

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 LTD.,

Claimant,

-and

REPUBLIC OF MOZAMBIQUE,

Respondent,

**RESPONDENT REPUBLIC OF MOZAMBIQUE'S
THIRD AMENDED EXHIBIT LIST**

DATE	FACT EXHIBIT	DESCRIPTION
6 May 2011	Exhibit R-1	Portuguese Version of the Memorandum of Interest between the Ministry of Transport and Communications and Patel Engineering Ltd
6 May 2011	Exhibit R-2	English Version of the Memorandum of Interest between the Ministry of Transport and Communications and Patel Engineering Ltd
11 May 2011	Exhibit R-3	Copy of Judgment in Patel Engineering Ltd. v. Union of India & Anr., No. 23059 of 2011
6 September 2007	Exhibit R-4	Article published by DNA
20 March 2020	Exhibit R-5	PEL Notice of Arbitration
6 May 2011	Exhibit R-6	Purported Memorandum of Interest submitted by PEL in the UNCITRAL Arbitration
April 2012	Exhibit R-7	PEL's Pre-Feasibility Report,

9 May 2012	Exhibit R-8	PEL's Power Point Presentation
15 May 2012	Exhibit R-9	Letter from PEL to the MTC
15 June 2012	Exhibit R-10	Letter from the MTC to PEL
18 June 2012	Exhibit R-11	Letter from PEL to the MTC
22 June 2012	Exhibit R-12	Letter from PEL to the MTC
7 August 2012	Exhibit R-13	Letter from PEL to Ports and Railways Company of Mozambique
15 August 2012	Exhibit R-14	Letter from PEL to the MTC
5 October 2012	Exhibit R-15	Letter from PEL to the MTC
28 November 2012	Exhibit R-16	Letter from PEL to the MTC
11 January 2013	Exhibit R-17	Letter from the MTC to PEL
22 January 2013	Exhibit R-18	Letter from PEL to the MTC
14 February 2013	Exhibit R-19	Letter from the MTC to PEL
	Exhibit R-20	Webpage curriculum of Maria Fernanda Rocha Lopes
4 March 2013	Exhibit R-21	Letter from PEL to the MTC
	Exhibit R-22	Contest to Acquiring of Rights of Concession to Conceive, Design, Finance, Build, Operate and Transfer the Railway and Macuse Port
12 April 2013	Exhibit R-23	MTC tender documents issued to six pre-qualified companied
8 March 2013	Exhibit R-24	Written expression of interest from a consortium of PEL,Grindrod and SPI to the MTC
12 March 2013	Exhibit R-25	Letter from PEL to the MTC
18 April 2013	Exhibit R-26	Letter from the MTC to PEL
13 May 2013	Exhibit R-27	Letter from the MTC Legal Department to PEL
4 June 2013	Exhibit R-28	Letter from PEL to the MTC
10 June 2013	Exhibit R-29	Letter with clarifications from the MTC to all bidders, including the consortium of PEL, Grindrod, and SPI
27 June 2013	Exhibit R-30	PEL, Grindrod, and SPI Financial and Technical Proposal for the Project

19 July 2013	Exhibit R-31	Minutes of the Opening Session of Economic Proposals
26 July 2013	Exhibit R-32	Letter from the MTC to the consortium of PEL, Grindrod and SPI
29 July 2013	Exhibit R-33	Letter from the consortium of PEL, Grindrod and SPI to the MTC
1 August 2013	Exhibit R-34	Letter from the consortium of PEL, Grindrod and SPI to the MTC
12 August 2013	Exhibit R-35	Letter from the MTC the consortium of PEL, Grindrod and SPI
19 August 2013	Exhibit R-36	Letter from the consortium of PEL, Grindrod and SPI to the MTC
27 August 2013	Exhibit R-37	Letter from the MTC to the consortium of PEL, Grindrod and SPI
28 August 2013	Exhibit R-38	Letter from the consortium of PEL, Grindrod and SPI to the MTC
15 August 2013	Exhibit R-39	Article published in the Economic Times, an Indian newspaper in Mumbai
18 February 2014	Exhibit R-40	Letter from the Mozambican law firm of Sal & Caldeira Advogados, Lda. to the MTC
25 June 2018	Exhibit R-41	Letter from the English law firm of Addleshaw Goddard sent another letter to the MTC
July 2017	Exhibit R-42	Update of the TML 2015 Feasibility Study for the Moatize-Macuse Railway and Port Project
2010-2011	Exhibit R-43	PEL Annual Report
2014	Exhibit R-44	World Bank PPP Reference Guide
	Exhibit R-45	World Bank Policy Guidelines for Managing Unsolicited Proposals in Infrastructure Projects
20 May 2020	Exhibit R-46	Request for Arbitration in the matter styled <i>Republic of Mozambique & Mozambique Ministry of Transport and Communications v. Patel Eng'g Ltd.</i> , ICC Case No. 25334/JPA
19 August 2020	Exhibit R-47	Answer in the matter styled <i>Republic of Mozambique & Mozambique Ministry of Transport and Communications v. Patel Eng'g Ltd.</i> , ICC Case No. 25334/JPA
2016	Exhibit R-48	Turkish Investor vs. North African State, chairman (co-arbitrators: P. Mayer and G. Khairallah), (Administrative Secretary: K.

