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American International Commercial Arbitration Court
- AICAC (LLC; Wilmington, USA)
of the International Union of Commerce and Industry (Limited; London, UK)
Secretariat of the American International Commercial Arbitration Court
USA, 1317 A 17 SE, Auburn, WA.98002
Arbitration case No. xxx-xx/GBU/UKL

Claimant: XXXXXXXX XXXXXXXX
XX XXXX XXXXXX, XXXXXXX, XXXXXX
XXXXXXXX XXXXXXXX
Respondent: XXXXXXXX XXXXXXXX
XX XXXX XXXXXX, XXXXXXX, XXXXXX
XXXXXXXX XXXXXXXX

No. XXXXXXXXXXXXXXXX
XX XXXXXXXX 20XX
XXXXXXXXXXXXXXXXXX

MOTION

Taking into consideration the specificity of the arbitration dispute between XXXXXXXXXXXX and XXXXXXXXXXXX, which is considered by the AICAC on the initiative of the Claimant and in accordance with the Claimant's application No. XXXXXXXXXXXX of XX/XX/20XX, and in order to ensure the objective and professional examination of evidence, I hereby request the authorized arbitral tribunal to involve the following experts in the arbitration proceedings:

1. The professional translator able to provide the grammatically correct and authentic translation of the documents, which regulate the legal relations between the parties to a dispute, as well as the other documents related to a dispute, from Russian into English.
2. The professional lawyer able to explain the essence of legal provisions of the XXXXXXXXXXXX legislation in English competently and impartially.

I ask the authorized arbitral tribunal to appoint these experts in its discretion.

The Claimant hereby expresses the willingness to advance the costs related to payment for work of these experts in the course of consideration of the dispute between XXXXXXXXXXXX and XXXXXXXXXXXX, and asks the AICAC to subsequently impose an obligation to compensate for such expenses on the non-prevailing party.

On behalf of the Claimant – Company XXXXXXXXXXXX
Managing Partner - Matthew Bradley
