

RECEIVED
07 DEC 2004

THE *JUNO TRADER* CASE, PROMPT RELEASE

BY: AL

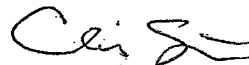
FINAL SUBMISSIONS OF GUINEA-BISSAU

Guinea-Bissau requests the Tribunal:

1. To declare:
 - (a) that the Tribunal lacks jurisdiction under Article 292 of the United Nations Convention on the Law of the Sea to entertain the Application of St Vincent and the Grenadines in this case;

in the alternative,
 - (b) that the Application of St Vincent and the Grenadines in this case is inadmissible;

in the further alternative,
 - (c) that the Application of St Vincent and the Grenadines in this case is not well founded.
2. As a subsidiary submission, if the Tribunal decides that the *Juno Trader* and its cargo are to be released upon the deposit of a bond or other financial guarantee, to order:
 - (a) that the bond shall be no less than EUR 1,227,214.00 (one million two hundred and twenty seven thousand two hundred and fourteen Euros);
 - (b) that the bond shall be in the form of a bank guarantee from a bank present in Guinea-Bissau or having corresponding arrangements with bank in Guinea-Bissau;
 - (c) that the bank guarantee shall state that it is issued in consideration of Guinea-Bissau releasing the *Juno Trader* in relation to the incidents dealt with in Minute No. 14/CIFM/04 dated 19 October 2004, and that the issuer undertakes to pay on first demand to the State of Guinea-Bissau such sums as may be determined by a final judgment, award or decision of the competent authority of Guinea-Bissau.
3. To decide that St Vincent and the Grenadines shall pay the costs of Guinea-Bissau incurred in connection with these proceedings, less any amount of financial assistance that may be provided to Guinea-Bissau by the Law of the Sea Trust Fund in connection with the case.



Christopher Staker
Agent of Guinea-Bissau
7 December 2004