

**RESPONDENT'S FACTUAL EXHIBITS**

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
1.	R-1	Letter of the Inspectorate of the Ministry of Taxes and Levies of the Republic of Belarus for the Minsk Region to the Minsk Inter-District Division of the Directorate of the Department for Financial Investigations of the State Control Committee of the Republic of Belarus (in Russian with partial English translation)	15 June 2017
2.	R-2	[REDACTED]	[REDACTED]
3.	R-3	[REDACTED]	[REDACTED]
4.	R-4	[REDACTED]	[REDACTED]
5.	R-5	[REDACTED]	[REDACTED]

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
6.	R-6	[REDACTED]	[REDACTED]
7.	R-7	Internal Memorandum of Ms [REDACTED] to Mr Dolgov (in Russian with partial English translation)	15 March 2013
8.	R-8	Letter from the insolvency administrator to the Investigative Department for the Minsk region of the Directorate of the Investigative Committee of the Republic of Belarus (in Russian with English translation)	29 August 2018
9.	R-9	A comparison between the draft of the investment contract attached to the Tender Documents as Annex 3 and the final version of the Investment Contract	N/A
10.	R-9.1	[REDACTED]	19 September 2018
11.	R-10	Order of MCEC Economy Committee No. 30 (in Russian with English translation)	27 April 2003
12.	R-10.1	Ruling of the Economic Court of the City of Minsk (in Russian with English translation)	16 August 2018
13.	R-11	Technical Specification for Design and Construction of the Motor Transport Base (in Russian with partial English translation)	29 April 2003
14.	R-11.1	Letter of the insolvency administrator of BMP to Minsk Prosecutor's Office (in Russian with partial English translation)	30 August 2018
15.	R-12	Technical Specification for Design and Construction of Depot (in Russian with English translation)	29 April 2003
16.	R-13	Technical Specification for Design and Construction of the Building at Mendeleeva Street (in Russian with partial English translation)	2 May 2003

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
17.	R-14	Letter from Bank Prominveststraschyot regarding Claimant's funds (in Russian with English translation)	22 May 2003
18.	R-15	Letter from Claimant regarding Claimant's funds (in Russian with English translation)	22 May 2003
19.	R-16	Minutes No. 1 of the tender committee meeting (in Russian with English translation)	27 May 2003
20.	R-17	Table of assessment of the applications for the Tender conducted by the tender committee and ratings (in Russian with English translation)	May 2003
21.	R-18	Letter from MCEC Economy Committee to ODO Perspektiva-Invest Stroy (in Russian with English translation)	4 June 2003
22.	R-19	Letter from MCEC Economy Committee to IP Arvitfood (in Russian with English translation)	4 June 2003
23.	R-20	Letter from MCEC Economy Committee to SP Aresa-Service-TS (in Russian with English translation)	4 June 2003
24.	R-21	Instruction of the President of the Republic of Belarus No. 09/111-225 (in Russian with English translation)	7 August 2003
25.	R-22	Letter from MCEC to the State Control Committee of the Republic of Belarus (in Russian with English translation)	28 August 2003
26.	R-23	Development management plan for the Depot (in Russian with partial English translation)	2005
27.	R-24	Letter from the Legal Department of MCEC to Deputy Chairman of MCEC (in Russian with English translation)	3 June 2005
28.	R-25	Letter from MCEC to the State Control Committee of the Republic of Belarus (in Russian with English translation)	14 June 2005

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
29.	R-26	Breakdowns of Manolium-Engineering's liabilities to the state as at 20 January 2017 (in Russian with English translation)	16 November 2018
30.	R-27	Opinion of Manolium-Engineering (in Russian with English translation)	2007
31.	R-28	Cover page of the land plot case file for the Depot (in Russian with English translation)	2007
32.	R-29	Extract from the Decision of MCEC No. 1095 (paragraphs 5 and 21) (in Russian with English translation)	24 May 2007
33.	R-30	Application from Manolium-Engineering to Gosstroy (in Russian with English translation)	16 July 2007
34.	R-31	Letter from Gosstroy to Manolium-Engineering (in Russian with English translation)	16 July 2007
35.	R-32	Construction permit for preparing the construction site for Depot (in Russian with English translation)	16 July 2007
36.	R-33	Letter from Manolium-Engineering to Gosstroy (in Russian with English translation)	4 October 2007
37.	R-34	Certificate of compliance of preparatory works completed off-and on-site in respect of occupational safety requirements and of the readiness of the facility for commencing construction (in Russian with English translation)	5 October 2007
38.	R-35	Letter from MCEC to UP Belgiprozem and others (in Russian with English translation)	5 December 2007
39.	R-36	Summary form, information about the Road (in Russian with English translation)	N/A
40.	R-37	Summary form, information about the Pull Station (in Russian with English translation)	N/A
41.	R-38	Letter from Claimant to MCEC (in Russian with English translation)	22 September 2008

