AFFIDAVIT

My name is Full name, external legal counsel of Requested party. This Affidavit is issued in accordance with Procedural Order No. [...] in the arbitration between [...]. Terms defined in Procedural Order No. [...] have the same meaning when used in this Affidavit.

I declare that:

- (i) I have explained to the Requested party (a) its obligation not to destroy or conceal any Document potentially relevant to the above-referred arbitration, and (b) the necessity of producing, and the potential consequences of the failure to produce, any Document which Requested party has voluntarily undertaken or has been ordered to produce;
- (ii) I have advised Requested party to carry out a reasonable search, and to produce all Documents it voluntarily undertook or it was ordered to produce (except for the privileged or confidential Documents duly identified in the Privilege Log);
- (iii) All Documents for which legal or settlement privilege has been claimed, meet the requirements established in Procedural Order No. [...].

Date:	Date			
Full n	ame			