

**INTERNATIONAL CENTRE FOR SETTLEMENT OF INVESTMENT DISPUTES**

**Cyrus Capital Partners, L.P. and Contrarian Capital Management, LLC  
(Claimants)**

**v.**

**United Mexican States  
(Respondent)**

**(ICSID Case No. ARB/23/33)**

---

**PROCEDURAL ORDER No. 4  
Document Production**

***Members of the Tribunal***

Rt. Hon. Lord Collins of Mapesbury, LLD, FBA, President of the Tribunal  
Dr. David J.A. Cairns, Arbitrator  
Prof. Zachary Douglas, KC, Arbitrator

***Secretary of the Tribunal***

Ms. Patricia Rodríguez Martín

---

18 December 2024

**I. Background**

1. This Procedural Order deals with the Parties' Requests for Document Production, simultaneously exchanged by the Parties on November 7, 2024, along with their respective Objections and Replies.
2. These proceedings are conducted in accordance with the ICSID Arbitration Rules in force as of July 1, 2022 and with the procedures set out in Procedural Order No. 1. Section 15.1 of Procedural Order No. 1 provides that "the Tribunal shall be guided by Articles 3 and 9 of the International Bar Association Rules on the Taking of Evidence in International Arbitration (2020) ("**IBA Rules**") in relation to document production in this case."
3. Accordingly, the Tribunal issues the present Procedural Order, as follows:

**II. General decisions and Order**

4. The Tribunal's specific decisions concerning the document production requests are set out on the Redfern schedules that are attached to this Order as Annexes A (Claimants' Redfern Schedule) and B (Respondent's Redfern Schedule). These Annexes form an integral part of the present Procedural Order.
5. None of the rulings on the document requests shall be taken as a decision on any of the contentions of the Parties on the jurisdictional objections, or on the merits.

On behalf of the Tribunal,

[Signed]

---

Rt. Hon. Lord Collins of Mapesbury, LLD, FBA  
President of the Tribunal  
Date: 18 December 2024