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
42.	R-39	Minutes of the meeting attended by MCEC, Minsktrans and Claimant (in Russian with English translation)	7 October 2008
43.	R-40	Letter from Claimant to MCEC (in Russian with English translation)	14 October 2008
44.	R-41	Letter from Manolium-Engineering to MCEC (in Russian with English translation)	19 November 2008
45.	R-42	Letter from Claimant to MCEC (in Russian with English translation)	1 December 2008
46.	R-43	Minutes of the MCEC Chairman's instructions given on 10 December 2008 at the discussion meeting which was attended by MCEC, Minsktrans and Manolium-Engineering on 10 December 2008 (in Russian with English translation)	19 December 2008
47.	R-44	Letter from Manolium-Engineering to MCEC, attaching a schedule for the final phase of the construction of the Depot dated 30 December 2008 (in Russian with English translation)	31 December 2008
48.	R-45	Cover page to the case file for the land plot for construction of the Road (in Russian with English translation)	2008
49.	R-46	Letter from CUP UDMSiB to MCEC Economy Committee (in Russian with English translation)	11 March 2009
50.	R-47	Letter from Manolium-Engineering to MCEC Economy Committee (in Russian with English translation)	27 March 2009
51.	R-48	Letter from Manolium-Engineering to MCEC (in Russian with English translation)	15 April 2009
52.	R-49	Minutes of the MCEC meeting (in Russian with partial English translation)	10 June 2009
53.	R-50	Minutes of the MCEC meeting (in Russian with partial English translation)	25 June 2009

<b>No.</b>	<b>Exhibit</b>	<b>Description</b>	<b>Date</b>
<b>Respondent's Factual Exhibits</b>			
54.	R-51	Letter from Minsktrans to Manolium-Engineering (in Russian with English translation)	27 July 2009
55.	R-52	Minutes of the MCEC meeting (in Russian with partial English translation)	4 August 2009
56.	R-53	Letter from Manolium-Engineering to Gosstroy (in Russian with English translation)	24 December 2009
57.	R-54	Letter from Manolium-Engineering to Gosstroy (in Russian with partial English translation)	20 April 2010
58.	R-55	Letter from Manolium-Engineering to MCEC (in Russian with English translation)	26 May 2010
59.	R-56	Letter from Minsktrans to MCEC Economy Committee (in Russian with English translation)	8 September 2010
60.	R-57	Letter from MCEC to Manolium-Engineering (in Russian with English translation)	20 September 2010
61.	R-58	Master Schedule for Design and Construction of a Trade, Cultural and Entertainment Centre (in Russian with English translation)	24 September 2010
62.	R-59	Letter from MCEC to Claimant and Manolium-Engineering (in Russian with English translation)	14 October 2010
63.	R-60	Minutes of a meeting on the implementation of the investment project (in Russian with English translation)	18 November 2010
64.	R-61	Letter from Manolium-Engineering to Gosstroy (in Russian with English translation)	21 December 2010
65.	R-62	Schedule for completion of Road construction (in Russian with English translation)	2011
66.	R-63	Schedule for completion of Depot construction (in Russian with English translation)	2011
67.	R-64	Letter from Manolium-Engineering to Gosstroy (in Russian with English translation)	28 June 2011

