

**IN THE MATTER OF AN ARBITRATION UNDER THE NEW ZEALAND
ARBITRATION ACT 1996**

BETWEEN

[NAME]

Claimant

-v-

[NAME]

Respondent

**[PROPOSED/AGREED] LIST OF
ISSUES**

[PROPOSED/AGREED] LIST OF ISSUES

I [Category of issue e.g. Jurisdiction]

1. [Each issue will ordinarily be phrased as a question].
 - (a) [Breaking issues into sub-issues may assist the tribunal. But avoid making each issue or sub-issue too forensic, unless that is appropriate. And avoid having *too many* issues or sub-issues].

II INTEREST

2. Is there a right to interest under the contract? If so,
 - (a) What is the start date for interest?
 - (b) The parties agree that if there is a right to interest, the rate is [amount]%. Should interest be calculated on a simple basis or be compounded monthly?