**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