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
68.	R-65	Additional Agreement to the [investment] contract dated 6 June 2003 (in Russian with English translation)	4 July 2011
69.	R-66	Letter from Minsktrans to Manolium-Engineering (in Russian with English translation)	6 July 2011
70.	R-67	Schedule for the completion of Depot construction, approved by MCEC Deputy Chair A.M. Borisenko (in Russian with English translation)	5 August 2011
71.	R-68	Letter from Minsktrans to Manolium-Engineering (in Russian with English translation)	26 August 2011
72.	R-69	Letter from Minsktrans to MCEC (in Russian with English translation)	12 September 2011
73.	R-70	Letter from Manolium-Engineering to Gosstroy (in Russian with English translation)	30 September 2011
74.	R-71	Construction permit for Depot (in Russian with English translation)	3 October 2011
75.	R-72	Complaint from Minsktrans to Claimant and Manolium-Engineering (in Russian with English translation)	21 October 2011
76.	R-73	Letter from Minsktrans to MCEC Economy Committee (in Russian with English translation)	14 November 2011
77.	R-74	Letter from MCEC to Claimant and Manolium-Engineering (in Russian with English translation)	5 January 2012
78.	R-75	Letter from Manolium-Engineering to Gosstroy (in Russian with English translation)	9 January 2012
79.	R-76	Complaint from Minsktrans to Claimant and Manolium-Engineering (in Russian with English translation)	3 February 2012
80.	R-77	"The territory of trolleybus depot No. 1 in the centre of Minsk will be build up this year" (realt.online.by) (in Russian with English translation)	19 March 2012

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
81.	R-78	Draft Supplemental Agreement to the [investment] contract dated 6 June 2003 (in Russian with English translation)	20 March 2012
82.	R-79	Minutes of a meeting on the implementation of an investment project (in Russian with English translation)	3 April 2012
83.	R-80	Letter from MCEC to Claimant and Manolium-Engineering (in Russian with English translation)	6 April 2012
84.	R-81	Letter from Manolium-Engineering to Gosstroy (in Russian with English translation)	13 April 2012
85.	R-82	"Minsk's authorities set to scam Russian investor" (naviny.by) (in Russian with partial English translation)	15 April 2012
86.	R-83	Letter from Manolium-Engineering to MCEC (in Russian with English translation)	17 April 2012
87.	R-84	Letter from Manolium-Engineering to Gosstroy (in Russian with English translation)	25 April 2012
88.	R-85	Letter from Manolium-Engineering to MCEC (in Russian with English translation)	30 April 2012
89.	R-86	Letter from Manolium-Engineering to the President of the Republic of Belarus (in Russian with English translation)	7 May 2012
90.	R-87	Letter from Manolium-Engineering to MCEC (in Russian with English translation)	18 May 2012
91.	R-88	Letter from Claimant to MCEC (in response to the MCEC Letter dated 18 June 2012) (in Russian with English translation)	June 2012
92.	R-89	Letter from MCEC to Claimant with draft supplemental agreement to the [investment] contract dated 6 June 2003 attached (in Russian with English translation)	18 June 2012



<b>No.</b>	<b>Exhibit</b>	<b>Description</b>	<b>Date</b>
<b>Respondent's Factual Exhibits</b>			
93.	R-90	Letter from MCEC Construction and Investment Committee to Manolium-Engineering (in Russian with English translation)	5 July 2012
94.	R-91	Letter from Claimant to MCEC (in Russian with English translation)	19 July 2012
95.	R-92	Letter from MCEC to Claimant (in Russian with English translation)	26 July 2012
96.	R-93	Minutes of the meeting attended by MCEC, Minsktrans and Manolium-Engineering representatives (in Russian with English translation)	2 August 2012
97.	R-94	Letter from Manolium-Engineering to Minsktrans (in Russian with English translation)	11 September 2012
98.	R-95	Letter from Minsktrans to MCEC (in Russian with English translation)	14 September 2012
99.	R-96	Letter from MCEC to Claimant (in Russian with English translation)	28 September 2012
100.	R-97	Minutes of a meeting on the implementation of an investment project by Claimant (in Russian with English translation)	5 December 2012
101.	R-98	Draft investment contract attached to the Letter from MCEC to Manolium-Engineering (in Russian with English translation)	10 December 2012
102.	R-99	Contract between MCEC and OOO Tekstur for the exercise of the right to design and construct a facility (in Russian with partial English translation)	13 December 2012
103.	R-100	Letter from Manolium-Engineering to MCEC with draft investment contract and draft supplemental agreement to the [investment] contract dated 6 June 2003 attached (in Russian with English translation)	18 December 2012
104.	R-101	Letter from MCEC to Manolium-Engineering (in Russian with English translation)	19 December 2012

