

UNITED NATIONS COMMISSION ON INTERNATIONAL TRADE LAW
ARBITRATION RULES (1976)

ABDALLAH ANDRAOUS

Claimant

v.

KINGDOM OF THE NETHERLANDS

Respondent

PROCEDURAL ORDER NO. 2

**ANNEX A: DECISION ON CLAIMANT'S DOCUMENT PRODUCTION
REQUESTS**

Arbitral Tribunal

Ms. Claudia Salomon (Presiding Arbitrator)
Prof. Nassib G. Ziadé
Mr. José Emilio Nunes Pinto

Secretary of the Tribunal

Mr. Felipe Aragón

Representative of ICSID

Mr. Alex B. Kaplan

9 July 2024

Preliminary remarks

1. The Kingdom of the Netherlands respectfully submits the following responses and objections to the Request for Production of Documents pertaining to the Jurisdictional Phase presented by Mr Abdallah Andraous ("Andraous") dated 5 June 2024.
2. In providing its responses and objections, the Kingdom of the Netherlands is guided by the International Bar Association Rules on the Taking of Evidence in International Arbitration (2020) ("IBA Rules") in accordance with para. 40 of Procedural Order No. 1 dated 23 November 2023.
3. As an overarching remark, the Kingdom of the Netherlands notes that Andraous' requests fail to comply with the standards set by the IBA Rules. The majority of Andraous' requests lack any explanation as to how the requests "are relevant to the case and material to its outcome" in accordance with Article 3.3(b) of the IBA Rules, and in fact altogether lack substantiation. The requests frequently consist of a mere reference to sections or paragraphs of the Kingdom of the Netherlands' Statement of Defence on Jurisdiction ("SoD") or its accompanying exhibits (see Requests Nos. 2-8).
4. Furthermore, many of Andraous' requests are unclear or unspecified, lacking, among other things, any indication of timeframe, contrary to the "narrow and specific" standard under Article 3.3(a) of the IBA Rules (see e.g. Request No. 4). Lastly, Andraous also requests documents already available to him by accessing public records (see e.g. Request No. 7), or documents that only he can request from the public authorities (see e.g. Request No. 5 in relation to Andraous' tax return forms).
5. The Kingdom of the Netherlands will nevertheless endeavor to comply with the requests to the extent feasible and reasonable.

Redfern Schedule

1	2	3	4	5	6	7
No.	Requesting Party	Documents or Category of Documents Requested	Relevance and Materiality According to Requesting Party	Responses / Objections to Document Request	Reply, if any, to Objections to Document Request	Tribunal's Decisions
1	Claimant	A copy of the Claimant's personal (hard copy) files which were held at his office at [REDACTED], Curaçao at the time of the Takeover	The Claimant was at his residence in Paris, France at the time of the Takeover and had no opportunity to preserve the evidence to prove his case. The file contains information on his investment. The Respondent is in possession, custody or control of the Respondent as the latter has relied on several documents from these files in its Statement of Defence on Jurisdiction and security for costs	The Kingdom of the Netherlands objects to Andraous' Request No. 1 on the grounds and to the extent set out below. Andraous requests an unidentified set of "personal (hard copy) files" that were allegedly held at Ennia's offices in Curaçao presumably at the time the Emergency Regulation was enacted. Andraous' request lacks <u>relevance and materiality</u> . Andraous fails to substantiate how the alleged "personal (hard copy) files" requested "are relevant to the case and material to its outcome" in accordance with Article	Claimant notes Respondent's endeavours to produce the requested documents. Claimant submits that it is virtually impossible to know which exact documents were at its office at the time of the Takeover, which took place six years ago. The requested documents include but are not limited to (i) ID documents, (ii) Claimant's bank statements, (iii) documents related to [REDACTED] (iv) personal invoices, (v) salary statements, (vi) insurance policies, and (vii) tax files, all of which were requested by Respondent in its Request for Document Production. The documents	The Tribunal takes note that Respondent has voluntarily accepted to produce the Documents responsive to this request to the extent that they are reasonably identified. Respondent is ordered to make a reasonable effort to locate the documents requested and produce them to Claimant, or otherwise inform Claimant whether the requested documents have been lost, destroyed or do not exist.

