

**IN THE MATTER OF AN ARBITRATION UNDER THE
NORTH AMERICAN FREE TRADE AGREEMENT
and
THE AGREEMENT BETWEEN THE GOVERNMENT OF THE REPUBLIC OF
FRANCE AND THE GOVERNMENT OF THE UNITED MEXICAN STATES ON THE
RECIPROCAL PROMOTION AND PROTECTION OF INVESTMENTS
and
THE AGREEMENT BETWEEN THE PORTUGUESE REPUBLIC AND THE UNITED
MEXICAN STATES ON THE RECIPROCAL PROMOTION AND PROTECTION OF
INVESTMENTS
and
*EL ACUERDO ENTRE EL GOBIERNO DE LOS ESTADOS UNIDOS MEXICANOS Y EL
GOBIERNO DE LA REPUBLICA ARGENTINA PARA LA PROMOCIÓN Y PROTECCIÓN
RECÍPROCA DE LAS INVERSIONES***

- and -

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

- between -

**CARLOS SASTRE AND OTHERS
(the “Claimants”)**

and

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

ICSID Case No. UNCT/20/2

PROCEDURAL ORDER NO. 3

Tribunal

Prof. Eduardo Zuleta (Presiding Arbitrator)
Dr. Charles Poncet
Mr. Christer Söderlund

Secretary of the Tribunal
Ms. Geraldine R. Fischer

September 17, 2020

I. PROCEDURAL HISTORY

1. Further to Procedural Order No. 2, the Tribunal invited the Parties to confer and agree on: (a) the procedural calendar; and (b) the applicable arbitration rules for these proceedings. Specifically, the Tribunal invited the Parties to seek an agreement as to whether to apply the 1976 or the 2010 UNCITRAL Arbitration Rules to these proceedings, and, in the absence of an agreement, indicate each Party's position.
2. On 9 September 2020, the Parties informed the Tribunal that they "*agreed to apply the 1976 version of the UNCITRAL Arbitration Rules for all of the claims in this proceeding*" and agreed on the proposed procedural calendar.

II. DECISION

3. The Tribunal decides as follows:
 - a. These proceedings will be governed by the 1976 version of the UNCITRAL Arbitration Rules; and
 - b. The Tribunal adopts the Parties' proposed procedural calendar, which is attached as Annex A to this Procedural Order.

On behalf of the Arbitral Tribunal,

[Signed]

Prof. Eduardo Zuleta

Date: September 17, 2020

ANNEX A- PROCEDURAL CALENDAR

Submission	Party	Time Limit	Due Date
Memorial on Jurisdictional Objections	Respondent	14 weeks from the date of issuance by the Tribunal of the jurisdiction procedural timetable	23 December 2020
Counter- Memorial on Jurisdictional Objections	Claimants	14 weeks from the due date of Memorial on Jurisdiction	31 March 2021
Requests for Production of Documents	Claimants and Respondent	3 weeks from the due date of Counter-Memorial on Jurisdictional Objections	21 April 2021
Production of non-objected documents and Objections to Requests for Production of Documents	Claimants and Respondent	3 weeks from the due date of Requests for Production of Documents	12 May 2021
Reply to Objections to Requests for Production	Claimants and Respondent	2 weeks from the due date of Production of non-objected documents and Objections to Requests for Production of Documents	26 May 2021
Decision on Requests for Production of Documents	Tribunal	3 weeks from the due date of Reply to Objections to Requests for Production	16 June 2021
Simultaneous Production of Documents Ordered by the Tribunal	Claimants and Respondent	3 weeks from the due date of Decision on Requests for Production of Documents	7 July 2021
Reply on	Respondent	4 weeks from the Production of Documents	4 August 2021

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Procedural Order No. 3

Submission	Party	Time Limit	Due Date
Jurisdictional Objections		Ordered by the Tribunal	
Rejoinder on Jurisdictional Objections	Claimants	7 weeks from the due date of the Reply on Jurisdiction	22 September 2021
Non-disputing Party Submissions	Non-disputing Parties	2 weeks from the due date of the Rejoinder on Jurisdiction	6 October 2021
Comments on Non-disputing Party Submissions	Claimants and Respondent	2 weeks from the due date of the Non-disputing Parties Submissions	20 October 2021
Witness Notifications (if necessary)	Claimants and Respondent	4 weeks from the due date of comments on the Non-disputing Parties Submissions	17 November 2021
Pre-Hearing Organizational Meeting (if necessary)	All	3 weeks from the due date of Witness Notifications	8 December 2021
Hearing on Jurisdictional Objections (if necessary)	All	At least 8 weeks from the date of the Pre-Hearing Organizational Meeting	TBD
Tribunal's Decision	Tribunal	TBD	TBD