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
105.	R-102	Statement of defense of Manolium-Engineering in case No. 399-3/2013 (in Russian with English translation)	2013
106.	R-103	Letter from Manolium-Engineering to MCEC with draft investment contract attached (in Russian with English translation)	10 January 2013
107.	R-104	Letter from Claimant to MCEC with draft investment contract and draft supplemental agreement to the [investment] contract dated 6 June 2003 attached (in Russian with English translation)	31 January 2013
108.	R-105	Letter from MCEC to Claimant and Manolium-Engineering (in Russian with English translation)	28 March 2013
109.	R-106	Letter from Manolium-Engineering to MCEC with draft supplemental agreement to the [investment] contract dated 6 June 2003 attached (in Russian with English translation)	3 April 2013
110.	R-107	Letter from MCEC to Manolium-Engineering (in Russian with English translation)	9 April 2013
111.	R-108	Letter from MCEC to Claimant (in Russian with English translation)	7 June 2013
112.	R-109	Letter from Claimant to the President of the Republic of Belarus (in Russian with English translation)	4 September 2013
113.	R-110	Ruling of the Court on commencement of settlement procedure and appointment of mediator (in Russian with English translation)	11 February 2014
114.	R-111	Demand of an officer of the Inspectorate of the Ministry of Taxes and Levies of the Republic of Belarus for the Central District of Minsk for 2013 (in Russian with English translation)	21 February 2014
115.	R-112	Demand of an officer of the Inspectorate of the Ministry of Taxes and Levies of the Republic of Belarus for the Central District of Minsk for 2014 (in Russian with English translation)	21 February 2014

<b>No.</b>	<b>Exhibit</b>	<b>Description</b>	<b>Date</b>
<b>Respondent's Factual Exhibits</b>			
116.	R-113	MCEC motion in case No. 399-3/2013 (in Russian with English translation)	3 April 2014
117.	R-114	Minsktrans motion in case No. 399-3/2013 (in Russian with English translation)	1 July 2014
118.	R-115	MCEC motion for conducting a valuation in case No. 399-3/2013 (in Russian with English translation)	9 July 2014
119.	R-116	MCEC motion for conducting an expert valuation in case No. 399-3/2013 and for suspending the proceedings in the case (in Russian with English translation)	28 July 2014
120.	R-117	Minutes of the court hearing in the case No. 399-3/2013 (in Russian with partial English translation)	30 July 2014
121.	R-118	Claimant's motion to the Economic Court of Minsk (in Russian with English translation)	29 August 2014
122.	R-119	Letter from Claimant to MCEC (in Russian with English translation)	8 January 2015
123.	R-120	Letter from Claimant to the Administration of the President of Belarus (in Russian with English translation)	8 January 2015
124.	R-121	Letter from MCEC to Claimant (in Russian with English translation)	20 January 2015
125.	R-122	Letter from Manolium-Engineering to Minsk City Agency for State Registration and Land Cadastre (in Russian with English translation)	24 February 2015
126.	R-123	Agreement between Manolium-Engineering and Minsk City Agency for State Registration and Land Cadastre for fee-based services to conduct a special construction and technical audit (in Russian with English translation)	25 February 2015
127.	R-124	Letter from Minsk City Agency for State Registration and Land Cadastre to MCEC (in Russian with English translation)	26 June 2015

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
128.	R-125	Letter from Manolium-Engineering to the President of the Republic of Belarus (in Russian with partial English translation)	30 June 2015
129.	R-126	Letter from State Property Committee of the Republic of Belarus to MCEC (in Russian with English translation)	9 July 2015
130.	R-127	Letter from Manolium-Engineering to the President of the Republic of Belarus (in Russian with English translation)	12 November 2015
131.	R-128	Resolution of the Prime-Minister regarding the Manolium-Engineering letter dated 12 November 2015 (in Russian with English translation)	23 November 2015
132.	R-129	Letter from MCEC to the Ministry of Economy of the Republic of Belarus (in Russian with English translation)	26 November 2015
133.	R-130	Letter from the Ministry of Economy of the Republic of Belarus to Manolium-Engineering (in Russian with English translation)	27 November 2015
134.	R-131	Letter from the Ministry of Economy of the Republic of Belarus to the Council of Ministers of the Republic of Belarus (in Russian with English translation)	27 November 2015
135.	R-132	Letter from MCEC to the Ministry of Architecture and Construction of the Republic of Belarus and the State Property Committee of the Republic of Belarus (in Russian with English translation)	2 December 2015
136.	R-133	Letter from MCEC to the Council of Ministers of the Republic of Belarus No. 1/2-18/5437 (in Russian with English translation)	8 December 2015
137.	R-134	Letter from the Ministry of Finance of the Republic of Belarus to MCEC No. 3-3-16/18558 (in Russian with English translation)	28 December 2015
138.	R-135	Letter from MCEC to the Council of Ministers of the Republic of Belarus (in Russian with English translation)	30 December 2015