		Baptista), <i>ICC, investment arbitration under BIT</i> , English language
20 January 2021	Exhibit R-49	Mantilla-Serrano, F. and Romero, D., Latham & Watkins, “ICC Launches Revised Arbitration Rules for 2021,” Client Alert Commentary, No. 2850
12 November 2020	Exhibit R-50	Wong, G., Clare Ryan, M., De Aguiar, S., “Newly Revised ICC Arbitration Rules,” Sherman & Sterling, Perspectives
20 April 2012	Exhibit R-51	Herbert Smith Freehills, “Successful ICC conference ‘Investment Treaty Arbitration: a ‘BIT’ of a problem?,’” Arbitration Notes
12 November 2020	Exhibit R-52	2021 ICC Rules of Arbitration Unveiled,” Cleary Gottlieb
	Exhibit R-53	Câmara de Comércio de Moçambique, Lista dos Membros
	Exhibit R-54	Grinrod Limited website, About Us
7 March 2019	Exhibit R-55	Mozambique: Former minister admits to authorizing allowances, Macau Business
2020	Exhibit R-56	ICC Dispute Resolution 2019 Statistics

LEGAL AUTHORITY	DESCRIPTION
RLA-1	Agreement Between the Government of the Republic of Mozambique and the Government of the Republic for India for the Reciprocal Promotion and Protection of Investments (“MZ-India BIT”)
RLA-2	Mozambique Constitution Article 10
RLA-3	Mozambique Decree No. 15-2010
RLA-4	Mozambique Civil Code Article 6
RLA-5	Mozambique Law No. 09-2002

RLA-6	Mozambique Law No. 15-2011 (“PPP Law”)
RLA-7	Mozambique Law No. 16-2012 (“PPP Regulations”)
RLA-8	Mozambique Investment Law (“MIL”)
RLA-9	Mozambique Law No. 6-2004
RLA-10	Mozambique Law No. 9-2001
RLA-11	Mozambique Civil Code Article 317
RLA-12	Mozambique Civil Code Article 227
RLA-13	Mozambique Civil Code Article 498
RLA-14	Mozambique Civil Code Article 306
RLA-15	Resolution No. 37-2009 (30 June 2009), Official Mozambique Republic Gazette
RLA-16	<i>Erusian Equipment & Chemicals Ltd. v. State of West Bengal</i> , 1 SCC 70 (11 November 1975) (“Erusian Equipment v. West. Bengal”)
RLA-17	<i>Raghunath Thakur v. State of Bihar</i> , 1 SCC 229 (8 November 1989)
RLA-18	<i>Gorkha Security Services v. Govt. NCT of Delhi</i> , 9 SCC 105 (2 August 2014) (“Gorkha v. Delhi”)
RLA-19	<i>UMC Technologies v Food Corporation of India</i> , SCC Online SC 934 (16 November 2020) (“UMC Tech. v. Food Corp.”)
RLA-20	<i>Patel Engineering Limited v. Union of India and Another</i> , SCC Online Del 3193 (2011) (“PEL v. India”)
RLA-21	<i>Patel Engineering Ltd. v. Union of India & Anr.</i> , No. 23059 (11 May 2011) (“PEL v. India 23059”)
RLA-22	<i>M/s Patel Engineering Limited v. The State of Jharkhand and Others</i> , SCC Online Jhar 974 (2016) (“PEL v. Jharkhand”)
RLA-23	<i>Kulja Industries Limited v. Chief General Manager, Western Telecom Project Bharat Sanchar Nigam Limited</i> , 14 SCC 731 (2014) (“Kulja Indus. v. W. Telecom”)

