

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

HYDRO ENERGY 1, S.À.R.L.; and
HYDROXANA SWEDEN AB,

Petitioners,

v.

KINGDOM OF SPAIN,

Respondent.

Civil Action No. 1:21-cv-02463-RJL

**THE KINGDOM OF SPAIN'S MOTION TO DISMISS THE PETITION
OR STAY THE PROCEEDING**

The Kingdom of Spain moves to dismiss the Petition pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). In the alternative, Spain requests at a minimum that these proceedings be stayed until its application to an ICSID *ad hoc* committee for annulment of the Award is resolved. The bases for this motion are set forth in the Memorandum of Law filed herewith. Spain respectfully requests oral argument on its motion pursuant to Local Rule 7(f).

Respectfully submitted,

/s/ Ana C. Reyes

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CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2022, I caused the foregoing to be filed electronically with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all registered participants.

/s/ Ana C. Reyes
Ana C. Reyes