JCAA Arbitration Case No. 　‐

Counterclaim

To: The Japan Commercial Arbitration Association

Counter-claimant: [Company name]

 [Address]

 [Telephone number]

 [Facsimile number]

 [Email address]

 [Representative name]

 [Representative Position]

Counsel for [Counsel name]

the Counter-claimant: [Law office name]

 [Address]

 [Telephone number]

 [Facsimile number]

 [Email address]

Counter-respondent: [Company name]

 [Address]

 [Telephone number]

 [Facsimile number]

 [Email address]

 [Representative name]

 [Representative Position]

The Counter-claimant hereby makes a counterclaim as follows:

Ⅰ　Relief or remedy sought:

The Counter-claimant requests that the following arbitral award be rendered:

 1. the Counter-respondent shall pay to the Counter-claimant the sum in the amount of U.S.$1,000,000 together with interest thereon at the rate of 6% per annum from, 20 until the date of full payment thereof; and

2. the administrative fee, arbitrator's remuneration and expenses, the fees and expenses of the counsels and other experts incurred by the parties, and any other expenses incurred with respect to the arbitral proceedings shall be borne by the Counter-respondent.

Ⅱ　Summary of the dispute and the basis for the Counterclaim:

 (omitted)

Ⅲ Reference to the arbitration agreement that is invoked:

 (omitted)

Ⅳ Manner or method of proof:

　Relevant evidence shall be submitted in the future during the course of the proceedings.

Date:　　　　　 　 20

 　 　　 (signature)

 Attorney-at-law

Counsel for the Counter-claimant