

ANNEX A: NICARAGUA'S SUBMISSION ON COSTS**I. THE REPUBLIC OF NICARAGUA'S DETAIL OF FEES AND COSTS****A. BakerHostetler Fees and Expenses**

<b>Phase No.</b>	<b>Description</b>	<b>Hours</b>	<b>Fees (US\$)</b>	<b>Expenses (US\$)</b>	<b>Total (US\$)</b>
<b>Phase No. 1</b>	<p><b>Timeframe:</b> Request for Arbitration through the First Session (from March 19, 2021 to June 22, 2022).</p> <p><b>Tasks included:</b> (i) analysis of Riverside's Request for Arbitration; (ii) BakerHostetler meetings with the client; (iii) analysis of the case; and (iv) participation in the First Session.</p>	■	\$155,729	N/A	\$155,729
<b>Phase No. 2</b>	<p><b>Timeframe:</b> Conclusion of First Session through Riverside's Memorial filing (June 23, 2022 to October 21, 2022).</p> <p><b>Tasks included:</b> (i) BakerHostetler meetings with the client; (ii) collection and review documents; and (iii) conducting legal research.</p>	■	\$88,692	N/A	\$88,692

Phase No.	Description	Hours	Fees (US\$)	Expenses (US\$)	Total (US\$)
Phase No. 3	<p><b>Timeframe:</b> After Riverside’s Memorial through Nicaragua’s Counter-Memorial filing (October 22, 2022 to March 3, 2023).</p> <p><b>Tasks included:</b> (i) preparation of Nicaragua’s Response (November 23, 2022) and Rejoinder (December 12, 2022) to Riverside’s Motion regarding the Protective Order (November 13, 2022);<sup>1</sup> (ii) several exchanges between the Parties regarding the procedural timetable due to delay caused by Riverside’s Motion and Riverside’s initial rejection of Nicaragua’s time extension request for its Counter-Memorial; (iii) preparation of Nicaragua’s Counter-Memorial filing; and (iv) BakerHostetler meetings with the client.</p>	██████	\$1,495,037	\$18,609.08	\$1,513,646.08

<sup>1</sup> Nicaragua notes that BakerHostetler’s legal fees for preparing the Response and Rejoinder to Riverside’s Motion, resulting in Procedural Order No. 4, were approximately ██████. The legal fees incurred in connection with Claimant’s baseless Protective Order arguments continued well past December 2022 and through the post-hearing brief. As the Tribunal will be aware, Claimant overhauled its post-Memorial factual narrative and merits theories to focus primarily on the Protective Order, and even hired a legal expert, Renaldy Gutierrez, to opine on the post-alleged-measures Protective Order. Claimant did all of this despite the Tribunal’s decision in Procedural Order No. 4. Nicaragua had no choice but to respond to Claimant’s new Protective Order arguments and engage a rebuttal expert.

Phase No.	Description	Hours	Fees (US\$)	Expenses (US\$)	Total (US\$)
Phase No. 4	<p><b>Timeframe:</b> After Nicaragua’s Counter-Memorial filing through Riverside’s Reply Memorial filing (March 4, 2022 to November 3, 2023).</p> <p><b>Tasks included:</b> (i) inter-Party correspondence regarding Riverside’s request for Nicaragua to withdraw its jurisdictional objections (beginning on March 13, 2023); (ii) preparation of response to Riverside’s Motion to Dismiss Nicaragua’s jurisdictional objections (March 16, 2023); (iii) preparing Nicaragua’s document requests; (iv) responding to Riverside’s document requests; (v) responding to Riverside’s objections to Nicaragua’s document requests;<sup>2</sup> (vi) inter-Party correspondence for Riverside’s baseless request for a Confidentiality Order;<sup>3</sup> (vii) preparing Nicaragua’s application for security for costs<sup>4</sup>; and (viii) answering Riverside’s various unsolicited requests.</p>	██████	\$585,637.75	\$24,894.50	\$610,532.25

<sup>2</sup> BakerHostetler’s legal fees for responding to Claimant’s 177-page Stern schedule comprising 112 document requests, followed by responding to Claimant’s frivolous objections and merits-based arguments against Nicaragua’s document requests (*i.e.*, for the period of April 14, 2023 to May 19, 2023) were approximately ██████.

<sup>3</sup> BakerHostetler’s legal fees for responding to Claimant’s absurd request to conclude a Confidentiality Order under the EU’s GDPR regime were approximately ██████.

<sup>4</sup> BakerHostetler’s legal fees for preparing the Security for Costs application and the Reply was approximately ██████. Nicaragua is voluntarily deducting this amount from the fees. This deduction is not reflected in the phase total here, but is shown in the final totals of fees being sought by Nicaragua.

Phase No.	Description	Hours	Fees (US\$)	Expenses (US\$)	Total (US\$)
Phase No. 5	<p><b>Timeframe:</b> After Riverside’s Reply Memorial filing through Nicaragua’s Rejoinder filing (November 4, 2023 to March 8, 2024)</p> <p><b>Tasks included:</b> (i) preparing responses to Riverside’s baseless request to hold a fully virtual hearing;<sup>5</sup> (ii) responding to constant and unnecessary official and inter-Party correspondence from Riverside;<sup>6</sup> (iii) preparing Nicaragua’s Reply on Security for Costs; and (iv) preparation of Nicaragua’s Rejoinder.</p>	██████████	\$1,636,270.25	\$15,883.52	\$1,652,153.77

<sup>5</sup> BakerHostetler’s legal fees for responding to Claimant’s request to hold a fully virtual hearing were approximately ██████████.

