

**IN THE MATTER OF INVESTMENT DISPUTE UNDER THE AGREEMENT
BETWEEN CANADA AND THE REPUBLIC OF SERBIA FOR THE PROMOTION
AND PROTECTION OF INVESTMENTS AND UNDER THE AGREEMENT
BETWEEN SERBIA AND MONTENEGRO AND THE REPUBLIC OF CYPRUS
ON RECIPROCAL PROMOTION AND PROTECTION OF INVESTMENTS**

**RAND INVESTMENTS LTD., WILLIAM ARCHIBALD RAND, KATHLEEN
ELIZABETH RAND, ALLISON RUTH RAND AND ROBERT HARRY LEANDER
RAND (CANADA)**

AND

**SEMBI INVESTMENT LIMITED
(CYPRUS)**

CLAIMANTS

– V –

THE REPUBLIC OF SERBIA

RESPONDENT

CONSOLIDATED LIST OF DOCUMENTS

6 March 2020

Prof. Gabrielle Kaufmann-Kohler
Mr. Baiju S. Vasani
Prof. Marcelo Kohen

SQUIRE 
PATTON BOGGS

CLAIMANT'S SUBMISSIONS		
Document No.	Description	Date
-	Notice of Dispute	4 August 2017
-	Request for Arbitration	9 February 2018
-	Memorial	16 January 2019
-	Reply	4 October 2019
	Rejoinder on Jurisdiction	6 March 2020
WITNESS STATEMENTS		
Witness statements submitted with the Request for Arbitration		
Document No.	Description	Date
-	First witness statement of Igor Markicevic	5 February 2018
-	First witness statement of William Rand	5 February 2018
-	First witness statement of Djura Obradovic	20 September 2017
-	First witness statement of Erinn Broshko	5 February 2018
Witness statements submitted with the Memorial		
-	Second witness statement of Igor Markicevic	16 January 2019
-	Second witness statement of Erinn Broshko	16 January 2019
-	First witness statement of Aksel Azrac	16 January 2019
Witness statements submitted with the Reply		
-	First Witness Statement of Robert Jennings	3 October 2019
-	Second Witness Statement of William Rand	3 October 2019
-	Second Witness Statement of Djura Obradović	3 October 2019
-	Third Witness Statement of Erinn Broshko	3 October 2019
-	Third Witness Statement of Igor Markićević	3 October 2019
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-	Third Witness Statement of William Rand	3 October 2019
-	Third Witness Statement of Djura Obradović	3 October 2019
-	Fourth Witness Statement of Erinn Broshko	3 October 2019
-	Fourth Witness Statement of Igor Markićević	3 October 2019
EXPERT REPORTS		
Expert reports submitted with the Memorial		
Document No.	Description	Date
-	First expert report of Miloš V. Milošević	16 January 2019
-	First expert report of Dr. Richard Hern	16 January 2019
-	First expert report of Agis Georgiades	16 January 2019
Expert reports submitted with the Reply		
-	First expert report of Bojana Tomić Brkušaniin	3 October 2019
-	First expert report of Krzysztof Grzesik	3 October 2019
-	First expert report of Robert J.C. Deane	3 October 2019
-	First expert report of Uglješa Grušić	3 October 2019
-	Second expert report of Miloš V. Milošević	3 October 2019
-	Second expert report of Agis Georgiades	3 October 2019
-	Second expert report of Richard Herrn	3 October 2019
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FACTUAL EXHIBITS		
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CE-1	Powers of Attorney issued by the Investors to Mr. Rostislav Pekař from Squire Patton Boggs s.r.o. and to Mr. Nenad Stanković and Ms. Sara Pendjer from Stankovic & partners law office	June 2017
CE-2	Copy of Canadian passport issued to Mr. William Archibald Rand	18 May 2017
CE-3	Statement of the Serbian Business Register Agency on the ownership of Marine Drive Holding d.o.o.	2 June 2017
CE-4	Register of Shareholders of Marine Drive Holdings Inc.	3 June 2009
CE-5	Register of Members of Rand Edgar Investment Corp.	31 July 2017
CE-6	Certificate of Shareholders of Sembi	8 June 2017
CE-7	Instructions Letter from Rand Investments to HLB Axfentiou Limited	31 December 2007
CE-8	The Ahola Family Trust Indenture	6 March 1995
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CE-10	Copy of Canadian passport issued to Ms. Kathleen Elizabeth Rand	27 January 2017
CE-11	Copy of Canadian passport issued to Ms. Allison Ruth Rand	26 August 2011
CE-12	Copy of Canadian passport issued to Mr. Robert Harry Leander Rand	25 August 2011
CE-13	E-mail from Mr. Ljubiša Jovanović to Mr. William Rand	16 May 2005
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CE-19	Confirmation of the Privatization Agency on the Buyer's Full Payment of the Purchase Price	6 January 2012
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CE-21	Confirmation of wire transfer from William Rand to Wiljill Farms Inc. for CAD 175,000.00 executed on 3 April 2008; Confirmation of wire transfer from William Rand to Wiljill Farms Inc. for CAD 607, 759.00 executed on 21 October 2008; Confirmation of wire transfer from William Rand to Wiljill Farms Inc. for CAD 199,816.00 executed on 22 December 2008; Confirmation of wire transfer from William Rand to Wiljill Farms Inc. for CAD 460,216.00 executed on 24 December 2008	2008
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CE-27	News Article “ <i>Record Holding Farmer’s day</i> ”	5 March 2012
CE-28	Agreement between Mr. Djura Obradović, The Lundin Family, Mr. William Rand and Sembi	22 February 2008
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CE-33	Letter from the Ministry of Economy to the Privatization Agency	30 May 2012
CE-34	Legal Opinion on the Privatization Agency’s Recommendation for Termination of the Agreement on Sale of Socially Owned Capital of the Subject of Privatization, “PPK Buducnost” from Dobanovci (now “BD AGRO a.d.”), through Public Auction	11 June 2013
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CE-47	Letter from Privatization Agency to BD Agro	20 July 2015
CE-48	Letter from Mr. Djura Obradović to Privatization Agency	8 September 2015
CE-49	Excerpt from the Judgment of the Commercial Appellate Court Pz. 11202/2010	21 September 2011
CE-50	Notice on Termination of the Privatization Agreement	28 September 2015
CE-51	Audit Report from Konsultant – revizija	10 March 2006
CE-52	Audit Report from Konsultant – revizija	9 June 2006
CE-53	Extract from the Company Register regarding Sembi	7 June 2017
