

IN THE MATTER OF AN ARBITRATION ADMINISTERED BY ARBITRATION AND
MEDIATION CENTER OF ARMENIA

BETWEEN:

[NAME OF CLAIMANT]

(CLAIMANT)

-AND-

[NAME OF RESPONDENT]

(RESPONDENT)

REQUEST FOR ARBITRATION

[Date of the Request]

I. INTRODUCTION

1. This Request for Arbitration is submitted on behalf of [Name of Claimant] (hereinafter “Claimant”) pursuant to Article 5 of Arbitration Rules of Arbitration and Mediation Center of Armenia (the “AMCA Rules”) against [Name of Respondent] (hereinafter “**Respondent**”), (hereinafter collectively referred to as the “**Parties**”).
2. This Request for Arbitration contains information concerning the following:
 - i. The name, description and address of each of the Parties (**II**);
 - ii. Description of the nature and factual circumstances of the dispute giving rise to the claims (**III**);
 - iii. The dispute resolution clause, the proposed governing law, the seat and language of the arbitration (the Arbitration Agreement that is invoked and other relevant agreements) (**IV**);
 - iv. The composition of the Arbitral Tribunal (**V**);
 - v. A statement of the relief sought (**VI**);
 - vi. Claimant’s payment of fees (**VII**); and
3. This dispute principally concerns Respondent’s [insert brief description of breach and nature of claim(s)].

II. THE PARTIES

A. Claimant

4. Claimant is [Name of Claimant], a company registered under the laws of [Name of country or jurisdiction], with its registered office located at [Complete address] *[only for legal persons]*. [Insert brief description of Claimant’s business activity, industry sector, size of business, number of employees, market position, revenue etc. as appropriate.] *[only for legal persons]*
5. Claimant’s address is:

[Claimant’s name]

[Claimant’s address]

[name of Claimant's director] *[only for legal persons]*

[Claimant's telephone number]

[Claimant's e-mail]

[Preferred means of notification of the Claimant legal person and the information necessary for notification]

6. Claimant's Representative

[Claimant's representative's name]

[Claimant's representative's telephone number]

[Claimant's representative's e-mail]

[other details]

B. RESPONDENT

7. Respondent is [Name of Respondent], *[only for legal persons]* a company registered under the laws of [Name of country], with its registered office located at [Complete address]. [Insert brief description of Respondent's business activity, industry sector, size of business, number of employees, market position, revenue etc. as appropriate.] *[only for legal persons]*

8. Respondent's contact information is:

[Respondent's name]

[Respondent's address in full]

[name of Respondent's director] *[only for legal persons]*

[Respondent's telephone number]

[Respondent's e-mail]

III. DESCRIPTION OF THE NATURE AND FACTUAL CIRCUMSTANCES OF THE DISPUTE GIVING RISE TO THE CLAIMS

A. FACTUAL BACKGROUND

9. [Define Respondent's conduct which gives rise to the claims].

B. LEGAL BASIS OF CLAIM

10. [Explain the basis of Respondent's liability, contractual or otherwise]

C. RESPONDENT'S VIOLATIONS OF ITS LEGAL OBLIGATIONS

11. [Explain Respondent's violations of its legal obligations]

[Insert description of Claimant's damages arising from Respondent's violations of its legal obligations.]

Claimant's total damages are currently estimated at [insert estimation of the damages suffered by Claimant].

IV. DISPUTE RESOLUTION CLAUSE, GOVERNING LAW, SEAT AND LANGUAGE OF THE ARBITRATION

A. THE ARBITRATION CLAUSE

12. This arbitration is initiated pursuant to the arbitration agreement [attached], which provides

13. [OPTIONAL: Arbitration may be commenced as Claimant has duly complied with all requirements provided for in the arbitration agreement. In particular, Claimant [Demonstrate compliance with requirements of arbitration agreement e.g. obligation to negotiate/attempt to settle in good faith/amicably resolve dispute.]

B. THE SEAT OF ARBITRATION

14. Pursuant to Article [specify Article of the arbitration agreement where the seat of the arbitration is provided for] set out above, the place of the arbitration is [insert city and country].

15. [NOTE: Claimant may also add any comment as to the place of arbitration]

C. THE APPLICABLE RULES OF LAW

16. The Agreement is governed by the substantive laws of [specify which jurisdiction's law applies to the contract] pursuant to Article [specify Article of the arbitration agreement where this is

found], which provides as follows:

[Cite the provisions where the applicable law is found, in full.]