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			<p>submissions. By not producing these documents, the Parties would be treated unequally.</p>	<p>3.3(b) of the IBA Rules. Andraous merely states that "the file [<i>sic</i>] contains information on his investment", without specifying the kind of information – and which alleged 'investment' – this relates to and why such files would be relevant and material to this case.</p> <p>Furthermore, Andraous fails to describe a <u>narrow and specific</u> category of documents in accordance with Article 3.3(a) of the IBA Rules, referring merely to "files held at his office" at the time. Andraous provides no description of the requested files, and makes no mention concerning the nature, presumed author and/or recipients, presumed date or timeframe, or presumed content of the documents.</p>	<p>are therefore relevant and material and demonstrate Claimant's nationality and investment (including but not limited to proof of ownership of Claimant's shares in Parman). Respondent has already used some of these documents in its Statement of Defence on Jurisdiction (whether or not as excerpts).</p> <p>These categories are narrow and specific, and so are all of Claimant's personal documents located at the Claimant's office at the time of the Takeover.</p> <p>Moreover, it is recalled that the Parties are on an unequal footing in these proceedings. The requested documents were seized unlawfully without sharing an inventory with Claimant,</p>	

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				<p>The request is thus overly broad and tantamount to a fishing expedition rather than a request for documents in conformity with the requirements of Article 3 of the IBA Rules.</p> <p>Lastly, the Kingdom of the Netherlands notes that the request attempts to present the circumstances surrounding the adoption of the Emergency Regulation as a hostile takeover involving an unauthorized retention of Andraous' personal files. Andraous misrepresents the facts by stating that he "had no opportunity to preserve the evidence to prove his case". In fact, he has since visited said office, for instance on 25 February 2021 together with [REDACTED] and [REDACTED] (together with lawyers from [REDACTED]</p>	<p>and without being returned to Claimant as its rightful owner.</p> <p>Finally, it must be noted that Claimant's alleged visit on 25 February 2021 is fabricated. Neither Claimant nor [REDACTED] were present at that meeting. This can be corroborated by any third party, and Respondent could have easily checked its allegation by searching for a Passenger Locator Form on behalf of Claimant, which was required in that period.</p>	

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				<p>██████████), on which occasion ██████████ and ██████████ both requested – and received – their personal files. By contrast, at no point did Andraous request access to any alleged personal files or complain that personal files were not returned to him.</p> <p>Nevertheless, and though immaterial for the purposes of these proceedings, the Kingdom of the Netherlands will search for, and provide, Andraous' files of a personal nature to the extent they can be reasonably identified.</p>		
2	Claimant	Claimant's alleged life insurance in the Kingdom of the Netherlands	Respondent's Statement of Defence on Jurisdiction, para. 159	While noting that the request is entirely unsubstantiated – and Andraous does not explain why such information would not already be in his possession (the Kingdom of	Respondent admits the requested document's relevance, materiality and specificity as it itself has invoked Claimant's life insurance as a relevant and material point in these	The Tribunal takes note that the document requested is both in Claimant's possession and in the record as Exhibit R-034-DUTCH.

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				<p>the Netherlands has, to that end, requested documents relating to Andraous' insurance policies in its Request No. 1 dated 5 June 2024) – the Kingdom of the Netherlands has already exhibited the life insurance document in question as Exhibit R-034-DUTCH, as referenced in its SoD at paras. 130 and 145, respectively. For the sake of completeness, the Kingdom of the Netherlands will also provide any further documentation within its possession pertaining to Andraous' said life insurance.</p>	<p>proceedings. Claimant notes that its reference to Respondent's Statement of Defence on Jurisdiction is sufficient to satisfy the relevance and materiality criterion, as well as that of specificity.</p> <p>Again, it is unclear to Claimant why Respondent requests Claimant to produce this information as not the latter but Respondent is in possession of Claimant's private files (see Document Request No. 1).</p> <p>Claimant welcomes Respondent's efforts to furnish documents relating to life insurance.</p>	<p>The Tribunal also takes note that Respondent will voluntarily produce additional documentation relating to Mr. Andraous' life insurance.</p>
3	Claimant	Detailed documentation of shareholders equity of Ennia	As indicated in Figure 3 at Respondent's Statement of Defence on	Andraous requests "detailed documentation of shareholders equity of Ennia Caribe Holding N.V.", an entity that directly and	Claimant welcomes Respondent's efforts to provide the stock register regarding Ennia Caribe Holding N.V..	<p>The Tribunal takes note that Respondent has voluntarily accepted to produce the documents</p>

