostokneftegaz Company v. The Government of Mongolia</i> , UNCITRAL, Award on Jurisdiction and Liability, 28 April 2011.
2008	CLA-151	<i>Plama Consortium Limited v. Republic of Bulgaria</i> , ICSID Case No. ARB/03/24, Award, 27 August 2008.
2008	CLA-152	<i>Limited Liability Company Amto v. Ukraine</i> , SCC Case No. 080/2005, Final Award, 26 March 2008.
2012	CLA-153	<i>Burlington Resources Inc. v. Republic of Ecuador</i> , ICSID Case No. ARB/08/5, Decision on Liability, 14 December 2012.
2019	CLA-154	<i>Belenergia S.A. v. Italian Republic</i> , ICSID Case No. ARB/15/40, Award, 6 August 2019.
2007	CLA-155	<i>Sempra Energy International v. The Argentine Republic</i> , ICSID Case No. ARB/02/16, Award, 28 September 2007.
2010	CLA-156	<i>Gustav F W Hamester GmbH & Co KG v. Republic of Ghana</i> , Award, 18 June 2010.
2005	CLA-157	<i>Petrobart Limited v. The Kyrgyz Republic</i> , SCC Case No. 126/2003, Arbitral Award, 29 March 2005.
2002	CLA-158	<i>Marvin Roy Feldman Karpa v. United Mexican States</i> , ICSID Case No. ARB(AF)/99/1, Award, 16 December 2002.
2016	CLA-159	<i>Copper Mesa Mining Corporation v. Republic of Ecuador</i> , PCA Case No. 2012-2, Award, 15 March 2016.
1926	CLA-160	<i>Certain German interests in Polish Upper Silesia, Germany v Poland</i> , Merits, Judgment, PCIJ Series A no 7, ICGJ 241, 25th May 1926.
2007	CLA-161	<i>Compañía de Aguas del Aconquija S.A. and Vivendi Universal S.A. v. Argentine Republic</i> , ICSID Case No. ARB/97/3, Award, 20 August 2007.
1986	CLA-162	<i>Liberian Eastern Timber Corporation v. Republic of Liberia</i> , ICSID Case No. ARB/83/2, Award, 31 March 1986.
2011	CLA-163	<i>Impregilo S.p.A. v. Argentine Republic</i> , ICSID Case No. ARB/07/17, Award, 21 June 2011.
2015	CLA-164	<i>Suez, Sociedad General de Aguas de Barcelona S.A. and Vivendi Universal S.A. v. Argentine Republic</i> , ICSID Case No. ARB/03/19, Award, 9 Apr. 2015.

2007	CLA-165	<i>Archer Daniels Midland Company and Tate & Lyle Ingredients Americas, Inc. v. The United Mexican States</i> , ICSID Case No. ARB(AF)/04/5, Award, 21 Nov. 2007.
2007	CLA-166	<i>OKO Pankki Oyj, VTB Bank (Deutschland) AG and Sampo Bank PLC v. The Republic of Estonia</i> , ICSID Case No. ARB/04/6, Award, 19 Nov. 2007.
2006	CLA-167	<i>Azurix Corp. v. The Argentine Republic</i> , ICSID Case No. ARB/01/12, 14 July 2006.
2007	CLA-168	<i>Enron Corporation and Ponderosa Assets, L.P. v. Argentine Republic</i> , ICSID Case No. ARB/01/3, 22 May 2007.
2009	CLA-169	<i>Sistem Mühendislik Insaat Sanayi ve Ticaret A.S. v. Kyrgyz Republic</i> , ICSID Case No. ARB(AF)/06/1, Award, 9 Sept. 2009.
2015	CLA-170	<i>East Mediterranean Gas S.A.E. v. Egyptian General Petroleum Corporation, Egyptian Natural Gas Holding Company and Israel Electric Corporation Ltd</i> , ICC Case No. 18215/GZ/MHM, Final Award, 4 December 2015.
2009	CLA-171	<i>Walter Bau AG (In Liquidation) v. The Kingdom of Thailand</i> , UNCITRAL, Award, 1 July 2009.
2007	CLA-172	<i>LG&E Energy Corp., LG&E Capital Corp. and LG&E International Inc. v. Argentine Republic</i> , ICSID Case No. ARB/02/1, Award, 25 July 2007.
2009	CLA-173	<i>Yukos Universal Limited (Isle of Man) v. The Russian Federation</i> , UNCITRAL, PCA Case No. 2005-04/AA227, 30 November 2009.
