

INTERNATIONAL CENTRE FOR SETTLEMENT OF INVESTMENT DISPUTES

Webuild S.p.A.
(formerly Salini Impregilo S.p.A.)

v.

Republic of Panama

(ICSID Case No. ARB/20/10)

PROCEDURAL ORDER NO. 3
ON THE PROCEDURAL CALENDAR

Members of the Tribunal

Ms. Lucy Reed, President of the Tribunal

Mr. Stanimir Alexandrov, Arbitrator

Prof. Dr. Hélène Ruiz Fabri, Arbitrator

Secretary of the Tribunal

Ms. Anneliese Fleckenstein

21 May 2021

1. On 3 May 2021, the Tribunal issued Procedural Order No. 2 establishing the dates for the first round of written pleadings and the range of dates for the hearing.
2. The Tribunal further invited the Parties to confer on the precise hearing date and the intervening dates in the procedural calendar and revert to the Tribunal by 17 May 2021. After agreement of the Parties, the Tribunal granted a short extension until 20 May 2021.
3. On 20 May 2021, the Parties reverted to the Tribunal with an agreed proposal for the precise hearing dates and the intervening dates in the procedural calendar as follows:


Date	Step	Parties / Tribunal	No. of Weeks
5 February 2021	First Session	All	NA
12 April 2021	Decision on Bifurcation	Tribunal	NA
5 November 2021	Memorial on Merits	Claimant	39 weeks from First Session
22 July 2022	Memorial on Preliminary Objections and Counter-Memorial on Merits	Respondent	37 weeks
19 August 2022	Document Requests	Parties (simultaneously)	4 weeks
2 September 2022	Objections to Requests	Parties (simultaneously)	2 weeks
16 September 2022	Replies to objections	Parties (simultaneously)	2 weeks
7 October 2022	Decision on Document requests	Tribunal	3 weeks
4 November 2022	Production of documents (both voluntary production and production ordered by the Tribunal) ¹	Parties (simultaneously)	4 weeks
27 January 2023	Counter-Memorial on Preliminary Objections and Reply on Merits	Claimant	27 weeks (12 weeks from production)
4 August 2023	Reply on Preliminary Objections and Rejoinder on Merits	Respondent	27 weeks
20 October 2023	Rejoinder on Preliminary Objections ²	Claimant	11 weeks
24 October 2023	List of witnesses and experts to be cross-examined during the hearing	Parties (simultaneously)	11 days before Hearing

¹ The Parties hereby agree to undertake to use best efforts to voluntarily produce documents on a rolling basis as they are located beginning at the Objections to Request step. The deadline indicated herein represents the last date for production without prejudice to the foregoing.

² Claimant reserves all rights in connection with its Rejoinder on Preliminary Objections submission, including to request additional time, including in light of Respondent's Reply on Preliminary Objections and Rejoinder on Merits.

Date	Step	Parties / Tribunal	No. of Weeks
24 October 2023	Pre-hearing organizational teleconference	Tribunal and Parties	11 days before Hearing
6-17 November 2023 (reserve 20-22 November)	Hearing on Preliminary Objections and Merits (10 days, with 3 days reserved) ³	Tribunal and Parties	
TBD	PHB (if any, in accordance with § 22 of Procedural Order No. 1)	Parties (simultaneously)	
TBD	Cost submissions	Parties (simultaneously)	
TBD	Award on Preliminary Objections and Merits	Tribunal	

4. Accordingly, the Tribunal hereby approves the agreed Procedural Calendar as set out above.



Lucy Reed
 President of the Tribunal
 Date: 21 May 2021

³ The Parties stipulate that neither can be sure of the length of time required for the hearing as the number of witnesses and experts is unknown at this time and the needs for the hearing may change once the submissions are filed. Further adjustments with respect to the duration of the hearing will be considered after the first round of pleadings and the Parties respectfully request that Tribunal hold 3 days in reserve for now and solicit further input from the Parties on this point following the first round of submissions.