17. [NOTE: Claimant may also add any comment as to applicable law]

D. THE LANGUAGE OF ARBITRATION

18. Pursuant to Article [specify Article of the arbitration agreement where the language of the arbitration is found] of the Contract, the language of the arbitration shall be [insert language of the arbitration]

19. [NOTE: Claimant may also add any comment as to the language of the arbitration.]

V. IV. THE COMPOSITION OF THE ARBITRAL TRIBUNAL [NOTE: ARTICLE 14 OF AMCA RULES]

20. Article [specify Article of the arbitration agreement which provides for the constitution of the tribunal] provides for...
[insert comments on constitution of tribunal including number of arbitrators, if identified in arbitration clause, and procedure of appointment. Invite Respondent's nomination/comments.]

[NOTE: if the parties have not previously agreed on the composition of the Tribunal, the Claimant should make proposals and observations on the number of arbitrators, the procedure for their appointment, their choice in accordance with the provisions of Article 13 and 14, and any nomination of an arbitrator required thereby]

21. [NOTE: in case the arbitration agreement provides for a Sole Arbitrator] Pursuant to Article [specify Article of the arbitration agreement which provides for the constitution of the tribunal] and Article 14 of AMCA Rules, Claimant nominates [name of proposed Sole Arbitrator] of [specify law firm or chambers, if applicable] for approval as Sole Arbitrator. To the best of Claimant's knowledge, [name of proposed Sole Arbitrator] is independent of the Parties involved in this arbitration. [name of proposed Sole Arbitrator]'s contact details are as follows:

[Sole Arbitrator's Name]

[Sole Arbitrator's Address]

[Sole Arbitrator's Telephone Number]

[Sole Arbitrator's E-mail]

22. [NOTE: in the case of a three-member tribunal] Pursuant to Article [specify Article of the arbitration agreement which provides for the constitution of the tribunal.] and Article 14 of AMCA Rules, Claimant nominates [name of Co-Arbitrator] of [specify law firm or chambers, if applicable] for approval as Claimant's Co-Arbitrator. To the best of Claimant's knowledge, [name of Co-Arbitrator] is independent of the Parties involved in this arbitration. [Co-Arbitrator]'s contact details are as follows:

[Co-Arbitrator's name]

[Co-Arbitrator's address]

[Co-Arbitrator's telephone number]

[Co-Arbitrator's e-mail]

VI. A STATEMENT OF RELIEF SOUGHT

23. As a result, Claimant respectfully requests the Arbitral Tribunal to issue an award:
- i. declaring that the Arbitral Tribunal has jurisdiction to consider the dispute described herein between the Parties;
 - ii. declaring that Respondent violated its obligations by [describe basis of Respondent's liability];
 - iii. ordering Respondent to compensate Claimant for the damages and losses suffered as a result of Respondent's breaches of the Contract, currently estimated to be in the amount of [insert estimation of the damages suffered by Claimant];
 - iv. ordering Respondent to pay all arbitration costs, including Claimant's representative's costs and expenses; and
 - v. [Optional: ordering payment by Respondent of interest at a rate of [insert the interest rate provided for in the contract] pursuant to [cite basis for determining interest] on all of the above amounts as of the date these amounts were due, until the date of their effective payment.
 - vi. For the avoidance of doubt, Claimant reserves its right to: raise any and all further claims arising out of or in connection with the disputed matters described in this Request for Arbitration or otherwise arising between the Parties; and
 - vii. amend and/or supplement the relief sought herein;

- viii. produce such factual or legal arguments or evidence (including witness testimony, expert testimony and other documents) as may be necessary to present its case or rebut any case which may be put forward by Respondent; and
- ix. seek interim and provisional measures before this Arbitral Tribunal or any competent national court.

VII. PAYMENT OF FEES

24. Pursuant to Annex 1 of the AMCA Rules, Claimant is attaching the evidence of paying as a fee.

Respectfully submitted,

[Name of Claimant and/or Claimant’s representative]

[Signature of Claimant and/or Claimant’s representative]

[OPTIONAL] DOCUMENTS SUBMITTED WITH REQUEST FOR ARBITRATION

| | Document type/details | Page |
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