

## Practicum on Discovery and Document Production in International Arbitration (Virtual Edition)

Wednesday, 27 April 2022  
2.00pm - 6.00pm SGT (+8 GMT)

**REGISTER HERE**

The importance of discovery and document production in international arbitration tends to be underemphasised. Through this mechanism, parties can obtain the additional evidence that they need to support their claims or defences.

This foundational course will discuss the purpose, tests, strategic considerations and issues in connection with discovery and document production in international arbitration, as well as the options open to parties if the opposing side has failed to produce documents pursuant to a discovery order. Following a lecture, participants will have the opportunity to craft a Request to Produce Documents as well as identify potential objections to resist a Request for Documents.

### FACULTY



**Mr Simon Dunbar**  
Advocate and Arbitrator,  
Gateway Law  
Corporation



**Ms Foo Yuet Min**  
Director,  
Dispute Resolution,  
Drew & Napier LLC



**Mr Vivek Neelakantan**  
Partner (Foreign Law),  
Allen & Gledhill LLP  
(Singapore)



**Mr Kabir Singh**  
Partner,  
Clifford Chance

### Programme

1.50pm - 2.00pm

Virtual Registration

2.00pm - 2.05pm

Opening Address by Jayden Zhao, Associate Counsel, SIAC

2.05pm - 3.15pm

Seminar on Discovery and Document Production in International Arbitration (Part 1)

Lecturers:

- Ms Foo Yuet Min, Director, Dispute Resolution, Drew & Napier LLC
- Mr Vivekananda Neelakantan, Partner (Foreign Law), Allen & Gledhill LLP (Singapore)

Topics to be covered include:

- Purpose and Timing of Discovery and Document Production in an International Arbitration Lifecycle
- Standard and Test for Document Production in International Arbitration
- IBA Rules on the Taking of Evidence in International Arbitration 2020
- Rules on the Efficient Conduct of Proceedings in International Arbitration: The Prague Rules
- IBA Guidelines on Party Representation in International Arbitration, Guidelines 12 - 17
- Redfern Schedule

3.15pm - 3.30pm

Break

3.30pm - 4.45pm

Seminar on Discovery and Document Production in International Arbitration (Part 2)

Lecturers:

- Mr Simon Dunbar, Advocate and Arbitrator, Gateway Law Corporation
- Mr Kabir Singh, Partner, Clifford Chance

Topics to be covered include:

- Discovery of Confidential Documents
- Requesting Disclosures from Third Parties
- Drawing Adverse Inferences and other Consequences for failure to produce Documents
- Electronic Discovery in International Arbitration
- Chartered Institute of Arbitrators: Protocol for E-Disclosure in International Arbitration

4.45pm - 5.00pm

Break

5.00pm - 6.00pm

[Breakout Sessions] Workshop on Discovery and Document Production in International Arbitration

Lecturers:

- Mr Simon Dunbar
- Ms Foo Yuet Min
- Mr Vivekananda Neelakantan
- Mr Kabir Singh

Topics to be covered include:

- Crafting a Request to Produce Documents
- Identifying Potential Objections to Request for Documents

### Registration Fee

Standard Rate - SGD 100\*

Early Bird Rate (register by 13 April 2022) - SGD80\*

SIAC Academy Alumni are entitled to a 10% discount on listed course fees

\*Excludes 7% GST

### Supporting Organisations