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
139.	R-136	Minutes of the meeting on the valuation of the property of Manolium-Engineering (in Russian with English translation)	30 December 2015
140.	R-137	Instruction of the Council of Ministers of the Republic of Belarus No. 39/1078p (in Russian with English translation)	27 January 2016
141.	R-138	Letter from the Ministry of Architecture and Construction of the Republic of Belarus to the Ministry of Finance of the Republic of Belarus (in Russian with English translation)	2 February 2016
142.	R-139	Instruction of the Ministry of Finance of the Republic of Belarus No. 8 (in Russian with English translation)	3 February 2016
143.	R-140	Letter from MCEC to the Council of Ministers of the Republic of Belarus No. 1/2-11/1084-2 (in Russian with English translation)	29 February 2016
144.	R-141	Letter of the Inspectorate of the Ministry of taxes and levies of the Republic of Belarus for the Central District of Minsk to Manolium-Engineering (in Russian with English translation)	18 May 2016
145.	R-142	Letter of the Inspectorate of the Ministry of taxes and levies of the Republic of Belarus for the Central District of Minsk to Claimant (in Russian with English translation)	18 May 2016
146.	R-143	Letters from the Inspectorate of the Ministry of taxes and levies of the Republic of Belarus for the Central District of Minsk to Manolium-Engineering (in Russian with English translation)	21 June 2016
147.	R-144	Letters of the Inspectorate of the Ministry of taxes and levies of the Republic of Belarus for the Central District of Minsk to Manolium-Engineering (in Russian with English translation)	19 July 2016
148.	R-145	Minutes of the meeting (in Russian with partial English translation)	17 November 2016

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<b>Respondent's Factual Exhibits</b>			
149.	R-146	Resolution of the Inspectorate of the Ministry of taxes and levies of the Republic of Belarus for the Central District of Minsk to impose an administrative sanction on Manolium-Engineering (in Russian with partial English translation)	24 November 2016
150.	R-147	Statement of property inventory and evaluation (in Russian with English translation)	25 November 2016
151.	R-148	Deed of property transfer (in Russian with English translation)	27 January 2017
152.	R-149	Objections of the insolvency administrator to the Second Tax Audit Report (in Russian with English translation)	21 April 2017
153.	R-150	Claims of the Inspectorate of the Ministry of Taxes and Levies of the Republic of Belarus for the Minsk District to Manolium-Engineering (in Russian with English translation)	28 April 2017
154.	R-151	Letter from the Inspectorate of the Ministry of Taxes and Levies of the Republic of Belarus for the Minsk District to the insolvency administrator (in Russian with English translation)	2 May 2017
155.	R-152	Announcement of the auction in relation to the right for design and construction on the Investment Object land plot ( <a href="http://mgcn.by/auctions/place/00001621.html">http://mgcn.by/auctions/place/00001621.html</a> ) (in Russian with English translation)	12 September 2017
156.	R-153	Minutes of the results of public auction (in Russian with English translation)	12 September 2017
157.	R-154	Letter of the insolvency administrator of Manolium-Engineering to the Inspectorate of the Ministry of Taxes and Levies of the Republic of Belarus for the Minsk District (in Russian with English translation)	13 September 2017
158.	R-155	Letter from White & Case to Baker McKenzie (in English)	23 July 2018

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<b>Respondent's Factual Exhibits</b>			
159.	R-156	Letter from Baker McKenzie to White & Case (in English)	24 July 2018
160.	R-157	Letter from White & Case to Baker McKenzie (in English)	25 July 2018
161.	R-158	Letter from Baker McKenzie to White & Case (in English)	27 July 2018
162.	R-159	Breakdown of Manolium-Engineering's liabilities to the state as at 19 January 2017 (in Russian with English translation)	16 November 2018
163.	R-160	Cover page to the Act of the selection of a land plot location with Belgiprozem note (in Russian with English translation)	2009
164.	R-161	Letter from MCEC to the President of the Republic of Belarus (in Russian with partial English translation)	24 June 2003
165.	R-162	Claimant's Order No. 1-C on conducting a tender for preparation of drawings for the Depot project (in Russian with English translation)	5 January 2004
166.	R-163	Table of anticipated payments and costs to design, construct and reconstruct the Communal Facilities (in Russian with English translation)	February 2004
167.	R-164	" <i>Russian investor to transform the centre of Minsk</i> ", Belarusian business newspaper (in Russian with partial English translation)	10 September 2004
168.	R-165	Doing Business in 2006, creating jobs. // Available at: <a href="http://www.doingbusiness.org/content/dam/doingBusiness/media/Annual-Reports/English/DB06-FullReport.pdf">http://www.doingbusiness.org/content/dam/doingBusiness/media/Annual-Reports/English/DB06-FullReport.pdf</a> (in English)	13 September 2005
169.	R-166	Letter from Minsk Land Planning Service to RUP Belgiprozem and Manolium-Engineering (in Russian with English translation)	18 October 2005
170.	R-167	Letter from MCEC to the Claimant (in Russian with English translation)	7 February 2006