CE-54	Certificate of Registered Office of Sembi	8 June 2017
CE-55	Law on Default Interest Rate, Official Gazette of the Republic of Serbia No. 119/2012	2012
Factual exhibits submitted with the Request for Arbitration		
CE-56	Central Securities Register of Indonesian Developments Co. Ltd.	2018
CE-57	Confirmation of wire transfer from Sembi to Mr. Ian Lundin for EUR 1,200,000.00	16 July 2008
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CE-62	Overview of Payments to Mr. David Wood	April 2013- January 2014
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CE-65	Wikipedia, Ian Lundin	2018
CE-66	Lundin Group Info Summary 2016	16 September 2016
CE-67	Agreement for Consulting Services	1 April 2013
CE-68	Overview of Payments to Mr. Gligor Calin	May 2013 – January 2015
CE-69	Rand Investments' Bank Account Statements from May 2013 to January 2015	May 2013 – January 2015
CE-70	E-mail from Ms. Neda Galić to Mr. Erinn Broshko	9 November 2014
CE-71	Law on Companies, Official Gazette of the Republic of Serbia Nos. 36/2011 and 99/2011, Article 396	2011
CE-72	Confirmation of the Serbian Business Register Agency on the Members of Management Board and Board of Directors of BD Agro	23 August 2017
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CE-94	Waiver of Mr. Robert Harry Leander Rand's right to initiate or continue parallel proceedings	26 January 2018
CE-95	Waiver of Mr. William Rand's right to initiate or continue parallel proceedings	26 January 2018
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CE-97	Notice of the Privatization Agency on Additional Time Period	6 October 2011
CE-98	Report of Ministry of Economy on the Control over the Privatization Agency	7 April 2015
CE-99	News Article "Human rights situation "unsatisfactory" – ombudsman"	15 April 2015
CE-100	News Article "Ombudsman Jankovic announces presidential bid"	26 December 2016
CE-101	Amendment to the Pre-pack Reorganization Plan of BD Agro	6 March 2015
CE-102	EUR/RSD Exchange Rate Table	2018
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CE-106	Wikipedia, Mr. Saša Janković	2018
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CE-109	Decision of the Commercial Court in Belgrade on opening bankruptcy proceedings over BD Agro	30 August 2016
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CE-118	Confirmations of receipt of Claimants' Notice of Dispute 2017 by the Public Attorney of the Republic of Serbia, the Office of the President of the Republic of Serbia, the Government of the Republic of Serbia and Ministry of Economy	8 August 2017
Factual exhibits submitted with the Memorial		
CE-119	A. Alexandropoulou, <i>European Company Law</i> (Athens: 2015, N. Vivliothiki)	2015
CE-120	Cyprus Companies Law	2018
CE-121	<i>Albatros</i> [1994] 4B A.A.D. 756	12 April 1994
CE-122	<i>Bank of Cyprus</i> [1999] 1B A.A.D. 1010	25 June 1999
CE-123	<i>Karakannas v. Republic</i> [2002] 3 A.A.D. 456	27 June 2002
CE-124	<i>Sartas v. Maroulli</i> [2003] 1C A.A.D. 1446	23 October 2003
CE-125	<i>Lapertas v. Zarvou</i> [2004] 1B A.A.D. 1261	5 July 2004
CE-126	<i>Omas (Cyprus) v. Republic</i> , Judicial Review Application No.906/03	9 September 2005
CE-127	<i>Thoma v. Eliadi</i> [2006] 1B A.A.D. 1263	24 November 2006
CE-128	<i>Investylia v. Tampouri</i> [2006] 1B A.A.D. 1325	15 December 2006
CE-129	<i>Saveriades</i> [2010] 1B A.A.D. 1401	11 August 2010
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CE-135	Electronic register of the Company Registry, entry for HLB Cyprus Limited	16 January 2019
CE-136	Commercial Court in Belgrade Decision number 9. St-321/2015, Decision on the List of Determined and Contested Claims	30 March 2018
CE-137	National Bank of Serbia Website - Exchange Rate EUR to RSD (2019), https://www.nbs.rs/internet/english/	11 January 2019
CE-138	Hern Analysis.xlsx	2019
CE-139	Kantor M., Valuation for Arbitration – Compensation Standards, Valuation Methods, and Expert Evidence, Wolters Kluwer	2008
CE-140	BD Agro AD Dobanovci Original Financial Statements for 2015	31 December 2015
CE-141	BD Agro Dobanovci, Minutes from the regular annual Shareholders' Meeting of BD Agro AD Dobanovci	8 July 2016
CE-142	Report on the valuation of assets, liabilities and capital of BD Agro Dobanovci	December 2015
CE-143	General Regulation Plan for the BD Agro Complex Zones A, B and C in the Suburb of Dobanovci, Municipality of Surčin	31 December 2008
CE-144	Purchase agreement between BD Agro and Hypo Park	11 June 2008
CE-145	Purchase agreement between BD Agro and Eko Elektrofrigo	27 October 2008
CE-146	Purchase agreement between BD Agro and Trajan	12 November 2009
CE-147	Official Gazette of the City of Belgrade Year LII Number 9, Spatial Plan of the City Municipality of Surčin	16 April 2008
CE-148	Spatial plan for part of the city municipality of Surčin	9 March 2012
CE-149	Spatial plan for the city municipality of Surčin, Settlement and Traffic Routes, Topographic Map 2a	February 2012
CE-150	European route E70, Wikipedia	10 January 2019
CE-151	Official Gazette of the City of Belgrade Year LVIII Number 82, Amendments and Supplements to the Program for Development and Lease of Development Land for the Year 2014	31 October 2014
CE-152	City of Belgrade - Belgrade City Administration - Secretariat for Utilities and Housing Services, Confirmation Letter	2 June 2017
CE-153	Expropriation Agreements between Belgrade Construction and Land Directorate P.E	2011 and 2012
CE-154	City Municipality of Surcin - Administration of the City Municipality - Department for property-legal, housing and legal aid matters, Decision no.465-310/2017 on the proposal of the Belgrade Construction and Land Directorate P.E	4 December 2017
CE-155	Lamda Development, Annual Report 2008	2008
CE-156	Lamda Development, Annual Report 2009	2009
CE-157	Singidunum-Buildings d.o.o. Beograd, Notes to the Financial Statements	28 February 2012

