

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

BETWEEN:

[NAME OF CLAIMANT]

(CLAIMANT)

-AND-

[NAME OF RESPONDENT]

(RESPONDENT)

ANSWER TO THE REQUEST FOR ARBITRATION

[Date of the Answer]

I. INTRODUCTION

1. This Answer to Claimant’s Request for Arbitration of [Date of the Request for Arbitration] (**hereinafter the “Answer”**), is submitted on behalf of [Name of Respondent] (**hereinafter “Respondent”**) pursuant to Article 6 of the Rules of Arbitration of the Arbitration and Mediation Center of Armenia (**“AMCA Rules”**).
2. Pursuant to Article 6 of the AMCA Rules, this Answer contains information concerning the following:
 - i. the name of the claimant, identification data if a natural person, state registration data if it is a legal person, contact details of the claimant, physical address, email address and preferred means of notification;
 - ii. the name, physical address, email address and other contact details of the representative of the claimant;
 - iii. the name, physical address of the respondent, and other contact details, including email address, if available to the claimant;
 - iv. a description of the nature and circumstances of the dispute giving rise to the claims and of the basis upon which the claims are made;
 - v. a statement of the relief sought, together with the amounts of any quantified claims and, to the extent possible, an estimate of the monetary value of any other claims;
 - vi. the arbitration agreement(s) and other relevant agreements;
 - vii. any observations or proposals concerning the number of arbitrators and their choice in accordance with the provisions of Articles 13 and 14, and any nomination of an arbitrator required thereby; and
 - viii. any observations or proposals as to the seat of the arbitration, the applicable rules of law and the language of the arbitration.
3. This dispute concerns [a brief statement of the objections to the request].

II. THE PARTIES

A. Claimant

1. 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]. [Insert brief description of Claimant’s business activity, industry sector, size of business, number of employees, market position, revenue etc. as appropriate.]

2. Claimant’s address is:

[Claimant’s name]

[Claimant’s address]

[name of Claimant’s director]

[Claimant’s telephone number]

[Claimant’s e-mail]

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

3. Claimant’s Representative

[Claimant’s representative’s name]

[Claimant’s representative’s telephone number]

[Claimant’s representative’s e-mail]

[other details]

B. RESPONDENT

4. Respondent is [Name of Respondent], 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.]

5. Respondent’s contact information is:

[Respondent's name]
[Respondent's address in full]
[name of Respondent's director]
[Respondent's telephone number]
[Respondent's e-mail]

III. OBSERVATIONS ON THE BASIS UPON WHICH THE CLAIMS ARE MADE AND THE NATURE AND CIRCUMSTANCES OF THE DISPUTE

A. Factual Background

6. [Provide Respondent's opinion on the facts and nature of the dispute as presented by the Claimant in the Request for Arbitration]

B. Legal grounds for the Answer

7. [Upon wish, provide legal grounds and justifications for submitted Answer]

C. Response to Claimant's Relief Sought

8. [Submit your response to the Claimant's relief sought, including the Claimant's breach of obligations, if any exists]

[In case of a counterclaim, detail the consequences experienced by the Respondent as a result of the Claimant's breach of its obligations.

The total amount of damages suffered by the Respondent is [insert amount of damages].

**IV. RESPONDENT’S COMMENTS AS TO THE PLACE OF
ARBITRATION, THE APPLICABLE LAW AND THE LANGUAGE
OF THE ARBITRATION**

A. The Seat of Arbitration

9. Pursuant to Article [specify Article of the arbitration agreement where the place of the arbitration is provided for] set out above, the place of the arbitration is [insert city and country].
10. [Insert Respondent’s comments as to the place of arbitration. Respondent may confirm the statement made by Claimant in the Request. In case of non-confirmation, Respondent should state its choice and reasons.]

B. Applicable law

11. 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.]

12. [Insert Respondent’s comments as to the applicable law. Respondent may confirm the statement made by Claimant in the Request. In case of non-confirmation, Respondent should state its choice and reasons.]

C. Language of Arbitration

13. 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]

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

**V. RESPONDENT’S COMMENTS CONCERNING THE
COMPOSITION OF THE ARBITRAL TRIBUNAL**

15. In its Request for Arbitration, Claimant nominated [name of arbitrator] as [Co-arbitrator / Sole Arbitrator], whose contact information is [insert contact information of arbitrator].

16. *[NOTE: if Respondent contests the Arbitrator nominated by Claimant]* Respondent contests the nomination of [name of arbitrator] on the grounds that [arguments].

17. [NOTE: If the arbitration agreement provides for the Respondent to appoint an arbitrator] In accordance with the Article 14 of the AMCA Rules, Respondent nominates [name of arbitrator] to serve as [Co-Arbitrator / Sole Arbitrator], whose details are the following:

[Arbitrator’s name]

[Arbitrator’s address in full]

[Arbitrator’s telephone number]

[Arbitrator’s e-mail]

VI. A STATEMENT OF RELIEF SOUGHT

18. Respondent respectfully requests the Arbitral Tribunal to:

i. [NOTE: in the event that Respondent contests jurisdiction] dismiss all Claimant’s claims on the ground of an Arbitral Tribunal’s lack of jurisdiction.

ii. Respondent rejects Claimant’s claims as set out in its Request and rejects the relief sought in its Request.

iii. [NOTE: if there are counterclaims] order Claimant to compensate Respondent

for the damages and losses suffered as a result of Claimant’s conduct, currently estimated to be in the amount of [insert estimation of damages suffered by Claimant];

- iv. Order Claimant to pay all arbitration costs, including Respondent’s counsel’s costs and expenses.

Respectfully submitted,

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

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

**[OPTIONAL] DOCUMENTS SUBMITTED WITH THE ANSWER TO THE
REQUEST FOR ARBITRATION**

	Document type/details	Page
1.	[•]	