

**IN THE MATTER OF AN ARBITRATION UNDER THE NORTH AMERICAN FREE  
TRADE AGREEMENT AND THE AGREEMENT BETWEEN THE UNITED STATES  
OF AMERICA, THE UNITED MEXICAN STATES, AND CANADA**

**-and-**

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

**-between-**

**AMERRA CAPITAL MANAGEMENT, LLC,  
AMERRA AGRI FUND, L.P.,  
AMERRA AGRI OPPORTUNITY FUND, L.P., AND  
JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, ON BEHALF OF THE  
JPMORGAN CHASE RETIREMENT PLAN  
(the “Claimants”)**

**and**

**THE UNITED MEXICAN STATES  
(the “Respondent”)**

**ICSID Case No. UNCT/23/1**

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**PROCEDURAL ORDER NO. 6**

***Members of the Tribunal***

Prof. Albert Jan van den Berg, Presiding Arbitrator

Mr. Eduardo Siqueiros T., Arbitrator

Prof. Jorge Viñuales, Arbitrator

***Secretary of the Tribunal***

Ms. Mercedes Cordido-Freytes de Kurowski, Legal Counsel, ICSID

***Assistant to the Tribunal***

Ms. Emily Hay

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November 14, 2024

## **I. PROCEDURAL BACKGROUND**

1. On April 14, 2023, the Tribunal held the First Session of the Tribunal with the disputing parties (“**Disputing Parties**” or “**Parties**”) by video conference.
2. On May 11, 2023, the Tribunal issued Procedural Order No. 1, which included a detailed Procedural Timetable attached under Annex A.
3. On November 29, 2023, the Tribunal issued Procedural Order No. 4, with revised Procedural Timetable in accordance with amendments agreed by the Parties and confirmed by the Tribunal.
4. On November 13, 2024, Respondent requested leave from the Tribunal for a one-week extension of the deadline for the filing of its Statement of Rejoinder, currently due on November 25, 2024. Respondent informed the Tribunal that at Respondent’s request, the Parties had agreed to extend the deadline for Respondent’s Statement of Rejoinder until December 2, 2024, with corresponding extensions to the remaining deadlines in the Procedural Timetable. Respondent further confirmed that the Parties’ agreed amendments to the Procedural Timetable, enclosed with its communication of November 13, 2024, would not affect the Hearing dates fixed under Annex A to Procedural Order No. 1, as amended by Procedural Order No. 4.
5. On November 13, 2024, Claimants confirmed the Parties’ agreement as expressed in Respondent’s communication of November 13, 2024.

## **II. TRIBUNAL’S CONSIDERATIONS AND DECISION**

6. In light of the Parties’ agreement, the Tribunal decides as follows:
  - a. The Tribunal hereby grants Respondent a one-week extension to present its Statement of Rejoinder, i.e., until **Monday, December 2, 2024**.
  - b. The Tribunal confirms the Parties’ proposed Procedural Timetable, which revises the one included as Annex A to Procedural Order No. 4, and is now attached as Annex A to

this Procedural Order with effect as of today's date.

*[SIGNED]*

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Prof. Albert Jan van den Berg  
President of the Tribunal  
Date: November 14, 2024