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<b>Respondent's Factual Exhibits</b>			
171.	R-168	Letter from the Administrative Office of the President of the Republic of Belarus to MCEC (in Russian with English translation)	29 March 2006
172.	R-169	Letter from the Claimant to MCEC (in Russian with English translation)	18 April 2006
173.	R-170	Comments of Manolium-Engineering with regards to the draft supplemental agreement to the Investment Contract (in Russian with English translation)	22 August 2006
174.	R-171	Letter from Manolium-Engineering to RUP Belgiprozem (in Russian with English translation)	13 February 2007
175.	R-172	" <i>Society is in favour</i> ", Vecherny Minsk (in Russian with partial English translation)	2 May 2007
176.	R-173	Agreement between Manolium-Engineering and SM ZAO Aresa-Service-Stroy No. 84/08 (in Russian with partial English translation)	17 January 2008
177.	R-174	Agreement between Manolium-Engineering and UP SSU-2 UDMSiB No. 9 (in Russian with partial English translation)	16 May 2008
178.	R-175	The Road and entrance to Ritm (Google Earth photograph with annotations in English)	13 July 2008
179.	R-176	Minsktrans Charter (in Russian with English translation)	19 March 2009
180.	R-177	Letter from ABM Amper to Manolium-Engineering (in Russian with English translation)	30 March 2009
181.	R-178	Agreement between Manolium-Engineering and OOO Profpartner dated 29 January 2009 No. 2/01, extended by Additional Agreement No. 1 (in Russian with partial English translation)	1 June 2009
182.	R-179	Agreement between Manolium-Engineering and ODO Teplosreda No. 18/08-09 (in Russian with partial English translation)	18 August 2009



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<b>Respondent's Factual Exhibits</b>			
183.	R-180	Agreement between Manolium-Engineering and ChUP LegoService dated 5 July 2007 No. 36/07-TN, extended by Additional Agreement No. 2 (in Russian with partial English translation)	30 September 2009
184.	R-181	Application of Manolium-Engineering to Gosstroy (in Russian with English translation)	5 January 2010
185.	R-182	Agreement between Manolium-Engineering and UP Monolittransstroy No. 2/10 (in Russian with partial English translation)	5 April 2010
186.	R-183	Agreement between Manolium-Engineering and OOO Vogez-Spetsnaladka No. 27 (in Russian with partial English translation)	28 May 2010
187.	R-184	Agreement between Manolium-Engineering and ZAO Electroservicestroy (in Russian with partial English translation)	21 July 2010
188.	R-185	Letter from Minsktrans to MCEC (in Russian with English translation)	14 October 2010
189.	R-186	Application of Manolium-Engineering to Gosstroy (in Russian with English translation)	29 October 2010
190.	R-187	Agreement between Manolium-Engineering and OAO Promtekhmontazh dated 28 April 2010 No. 20/10, extended by Additional Agreement No. 1 (in Russian with partial English translation)	30 December 2010
191.	R-188	Letter from Minsktrans to Manolium-Engineering (in Russian with English translation)	30 December 2010
192.	R-189	Act of inspection of the Pull Station (in Russian with English translation)	6 January 2011
193.	R-190	Act of inspection of the Pull Station (in Russian with English translation)	15 February 2011
194.	R-191	Letter from the chief engineer of Minsktrans' branch to the director of Minsktrans (in Russian with English translation)	23 August 2011