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		Caribe Holding N.V.	Jurisdiction, para. 195, which is not a correct replication of Exhibit RL-018	<p>indirectly holds the Ennia subsidiaries of which he was a director and purports to be an indirect shareholder, on account of the unexplained claim that Figure 3 of the SoD "is not a correct replication of Exhibit RL-018".</p> <p>To the latter point, the Kingdom of the Netherlands assumes that Andraous is referring to the full structure chart of PIBV and Ennia in para. 3.2 of Exhibit RL-018. As mentioned explicitly in the SoD, the structure chart is "simplified" (see Figures 1 and 3). Accordingly, it only includes the relevant portion of the corporate structure and accurately represents the relationship between the relevant Ennia entities for the purposes of these proceedings.</p>	The requested document is relevant, material and specific as it relates to the ownership of the company of which Claimant is a shareholder and investor.	responsive to this request.

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				<p>In the interest of transparency and procedural efficiency, the Kingdom of the Netherlands will provide Andraous with the stock register of Ennia Caribe Holding N.V.</p> <p>However, the Kingdom of the Netherlands also notes that Andraous fails to provide any reasoning as to how the requested documents relate to his pleaded case and would have bearing on the outcome of the dispute, merely alleging that Figure 3 is incorrect. The <u>relevance and materiality</u> of the request is thereby left entirely unsubstantiated. Andraous likewise fails to describe a <u>narrow and specific</u> category of documents, referring vaguely to "detailed</p>		

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				documentation of shareholders equity of Ennia Caribe Holding N.V.", without providing any specification, nor any indication of timeframe with respect to the requested documentation.		
4	Claimant	Periodic UBO statements (as per compliance requirements) prepared by Ennia and sent to those banks where Ennia has an account	Respondent's Statement of Defence on Jurisdiction, paras. 192-194	The Kingdom of the Netherlands objects to Andraous' Request No. 4 on the grounds set out below. Andraous requests UBO statements "prepared by Ennia and sent to those banks where Ennia has an account" without any further substantiation, merely referencing a section of the SoD in which the Kingdom of the Netherlands explains that Andraous has not proven his ownership of shares in PIBV and, in fact, sold and	Each couple of years, the banks ask Ennia to update "Know your client" ("KYC") information. This includes a statement of ultimate beneficial owners ("UBO"). As these banks will not accept a company or a foundation as a UBO, one must identify each individual shareholder. Usually, only shareholders of at least 5% of the share capital must be identified, but Ennia's policy was to break down the entire share capital (usually via email).	<p>The Tribunal considers that the documents requested seem <i>prima facie</i> relevant and material and have been narrowly and specifically identified.</p> <p>Further, the Tribunal takes note of Claimant's position that the periodic UBO statements are not in his possession, custody or control.</p> <p>Respondent is ordered to endeavour</p>

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				<p>transferred his shares in PIBV on 1 December 2015.</p> <p>Andraous fails to substantiate <u>relevance and materiality</u> in accordance with Article 3.3(b) of the IBA Rules. Andraous provides no reasoning on how these documents relate to his pleaded case and would have bearing on the outcome of the dispute. Specifically, Andraous does not elaborate on how these documents would disprove the fact that he does not hold an 'investment' in Ennia, as follows from his own evidence that he has sold his shares in PIBV in 2015 (see SoD, paras. 192-194, as referred by Andraous). In any event, a 1% shareholder would not qualify as an ultimate beneficial owner for the purposes of such UBO</p>	<p>Claimant submits that the UBO statements demonstrate that Claimant is a 1% shareholder in Ennia Caribe Holding N.V., which is thus relevant and material to Claimant's case and investment, as well as narrow and specific.</p> <p>Moreover, it is recalled that Respondent seized the requested documents without sharing an inventory with Claimant, and without being returned to Claimant as its rightful owner. While Claimant agrees it carries the burden of proof to demonstrate that it has an investment, it needs to be able to do so. Therefore, Respondent must share the above documents in its possession, custody or control.</p>	<p>to locate and produce the periodic UBO statements filed by the Ennia entities.</p>