RLA-24	<i>Rajasthan Coop. Dairy Federation Ltd. v. Maha Laxmi Mingrate Marketing Service (P) Ltd.</i> , 10 SCC 405 (17 September 1996) (“Rajasthan v. Maha Laxmi”)
RLA-25	<i>Dresser Rand S.A. v. Bindal Agro Chem Ltd.</i> , 1 SCC 751 (1 December 2006) (“Dresser Rand v. Bindal Agro”)
RLA-26	<i>Speech & Software Technologies (India) (P) Ltd. v. Neos Interactive Ltd.</i> , 1 SCC 475 (2009) (“Speech & Software v. Neos”)
RLA-27	<i>PSA Mumbai Investments Pte. Ltd. v. Jawaharlal Nehru Port Trust</i> , 10 SCC 525 (11 September 2018) (“Mumbai Investments v. Jawaharlal”)
RLA-28	<i>Metalclad Corp. v. United Mexican States</i> , ICSID Case No. ARB(AF)/97/1, Award (30 August 2000) (“Metalclad v. Mexico”)
RLA-29	<i>Gustav FW Hamester GmbH & Co KG v. Republic of Ghana</i> , ICSID Case No. ARB/07/24, Award (18 June 2010) (“Hamester v. Ghana”)
RLA-30	<i>Inceysa Vallisoletana, S.L. v. Republic of El Salvador</i> , ICSID Case No. ARB/03/26, Award (2 August 2006) (“Inceysa v. El Salvador”)
RLA-31	<i>Plama Consortium Limited v. Republic of Bulgaria</i> , ICSID Case No. ARB/03/24, Award (27 August 2008) (“Plama v. Bulgaria”)
RLA-32	<i>Fraport AG Frankfurt Airports Servs. Worldwide v. Republic of the Philippines</i> , ICSID Case No. ARB/03/25, Award (16 August 2007) (“Fraport v. Philippines”)
RLA-33	<i>Phoenix Action, Ltd. v. Czech Republic</i> , ICSID Case No. ARB/06/5, Award (15 April 2009) (“Phoenix Action v. Czech Republic”)
RLA-34	<i>SAUR International S.A. v. Argentine Republic</i> , ICSID Case No. ARB/04/4, Decision on Jurisdiction and Liability (6 June 2012) (“SAUR Int’l v. Argentina”)
RLA-35	<i>Metal-Tech Ltd. v. Republic of Uzbekistan</i> , ICSID Case No. ARB/01/3, Award (4 October 2013) (“Metal-Tech Ltd. v. Uzbekistan”)
RLA-36	<i>World Duty Free Ltd. v. Kenya</i> , ICSID Case No. ARB/00/7, Award (4 October 2006) (“World Duty Free Ltd. v. Kenya”)
RLA-37	<i>Mamidoil Jetoil Greek Petroleum Products Société Anonyme SA v. Republic of Albania</i> , ICSID Case No. ARB/11/24, Award (30 March 2015) (“Mamidoil v. Albania”)
RLA-38	<i>Phelps Dodge v. Islamic Republic of Iran</i> , IUSCT Case No. 99, Award No. 217-99-2 (19 March 1986) (“Phelps Dodge v. Iran”)

