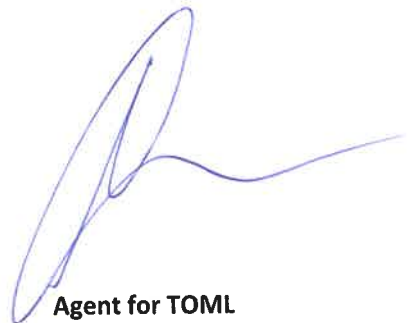


SUBMISSIONS OF TONGA OFFSHORE MINING LTD (TOML) ON PROVISIONAL MEASURES

TOML requests that the Chamber prescribe the following provisional measures:

- (1) Order the Authority to immediately suspend the inquiry regarding the alleged "*possible non-compliance*" of TOML with its contractual obligations, pending the final decision of the Chamber;
- (2) Order the Authority to refrain from taking, authorizing, or permitting any further steps or measures in connection with that inquiry pending the final decision of the Chamber;
- (3) Order the Authority to ensure that no recommendations, findings, reports, or other outputs arising from the Commission's inquiry are adopted, issued, published, communicated, or otherwise relied upon pending the final decision of the Chamber;
- (4) Pending the final decision of the Chamber, prohibit the Authority from taking any action that might aggravate or extend the dispute, or prejudice the execution of any decision the Chamber may render; and
- (5) Order such other provisional measures as the Chamber considers necessary to preserve TOML's rights and to ensure the effectiveness of its eventual decision.



**Agent for TOML
Nathan Eastwood**