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25 July 2016

BY EMAIL

Mr David AR Williams QC
Bankside Chambers
Level 22, Lumley Centre
88 Shortland Street
Auckland 1010
New Zealand
DAVID.WILLIAMS@DARWILLIAMS.CO.NZ

The Hon Charles N Brower 20 Essex Street Chambers 20 Essex Street London WC2R 3AL CBROWER@20ESSEXST.COM

Mr Hugo Perezcano Díaz Bosque de Tabachines 9 Col. Bosques de las Lomas México, D.F., C.P. 05120 Mexico

Dear Members of the Tribunal

PCA Case No. 2016-14 – JSC Oschadbank v. Russian Federation UNCITRAL Arbitration

The Claimant writes in response to the invitation by the presiding arbitrator, transmitted on 21 July 2016, to sign the Terms of Reference prior to the Procedural Teleconference of 26 July 2016. Because of its own internal procedures, however, the Claimant will not be able to transmit a signed version of the Terms of Reference earlier than 3 August 2016. The Claimant shall endeavour to complete the necessary procedures as soon as possible.

Moreover, the Claimant has noted the Tribunal's proposed changes to the Terms of Reference and has no comments, save for a request regarding the arbitrators' hourly rate. Based on current exchange rates, the arbitrators' rate of EUR 650 per hour converts to approximately USD 710 per hour. The Claimant would be grateful if the Tribunal kindly would consider making the necessary correction.

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Yours faithfully

Quin Emanuel

QUINN EMANUEL URQUHART & SULLIVAN LLP

Copy (by email): H.E. The Ambassador of the Russian Federation to the Kingdom of the Netherlands (AMBRUSNL@EURONET.NL)

H.E. The Ambassador of the Russian Federation to the Republic of France

(ambrusfrance@mid.ru)

Ms. Evgeniya Goriatcheva, Legal Counsel, Permanent Court of Arbitration

(EGORIATCHEVA@PCA-CPA.ORG)

Copy (by courier): Vladimir Putin, President of the Russian Federation

Dmitry Medvedev, Prime Minister of the Russian Federation Anton Siluanov, Finance Minister of the Russian Federation

Sergey Lavrov, Minister of Foreign Affairs of the Russian Federation Mikhail Zurabov, The Ambassador of the Russian Federation to Ukraine

From:

Evgeniya Goriatcheva

Sent:

25 July 2016 08:56 Marion Joullie Carles

To: Subject:

Fwd: PCA Case No. AA604 - JSC Oschadbank (Ukraine) v. The Russian Federation

Attachments:

Letter to the Tribunal dated 25 July 2016.pdf; ATT00001.htm

From: Epaminontas Triantafilou < etriantafilou@quinnemanuel.com>

Date: 25 Jul 2016 08:51:59 CEST

To: 'David Williams' < david.williams@DARWilliams.co.nz, "'cbrower@20essexst.com" < cbrower@20essexst.com" < cbrower@20essexst.com cbrower@20essexs

"'hugo.perezcano@iiuris.com'" <hugo.perezcano@iiuris.com>

Cc: 'Evgeniya Goriatcheva' <<u>egoriatcheva@pca-cpa.org</u>>, "'<u>ambrusnl@euronet.nl</u>" <<u>ambrusnl@euronet.nl</u>>, Stephen Jagusch <<u>stephenjagusch@quinnemanuel.com</u>>, Alex Gerbi <<u>alexgerbi@quinnemanuel.com</u>>, Philip

Devenish < philipdevenish@quinnemanuel.com >, Manthi Wickramasooriya

<mwickramasooriya@quinnemanuel.com>, "info@minjust.ru" <info@minjust.ru>

Subject: PCA Case No. AA604 - JSC Oschadbank (Ukraine) v. The Russian Federation

Dear Members of the Tribunal,

Please see the attached correspondence. Further, regarding tomorrow's Procedural Teleconference, please see the dial-in details below. If the applicable regional number does not function properly for any reason, please use the UK number provided.

UK (+44)	(0)2081186100
Ukraine (+380)	0800504146
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USA (+1)	18776664180
Mexico (+52)	0018777432431
Russian Federation (+7)	81080024182044

Conference code:

8527010864

Sincerely,

Epaminontas Triantafilou

Partner

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