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<b>Respondent's Factual Exhibits</b>			
195.	R-192	Letter from the director of Minsktrans' branch to the director of Minsktrans (in Russian with English translation)	30 August 2011
196.	R-193	Investment Contract between MCEC and Tekstur (in Russian with partial English translation)	8 September 2011
197.	R-194	Letter from Minsktrans to Manolium-Engineering (in Russian with English translation)	20 September 2011
198.	R-195	Decision of MCEC No. 3212 (in Russian with English translation)	26 October 2011
199.	R-196	Letter from the Administrative Office of the President of the Republic of Belarus to MCEC (in Russian with English translation)	10 May 2012
200.	R-197	Letter from Manolium-Engineering to MCEC (in Russian with English translation)	8 November 2012
201.	R-198	Letter from Manolium-Engineering to MCEC (in Russian with English translation)	20 November 2012
202.	R-199	List of works performed, which deviated from the Design Specification and Estimate Documentation, dated 30 November 2012 and submitted by Minsktrans in the course of the Termination Proceedings (in Russian with partial English translation)	30 November 2012
203.	R-200	Doing Business in 2014. Understanding Regulations for Small and Medium-Size Enterprises // Available at <a href="https://openknowledge.worldbank.org/bitstream/handle/10986/16204/19984.pdf">https://openknowledge.worldbank.org/bitstream/handle/10986/16204/19984.pdf</a> (in English)	29 October 2013
204.	R-201	Statement of claim (in Russian with English translation)	12 November 2013
205.	R-202	Internal Memorandum of Ms [REDACTED] to Mr Dolgov (in Russian with partial English translation)	20 February 2014
206.	R-203	Motion of the Registration and Cadastre Agency to the Economic Court of Minsk (in Russian with English translation)	14 August 2014

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
207.	R-204	Letter from the Economic Court of Minsk to the Claimant and Manolium-Engineering (in Russian with English translation)	21 August 2014
208.	R-205	Amendment No. 1 between Tekstur and MCEC to Contract No. 427-D between Tekstur and MCEC for the exercise of the right to design and construct a facility dated 13 December 2012 (in Russian with English translation)	7 October 2014
209.	R-206	Letter from the Administrative Office of the President of the Republic of Belarus to the State Control Committee (in Russian with English translation)	17 August 2015
210.	R-207	Letter from the State Control Committee to MCEC (in Russian with English translation)	27 August 2015
211.	R-208	Doing Business in 2016. Measuring Regulatory Quality and Efficiency // Available at <a href="http://www.doingbusiness.org/content/dam/doingBusiness/media/Annual-Reports/English/DB16-Full-Report.pdf">http://www.doingbusiness.org/content/dam/doingBusiness/media/Annual-Reports/English/DB16-Full-Report.pdf</a> (in English)	27 October 2015
212.	R-209	Power of Attorney (in Russian with English translation)	9 August 2016
213.	R-210	Application to familiarise with case file (in Russian with English translation)	5 September 2016
214.	R-211	Minutes of the court hearing in relation to the case No. 40-5/B/2017 (in Russian with partial English translation)	1 – 8 February 2017
215.	R-212	Order of Minsktrans' director (in Russian with English translation)	13 February 2017
216.	R-213	Letter from the Architecture Committee to Minsktrans (in Russian with English translation)	14 February 2017
217.	R-214	Letter from Minsktrans to MCEC (in Russian with English translation)	2 March 2017
218.	R-215	Letter from MCEC to UP Zemproject and Minsktrans (in Russian with English translation)	30 March 2017

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
219.	R-216	Letter from UP Zemproject to MCEC received on 22 June 2017 (in Russian with English translation)	22 June 2017
220.	R-217	Decision of MCEC No. 2536 (in Russian with English translation)	27 July 2017
221.	R-218	Decision of MCEC No. 3440 (in Russian with English translation)	12 October 2017
222.	R-219	Letter from Belpromstroyproject to Minsktrans (in Russian with English translation)	23 January 2018
223.	R-220	The official exchange rate of the Belarusian Ruble against US dollar of the National Bank of Belarus for 1 February 2018 // Available at: <a href="http://www.nbrb.by/eng/statistics/rates/ratesDaily.asp">http://www.nbrb.by/eng/statistics/rates/ratesDaily.asp</a> (in English)	1 February 2018
224.	R-221	Excerpts from the Expert Approval of the Design Specification and Estimate Documentation for completion of the Depot (in Russian with partial English translation)	15 June 2018
225.	R-222	List of defects with the Depot as at 31 January 2017 in Minsktrans' note (in Russian with English translation)	19 June 2018
226.	R-223	Decision of MCEC No. 2265 (in Russian with partial English translation)	19 July 2018
227.	R-224	Extract from the Unified State Register of Legal Entities and Individual Entrepreneurs concerning Centrobeton (in Russian with English translation)	3 August 2018
228.	R-225	Letter from the Architecture and Construction and the State Property Committee to Centrobeton and OOO Project-M (in Russian with English translation)	30 August 2018
229.	R-226	Notice from Gosstroy to Minsktrans (in Russian with English translation)	2 October 2018
230.	R-227	Internal Order of Minsktrans No. 633 (in Russian with English translation)	1 November 2018
231.	R-228	Decision of MCEC No. 786 (in Russian with partial English translation)	21 March 2019

