

Statement of independence pursuant to Article 11 of the UNCITRAL Arbitration Rules

Kleopatra Selene v Herod of Judea

There is no reason why I should not serve as arbitrator in the dispute between Kleopatra Selene as Claimant and Herod of Judea as Respondent. I am impartial and independent of each of the parties and intend to remain so. To the best of my knowledge, there are no circumstances, past or present, likely to give rise to justifiable doubts as to my impartiality or independence.

The facts that I am a Roman citizen and that I have been an arbitrator in the case of Publius Canidius Crassus Filius and Middle East Fine Wines and Spirits Ltd. vs. Rome in [30 BC] do not, in my view, affect my impartiality and independence in any way.

First of all, the Roman state is no party to the present arbitration. Furthermore, each case is different. In treaty arbitrations, the arbitrators apply the relevant rules of law, first and foremost the treaty on the basis of which the arbitration is conducted to the relevant circumstances and facts of the case at hand. I see myself as completely impartial and independent to do so. I hereby declare that I will judge fairly between the parties, according to the law applicable to their dispute, and that I am not accepting any instruction or payment with regard to the arbitration at hand.

I also declare that I will promptly notify the parties and the other arbitrators of any circumstances that may subsequently come to my attention during this arbitration and influence my impartiality or independence.

[signature]

26 November 10 BC

Signature: _____

Date: _____

Marcus Tullius Tiro