

[Translation from French by the Registry/Rev.2-15.12.2004]

Saint Vincent and the Grenadines requests that it may please the Tribunal to make the following orders and declarations:

- (a) a declaration that the International Tribunal for the Law of the Sea has jurisdiction, pursuant to Article 292 of the United Nations Convention on the Law of the Sea of 1982 (hereinafter the "Convention") to hear the Application.
- (b) a declaration that the Application is admissible.
- (c) a declaration that the Respondent has violated Article 73, paragraph 2, of the Convention in that the conditions set by the Respondent for the release from detention of the vessel "Juno Trader" and the release of all the members of its crew are not authorized pursuant to Article 73, paragraph 2, and are not reasonable in terms of Article 73, paragraph 2.
- (d) an order requesting the Respondent to release the "Juno Trader" from detention and to release all the members of its crew without posting a bond or any other financial security and, in that event, requesting the Respondent to return the bond or security posted.
- (e) alternatively, an order requesting the Respondent to release the "Juno Trader" from detention and to release all the members of its crew as soon as the owner of the vessel posts a bond or other security in an amount determined to be reasonable by the Tribunal in view of the particular circumstances of the present case.
- (f) an order, in that last event, prescribing the form of the aforementioned bond or other security.
- (g) an order requesting the Respondent to rescind the confiscation of the cargo of fish found on board the vessel "Juno Trader".
- (h) an order requesting the Respondent to pay the Applicant's costs.

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(signed)

Werner GERDTS      7.12.2004