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
232.	R-229	Letter from White & Case to Baker McKenzie (in English)	22 March 2019
233.	R-230	Email from Baker McKenzie to White & Case (in English)	9 April 2019
234.	R-231	Email from Baker McKenzie to White & Case (in English)	30 April 2019
235.	R-232	<i>World Bank website, Government Effectiveness</i> // Available at: <a href="http://info.worldbank.org/governance/wgi/index.aspx#home">http://info.worldbank.org/governance/wgi/index.aspx#home</a> (in English)	22 May 2019
236.	R-233	<i>World Bank website, Regulatory Quality</i> // Available at: <a href="http://info.worldbank.org/governance/wgi/index.aspx#home">http://info.worldbank.org/governance/wgi/index.aspx#home</a> (in English)	22 May 2019
237.	R-234	Article about Mikhail Pavlov (politician), Wikipedia // Available at: <a href="https://en.wikipedia.org/wiki/Mikhail_Pavlov_(politician)">https://en.wikipedia.org/wiki/Mikhail_Pavlov_(politician)</a> (in English)	29 May 2019
238.	R-235	Historical photos of the Depot together with the properties of the files (photographs with annotations in English)	N/A
239.	R-236	Manolium's announcement re tender for the Depot's design // Available at: <a href="http://www.gostorgi.ru/2004/b28/b28-24972.xml">http://www.gostorgi.ru/2004/b28/b28-24972.xml</a> (in Russian with English translation)	2004
240.	R-237	Note justifying a draft decision of MCEC (in Russian with partial English translation)	N/A
241.	R-238	Properties of the attached Excel files to the email from a certain "Vladimir" to Mr Dolgov (TT-77) (in English)	N/A
242.	R-239	Redline between Appeal of Manolium-Engineering dated 9 October 2014 and Cassation appeal of Manolium-Engineering dated 29 November 2014 (in English)	N/A

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
243.	R-240	Redline between Manolium Engineering's Statement of Defence regarding case No. 399-3/2013 and Appeal of Manolium-Engineering dated 9 October 2014 (in English)	N/A
244.	R-241	Tables with daily exchange rates for 2004 – 2006 with the Respondent's calculation of the average annual rates (in English)	N/A
245.	R-242	Order of the President of Belarus (in Russian with English translation)	20 January 2017
246.	R-243	Instruction of the Council of Ministers of the Republic of Belarus No. 39/105-74/1691r (in Russian with English translation)	9 February 2016
247.	R-244	Instruction of the Administrative Office of the President of the Republic of Belarus No. 09/124-185 (in Russian with English translation)	5 February 2016
248.	R-245	Resolution of the President of the Republic of Belarus No. 09/219 (in Russian with English translation)	26 December 2014
249.	R-246	Internal memorandum to the President of the Republic of Belarus No. 09/219 (extract) (in Russian with English translation)	10 December 2014
250.	R-247	Letter from the Claimant to the President of the Republic of Belarus (in Russian with English translation)	19 September 2014
251.	R-248	Draft report to the Administration of the President of the Republic of Belarus (appended to the letter from MCEC to the Council of Ministers of the Republic of Belarus No. 1/2-11/1084-2 dated 29 February 2016)	N/A
252.	R-249	Instruction of the President of the Republic of Belarus No. 09/111- 123 (in Russian with English translation)	12 May 2014
253.	R-250	National Bank BYN : US\$ exchange rate (January 2017)	2017
254.	R-251	Land tax liabilities of Manolium-Engineering by year	N/A

No.	Exhibit	Description	Date
<b>Respondent's Factual Exhibits</b>			
255.	R-252	National Bank of Belarus rate vs LIBOR (2017 – 2019)	N/A
256.	R-253	Central Russian Bank rate vs LIBOR (2018 – 2019)	N/A