RLA-39	<i>Gremcitel S.A., Renée Rose Levy v. Republic of Peru</i> , ICSID Case No. ARB/11/17, Award (9 January 2015) (“Gremcitel v. Peru”)
RLA-40	<i>Churchill Mining & Planet Mining Pty Ltd. v. Republic of Indonesia</i> , ICSID Case No. ARB/12/1, ARB/12/40 (6 December 2016) (“Churchill v. Indonesia”)
RLA-41	<i>Europe Cement Investment & Trade S.A. v. Republic of Turkey</i> , ICSID Case No. ARB(AF)/07/2, Award (13 August 2009) (“Europe Cement v. Turkey”)
RLA-42	<i>Caratube Intt’l Oil Co. LLP v. Republic of Kazakhstan</i> , ICSID Case No. ARB/13/13, Award (27 September 2017) (“Caratube v. Kazakhstan”)
RLA-43	<i>Cenzig Insaat Sanayi ve Ticaret A.S. v. The State of Libya</i> , ICC Case No. 201537/ZF/AYZ, Final Award (7 November 2018) (“Cenzig v. Libya”)
RLA-44	<i>Cambodia Power Co. v. Kingdom of Cambodia, Electricité du Cambodge</i> , ICSID Case No. ARB/09/18, Decision on Jurisdiction (22 March 2011) (“Cambodia Power v. Cambodia”)
RLA-45	<i>Duke Energy Int’l Peru Investments No. 1, Ltd. v. Republic of Peru</i> , ICSID Case No. ARB/03/28, Annulment Proceeding (1 March 2011) (“Duke Energy v. Peru”)
RLA-46	<i>Emmis Int’l Holding, B.V., Emmis Radio Operating, B.C., MEM Magyar Electronic Media Kereskedelmi és Szolgáltató Kft. v. Hungary</i> , ICSID Case No. ARB/12/2, Award (16 April 2014) (“Emmis v. Hungary”)
RLA-47	<i>Mobil Cerro Negro, Ltd., Mobil Cerro Negro Holding, Ltd., Mobil Corp., Mobil Venezolana de Petróleos Holdings, Inc., Mobil Venezolana de Petróleos, Inc. Venezuela Holdings, B.V. v. Bolivarian Republic of Venezuela</i> , ICSID Case No. ARB/07/27, Award (9 October 2014) (“Mobil Cerro v. Venezuela”)
RLA-48	<i>Southern Pacific Properties (Middle East) Ltd. v. Arab Republic of Egypt</i> , ICSID Case No. ARB/84/3, Decision on Jurisdiction (27 November 1985) (“Southern Pacific v. Egypt”)
RLA-49	Treaty between the Government of the United States and the Government of Mozambique Concerning the Encouragement and Reciprocal Protection of Investment (1998) (“US-MZ BIT”)
RLA-50	Agreement between the Government of the United Kingdom of Great Britain and Northern Ireland and the Government of the Republic of Mozambique for the Promotion and Protection of Investments (2004) (“UK-MZ BIT”)

RLA-51	Agreement between the Government of Japan and the Government of the Republic of Mozambique on the Reciprocal Liberalisation, Promotion and Protection of Investment (2013) (“Japan-MZ BIT”)
RLA-52	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 (2001) (“Dutch-MZ BIT”)
RLA-53	<i>Joy Mining Machinery Ltd. v. Arab Republic of Egypt</i> , ICSID Case No. ARB/03/11, Award on Jurisdiction (6 August 2004) (“Joy Mining v. Egypt”)
RLA-54	<i>Mihaly Int’l Corp. v. Democratic Socialist Republic of Sri Lanka</i> , ICSID Case No. ARB/00/2, Award (15 March 2002) (“Mihaly v. Sri Lanka”)
RLA-55	<i>PSEG Global Inc., The North Am. Coal Corp. & Konya Ilgin Elektrik Uretim ve Ticaret Limited Sirketi v. Republic of Turkey</i> , ICSID Case No. ARB/02/5, Decision on Jurisdiction (4 June 2004) (“PSEG Global v. Turkey”)
RLA-56	<i>Zhinvali Development Ltd. v. Republic of Georgia</i> , ICSID Case No. ARB/00/1, Award (24 January 2003) (“Zhinvali v. Georgia”)
RLA-57	<i>Salini Costruttori S.p.A. v. Kingdom of Morocco</i> , ICSID Case No. ABR/00/4, Decision on Jurisdiction (16 July 2001) (“Salini v. Morocco”)
RLA-58	<i>Nova Scotia Power Inc. v. Bolivarian Republic of Venezuela</i> , ICSID Case No. ARB(AF)/11/1, Award Excerpts (30 April 2014) (“Nova Scotia v. Venezuela”)
RLA-59	<i>Içkale Insaat Ltd. Sirketi v. Turkmenistan</i> , ICSID Case No. ARB/10/24, Award (8 March 2016) (“Ickale v. Turkmenistan”)
RLA-60	<i>Poštová Banka, a.s., Istrokapitál SE v. The Hellenic Republic</i> , ICSID Case No. ARB/13/8, Award, (9 April 2015) (“Postova Banka v. The Hellenic Republic”)
RLA-61	<i>Romak S.A. v. Republic of Uzbekistan</i> , PCA Case No. AA280, Award (26 November 2009) (“Romak v. Uzbekistan”)
RLA-62	<i>Beijing Urban Construction Group Co Ltd v. Yemen</i> , ICSID Case No. ARB/14/30, Decision on Jurisdiction, (31 May 2017) (“Beijing Urban v. Yemen”)