CE-158	Tax Administration Branch B Stara Pazova, Number 235-464-08-00090/2016-J2B02, Delivery on Information Request	23 December 2016
CE-159	Tax Administration Zemun Branch (17 March 2016), Number 021-464-08-00029/2016-I1A02, Delivery of information on market value of immovable, your reference number 9268/6-5	12 February 2016
CE-160	Tax Administration Zemun Branch (8 June 2016), Number 021-464-08-00029-1/2016-I1A02, Delivery of of information on market value of immovable your reference number 32381/6-05	25 May 2016
CE-161	Tax Administration Zemun Branch (24 August 2016), Number 021-464-08-00125/2016-I1A02, Delivery of of information on market value of immovable your reference number 47336/6-05	28 July 2016
CE-162	Tax Administration Head Office (26 March 2013), Number 000-464-08-00139-1/2013-D0018, Comparables for valuation of market value of immovable - Reference: your request	19 February 2013
CE-163	Tax Administration Zemun Branch, Number 021-4364-61/2014, Valuation of market value of immovable	5 August 2014
CE-164	Municipality of Stara Pazova, Invest in Pazova!, http://www.investinpazova.com/	11 January 2019
CE-165	Wikipedia website European Route E75 (2019), https://en.wikipedia.org/wiki/European_route_E75	10 January 2019
CE-166	Official Gazette of the City of Belgrade Year LIX Number 70, Decision on Determining the Amount of Average Price of Square Meter of Appropriate Immovable for Zones in the Territory of the City of Belgrade for the Purpose of Determining Property Tax for the Year 2016	30 November 2015
CE-167	"Official Gazette of RS" no. 26/2011, "Official Gazette of SRJ", no.42/2002 – Federal Constitutional Court Decision and "Official Gazette of RS", no. 80/2003 – other law, 135/2004, 61/2007, 5/2009, 101/2010, 24/2011, 78/2001, 57/2012 – Constitutional Court Decision, 47/ 2013 and 68/2014 – other law (2014), Law on Property Taxes	2014
CE-168	"Official Gazette of the City of Belgrade", no. 55/2013, 87/2014 and 69/2015 (2015), Decision on Determining the Zones and most Equipped Zones in the Territory of the City of Belgrade for the Purpose of Determining Property Tax	2015
CE-169	Letter from the Privatization Agency to BD Agro	9 November 2015
CE-170	Email communication between I. Markićević and R. Knežević titled Offers for valuation of capital	18 November 2015
CE-171	Notes to 2015 financial statements	2015
CE-172	Confineks d.o.o. Beograd, Report on the Valuation of Assets, Liabilities and Capital of BD Agro AD Dobanovci	January 2016
CE-173	BD Agro AD Dobanovci, Notes to the Financial Statements for Year 2016	2016
CE-174	BD Agro AD Dobanovci, Notes to the Financial Statements for Year 2017	2017

