



INTERNATIONAL TRIBUNAL FOR THE LAW OF THE SEA

MV Louisa

SAINT VINCENT AND THE GRENADINES v. THE KINGDOM OF SPAIN

FINAL SUBMISSIONS OF SAINT VINCENT AND THE GRENADINES
PURSUANT TO ARTICLE 75(2), RULES OF THE INTERNATIONAL
TRIBUNAL FOR THE LAW OF THE SEA

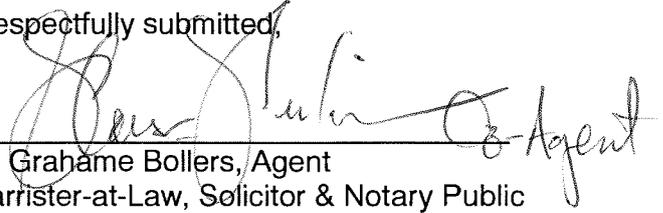
11 DECEMBER 2010

In accordance with Article 75(2), Rules of the International Tribunal for the Law of the Sea, Applicant Saint Vincent and the Grenadines makes the following final submissions:

The Applicant requests the Tribunal, by means of provisional relief, to:

- (a) declare that the Tribunal has jurisdiction under Articles 287 and 290 of the Convention to hear the Request for Provisional Measures concerning the detention of the vessel, the *M.V. Louisa*;
- (b) declare that the Request is admissible, that the allegations of the Applicant are well-founded, and that the Respondent has breached its obligations under the Convention;
- (c) order the Respondent to release the vessel *Louisa* and its tender, the *Gemini III*, upon such terms and conditions as the Tribunal shall consider reasonable, but without bond or other further economic hardship;
- (d) order the return of scientific research, information, and property held since 2006;
- (e) prescribe such other provisional measures as may be appropriate such as issuing an order requiring the Spanish Agent to meet with the Applicant's Agent or representatives to resolve the matter, or other important measures; and
- (f) order the Respondent pay the costs incurred by the Applicant in connection with this Request, including but not limited to Agents' fees, attorneys' fees, experts' fees, transportation, lodging, and subsistence.

Respectfully submitted,



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