

From: "Vivekananda Neelakantan" <vivek.n@allenandgledhill.com>
To: kevinnash@siac.org.sg
Date: 4/22/2016 3:53:13 AM
Subject: RE: Notice of Arbitration dated 31 March 2016 [RHT-ACTIVE.FID249677]

Dear Sir,

1. We refer to the Claimant's letter dated 21 April 2016.
2. The Respondent respectfully submits that Rule 4 of the SIAC Rules 2013 is permissive in nature and the Respondent is at liberty to include all relevant details in its response if needed. As we have not taken our client's substantive instructions, it is precisely for this reason that the Respondent has requested additional time to be able to properly review the facts and documents relevant to this arbitration before preparing its response.
3. The Respondent therefore maintains that an extension of time up to 11 May 2016 is not excessive in the circumstances and will in any event not cause any prejudice to the Claimant.
4. Lastly, we note that the letter dated 19 April 2016 received from SIAC does not contain a request to the Respondent to pay any deposit, as has been suggested by the Claimant in paragraph 4 of its letter.
5. We look forward to hearing from you.

Thank you.

Regards,

Allen & Gledhill

Vivekananda N

International Counsel | Allen & Gledhill LLP
T +65 6890 7154 | M +65 8726 0438 | F +65 6302 3306 | vivek.n@allenandgledhill.com
One Marina Boulevard #28-00 Singapore 018989 | www.allenandgledhill.com

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From: Cheng, Abigail [<mailto:abigail.cheng@rhtlawtaylorwessing.com>]
Sent: Thursday, 21 April, 2016 7:56 PM
To: kevinnash@siac.org.sg; aliona@siac.org.sg; rohana@siac.org.sg
Cc: Quah, Eugene; Vivekananda Neelakantan; Vincent Leow; Seow, Valerie; Seah, Germain
Subject: RE: Notice of Arbitration dated 31 March 2016 [RHT-ACTIVE.FID249677]

Dear Sirs,

Please find attached our letter of even date for your kind attention.

Best Regards

Abigail CHENG

Associate
RHTLaw Taylor Wessing LLP
Litigation and Dispute Resolution Practice

DID +65 6381 6923
abigail.cheng@rhtlawtaylorwessing.com
www.rhtlawtaylorwessing.com

From: Vivekananda Neelakantan [<mailto:vivek.n@allenandgledhill.com>]
Sent: Wednesday, 20 April, 2016 05:50 PM
To: kevinnash@siac.org.sg
Cc: aliona@siac.org.sg ; Quah, Eugene; Cheng, Abigail; rohana@siac.org.sg ; Vincent Leow
Subject: Notice of Arbitration dated 31 March 2016

5/1/2017

The Registrar

Singapore International Arbitration Centre (SIAC)
#02-01 Maxwell Chambers
32 Maxwell Road
Singapore 069115

Dear Sir,

Re: Notice of Arbitration dated 31 March 2016: Geo Millennium System Pte Ltd and NCS Pte Ltd. (SIAC Arbitration No. 83 of 2016)

1. We refer to the Notice of Arbitration dated 31 March 2016 filed by M/s RHTLaw Taylor Wessing LLP on behalf of Geo Millennium System Pte Ltd ("**Notice**").
2. We have been instructed to act for NCS Pte Ltd ("**NCS**").
3. We note that pursuant to Rule 4.1 of the SIAC Rules 2013, a response to the Notice must be filed by NCS within 14 days of the receipt of the Notice.
4. We respectfully request an extension of time to file a response to the Notice on behalf of NCS, on account of the following factors:
 - 4.1 We have just been instructed by NCS to act in the matter.
 - 4.2 We have been provided with a copy of SIAC's letter dated 19 April 2016 only today.
 - 4.3 We will require some time to apprise ourselves as to the full facts involved which we understand are complex and technical due to the nature of the project involved, and will require the examination of several documents.
 - 4.4 NCS will also require some time to extract the technical details and documents relating to the project as well as the issues raised in the Notice.
5. Accordingly, we respectfully request SIAC for an extension of time of three weeks to file a response to the Notice on behalf of NCS, up to 11 May 2016.
6. We look forward to hearing from you.

Thank you.

Regards,

Allen & Gledhill

Vivekananda N

International Counsel | Allen & Gledhill LLP
T +65 6890 7154 | M +65 8726 0438 | F +65 6302 3306 | vivek.n@allenandgledhill.com
One Marina Boulevard #28-00 Singapore 018989 | www.allenandgledhill.com

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RHTLaw Taylor Wessing LLP
Six Battery Road #10-01, Singapore 049909 Tel +65 6381 6868 Fax +65 6381 6869

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