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Paris, 9 April 2021

VIA E-MAIL

To:

Helge Seland, Director General
Norwegian Ministry of Foreign Affairs
Legal Affairs Department
Section for EEA and Trade Law
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Subject: ICISD Arbitration Case ARB/20/11 – Norway's Request for Bifurcation and Procedural Schedule

Dear Mr. Seland,

Claimants have now reviewed Norway's Request for Bifurcation. Out of courtesy, Claimants inform Norway that in their formal response to Norway's request (which Claimants will oppose), Claimants will request that the Tribunal adopt an efficient schedule for the remainder of the proceedings, to be held in one phase. Claimants also note that Norway did not suggest any procedural schedule following the Tribunal's decision on bifurcation.

Considering the length of Norway's Request for Bifurcation, Claimants will take the position that Norway should in any event have no more than 180 days from the submission of Claimants' Memorial to submit a Counter-Memorial on merits and damages, including any jurisdictional objections.

Sincerely,

Savoie Laporte s.e.l.a.s.u.

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