

**De:** Norum, Margrethe Margrethe.Norum@mfa.no   
**Objet:** RE: Peteris Pildegovics and SIA North Star v. Kingdom of Norway (ICSID Case ARB/20/11)  
**Date:** 17 novembre 2020 à 18:55  
**À:** Pierre-Olivier Savoie pierre-olivier.savoie@savoielaporte.com  
**Cc:** Seland, Helge helge.seland@mfa.no, Myklebust, Olav olav.myklebust@mfa.no, Vaughan Lowe vlowe@essexcourt.net, Mubarak Waseem MWaseem@essexcourt.net, Alain Pellet courriel@alainpellet.eu, Pierre-Olivier Laporte pierre-olivier.laporte@savoielaporte.com, Alina MIRON mail@alinamiron.fr, Mads Andenæs mads.andenas@jus.uio.no, Eirik Bjorge eirik.bjorge@bristol.ac.uk, Justine Touzet justine.touzet@savoielaporte.com, Léna Kim lena.kim@savoielaporte.com

Dear Mr Savoie,

Reference is made to our phone conversation yesterday and to your email, below, in which you propose to inform the Tribunal that it does not need to decide the issues referred to in our letter of 5 November 2020 concerning the Claimants' proposed redactions of the Request for Arbitration. We note that you wish to inform the Tribunal that the parties "will try to come to an agreement", and that you have suggested (but do not propose to tell the Tribunal) that no further discussion on the issues should take place until after Claimants have submitted their full Memorial.

For the reasons referred to in our letter dated 5 November 2020, which you have not addressed, we do not agree to your proposal. In Norway's view, any arguments concerning redaction of the Request for Arbitration (which we recall was initially published unilaterally by you) can be decided by the Tribunal now, in accordance with PO #1. There is no need to wait until Claimants submit their full Memorial.

Best regards,



**Margrethe R. Norum**

Seniorrådgiver / Senior Adviser

Utenriksdepartementet - Norwegian Ministry of Foreign Affairs

Rettsavdelingen – Legal Affairs Department

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**From:** Pierre-Olivier Savoie <pierre-olivier.savoie@savoielaporte.com>

**Sent:** tirsdag 17. november 2020 00:06

**To:** Norum, Margrethe <Margrethe.Norum@mfa.no>

**Cc:** Seland, Helge <helge.seland@mfa.no>; Myklebust, Olav <olav.myklebust@mfa.no>; 'Vaughan Lowe' <vlowe@essexcourt.net>; 'Mubarak Waseem' <MWaseem@essexcourt.net>; Alain Pellet <courriel@alainpellet.eu>; Pierre-Olivier Laporte <pierre-olivier.laporte@savoielaporte.com>; Alina MIRON <mail@alinamiron.fr>; Mads Andenæs <mads.andenas@jus.uio.no>; Eirik Bjorge <eirik.bjorge@bristol.ac.uk>; Justine Touzet <justine.touzet@savoielaporte.com>; Léna Kim <lena.kim@savoielaporte.com>

**Subject:** Re: Peteris Pildegovics and SIA North Star v. Kingdom of Norway (ICSID Case ARB/20/11)

Dear Ms. Norum,

As per our discussion of this morning, Claimants make the following proposal for a joint agreement of the parties in light of Respondent's letter of 5 November 2020 and the Tribunal's direction of 12 November 2020 that Claimants provide any comments on such letter by 19 November:

The parties inform the Tribunal that they have agreed that Respondent will not make public any information currently redacted from the Request for Arbitration until a decision of the Tribunal or an agreement of the parties has been arrived at. The parties have also agreed that they will try to come to an agreement on the issues raised by Respondent in its letter of 5 November, based on the principles established in Procedural Order No. 1, and that, as such, at this time, the Tribunal does not need to decide the questions put forth in Respondent's letter of 5 November 2020. This agreement of the parties is subject to the right of either party, at any time, to seize the Tribunal again of this issue.

As mentioned during the call today, we believe the best time to further discuss this matter would be after the Claimants' Memorial has been submitted on 11 March 2021, when other issues concerning business confidential information may arise and the parties can address these matters based on the principles found in Procedural Order No. 1. We remain available to further discuss at your convenience.

Best regards,

**Pierre-Olivier Savoie**  
Avocat à la Cour



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**De :** "Norum, Margrethe" <[Margrethe.Norum@mfa.no](mailto:Margrethe.Norum@mfa.no)>

**Date :** jeudi 5 novembre 2020 à 18:23

**À :** Leah Waithira Njoroge <[lnjoroge@worldbank.org](mailto:lnjoroge@worldbank.org)>

**Cc :** Phoebe Nqan <[snqan@worldbank.org](mailto:snqan@worldbank.org)>.

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**Objet** : RE: Peteris Pildegovics and SIA North Star v. Kingdom of Norway (ICSID Case ARB/20/11)

Dear Ms. Njoroge,

Reference is made to my e-mail below. Unfortunately, the attachment to the letter was not included. Please find enclosed the letter and the attachment. Sorry for the inconvenience.

Best regards,



**Margrethe R. Norum**

Seniørrådgiver / Senior Adviser

Utenriksdepartementet - Norwegian Ministry of Foreign Affairs

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**From:** Norum, Margrethe

**Sent:** torsdag 5. november 2020 17:18

**To:** 'Leah Waithira Njoroge' <[lnjoroge@worldbank.org](mailto:lnjoroge@worldbank.org)>

**Cc:** Phoebe Ngan <[sngan@worldbank.org](mailto:sngan@worldbank.org)>; [ARB/20/11@icsidcases.worldbank.org](mailto:ARB/20/11@icsidcases.worldbank.org);

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Helge <[helge.seland@mfa.no](mailto:helge.seland@mfa.no)>; 'Vaughan Lowe' <[vlowe@essexcourt.net](mailto:vlowe@essexcourt.net)>

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**Subject:** Peteris Pildegovics and SIA North Star v. Kingdom of Norway (ICSID Case ARB/20/11)

Dear Ms. Njoroge,

Attached to this email please find today's letter from Norway to the Tribunal regarding publication of documents.

Best regards,



**Margrethe R. Norum**

Seniorrådgiver / Senior Adviser

Utenriksdepartementet - Norwegian Ministry of Foreign Affairs

Rettsavdelingen – Legal Affairs Department

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