

MODEL PROCEDURAL TIMETABLE

DISCLAIMER

This model is intended solely to assist arbitrators acting in ICC arbitrations in the drafting of the Procedural Timetable. It does not constitute an exhaustive, mandatory or otherwise binding document.

This model is provided for guidance only and should be adapted to the facts and circumstances of each case.

Pursuant to Appendix IV of the ICC Arbitration Rules on Case Management Techniques, appropriate control of time and costs is important in all cases.

Square brackets demarcate the beginning and end of the optional sentences suggested in the model, and slashes refer to the various options.

For any questions, the arbitrators may contact their respective case management teams.

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MODEL PROCEDURAL TIMETABLE

Pursuant to Article 24 of the ICC Arbitration Rules in force as of
/[1 January 2012] / [1 March 2017]

ICC Arbitration ***/*****

Claimant/s v/ Respondent/s v/ Additional Party/Parties

N°	Event	Parties / Tribunal	Time Interval	Date
	Statement of Claim , together with all documentary evidence and Witness Statements (expert and fact witnesses, if any)	Claimant/s		dd/mm/yyyy
	Statement of Defence [and Counterclaim] , together with all documentary evidence and Witness Statements (expert and fact witnesses, if any)	Respondent/s		dd/mm/yyyy
	Simultaneous exchange of document production requests	Claimant/s and Respondent/s		dd/mm/yyyy
	Simultaneous production of requested documents and objections to document production requests, where contested	Claimant/s and Respondent/s		dd/mm/yyyy
	Replies to objections to document production requests and applications to the Tribunal regarding document production (if necessary)	Claimant/s and Respondent/s		dd/mm/yyyy
	Decision on applications for document production	Tribunal		dd/mm/yyyy
	Production of documents ordered by the Tribunal	Claimant/s and Respondent/s		dd/mm/yyyy
	Reply [and Defence to Counterclaim] , together with all documentary evidence and witness statements (expert and fact witnesses)	Claimant/s		dd/mm/yyyy
	Rejoinder [and Reply on Counterclaim] , together with all documentary evidence and witness statements (expert and fact witnesses)	Respondent/s		dd/mm/yyyy

N°	Event	Parties / Tribunal	Time Interval	Date
	Rejoinder on Counterclaim	Claimant/s		dd/mm/yyyy
	Notification of experts and fact witnesses required for cross-examination	Claimant/s and Respondent/s		dd/mm/yyyy
	Pre-hearing conference	Claimant/s, Respondent/s and Tribunal		dd/mm/yyyy
	Written opening submissions	Claimant/s and Respondent/s		dd/mm/yyyy
	Hearing Bundles	Claimant/s and Respondent/s		dd/mm/yyyy
	Hearing	Claimant/s, Respondent/s and Tribunal	/*** /weeks /months from *** /Week of *** (i.e. *** days, with *** days reserved)	dd/mm/yyyy
	Simultaneous filing of post-hearing briefs	Claimant/s and Respondent/s		dd/mm/yyyy
	Simultaneous filing of reply post-hearing briefs	Claimant/s and Respondent/s		dd/mm/yyyy
	Simultaneous filing of submissions on costs	Claimant/s and Respondent/s		dd/mm/yyyy
	Simultaneous filing of reply submission on costs	Claimant/s/Respondent/s		dd/mm/yyyy
	Closing of the proceedings	Tribunal		dd/mm/yyyy
	Award	Tribunal		dd/mm/yyyy

N°	Event	Parties / Tribunal	Time Interval	Date
<i>Option for Cases where Interim and Conservatory Measures are requested</i>				
	Request for interim and conservatory measures	Claimant/s/Respondent/s/Additional party(ies)		dd/mm/yyyy
	Answer to the request for interim and conservatory measures	Respondent/s/Claimant/s/Additional party(ies)		dd/mm/yyyy
	Reply to the request for interim and conservatory measures	Claimant/s/Respondent/s/Additional party(ies)		dd/mm/yyyy
	Rejoinder to the request for interim and conservatory measures	Respondent/s/Claimant/s/Additional party(ies)		dd/mm/yyyy
	Hearing on the request for interim and conservatory measures	Claimant/s/Respondent/s/Additional party(ies) and Tribunal	/*** /weeks /months from *** /Week of *** (i.e. *** days, with *** days reserved)	dd/mm/yyyy
	Partial award on request for interim and conservatory measures	Tribunal		dd/mm/yyyy

N°	Event	Parties / Tribunal	Time Interval	Date
<i>Option for Cases where Jurisdictional Objections are filed</i>				
	Submission on jurisdiction	Respondent/s/Additional party(ies)		dd/mm/yyyy
	Answer on jurisdiction	Claimant/s/Additional party(ies)		dd/mm/yyyy
	Reply on jurisdiction	Respondent/s/Additional party(ies)		dd/mm/yyyy
	Rejoinder on jurisdiction	Claimant/s/Additional party(ies)		dd/mm/yyyy
	Hearing on jurisdiction	Claimant/s/Respondent/s/Additional party(ies) and Tribunal	/*** /weeks /months from *** /Week of *** (i.e. *** days, with *** days reserved)	dd/mm/yyyy
	[Partial] Award on jurisdiction	Tribunal		dd/mm/yyyy

Place of arbitration: (city, country)

Date:

President / Sole Arbitrator