

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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LISA BALLANTINE and MICHAEL	:	
BALLANTINE,	:	
	:	Case No. 1:19-cv-03598
Plaintiffs,	:	
	:	
- against -	:	
	:	
THE DOMINICAN REPUBLIC,	:	
	:	
Defendant.	:	
	:	
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**DECLARATION OF EDWARD BALDWIN IN SUPPORT OF
PETITION TO VACATE ARBITRATION AWARD**

I, Edward Baldwin, declare as follows:

1. I am a partner in the Washington, D.C. office of Steptoe & Johnson LLP, counsel for the Petitioners Lisa Ballantine and Michael Ballantine in the arbitration *Michael Ballantine and Lisa Ballantine v. The Dominican Republic*, PCA Case No. 2016-17 (the "Arbitration"). I am an attorney licensed to practice in this Court.
2. I submit this declaration in support of Lisa Ballantine and Michael Ballantine's Petition to Vacate the Arbitration Award Declining to Exercise Jurisdiction. The purpose of this declaration is to place before the Court true and correct copies of certain documents from the Arbitration record, which are cited as exhibits in the accompanying *Memorandum of Points and Authorities in Support of the Petition to Vacate the Arbitration Award Declining to Exercise Jurisdiction*.
3. Attached hereto is a true and correct copy of Exhibit A, the Final Award of the Tribunal dated September 3, 2019.

4. Attached hereto is a true and correct copy of Exhibit B, the Dissenting Opinion of Ms. Marney L. Cheek on Jurisdiction dated September 3, 2019.

5. Attached hereto is a true and correct copy of Exhibit C, the Dissenting Opinion of Prof. Raul Emilio Vinuesa on Costs dated September 3, 2019.

6. Attached hereto is a true and correct copy of Exhibit D, the Amended Statement of Claim submitted by the Claimants on January 4, 2017, with Witness Statement of Lisa Ballantine and Witness Statement of Michael Ballantine attached.

7. Attached hereto is a true and correct copy of Exhibit E, the Supplemental Witness Statement of Michael Ballantine dated March 6, 2017.

8. Attached hereto is a true and correct copy of Exhibit F, the Tribunal's Procedural Order No. 1 dated October 21, 2016, which states, *inter alia*, that the place of arbitration is Washington, D.C.

9. Attached hereto is a true and correct copy of Exhibit G, the Tribunal's Procedural Order No. 2 dated April 21, 2017, which rejected the request of the Respondent Dominican Republic to bifurcate the Arbitration.

10. Attached hereto is a true and correct copy of Exhibit H, the Statement of Defense submitted by the Respondent Dominican Republic on May 25, 2017.

11. Attached hereto is a true and correct copy of Exhibit I, the Reply Submission submitted by the Claimants on November 9, 2017, with Reply Witness Statement of Lisa Ballantine and Reply Witness Statement of Michael Ballantine attached.

12. Attached hereto is a true and correct copy of Exhibit J, the Rejoinder on Jurisdiction and Admissibility submitted by the Claimant on May 21, 2018

13. Attached hereto is a true and correct copy of Exhibit K, the Transcript of the Oral Hearing held on September 7, 2018, which includes the Closing Arguments from counsel for the Claimants and Respondent.

14. Attached hereto is a true and correct copy of Exhibit L, the Rejoinder of the Dominican Republic on Jurisdiction and Admissibility submitted on March 19, 2018.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on December 3, 2019 in Washington, D.C.

/s/ Edward Baldwin
Edward Baldwin