CE-175	Report on the valuation of the market value of construction land in the BD Agro complex Zones A, B and C in the town of Dobanovci	December 2014
CE-176	Jones Lang LaSalle d.o.o., Report on the Valuation of Immovable Property of BD Agro, located in Dobanovci, Serbia	February 2015
CE-177	Commercial Court in Belgrade Case number 1.St-321/2016, Report by the Bankruptcy Trustee on Bankruptcy Proceeding and Bankruptcy Estate for the period August 31, 2016 to September 30, 2016	2 March 2017
CE-178	WM Equity Partners, Financial consolidation plan BD Agro ad, Dobanovci	February 2011
CE-179	Law on Agricultural land (Official Gazette of the Republic of Serbia no. 62/2006, 65/2008 – other law and 41/2009)	2009
CE-180	Official Gazette of SRS no. 32/68, 17/69 – corr., 29/69, 19/71, 16/72, 24/73 and 39/73, Law on Determination of Development Land in Cities and Settlements having the Character of Cities	1973
CE-181	Department for Agriculture of the Secretariat for Economy of the City Administration of the City of Belgrade, Decision VIII-07 NUMBER 32-43/12	22 March 2012
CE-182	Serbian Cadaster Website (2019), http://katastar.rgz.gov.rs/RegistarCenaNepokretnosti/	11 January 2019
CE-183	Purchase Agreement between BD Agro AD Dobanovci and Galenika Fitofarmacija AD for land located in Bečmen	12 February 2013
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CE-186	Geodetic Authority of the Republic of Serbia website (2018), Data from Real Estate Cadaster, katastar.rgz.gov.rs/KnWebPublic	5 December 2018
CE-187	Offer for the irrigation system	25 June 2014
CE-188	KPMG Corporate Tax Rates Table (2019), https://home.kpmg/vn/en/home/services/tax/tax-tools-and-resources/tax-rates-online/corporate-tax-rates-table.html	11 January 2019
CE-189	Resolution of the sole shareholder	25 June 2008
CE-190	Minutes of a meeting of the Board of Directors of Sembi	5 June 2008
CE-191	Minutes of a meeting of the Board of Directors of Sembi	12 October 2010
CE-192	Law on Default Interest	25 December 2012
CE-193	National Bank of Serbia Website, Historical Data of Default Interest Rates Spreadsheet (2019), NBS website - http://www.nbs.rs/static/nbs_site/gen/latinica/30/zatezne_kamate_arhiva.xls	11 January 2019
CE-194	Bloomberg, 6 Month Euribor Index	2019
CE-195	Graham and Harvey, The Theory and Practice of Corporate Finance: Evidence from the Field, Journal of Financial Economics	2001

CE-196	UK Competition and Markets Authority (then Competition Commission) (2014), "NIE Limited price determination", p.13-16 and 13-27	26 March 2014
CE-197	Dimson, Marsh, Staunton, Global Investment Returns Yearbook, Credit Suisse Research Institute	February 2015
CE-198	Brealey, Myers, Allen, "Principles of Corporate Finance", McGraw-Hill, 10th ed.	2011
CE-199	Bloomberg, BD Agro Listing	2019
CE-200	Bloomberg, Trading Volume of BD Agro	2019
CE-201	Damodaran, A, Investment Valuation: tools and techniques for determining the value of any asset	2012
CE-202	Damodaran, http://people.stern.nyu.edu/adamodar/New_Home_Page/dataarchived.html , Levered and Unlevered Betas by Industry - Emerging Markets	2015
CE-203	Damodaran, http://people.stern.nyu.edu/adamodar/New_Home_Page/dataarchived.html , Risk Premiums for Other Markets	2015
CE-204	World Economic Outlook (WEO) Database – Inflation, average consumer prices	October 2015
CE-205	Factset, iBoxx data on Corporate Yields	2018
CE-206	Decision of the Ministry of Economy	23 December 2013
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CE-208	Letter from Dj. Obradović to the Privatization Agency	13 February 2012
CE-209	Article 4 of the 1953 Constitutional Law on the Fundamentals of Social-Political Organization of the FPRY	1953
CE-210	Article 13 of the 1974 Constitution	1974
CE-211	Articles 2 and 3 of the 1976 Law on Associated Labor	1976
CE-212	J. Barbić, <i>Jugoslovenska preduzeće od udruživanja rada do povratka kapitalu</i> [in English: <i>The Yugoslav Enterprise: From Associated Labor Towards Return to Capital</i>]	1990
CE-213	V. Besarević, <i>Deregulacija viših oblika privredne saradnje sa inostranstvom</i> [in English: <i>Deregulation of Advanced Forms of International Economic Cooperation</i>]	1990
CE-214	Articles 2 and 196 of the 1988 Law on Enterprises	1988
CE-215	M. Kosovac, B. Grahovac, Lj. Radosavljević, <i>Zakon o preduzećima s komentarom</i> [in English: <i>Law on Enterprises with Commentary</i>]	1989
CE-216	1990 amendments to the 1988 Law on Enterprises	1990
CE-217	M. Vasiljević, <i>Trgovinsko pravo</i> [in English: <i>Commercial Law</i>]	1992
CE-218	Articles 55, 59 and 94 of the 1990 Constitution	1990
CE-219	Article 14 of the 2001 Law on Privatization	2001
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CE-238	Articles 2, 5, 6, 9, 10, 11, 12, 15, 15a, 15b and 18 of the 2001 Law on Privatization Agency	2016
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CE-246	Article 1, 2, 5, 6, 23 and 24 of the 2001 Law on Share Fund	2005
CE-247	Articles 12 and 13 of the 2010 amendments to the 2001 Law on Privatization Agency	2010
CE-248	Articles 5, 190 and 260 of the 2002 Law on the Market of Securities and Other Financial Instruments	2005
CE-249	Article 53 of the 2006 Business Rules of Central Register, Clearing and Depository of Securities	Until 2010
CE-250	Articles 35, 53, 104, and 105 of the 2006 Business Rules of Central Register, Clearing and Depository of Securities	After 2010
CE-251	Articles 11, 132, 451, 997 and 1005 of the 1978 Law on Obligations	2019