RLA-63	<i>Toto Construzioni Generali S.p.A. v. Republic of Lebanon</i> , ICSID Case No. ARB/07/12, Decision on Jurisdiction (11 September 2009) (“Toto Construzioni v. Lebanon”)
RLA-64	<i>Abaclat and Others. v. Argentine Republic</i> , ICSID Case No. ARB/07/5, Decision on Jurisdiction and Admissibility (4 August 2011) (“Abaclat v. Argentina”)
RLA-65	<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) (“Ambiente Ufficio v. Argentina”)
RLA-66	<i>Republic of Argentina v. Weltover, Inc.</i> , 504 U.S. 607 (1992) (“Argentina v. Weltover”)
RLA-67	<i>Consortium RFCC v. The Kingdom of Morocco</i> , ICSID Case No. ARB/00/6, Award (22 December 2003) (“RFCC v. Morocco”)
RLA-68	<i>Cementownia “Nowa Huta” S.A. v. Republic of Turkey</i> , ICSID Case No. ARB(AF)/06/2, Award (17 September 2009) (“Cementownia v. Turkey”)
RLA-69	<i>ST-AD GmbH v. Bulgaria</i> , UNCITRAL, PCA Case No. 2011-06, Award on Jurisdiction (18 July 2013) (“ST-AD v. Bulgaria”)
RLA-70	<i>Tamimi v. Sultanate of Oman</i> , ICSID Case No. ARB/11/33, Award (3 November 2015) (“Tamimi v. Oman”)
RLA-71	<i>Case of the Monetary Gold Removed from Rome in 1943 (Italy v. France, and others)</i> , ICJ Reports 1954 (15 June 1954) (“Monetary Gold”)
RLA-72	<i>Larsen v. The Hawaiian Kingdom</i> , PCA Case No. 1999-01, Award (5 February 2001) (“Larsen v. Hawaii”)
RLA-73	<i>Tokios Tokelès v. Ukraine</i> , ICSID Case No. ARB/02/18, Award, (26 July 2007) (“Tokios v. Ukraine”)
RLA-74	<i>F-W Oil Interests Inc. v. Republic of Trinidad and Tobago</i> , ICSID Case No. ARB/01/14, Award (3 March 2006) (“F-w Oil v. Trinidad and Tobago”)
RLA-75	<i>Generation Ukraine, Inc. v. Ukraine</i> , ICSID Case No. ARB/00/9, Award (16 September 2003) (“Generation Ukraine v. Ukraine”)

