

[Place and date]

Expert Opinion

by

[■]

in

[Claimant's name]

vs

[Respondent's name]

I. Introduction

A. Qualifications of [■]

My name is [■]

[Description of the expert in connection with its field of expertise, educational background and qualification, emphasize on the most interesting aspects of the expert's CV in relation with the dispute and the issue the expert is instructed to opine on]

II. Instructions

I have been instructed by [■] (**Instructing Attorneys**) to provide an expert opinion (**Opinion**) on issues relating to [■]. I understand that our Opinion will be submitted in the arbitration initiated by Claimant [■] against [■]. I understand that the arbitration relates to a dispute arising under the Agreement [■].

I further understand that [...].

My expert opinion is based on the following facts as provided to me by [Claimant's/Respondent's] counsel:

[...]

The documents I have consulted during the preparation of this report are listed as Appendix C.

Against this background, I have been asked:

- (a) To describe [...];
- (b) To discuss [...];
- (c) To opine on whether [...].

I do not express an opinion on whether [...].

III. Summary of our Conclusions

As I will explain below in detail:

- (a) [...];
- (b) [...];
- (c) [...].

IV. [Issue a]

V. [Issue b]

VI. [Issue c]

Etc.

VII. Conclusion

VIII. Experts Declarations

I, [■], declare that:

- (a) I understand that my duty in providing written reports and giving evidence is to help the Arbitral Tribunal, and that this duty overrides any obligation to the party by whom I am engaged or the person who has paid or is liable to pay me. I confirm that I have complied and will continue to comply with my duty.
- (b) I confirm that I have not entered into any arrangement where the amount or payment of fees is in any way dependent on the outcome of the case.
- (c) I have set out in my report that I understand from those instructing me to be the questions in respect of which my opinion as expert is required.
- (d) I have exercised reasonable care and skill in order to be accurate and complete in preparing this report. I have mentioned all matters that I regard as relevant to the opinions I have expressed. All of the matters on which I have expressed an opinion lie within my field of expertise.
- (e) I have drawn the attention of the Arbitral Tribunal all matters, of which I am aware, which might adversely affect my opinions.
- (f) I have referred to all of the sources of all information I have used.
- (g) I have not included anything in this Opinion that has been suggested to me by anyone, including the lawyers instructing me, without forming my own independent view of the matter.
- (h) Where, in my view, there is a range of reasonable opinions, I have indicated the extent of that range in the report.
- (i) At the time of signing the Opinion, I consider it to be complete and accurate. I will notify the Instructing Attorneys if, for any reason, I subsequently consider that the report required any correction or qualification.

IX. Statement of Truth

I confirm that that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

[Name]

[Signature]

Appendix A: Curriculum Vitae of [■]

Appendix B: List of Publications of [■]

Appendix C: List of documents consulted during the drafting of the report