CE-252	<i>Uniworl d v. Privatization Agency and Srbija-Turist A.D.</i> , ICC Case No. 14361/AVH/CCO/JRF/GZ, Award	30 May 2011
CE-253	Judgment of the Supreme Court of Cassation of the Republic Serbia, Prev 104/2013	19 June 2014
CE-254	Article 56 of the 2015 Business Rules of Central Securities Depository	2015
CE-255	Extract from the CSD and Clearing House showing current shareholders' structure of BD Agro	11 January 2019
CE-256	Article 249 of the 2011 Company Law	2015
CE-257	Excerpt from the decision of the Supreme Court of Serbia, U. 207/2006	20 June 2007
CE-258	Articles 4 and 6 of the 2009 Law on Administrative Disputes	2019
CE-259	British Columbia Income Tax Act	-
CE-260	Excerpt from the Decision of the Supreme Court of Serbia, U.2263/2006	10 July 2006
CE-261	Decision of the Administrative Court, U 4421/13	25 April 2013
CE-262	Email from I. Markićević to Marine Drive Holdings	15 January 2013
CE-263	Email from I. Markićević to W. Rand and D. Wood	28 July 2013
CE-264	Email from I. Markićević to W. Rand	30 September 2013
CE-265	Email from I. Markićević to W. Rand	7 October 2013
CE-266	Email from I. Markićević to W. Rand and E. Broshko	16 November 2013
CE-267	Consolidated Financial Statements	31 December 2012
CE-268	Confirmation from Serbian National Bank	29 November 2018
CE-269	Letter from BD Agro to the Privatization Agency	12 December 2012
CE-270	PKB Korporacija's website	26 November 2018
CE-271	Email from I. Markićević to D. Wood and E. Broshko	12 December 2013
CE-272	List of documents requested by the Privatization Agency	11 June 2013
CE-273	Letter from D. Obradović to the Privatization Agency	1 August 2013
CE-274	Agreement on Assignment of Agreement on Sale of Socially Owned Capital Through Public Auction between Djura Obradović and Coropi Holdings Limited	21 September 2013
CE-275	Letter from Coropi Holdings Ltd to the Privatization Agency	26 September 2013
CE-276	Email from I. Markićević to W. Rand	3 September 2013

CE-277	Email from I. Markićević to B. Bogdan	23 September 2013
CE-278	Email from W. Rand to M. Bogićević and I. Markićević	27 September 2013
CE-279	Email from I. Markićević to S. Živanović	6 October 2013
CE-280	Email from I. Markićević to E. Broshko	28 November 2013
CE-281	Email from I. Markićević to E. Broshko	18 November 2013
CE-282	Draft term sheet for joint venture for the establishment and management of dairy in Dobanovci	January 2014
CE-283	Email from I. Markićević to Remax	6 March 2014
CE-284	Email from I. Markićević to Remax	23 January 2014
CE-285	Email from Bigadan to I. Markićević	26 August 2013
CE-286	Email communication between Mr. Rand and Bigadan	September-October 2013
CE-287	Email from I. Markićević to Bigadan	17 October 2013
CE-288	Email communication between I. Markićević and Nova Agrobanka	12-28 March 2014
CE-289	Email from I. Markićević to M. Ristović (Deposit Insurance Agency)	22 April 2014
CE-290	Email from I. Markićević to Nova Agrobanka	10 November 2014
CE-291	Email from I. Markićević to Nova Agrobanka	25 November 2014
CE-292	Email from I. Markićević to Nova Agrobanka	10 March 2015
CE-293	Email communication between I. Markićević and Nova Agrobanka	26 January 2015
CE-294	Nova Agrobanka's submission to Commercial Court Belgrade	26 March 2015
CE-295	Email from K. Lutz to P. Djurišić attaching letter from Mr. Rand	2 June 2013
CE-296	Email from I. Markićević to P. Djurišić	11 December 2013
CE-297	Email from I. Markićević to Banca Intesa	28 March 2014
CE-298	Email from I. Markićević to Banca Intesa	10 November 2014
CE-299	M. Škrbić, <i>Largest dairy producers will continue to raise their prices until year end</i> , Blic	15 December 2011
CE-300	Email from I. Markićević to Imlek	19 December 2013
CE-301	Email communication between I. Markićević and Imlek	12-28 March 2014

CE-302	Email communication between I. Markićević and Imlek	28 May-2 June 2014
CE-303	Email communication between I. Markićević and Imlek	10-25 November 2014
CE-304	Email communication between I. Markićević, D. Barona and E. Broshko	31 March-17 April 2014
CE-305	Email from I. Markićević to N. Dragan	25 November 2014
CE-306	L. Malešević, <i>Privatization Agency officially winds up</i> , Dnevnik	20 December 2015
CE-307	<i>Vida Uzelac appointed acting director of the Privatization Agency</i> , eKapija	14 November 2013
CE-308	Email from I. Markićević to the Privatization Agency attaching letter to Ms. Uzelac	13 December 2013
CE-309	Email from I. Markićević to the Privatization Agency attaching letter to Ms. Uzelac	24 January 2014
CE-310	Email from I. Markićević to R. Waschuk, W. Rand et al.	18 December 2013
CE-311	Email communication between G. Džafić and I. Markićević	19 December 2013
CE-312	Email from I. Markićević to R. Broshko	23 June 2014
CE-313	Email communication between N. Galić and I. Markićević	24 June-3 July 2014
CE-314	Email from I. Markićević to N. Galić	9 July 2014
CE-315	Letter from BD Agro to the Ministry of Economy	13 August 2014
CE-316	Letter from BD Agro to the Privatization Agency	13 August 2014
CE-317	Letter from the Privatization Agency to BD Agro	21 August 2014
CE-318	Letter from BD Agro to the Ministry of Economy and Privatization Agency	6 October 2014
CE-319	Email from I. Markićević to the Ministry of Economy and Privatization Agency	5 November 2014
CE-320	Letter from BD Agro to the Ministry of Economy and Privatization Agency	5 November 2014
CE-321	Pre-pack Reorganization Plan	November 2014
CE-322	Bankruptcy Law (Official Gazette of the Republic of Serbia no. 04/2009, 99/2011 – other law, 71/2012 – decision of the CC and 83/2014)	2014
CE-323	Letter from BD Agro to the Privatization Agency	16 December 2014
CE-324	Letter from BD Agro to the Ministry of Economy	16 December 2014
CE-325	Email from E. Broshko to N. Galić, W. Rand et al. attaching a letter for D. Stevanović	18 December 2014