RLA-76	<i>Alex Genin, Eastern Credit Ltd., Inc. and A.S. Baltoil v. The Republic of Estonia</i> , ICSID Case No. ARB/99/2, Award (25 June 2001) (“Genin v. Estonia”)
RLA-77	<i>William Nagel v. The Czech Republic</i> , SCC Case No. 049/2002, Final Award (9 September 2003) (“Nagel v. Czech Republic”)
RLA-78	<i>Saluka Investments B.V. v. The Czech Republic</i> , UNCITRAL, Partial Award (17 March 2006) (“Saluka v. Czech Republic”)
RLA-79	<i>Arcadian Phosphates, Inc. v. Arcadian Corp.</i> , 884 F.2d 69, 70, 73 (2d Cir. 1989) (“Arcadian Phosphates v. Arcadian Corp.”)
RLA-80	<i>Confor & Tembec v. USA</i> , UNCITRAL, Order of the Consolidation Tribunal (7 September 2005) (“Confor v. Tembec”)
RLA-81	A. R. Ibrahim, <i>The Doctrine of Laches in Int’l Law</i> , 83 VA. L. Rev. 647, 650-51 (April 1997)
RLA-82	<i>Impregilo S.p.A. v. Argentine Republic</i> , ICSID Case No. ARB/07/17, Award (21 June 2011) (“Impregilo v. Argentina”)
RLA-83	<i>Luigiterzo Bosca v. Republic of Lithuania</i> , UNCITRAL, PCA Case No. 2011-05, Award (17 May 2013) (“Bosca v. Lithuania”)
RLA-84	<i>El Paso Energy Int’l Co. v. Argentina</i> , ICSID ARB/03/15, Award (31 October 2011) (“El Paso v. Argentina”)
RLA-85	<i>Técnicas Medioambientales Tecmed, S.A. v. The United Mexican States</i> , ICSID Case No. ARB(AF)/00/2, Award (29 May 2003) (“Tecmed v. Mexico”)
RLA-86	<i>S.D. Myers, Inc. v. Government of Canada</i> , UNCITRAL (NAFTA), Partial Award (13 November 2000) (“S.D. Myers v. Canada”)
RLA-87	<i>Parkerings-Compagniet AS v. Republic of Lithuania</i> , ICSID Case No. ARB/05/8, Award (11 September 2007) (“Parkerings v. Lithuania”)
RLA-88	<i>Jan Oostergetel & Theodora Laurentius v. Slovak Republic</i> , UNCITRAL, Final Award (23 April 2021) (“Oostergetel v. Slovakia”)
RLA-89	<i>AES Summit Generation Ltd. et al v. Republic of Hungary</i> , ICSID Case No. ARB/07/22, Award (23 September 2010) (“AES Summit v. Hungary”)
RLA-90	<i>EDF v. Republic of Romania</i> , ICSID Case No. ARB/05/13, Award (8 October 2009) (“EDF v. Romania”)
RLA-91	<i>Cargill, Inc. v. Republic of Poland</i> , ICSID Case No. ARB(AF)/04/2, Final Award (29 February 2008) (“Cargill v. Poland”)

RLA-92	<i>Merrill & Ring Forestry L.P. v. The Government of Canada</i> , UNCITRAL (ICSID), Award (31 March 2010) (“Merrill v. Canada”)
RLA-93	<i>Suez, Sociedad General de Aguas de Barcelona S.A. & Vivendi Universal S.A v. Argentine Republic</i> , ICSID Case No. ARB/03/19, Award (9 April 2015) (“Suez v. Argentina”)
RLA-94	<i>Photovoltaik Knopf Betriebs GmbH v. Czech Republic</i> , PCA Case No. 2014-21, Award (15 May 2019) (“Photovoltaik v. Czech Republic”)
RLA-95	<i>Ioan Micula, Viorel Micula, S.C. European Food S.A., S.C. Starmill S.R.L. & S.C. Multipack S.R.L. v. Romania</i> , ICSID ARB/05/20, Award (11 December 2013) (“Micula v. Romania”)
RLA-96	<i>Saint-Gobain Performance Plastics Europe v. Venezuela</i> , ICSID Case No. ARB/12/13, Decision on Liability and Principles of Quantum (30 December 2016) (“Saint-Gobain v. Venezuela”)
RLA-97	<i>Philip Morris Brands Sarl, Philip Morris Products S.A., Abal Hermanos S.A. v. Oriental Republic of Uruguay</i> , ICSID Case No. ARB/10/7, Award (8 July 2016)
RLA-98	<i>MTD Equity Sdn. Bhd. & MTD Chile S.A. v. Republic of Chile</i> , ICSID Case No. ARB/01/7, Award (25 May 2004) (“MTD v. Chile”)
RLA-99	<i>Tethyan Copper Company Pty Ltd. v. Islamic Republic of Pakistan</i> , ICSID Case No. ARB/12/1, Decision on Jurisdiction and Liability (10 November 2017) (“Tethyan Copper v. Pakistan”)
RLA-100	<i>Global Telecom Holding S.A.E. v. Canada</i> , ICSID Case No. ARB/16/16, Award (27 March 2020) (“Global Telecom v. Canada”)
RLA-101	<i>Int’l Thunderbird Gaming Corporation. v. The United Mexican States</i> , UNCITRAL (NAFTA), Award (26 January 2006) (“Thunderbird v. Mexico”)
RLA-102	<i>Biwater Gauff (Tanzania) Ltd. v. United Republic of Tanzania</i> , ICSID Case No. ARB/05/22, Award (24 July 2008) (“Biwater Gauff v. Tanzania”)
RLA-103	<i>Waste Management, Inc. v. The United Mexican States</i> , ICSID Case No. ARB(AF)/00/3, Award (30 April 2004) (“Waste Management v. Mexico”)
RLA-104	<i>Jan de Nul N.V. & Dredging Int’l N.V. v. Arab Republic of Egypt</i> , ICSID Case No. ARB/04/13, Award (6 November 2008) (“Jan de Nul v. Egypt”)
RLA-105	<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) (“Bayindir v. Pakistan”)
RLA-106	Simon Batifort & J. Benton Heath, <i>The New Debate on the Interpretation of MFN Clauses in Investment Treaties: Putting the Brakes on Multilateralization</i> , 111 Am. J. Int’l L. 873 (2018)
RLA-107	<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) (“Bureau Veritas v. Paraguay”)

