

International Centre for Settlement of Investment Disputes

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Website: www.worldbank.org/icsid

By Fax

April 5, 2004

Fireman's Fund Insurance Company
c/o Sidley Austin Brown & Wood
Attn. Mr. Daniel M. Price
1501 K Street N.W.
Washington, D.C. 20005
And
c/o Mr. Raymundo E. Enriquez
Edificio Plaza Inverlat
Blvd. M. Avila Carnacho No. 1-12°
Col. Lomas de Chapultepec
11560 Mexico, D.F., México

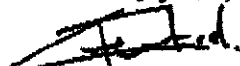
The United Mexican States
c/o Mr. Hugo Perezcano Diaz
Consultor Jurídico de Negociaciones
Secretaría de Economía
Alfonso Reyes No. 30, Piso 17
Colonia Condesa 1911
México, Distrito Federal, C.P. 06140

Re: Fireman's Fund Insurance Company v. The United Mexican States
(ICSID Case No. ARB(AF)/02/01)

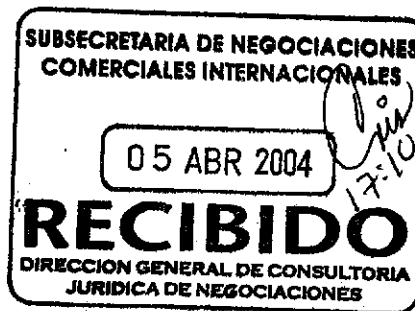
Dear Sirs,

In connection with the Claimant's letter of April 2, 2004, the President of the Tribunal has asked me to invite the parties to work on a schedule by agreement for the remainder stages of the proceeding no later than Thursday, April 8, 2004. If the parties could not reach an agreement, the Tribunal will decide on this issue.

Sincerely yours,


Claudia Frutos-Peterson
Secretary of the Tribunal

cc:
Professor Albert Jan van den Berg
Professor Andreas F. Lowenfeld
Lic. Francisco Carrillo Gamboa



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April 13, 2004

By Facsimile

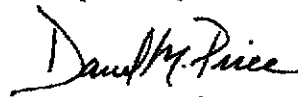
Ms. Claudia Frutos-Peterson
Secretary to the Tribunal
International Centre for Settlement of Investment Disputes
1818 H Street NW
Washington, D.C. 20433

Re: Fireman's Fund Insurance Co. v. The United Mexican States, ICSID Case No. ARB(AF)/02/01

Dear Ms. Frutos-Peterson:

By its letter of April 5, 2004, the Tribunal invited the parties to agree on a revised schedule for the proceedings in the above-captioned case. Pursuant to the Tribunal's request, the parties have conferred and have reached agreement on the attached revised schedule, subject (as indicated) to the Tribunal's preference with respect to the dates for the hearing on the merits.

Respectfully submitted,



Daniel M. Price
Counsel for Claimant

cc: Sr. Hugo Perezcano Díaz
Sr. Máximo Romero Jiménez



Fireman's Fund Ins. Co. v. United Mexican States
ICSID Case No. ARB(AF)/02/01

Revised Schedule (proposed April 13, 2004)

- | | |
|--|---|
| 1. Claimant's memorial | June 25, 2004 |
| 2. Respondent's request for production of documents | July 16, 2004 |
| 3. Claimant's objections to document production | July 30, 2004 |
| 4. Claimant's production of documents | Aug. 30, 2004 |
| 5. Tribunal's decision re: document production compliance issues | Sept. 20, 2004 |
| 6. Respondent's memorial | Jan. 24, 2005 |
| 7. Claimant's reply | Mar. 11, 2005 |
| 8. Respondent's rejoinder | Apr. 25, 2005 |
| 9. Notification of witnesses | May 9, 2005 |
| 10. U.S./Canada submissions | May 25, 2005 |
| 11. Hearing | June 20-24, 2005
[or in the alternative, June 27-July 1, 2005] |
| 12. U.S./Canada post-hearing submissions | Aug. 12, 2005 |

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April 19, 2004

Fireman's Fund Insurance Company
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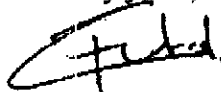
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Alfonso Reyes No. 30, Piso 17
Colonia Condesa 1911
México, Distrito Federal, C.P. 06140

Re: Fireman's Fund Insurance Company v. The United Mexican States
(ICSID Case No. ARB(AF)/02/1)

Dear Sirs,

The President of the Tribunal has asked me to inform you that the Tribunal approves the proposed revised schedule for the proceedings. In this connection, the Tribunal would like to advise the parties that a further change in the schedule will, barring exceptional circumstances, not be looked upon favorably, in particular in light of the difficulty of finding new dates for the hearing. The first option for the hearing period can be retained (i.e., June 20-24, 2005).

Sincerely yours,



Claudia Frutos-Peterson
Secretary of the Tribunal

cc:

Professor Albert Jan van den Berg
Professor Andreas F. Lowenfeld
Lic. Francisco Carrillo Gamboa