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				<p>statements submitted to banks. Accordingly, UBO statements would not serve as evidence of Andraous' alleged 1% shareholding in Ennia.</p> <p>Furthermore, Andraous fails to describe <u>narrow and specific</u> documents in accordance with Article 3.3(a) of the IBA Rules. The request lacks any specification as to which Ennia entities or which banks it pertains to, as well as any indication of the timeframe for which Andraous is seeking the documents and why.</p> <p>Lastly, the Kingdom of the Netherlands notes that Andraous, as a purported shareholder of Ennia, shall be expected to hold in his possession documents that directly and conclusively</p>		

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				<p>demonstrate his shareholding with a view to satisfying his burden of proof vis-à-vis the requirement of having a qualifying 'investment' under the BIT.</p>		
5	Claimant	<p>The complete government file on the Claimant held by the public authorities in the Kingdom of the Netherlands (including Curaçao and Sint Maarten) as linked to his national registration number (including but not limited to the full naturalization file, if any, and</p>	<p>Respondent's Statement of Defence on Jurisdiction, Section III.</p> <p>The Respondent relies only on a limited amount of exhibits (Exhibits R-010-DUTCH, and R-051), while all of them are in its possession, custody or control.</p>	<p>In the interest of transparency and procedural efficiency, the Kingdom of the Netherlands will provide Andraous with his complete naturalization file.</p> <p>The Kingdom of the Netherlands does, however, once again note that Andraous fails to provide any reasoning on the <u>relevance and materiality</u> of the request. Moreover, Andraous fails to describe a <u>narrow and specific</u> category of documents. The request refers merely to "the complete government</p>	<p>Claimant welcomes Respondent's efforts and gives its consent with regard to the requested tax statements.</p> <p>Again, as Respondent has invoked these points in its Statement of Defence on Jurisdiction, Claimant's request is relevant and material (as well as narrow and specific).</p>	<p>The Tribunal takes note that Respondent has voluntarily accepted to produce the documents responsive to this request, except for the tax form, which Respondent is unable to produce due to their confidential nature under the laws of the Kingdom of the Netherlands.</p> <p>The Tribunal takes note, however, that Claimant gave its consent with regard</p>

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		tax return forms)		<p>file on the Claimant" without providing any description of the requested documents. The request lacks any specification as to presumed contents, presumed type, presumed date or timeframe of the requested documents, or by which public authorities these documents are presumably held.</p> <p>With regard to Andraous' tax return forms, the Kingdom of the Netherlands notes that these are strictly confidential documents protected by privacy laws. According to these laws, the tax authorities are not permitted to share tax return forms of an individual with other organs of the State without the explicit consent of the individual concerned.</p>		<p>to the requested tax statements.</p> <p>The Tribunal takes note that Respondent also requested the production of Mr. Andraous Dutch tax return forms (Respondent's Request No.5).</p> <p>Because both Parties agree that the Dutch tax returns should be available in this arbitration, the Tribunal invites the Parties to cooperate and endeavor to fulfill the procedural formalities to obtain Mr. Andraous' Dutch tax records for disclosure and use in this arbitration as the Parties consider appropriate.</p>

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				<p>Therefore, the Kingdom of the Netherlands is unable to obtain tax return forms of Andraous without his explicit consent. Conversely, Andraous should hold these documents in his possession or be able to directly request them from the tax authorities himself. To that end, the Kingdom of the Netherlands has in fact requested this information from Andraous in its Request No. 9 dated 5 June 2024.</p>		
6	Claimant	Central Bank of Curaçao and St Maarten Personal Questionnaire on Abdallah Andraous for the period 2006 to date	Only a selection has been provided by the Respondent (Exhibits R-018 and R-019)	In the interest of transparency and procedural efficiency, the Kingdom of the Netherlands will not object to providing Andraous with the rest of the personal questionnaires within its possession.	Claimant welcomes Respondent's efforts to produce the rest of the personal questionnaires.	The Tribunal takes note that Respondent has voluntarily accepted to produce the Documents responsive to this request.