CE-326	Email communication between I. Makrićević, D. Stevanović, N. Galić et al.	6-14 January 2015
CE-327	Report on Factual Findings from Prva Revizija	12 January 2015
CE-328	Email from E. Broshko to N. Galić, W. Rand et al. attaching a letter to D. Stevanović	26 January 2015
CE-329	Email from E. Broshko to N. Galić, W. Rand et al.	4 February 2015
CE-330	A. Bajrovic, <i>Muamer Redžović to head the Serbian Privatization Agency Management Board</i> , SandzakVijesti.net	4 July 2014
CE-331	Email from I. Markićević to M. Redžović	11 February 2015
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CE-333	Email from I. Markićević to E. Broshko	26 February 2015
CE-334	Letter from BD Agro to the Privatization Agency	26 February 2015
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CE-336	<i>Pan-European Corridor X</i> , Wikipedia	12 January 2019
CE-337	<i>Sremska gazela is coming into being</i> , Vecernje	28 September 2011
CE-338	Email from B. Vujić to I. Markićević	21 November 2014
CE-339	Email from B. Vujić to I. Markićević attaching map of Sremska gazela	21 November 2014
CE-340	Email from I. Markićević to P. Stojanović	10 March 2015
CE-341	Email from I. Markićević to B. Milojević	10 March 2015
CE-342	Email communication between I. Markićević and Nova Agrobanka	10-11 March 2015
CE-343	Email from I. Markićević to N. Galić	20 March 2015
CE-344	BD Agro's submission to Commercial Court Belgrade	8 April 2015
CE-345	Email from I. Markićević to E. Broshko	31 March 2015
CE-346	Email from I. Markićević to E. Broshko	2 April 2015
CE-347	Letter from the Privatization Agency to BD Agro	3 April 2015
CE-348	Letter from the Privatization Agency to D. Obradović	27 April 2015
CE-349	Letter from D. Obradović to the Privatization Agency	30 April 2015
CE-350	Letter from Rand Investments to I. Markićević	7 May 2015

CE-351	Letter from the Privatization Agency to D. Obradović and BD Agro	23 June 2015
CE-352	Submission of Nova Agrobanka to the Commercial Court	24 June 2015
CE-353	Submission of BD Agro to the Commercial Court	24 June 2015
CE-354	Appeal of Banca Intesa	30 July 2015
CE-355	Email communication between I. Markićević and D. Damjanović	1 September 2015
CE-356	Email communication between D. Damjanović and I. Markićević	8 September 2015
CE-357	Letter from BD Agro to the Privatization Agency	11 September 2015
CE-358	Decision of the Appellate Court	30 September 2015
CE-359	Notice from the Commercial Court in Belgrade	16 October 2015
CE-360	Letter from I. Markićević to the Privatization Agency	26 October 2015
CE-361	Decision of the Commercial Court in Belgrade	8 December 2015
CE-362	Decision of the Privatization Agency on appointment of the administrator of Agency's shareholding in BD Agro	6 November 2015
CE-363	Email from I. Markićević to R. Knežević, N. Stajić et al.	17 November 2015
CE-364	Email communication between I. Markićević and R. Knežević	18 November 2015
CE-365	Email from E. Broshko to F. Oksenfled	4 May 2012
CE-366	Minutes from the General Assembly of BD Agro Dobanovci	30 June 2016
CE-367	Decision of the bankruptcy trustee	24 February 2017
CE-368	Decision of the bankruptcy trustee	26 February 2018
CE-369	Second pre-pack reorganization plan	11 January 2016
CE-370	Minutes from the General Assembly of BD Agro AD Dobanovci	27 February 2016
CE-371	Letter from R. Knežević to the Ministry of Economy	17 February 2016
CE-372	Letter from BD Agro to the Commercial Court in Belgrade	17 February 2016
CE-373	Canadian Income Tax Act	-
CE-374	Robert Eriksson, Adolf Lundin: No Guts No Glory, Affars Information Ehrenblad Editions AB	2003

