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Paris, 6 May 2025

VIA E-MAIL

To:

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SUBJECT: Mr. Peteris Pildegovics and SIA North Star v The Kingdom of Norway, ICSID Case ARB/20/11, Annulment Proceedings – Document Production

Dear Members of the Ad Hoc Committee,

The Applicants hereby provide their request for additional production of documents, as allowed by paragraph 81 of Procedural Order No. 3. Pursuant to that paragraph, Applicants understand that, upon further requests for production being made, the following procedural schedule now applies:



The deadline for the Applicants' Reply on Annulment would be extended by four weeks as foreseen in this Committee's Procedural Order No. 1 (i.e., from 3 June 2025 to 1 July 2025) and the deadline for the Respondent's Rejoinder on Annulment would be extended to a date six weeks from the Reply (i.e., to 12 August 2025). The prehearing conference will be scheduled in August 2025 approximately a month prior to the hearing, and the hearing dates of 22 to 24 September 2025 shall be maintained.

The Applicants further note that they have tried to keep their requests as targeted as possible, and to justify them as much as possible, including with documents received in the first round of document production from Respondent. Applicants note that for several requests, only one document is requested or very specific documents, identifiable through documents produced by Respondent, are requested.

With respect to Norway's documents produced in March 2025, Applicants have referred to some in their Redfern Schedule and intend to revert to the Tribunal either this week or next to properly introduce those documents into the record, taking into consideration section 15.5 of Procedural Order No. 1. This would allow the Committee to have such documents if any decision needs to be made on contested requests.

The Applicants thank in advance the Committee for its attention to the matters raised in the present letter and remain at their disposal with respect to any further questions arising from the above.

Sincerely,

[signed]

Mr. Pierre-Olivier Savoie

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