1928	CLA-174	<i>The Factory At Chorzow (Claim for Indemnity) (The Merits) Germany v. Poland Judgment</i> , 13 September 1928
International Investment Treaties Referenced in Claimant's Statement of Claim		
1992	CLA-175	Agreement between the Kingdom of the Netherlands and the Republic of Poland on encouragement and reciprocal protection of investments, entered into force on 7 September 1992
1998	CLA-176	Energy Charter Treaty concluded on 17 December 1994 and entered into force on 16 April 1998
Other International Legal Authorities Referenced in Claimant's Statement of Claim		
2001	CLA-177	Draft Articles on Responsibility of States for Internationally Wrongful Acts, with commentaries, in Yearbook of the International Law Commission 2001 (Vol II, Part Two)
	CLA-178	Intentionally Left Blank
Legal Authorities Submitted with Claimant's Response to Respondent's Motion to Bifurcate		
2016	CLA-179	UNCITRAL Notes on Organizing Arbitral Proceedings
2019	CLA-180	Lucy Greenwood, "Revisiting Bifurcation and Efficiency in International Arbitration Proceedings", in Journal of International Arbitration, Vol 36, Issue 4, 2019
2014	CLA-181	A. Raviv, "Achieving a Faster ICSID," Transnational Dispute Management, 2014, 11(1)
2016	CLA-182	J. Billiet, <i>International Investment Arbitration, A Practical Handbook</i> , (Maklu Publishers 2016)
19 April 2017	CLA-183	<i>Cairn Energy PLC and Cairn UK Holdings Limited (CUHL) v. Government of India</i> , PCA Case No. 2016-7, Procedural Order No. 4 – Decision on the Respondent's Application for Bifurcation, 19 April 2017
8 August 2013	CLA-184	<i>Accession Mezzanine Capital L.P. and Danubius Kereskedohaz Vagyonkezelő v. Republic of Hungary</i> , ICSID Case No. ARB/12/3, Decision on Respondent's Notice of Jurisdictional Objections and Request for Bifurcation, 8 August 2013
17 January 2020	CLA-185	<i>Gran Colombia Gold Corp. v. Republic of Colombia</i> , ICSID Case No. ARB/18/23, Procedural Order No. 3, Decision on the Respondent's Request for Bifurcation, 17 January 2020
24 June 2019	CLA-186	<i>Rand Investments Ltd. and others v. Republic of Serbia</i> , ICSID Case No. ARB/18/8, Procedural Order No. 3, 24 June 2019
12 January 2015	CLA-187	<i>Churchill Mining and Planet Mining Pty Ltd v. Republic of Indonesia</i> , ICSID Case No. ARB/12/14 and 12/40, Procedural Order No. 15, 12 January 2015

	CLA-188	Text of the Dutch Arbitration Act published by the Netherlands Arbitration Institute, available at https://www.nai-nl.org/en/documents/dutch_arbitration_act/
21 January 2015	CLA-189	<i>Gavrilovic and Gavrilovic d.o.o. v. Republic of Croatia</i> , ICSID Case No. ARB/12/39, Decision on Bifurcation, 21 January 2015
31 May 2005	CLA-190	<i>Glamis Gold, Ltd. v. The United States of America</i> , UNCITRAL, Procedural Order No. 2 (Revised), 31 May 2005
27 February 2020	CLA-191	<i>Tennant Energy, LLC v. Government of Canada</i> , PCA Case No. 2018-54, Procedural Order No. 4, 27 February 2020
21 April 2017	CLA-192	<i>Michael Ballantine and Lisa Ballantine v. Dominican Republic</i> , PCA Case No. 2016-17, Procedural Order No. 2, 21 April 2017
13 August 2020	CLA-193	<i>Carlos Sastre and others v. United Mexican States</i> , ICSID Case No. UNCT/20/2, Procedural Order No. 2 Decision on Bifurcation, 13 August 2020
9 October 2019	CLA-194	<i>LSG Building Solutions GmbH and others v. Romania</i> , ICSID Case No. ARB/18/19, Procedural Order No. 3, Decision on Bifurcation, 9 October 2019
28 June 2018	CLA-195	<i>Eco Oro Minerals Corp. v. Republic of Colombia</i> , ICSID Case No. ARB/16/41, Procedural Order No. 2, Decision on Bifurcation, 28 June 2018
5 December 2018	CLA-196	<i>Mr. Edmond Khudyan and Arin Capital & Investment Corp. v. Republic of Armenia</i> , ICSID Case No. ARB/17/36, Procedural Order No. 3: Decision on the Respondent's Request for Bifurcation, 5 December 2018