

INTERNATIONAL CENTRE FOR SETTLEMENT OF INVESTMENT DISPUTES

Webuild S.p.A.
(formerly Salini Impregilo S.p.A.)

v.

Republic of Panama

(ICSID Case No. ARB/20/10)

PROCEDURAL ORDER NO. 4
ON THE PROCEDURAL CALENDAR

Members of the Tribunal

Ms. Lucy Reed, President of the Tribunal

Mr. Stanimir Alexandrov, Arbitrator

Prof. Dr. Hélène Ruiz Fabri, Arbitrator

Secretary of the Tribunal

Ms. Veronica Lavista

26 October 2021

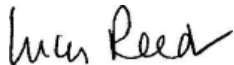
1. On 3 May 2021, the Tribunal issued Procedural Order No. 2 establishing the dates for the first round of written pleadings and the range of dates for the hearing.
2. On 21 May 2021, the Tribunal issued Procedural Order No. 3 approving the procedural calendar as agreed to by the Parties.
3. On 25 October 2021, the Parties wrote to the Tribunal informing it of their agreement to make the following adjustments to the procedural calendar:
 - Claimant's Memorial on the Merits will be due on 12 November 2021;
 - Respondent's Memorial on Preliminary Objections and Counter-Memorial on the Merits will be due on 5 August 2022.
4. These changes have been reflected in the previously agreed procedural calendar as follows:

Date	Step	Parties / Tribunal	No. of Weeks
5 February 2021	First Session	All	NA
12 April 2021	Decision on Bifurcation	Tribunal	NA
12 November 2021	Memorial on Merits	Claimant	40 weeks from First Session
5 August 2022	Memorial on Preliminary Objections and Counter-Memorial on Merits	Respondent	39 weeks
19 August 2022	Document Requests	Parties (simultaneously)	2 weeks
2 September 2022	Objections to Requests	Parties (simultaneously)	2 weeks
16 September 2022	Replies to objections	Parties (simultaneously)	2 weeks
7 October 2022	Decision on Document requests	Tribunal	3 weeks
4 November 2022	Production of documents (both voluntary production and production ordered by the Tribunal) ¹	Parties (simultaneously)	4 weeks
27 January 2023	Counter-Memorial on Preliminary Objections and Reply on Merits	Claimant	27 weeks (12 weeks from production)
4 August 2023	Reply on Preliminary Objections and Rejoinder on Merits	Respondent	27 weeks

¹ The Parties hereby agree to undertake to use best efforts to voluntarily produce documents on a rolling basis as they are located beginning at the Objections to Request step. The deadline indicated herein represents the last date for production without prejudice to the foregoing.

Date	Step	Parties / Tribunal	No. of Weeks
20 October 2023	Rejoinder on Preliminary Objections ²	Claimant	11 weeks
24 October 2023	List of witnesses and experts to be cross-examined during the hearing	Parties (simultaneously)	11 days before Hearing
24 October 2023	Pre-hearing organizational teleconference	Tribunal and Parties	11 days before Hearing
6-17 November 2023 (reserve 20-22 November)	Hearing on Preliminary Objections and Merits (10 days, with 3 days reserved) ³	Tribunal and Parties	
TBD	PHB (if any, in accordance with § 22 of Procedural Order No. 1)	Parties (simultaneously)	
TBD	Cost submissions	Parties (simultaneously)	
TBD	Award on Preliminary Objections and Merits	Tribunal	

5. Accordingly, the Tribunal hereby approves the agreed Procedural Calendar as set out above.



Lucy Reed
 President of the Tribunal
 Date: 26 October 2021

² Claimant reserves all rights in connection with its Rejoinder on Preliminary Objections submission, including to request additional time, including in light of Respondent’s Reply on Preliminary Objections and Rejoinder on Merits.

³ The Parties stipulate that neither can be sure of the length of time required for the hearing as the number of witnesses and experts is unknown at this time and the needs for the hearing may change once the submissions are filed. Further adjustments with respect to the duration of the hearing will be considered after the first round of pleadings and the Parties respectfully request that Tribunal hold 3 days in reserve for now and solicit further input from the Parties on this point following the first round of submissions.