<sup>6</sup> This includes but is not limited to: (i) frequent inter-Party and tribunal communications regarding Riverside’s two-month-long failure to upload numerous supporting documents cited in its Reply Memorial (as the Tribunal Secretary also noted twice in November 2023), the correspondence for which transpired from November 8, 2023 to January 16, 2023 and involved unnecessarily prolix errata and reports from Claimant as Nicaragua was preparing its Rejoinder; (ii) responding to Claimant’s baseless and incessant inter-Party communications from February 2, 2024 to February 26, 2024 (immediately before Nicaragua’s Rejoinder filing) accusing Nicaragua of failing to comply with its document production obligations; (iii) responding to Claimant’s additional, prolix inter-Party communications regarding visa application procedures, also immediately before Nicaragua’s Rejoinder filing. BakerHostetler’s legal fees during these circumstances were approximately ██████████.

Phase No.	Description	Hours	Fees (US\$)	Expenses (US\$)	Total (US\$)
Phase No. 6	<p><b>Timeframe:</b> After Nicaragua's Rejoinder filing until Hearing commences (March 9, 2024 to June 30, 2024)</p> <p><b>Tasks included:</b> (i) preparing Opposition (April 8, 2024) and Rejoinder (April 16, 2024) to Riverside's Motion to Strike (March 26, 2024);<sup>7</sup> (ii) responding to additional document production requests submitted by Claimant;<sup>8</sup> (iii) inter-Party correspondence regarding Nicaragua's concerns over Riverside's use of artificial intelligence programs for its pleadings and other submissions, as well as Nicaragua's proposal to conclude an artificial intelligence protocol; (iv) preparation of fact and expert witnesses for the Hearing, including those fact and expert witnesses Claimant dropped less than one month before the Hearing; and (v) preparation for the Hearing.</p>	██████	\$1,272,214.50	\$41,437.62	\$1,313,652.12
Phase No. 7	<p><b>Timeframe:</b> Hearing (July 1, 2024 to July 12, 2024)</p> <p><b>Tasks included:</b> (i) participation in the Hearing; (ii) preparing Nicaragua's Motion to Strike Mr. Ferrufino's witness statement; (iii) preparing observations to Riverside's application for leave to introduce new evidence; and (iv) preparation of Nicaragua's closing arguments.</p>	██████	\$630,180	\$13,746.36 <sup>9</sup>	\$643,926.36

<sup>7</sup> BakerHostetler's legal fees for responding to Claimant's Motion to Strike, resulting in Procedural Order No. 9, were approximately ██████.

<sup>8</sup> BakerHostetler's legal fees for responding to Claimant's additional document requests were approximately ██████.

<sup>9</sup> This expense includes accommodation, meals, and transportation for Nicaragua's fact witnesses during the Hearing.

Phase No.	Description	Hours	Fees (US\$)	Expenses (US\$)	Total (US\$)
Phase No. 8	<p><b>Timeframe:</b> After the Hearing through Nicaragua's Submission on Costs (July 13, 2024 to November 8, 2024)</p> <p><b>Tasks included:</b> (i) preparing Nicaragua's observations to Riverside's new evidence; (ii) review and revision of the Hearing transcripts; (iii) preparation of Nicaragua's Post-Hearing Submission; and (iv) preparation of Nicaragua's Submission on Costs.</p>	██████	\$974,036	\$6,165.88	980,201.88
	<b>TOTAL</b>	██████	\$6,632,796.50 (including \$205,000 deduction)	\$120,736.96	<b>\$6,753,533.46</b>

**B. Experts' Fees and Expenses**

Expert	Fees and Expenses (US\$)
Dr. Byron Sequeira	\$28,419
Dr. Odilo Duarte	\$35,600
Prof. William Burke-White	\$30,166
Messrs. Tim Hart and Ken Kratovil (HKA, formerly Credibility)	\$400,000
<b>TOTAL</b>	<b>\$494,185</b>

**C. Arbitration Costs**

<b>Item</b>	<b>Amount (US\$)</b>
Advance payment to ICSID (June 8, 2022)	\$150,000
Advance payment to ICSID (September 5, 2023)	\$199,950
Advance payment to ICSID (August 20, 2024)	\$299,950
<b>TOTAL</b>	<b>\$649,900</b>

**D. Additional Expenses**

<b>Item</b>	<b>Amount (US\$)</b>
Security Services Agreement between the Attorney General's Office and the Empresa de Servicios de Seguridad Privada (CYB) for 24-hour security at Hacienda Santa Fé (from September 2021 to March 2025) <sup>10</sup>	\$342,827.40 <sup>11</sup>

<sup>10</sup> Under the terms of the Agreement, any sums for future security through March 2025 have already been disbursed by Nicaragua to CYB.

<sup>11</sup> Paid in Nicaraguan Cordobas (NIO). Total sum paid by Nicaragua to CYB as of this filing are NIO 12,602,771.82. Converted to U.S. dollars on November 5, 2024 using the currency conversion platform available at: <https://www.xe.com/currencyconverter/>

<b>TOTAL</b>	<b>\$342,827.40</b>
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**II. THE REPUBLIC OF NICARAGUA'S SUMMARY OF TOTAL FEES AND COSTS**

<b>Item</b>	<b>Amount (US\$)</b>
BakerHostetler Fees and Expenses	\$6,753,533.46
Expert Fees and Expenses	\$494,185
Arbitration Costs	\$649,900
Additional Expenses	\$342,827.40
<b>TOTAL FEES &amp; COSTS</b>	<b>\$8,240,445.86</b>