**Julie Hopkins' Domestic Award Checklist**

* A Domestic Award Checklist
  + Correct Party Names
  + Proper Award Title– Final, Partial, Interim, Preliminary, Consent and Default
  + Applicable commercial and arbitration agreements – verbatim arbitration clause
  + The substantive law and any applicable procedural rules and the place of the arbitration
  + Procedural History – what to include
    - Commencement – how and when
    - Appointment of Arbitrator - how and when
    - Jurisdiction – outline objections or confirm none
    - Pleadings
    - Procedural Conferences and Orders
    - Preliminary Motions
    - Pre-hearing Steps – eg. exchange of written direct evidence, expert reports, pre-hearing briefs
    - Hearing – when, where, mode, who attended, argument or post-hearing briefs
    - When the evidence was declared closed
    - In case of self-reps – confirm the party understood they had right to counsel and elected to proceed without
  + Summary of relief sought and issues to be decided
  + Statement of Facts – different approaches
  + Summary of Arguments
  + Analysis
    - Every issue/claim – accepted(allowed)/rejected (dismissed)/unnecessary to decide/abandoned
  + Interest
    - the arbitral tribunal’s statutory or contractual power to award interest;
    - summary of positions;
    - start and end dates;
    - simple or compound, pre- or post-award interest
  + Award Attorney’s Fees, Costs of the Arbitration and other Disbursements and Expenses (what Canadians call “Costs”)
    - the arbitral tribunal’s statutory or contractual power to award “costs”;
    - summary of positions
  + *Dispositif* – the Dispositive Portion of Award
    - “For the above reasons I award as follows…”
    - Contains no reasoning
    - Accurately reflects what was decided on every issue
    - Expressly reserve jurisdiction for any undecided matters (like costs)
    - Include a catch all - ‘All other claims and counterclaims are dismissed’.
  + Date,made at theplace of arbitration and signature