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OUR REF : VLEOW/NVIVEK/HOHJY/1016003063

YOUR REF : ARB083/16/AB

11 May 2017

SIAC

32 Maxwell Road #02-01
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Singapore 069115

BY EMAIL ONLY

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Attn: Ms Aliona Bitkivskaja / Ms Rohanaahliza Yusof

Dear Madams

RE: SIAC ARBITRATION NO. 83 OF 2016

1. We refer to your letter dated 26 April 2017, our letter dated 28 April 2017 and the Claimant's letter dated 3 May 2017.
2. The Respondent strongly objects to the mischaracterisation of its letter of 28 April 2017 by the Claimant as an attempt to delay the proceedings.
3. The Respondent reiterates that any delay in these proceedings has been caused by the Claimant which sought to commence this arbitration in April 2016 but did not quantify its claim until late March 2017. There have been no settlement discussions between the parties as has been suggested by the Claimant in its letter of 3 May 2017.
4. Further, the SIAC's letter requesting deposits was only issued on 3 April 2017 and not on 29 March 2017 as has been incorrectly stated in the Claimant in its letter of 3 May 2017.
5. The Respondent respectfully requests SIAC to grant it further time to consider the Claimant's new position in this arbitration after a gap of almost a year, and respond thereafter. It is apparent that there is no urgency whatsoever in the matter given the timelines set out above. We also note that it is not for the Claimant to arbitrarily set timelines for the conduct of this arbitration as it has sought to do in its letter of 3 May 2017.

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6. All our client's rights are reserved.

Yours faithfully

A handwritten signature in cursive script, appearing to read "Allen & Gledhill".

Allen & Gledhill LLP

cc Intelleigen Legal LLC
By email only: cheryl@intelleigen.com
File Ref: 1000976.CW.CN