RLA-108	<i>Teinver S.A., Transportes de Carcanias S.A. & Autobuses Urbanos del Sur S.A. v. Argentine Republic</i> , ICSID Case No. ARB/09/1, Award (21 July 2017) (“Teinver v. Argentina”)
RLA-109	<i>Franck Charles Arif v. Republic of Moldova</i> , ICSID Case No. ARB/11/23, Award of the Tribunal (8 April 2013) (“Arif v. Moldova”)
RLA-110	<i>EDF Int’l S.A., SAUR Int’l S.A. & León Participaciones Argentinas S.A. v. Argentine Republic</i> , ICSID Case No. ARB/03/23 (11 June 2012) (“EDFI v. Argentina”)
RLA-111	<i>Eureko B.V. v. Republic of Poland</i> , Ad Hoc Arb., Partial Award (19 August 2005) (“Eureko v. Poland”)
RLA-112	<i>Achmea B.V. v. Slovak Republic II</i> , PCA Case No. 2013-12, Award on Jurisdiction and Admissibility (20 May 2014) (“Achmea v. Slovakia”)
RLA-113	<i>Bear Creek Mining Corp. v. Peru</i> , ICSID Case No. ARB/14/21, Award (30 November 2017) (“Bear Creek v. Peru”)
RLA-114	<i>BP Am. Prod. Co. et al v. Argentina</i> , ICSID Case No. ARB/04/8, Decision on Preliminary Objections (27 July 2006) (“BP v. Argentina”)
RLA-115	<i>Baywa R.E. Renewable Energy GmbH et al v. Kingdom of Spain</i> , ICSID Case No. ARB/15/16 (2 December 2019) (“Baywa v. Spain”)
RLA-116	<i>SGS Société General de Surveillance S.A. v. Philippines</i> , ICSID Case No. ARB/02/6, Decision of the Tribunal on Objections to Jurisdiction (29 January 2004) (“SGS v. Philippines”)
RLA-117	<i>Oxus Gold PLC v. Republic of Uzbekistan et al</i> , Ad Hoc Arb., Final Award (17 December 2015) (“Oxus Gold v. Uzbekistan”)
RLA-118	<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) (“Paushok v. Mongolia”)
RLA-119	<i>Vannessa Ventures Ltd. v. Bolivarian Republic of Venezuela</i> , ICSID Case No. ARB(AF)/04/6, Award (16 January 2013) (“Vannessa v. Venezuela”)
RLA-120	<i>Wena Hotels, Ltd. v. Arab Republic of Egypt</i> , ICSID Case No. ARB/98/4, Award (8 December 2000) (“Wena v. Egypt”)
RLA-121	<i>EnCana Corp. v. Republic of Ecuador</i> , LCIA Case No. UN 3481, Award (3 February 2006) (“EnCana v. Ecuador”)
RLA-122	<i>Rusoro Mining v. Bolivarian Republic of Venezuela</i> , ICSID Case No. ARB(AF)/12/5, Award (22 August 2016) (“Rusoro v. Venezuela”)
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RLA-124	<i>Arkin v. Borchard Lines Ltd. and Others</i> , EWCA Civ 655 (26 May 2005) (“Arkin v. Borchard”)
RLA-125	<i>Moorview Development Ltd. & Others v. First Active PLC & Others</i> , IESC 33 (27 July 2018) (“Moorview v. First Active”)
RLA-126	J. Crawford, <i>BROWNIE’S PRINCIPLES OF PUBLIC INTERNATIONAL LAW</i> (8th Ed. 2012)
RLA-127	J. Kalici, D. Evseev & M. Silberman, <i>Building International Investment Law: The First 50 Years of ICSID</i> , WOLTERS KLUWER (2016)

