

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.	[•]	