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				<p>The Kingdom of the Netherlands does, however, once again note that Andraous' request lacks <u>relevance and materiality</u>. Andraous fails to substantiate how the requested documents "are relevant to the case and material to its outcome", in accordance with Article 3.3(b) of the IBA Rules, stating merely that only a selection was provided.</p>		
7	Claimant	Complete Curaçao Commercial Register files	(Only excerpts have been provided: Exhibits R-016, R-020, R-021, R-022, R-023-DUTCH, R-024-DUTCH, R-025-DUTCH, R-027, R-028, R-029, R-030-DUTCH, R-031, and R-043)	Andraous requests "[c]omplete Curaçao Commercial Register files", referring to information from publicly available sources. That information is therefore already available to him by accessing the (website of the) Curaçao Commercial Register himself and thus within his control.	Claimant notes Respondent's clarifications, and notes, again, that since Respondent has introduced these documents, they are relevant and material (as well as narrow and specific).	<p>The Tribunal takes note that the documents requested are in the public domain and readily accessible to Claimant.</p> <p>The Tribunal appreciates Respondent's effort to indicate the</p>

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				<p>In the interest of procedural efficiency, the Kingdom of the Netherlands specifies the following with regard to the referenced exhibits:</p> <ul style="list-style-type: none"> Exhibits R-016, R-020, R-022, R-027, R-028, R-029, R-031 and R-043: these excerpts have been obtained by accessing the following website of the Curaçao Commercial Register (managed by the Curaçao Chamber of Commerce) – https://www2.curacao-chamber.cw/companys elect.asp – or have otherwise been requested from the Curaçao Chamber of Commerce in the years preceding the digital website that immediately generates 		<p>sources of the documents for Claimant to obtain access to these archives.</p> <p>In light of the above, Claimant's request is rejected.</p>

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				<p>excerpts. The information contained therein is publicly available. Such excerpts are made available by the Commercial Register, offering entity profiles containing information relevant at the moment of the request, such as full legal name, registration number and date, legal address, directors, etc. For the avoidance of doubt, the 'excerpts', as they are referred to by the Curaçao Chamber of Commerce, are in and of themselves complete.</p> <ul style="list-style-type: none"> Exhibit R-024: is a form completed with a view to submitting it to the Curaçao Chamber of Commerce to register the date of incorporation and 		

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				<p>establishment of Resorts Caribe B.V.</p> <ul style="list-style-type: none"> Exhibits R-023-DUTCH and R-030-DUTCH: these documents are completed 'Model Q' forms that are submitted to the Curaçao Chamber of Commerce to register new official(s) of legal entities. The template forms are accessible on the following website of the Curaçao Chamber of Commerce: https://www.curacaochamberofcommerce.com/registry-services/registry-forms/. For the avoidance of doubt, these documents are complete and were signed by Andraous himself. The Kingdom of the Netherlands notes that, although 		

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				<p>Andraous does not raise it, Exhibit R-026-DUTCH is the same in terms of format, scope, and length.</p> <ul style="list-style-type: none"> • Exhibit R-025-Dutch: this document is a completed form that was similarly submitted to the Curaçao Chamber of Commerce in 2007 to register the new managing directors of National Investment Bank N.V.. • In relation to Exhibit R-021, the Kingdom of the Netherlands will provide the second page of the document, which was not included as part of the initial exhibit as an oversight. <p>The Kingdom of the Netherlands does, however, once again note that Andraous fails to</p>		

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				<p>substantiate the <u>relevance and materiality</u> of the request. Andraous likewise fails to describe a <u>narrow and specific</u> category of documents in terms of the entities in relation to which the documents are sought and the time period for which they are requested.</p>		
8	Claimant	<p>Complete files of Sint Maarten Personal Records Database regarding,</p> <p>██████████</p> <p>██████</p> <p>██████████ █████</p> <p>██████████</p> <p>██████</p>	<p>(Only excerpts have been provided: Exhibits R-037-DUTCH, R-038-DUTCH, R-039-DUTCH)</p>	<p>While once again noting that Andraous leaves this request unsubstantiated, the Kingdom of the Netherlands has already placed all available documentation from the Sint Maarten Personal Records Database regarding</p> <p>████████████████████</p> <p>██████████ ██████████</p> <p>██████████ on the record. For the avoidance of doubt, the 'excerpts', as they are referred to by the Sint</p>	<p>Claimant notes Respondent's clarifications.</p>	<p>The Tribunal takes note that the documents requested have been completely produced as Exhibits R-037-DUTCH, R-038-DUTCH, R-039-DUTCH).</p>

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				Maarten Personal Records Database, are in and of themselves complete.		