

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED MEXICAN STATES,

Petitioner,

v.

LION MEXICO CONSOLIDATED L.P.,

Respondent.

Civil Action No. 1:21-cv-03185 (TFH)

**CROSS-PETITION FOR CONFIRMATION,
RECOGNITION, AND ENFORCEMENT OF AN ARBITRAL AWARD**

Respondent Lion Mexico Consolidated L.P. (“Lion Mexico”) hereby Cross-Petitions for Confirmation, Recognition, and Enforcement of an Arbitral Award (the “Award”) pursuant to the Federal Arbitration Act, 9 U.S.C. § 9 and Article IV of the Convention on Recognition and Enforcement of Foreign Arbitral Awards, incorporated into U.S. law by 9 U.S.C. § 201 *et seq.* The arbitration tribunal was constituted under the International Centre for Settlement of Investment Disputes – Additional Facility Rules, and the Award was issued pursuant to the North American Free Trade Agreement. The Award was issued on September 20, 2021, and became final on that date.

The basis for this Cross-Petition is set forth in the accompanying Memorandum of Law. A proposed order, as well as the declaration of John M. Conlon, have also been filed in support of this Cross-Petition.

Respectfully submitted,

Dated: February 4, 2022

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