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RLA-130	Barton Legum, Investment Treaty Arbitration Review (Law Business Research Ltd. 2020)
RLA-131	Resolution No. 44-2010
RLA-132	Mozambique Civil Code (1966)
RLA-133	Mozambican Law No. 13-97
RLA-134	Mozambican Law No. 11-2009

WITNESS STATEMENT EXHIBIT NUMBER	WITNESS
RWS-1	Luis Amandio Chauque
RWS-2	Paulo Zucula

EXPERT REPORT NUMBER	EXPERT
RER-1	José Tiago de Pina Patrício de Mendonça MZ Betar, Engenheiros e Consultores, Lda. (“Betar”)
RER-2	Teresa Muenda
RER-3	Gourab Banerji
RER-4	Dr. Daniel Flores Quadrant Economics
RER-5	Mark Lanterman

DATE	RER-4, “QE” EXHIBITS	DESCRIPTION
	QE-1	Biographical Information, Daniel Flores, Quadrant Economics
	QE-2	Supporting Analyses
	QE-3	Sensitivities
10 August 2011	QE-4	Mozambique Law No. 15/2011
27 November 2020	QE-5	Jorge Marcos, “Mozambique: Construction works on Port of Macuse in Zambézia to start in 2021,” Club of Mozambique
30 November 2020	QE-6	Club of Mozambique, “Mozambique: Work on Macuse port to begin next year – AIM report”
26 November 2020	QE-7	Italian-Thai Development, “Updated Work on Hand Report,” available at https://www.itd.co.th/documentfile/ir/361770718-20Q3Backlog-Q3-20-26-11-63.pdf
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21 January 2021	QE-9	Mitsui & Co., “Mitsui Entered Into Heads of Agreement for Moatize Coal Mine, Nacala Corridor Rail & Port Infrastructure Projects,” Press Release
21 January 2021	QE-10	S&P Global, “Vale to divest Mozambique JV with Mitsui as part of coal exit plan”
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13 June 2017	QE-12	Mota-Engil, “Mota-Engil Signed a Contract in Mozambique Worth US\$2,4 Billion,” Press Release
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	QE-16	Italian-Thai Development website, “Support Facilities”
2019-2020	QE-17	Patel Engineering, Annual Report

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1978-2019	QE-19	International Energy Agency, World Coal Consumption
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1978-2019	QE-21	International Energy Agency, World Coal Production
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10 February 2017	QE-34	Keith Campbell, "Indian coal project in Mozambique to resume operations," Mining Weekly
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26 November 2019	QE-42	Vale, “Vale on Base Metals and Coal businesses impairment tests,” Press Release
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1992	QE-44	General Counsel of the World Bank et al., “Legal Framework for the Treatment of Foreign Investment, Report to the Development Committee and Guidelines on the Treatment of Foreign Direct Investment, VOLUME II: Guidelines,” The World Bank
	QE-45	CSX Corporation website, “Company Overview”
	QE-46	Union Pacific Corporation website, “Company Overview”
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	QE-48	Reuters, “Aurizon Holdings Ltd”
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	QE-51	Adani Group website, “About Us”
April-May 2014	QE-52	Bent Flyvbjerg, “What You Should Know About Megaprojects, and Why: An Overview,” Project Management Journal, Vol. 45, No. 2: 6-19
	QE-53	Duff & Phelps, “2020 Valuation Handbook – International Guide to Cost of Capital,” Chapter 6, Erb-Harvey-Viskanta Country Credit Rating Model
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	QE-60	Federal Reserve Economic Data, 20-Year Treasury Constant Maturity Rate, Percent, Daily, Not Seasonally Adjusted
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