Factual exhibits submitted with the Letter of 11 July 2019		
CE-375	Affidavit from Mr. Igor Markićević	10 July 2019
CE-376	Article 288 of Law on Criminal Procedure	2011
Factual exhibits submitted with the Request for Production of Documents and Replies to Respondent's Objections		
CE-377	Article 236 of Operational Rules of Belgrade Stock Exchange	2004
Factual exhibits submitted with the Letter of 30 September 2019		
CE-378	Article 4 of Law on Protection of Trade Secrets	-
CE-379	Webpage of the Business Registers Agency	28 September 2019 (accessed)
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CE-380	Letter from Mr. Obradović and BD Agro to the Privatization Agency	9 November 2011
CE-381	Email from K. Lutz to W. Rand	26 July 2005
CE-382	Extract from the Commercial Register regarding Agrounija	22 September 2019
CE-383	<i>Miodrag Kostić</i> , MK Group	22 September 2019 (accessed)
CE-384	Confirmation of transfer of EUR 3,312,740 from Mr. Lundin to Marine Drive Holding	15 September 2005
CE-385	Confirmation of transfer EUR 399,950 from Oil Company to Mr. Obradović	2 January 2006
CE-386	Bank confirmation of transfer of EUR 399,950 from Oil Company to Mr. Obradović	2 January 2006
CE-387	Confirmation of transfer of EUR 100,000 from Oil Company to Mr. Obradović	20 January 2006
CE-388	Confirmation of transfer of EUR 700,000 from Mr. Lundin to Mr. Obradović	1 February 2006
CE-389	Confirmation of transfer of EUR 500,000 from Mr. Lundin to Mr. Obradović	20 February 2006
CE-390	Confirmation of transfer of EUR 400,000 from Mr. Lundin to Mr. Obradović	23 February 2006
CE-391	Confirmation of transfer of EUR 5,000 from Mr. Lundin to Marine Drive Holding	3 March 2006
CE-392	Confirmation of transfer of EUR 700,000 from Mr. Lundin to Mr. Obradović	6 March 2006
CE-393	Confirmation of transfer from Longdale Assets Ltd of EUR 100,000 to Mr. Obradović	7 April 2006
CE-394	Confirmation of transfer of EUR 700,000 from Mr. Lundin to Mr. Obradović	20 April 2006
CE-395	Confirmation of transfer from Longdale Assets Ltd of EUR 100,000 to Mr. Obradović	5 May 2006
CE-396	Confirmation of transfer of EUR 1,000,000 from Mr. Lundin to Mr. Obradović	11 May 2006

CE-397	Confirmation of transfer from Longdale Assets Ltd of EUR 50,000 to Mr. Obradović	13 June 2006
CE-398	Confirmation of transfer from Longdale Assets Ltd of EUR 10,000 to Marine Drive Holding	5 July 2006
CE-399	Confirmation of transfer from Longdale Assets Ltd of EUR 130,000 to Mr. Obradović	11 July 2006
CE-400	Confirmation of transfer of EUR 1,000,000 from Mr. Lundin to Mr. Obradović	17 July 2006
CE-401	Confirmation of transfer from Longdale Assets Ltd of EUR 100,000 to Mr. Obradović	7 August 2006
CE-402	Confirmation of transfer of EUR 1,000,000 from Mr. Lundin to Mr. Obradović	28 August 2006
CE-403	Confirmation of transfer from Longdale Assets Ltd of EUR 1,200,000 to Mr. Obradović	2 November 2006
CE-404	Confirmation of transfer from Longdale Assets Ltd of EUR 200,000 to Mr. Obradović	28 December 2006
CE-405	Confirmation of transfer of EUR 800,000 from Mr. Lundin to Mr. Obradović	29 December 2006
CE-406	Confirmation of transfer of EUR 250,000 from Mr. Lundin to Mr. Obradović	5 April 2007
CE-407	Confirmation of transfer from Longdale Assets Ltd of EUR 150,000 to Mr. Obradović	4 May 2007
CE-408	Confirmation of transfer from Longdale Assets Ltd of EUR 230,000 to Mr. Obradović	30 May 2007
CE-409	Confirmation of transfer from Longdale Assets Ltd of EUR 150,000 to Mr. Obradović	7 June 2007
CE-410	Confirmation of transfer from Longdale Assets Ltd of EUR 350,000 to Mr. Obradović	1 November 2007
CE-411	Confirmation of transfer from Longdale Assets Ltd of EUR 150,000 to Mr. Obradović	1 February 2008
CE-412	Email from D. Groves to L. Jovanović and D. Obradović	1 March 2006
CE-413	Email from K. Lutz to D. Obradović	16 November 2006
CE-414	Email from W. Rand to D. Obradović et al.	1 September 2006
CE-415	Photographs from Mr. Rand's visit of BD Agro	July 2008
CE-416	Picture from the governmental visit	3 January 2007
CE-417	Corporate register of Sembi	27 June 2019
CE-418	Notes to Financial Statements of BD Agro for year 2007	3 July 2017 (accessed)
CE-419	Notes to Financial Statements of BD Agro for year 2008	3 July 2017 (accessed)
CE-420	Report and financial statements of Sembi Investment Limited for the period from 31 December 2007 to 31 December 2008	10 December 2009
CE-421	Confirmation letter regarding a meeting of the Board of Directors	8 May 2008
CE-422	Minutes of a meeting of the Board of Directors of Sembi Investment Limited	12 May 2008

CE-423	Minutes of a meeting of the Board of Directors of Sembi Investment Limited	28 November 2008
CE-424	Confirmation letter regarding a meeting of the Board of Directors	7 May 2009
CE-425	Minutes of a meeting of the Board of Directors of Sembi Investment Limited	11 May 2009
CE-426	Minutes of a meeting of the Board of Directors of Sembi Investment Limited	27 November 2009
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CE-428	Email from W. Rand to L. Jovanović et al.	10 April 2013
CE-429	Email from W. Rand to BD Agro	29 March 2013
CE-430	Auditor's report on BD Agro's financial statements	27 May 2010
CE-431	Auditor's report on BD Agro's financial statements	27 September 2010
CE-432	Auditor's report on BD Agro's financial statements	31 May 2011
CE-433	Auditor's report on BD Agro's consolidated financial statements	29 September 2011
CE-434	Auditor's report on BD Agro's financial statements	29 June 2012
CE-435	Auditor's report on BD Agro's consolidated financial statements	29 June 2012
CE-436	Email from MDH to W. Rand	28 December 2007
CE-437	Purchase agreement between Sokolac doo Novi Bečej and BD Agro	7 December 2007
CE-438	<i>Visit of the Honourable Peter Milliken, M.P., Speaker of the House of Commons, and a Parliamentary Delegation, United Kingdom and Serbia, Parliament of Canada</i>	25 September 2019 (accessed)
CE-439	Email from K. Lutz to R. Rand	16 July 2010
CE-440	Emails from J. Morrison and D. Ceramilac	20 July 2010
CE-441	Loan agreement between BD Agro and Nova Agrobanka	22 June 2012
CE-442	Guarantee agreement between Crveni signal and Nova Agrobanka	22 June 2012
CE-443	Email from Marine Drive Holdings Inc. to W. Rand and P. Bagnara	29 December 2006
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CE-446	Decision of the Higher Commercial Court, Pž. 865/2005(2)	1 September 2006
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CE-449	Decision of the Commercial Appeal Court, Pž. 5459/2013	9 April 2014
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	<i>Commercial Contract for the International Sale of Goods</i>] (Belgrade, Institut za uporedno pravo, 1989)	
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CE-460	Certain provisions of the 2002 Law on the Market of Securities and Other Financial Instruments	2002
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CE-509	Valuation Report of Ingekspert procene i veštačenje	December 2009
CE-510	Valuation Report of PROCENA ING d.o.o.	March 2012
CE-511	Report on evaluation of market value of bankruptcy debtor's property and evaluation of debtor as legal entity "BD AGRO" AD DOBANOVCI IN BANKRUPTCY on the date of 30 June 2018 (Valuation team headed by Mr Tibor Bodolo)	January 2019
CE-512	<i>European Valuation Standards 2012</i> , published by the European Group of Valuers' Associations	June 2012
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CE-514	<i>RICS Valuation – Professional Standards January 2014</i> , published by Royal Institution of Chartered Surveyors	January 2014
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CE-516	<i>International Valuation Standards 2013</i> , published by International Valuation Standards Council	July 2013
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CE-518	Rulebook on national standards, ethical codex and rules on professional behavior of the licensed valuator (" <i>Official Gazette of RS</i> ", no. 70/2017)	2017
CE-519	Law on Expropriation (" <i>Official Gazette of RS</i> ", no. 53/95, " <i>Official Gazette of FRY</i> ", no. 16/2001 – decision of Federal Constitutional Court and " <i>Official Gazette of RS</i> ", no. 20/2009, 55/2013 – decision of CC and 106/2016 – authentic interpretation)	1996
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CE-531	2009 BSE Rules	2009
CE-532	2016 BSE Rules	2016
CE-533	Ministry of Finances for Insajder: By the end of November we will purchase shares of Komercijalna Banka both from EBRD and the IFC	28 June 2019
CE-534	2004 Company Law	2004
CE-535	2011 Company Law	2011
CE-536	2006 SEC Opinion	2006
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CLA-161	<i>Enron Corporation and Ponderosa Assets LP v. Argentine Republic</i> , ICSID Case No. ARB/01/3, Decision on Jurisdiction	14 January 2004
CLA-162	<i>Siemens A.G. v. The Argentine Republic</i> , ICSID Case No. ARB/02/8, Decision on Jurisdiction	3 August 2004
CLA-163	<i>Ethyl Corporation v. The Government of Canada</i> , Award on Jurisdiction	24 June 1998
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CLA-166	<i>Plama Consortium Limited v. Republic of Bulgaria</i> , ICSID Case No. ARB/03/24, Decision on Jurisdiction	8 February 2005
CLA-167	<i>Accession Mezzanine Capital L.P. and Danubius Kereskedőház Vagyonkezelő Zrt. v. Hungary</i> , ICSID Case No. ARB/12/3, Award	17 April 2015
CLA-168	<i>Bernhard von Pezold and others v. Republic of Zimbabwe</i> , ICSID Case No. ARB/10/15, Award	28 July 2015
CLA-169	<i>Teinver S.A., Transportes de Cercanías S.A. and Autobuses Urbanos del Sur S.A. v. The Argentine Republic</i> , ICSID Case No. ARB/09/1, Decision on Jurisdiction	21 December 2012
CLA-170	<i>Liman Caspian Oil BV and NCL Dutch Investments BV v. Republic of Kazakhstan</i> , ICSID Case No. ARB/07/14, Award	22 June 2010

CLA-171	<i>Peter A. Allard v. Government of Barbados</i> , PCA Case No. 2012-06, Award on Jurisdiction	13 June 2014
CLA-172	<i>SGS Société Générale de Surveillance S.A. v. Republic of the Philippines</i> , ICSID Case No. ARB/02/6, Decision of the Tribunal on Objections to Jurisdiction	19 January 2004
CLA-173	<i>Pac Rim Cayman LLC v. Republic of El Salvador</i> , ICSID Case No. ARB/09/12, Decision on the Respondent's Jurisdictional Objections	1 June 2012