Effective and Persuasive Written Advocacy in International Commercial Arbitration

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The importance of written advocacy

Writing well is a powerful tool in the practice of law. Just like oral advocacy, the purpose of written advocacy is to persuade and in order to be persuasive, the document must be useful for the intended reader. Written work that is dense, impenetrable, lacking cohesion or badly structured will rarely be useful and sometimes may be counter productive. A valuable opportunity to persuade will have been wasted, sometimes irredeemably.

Written advocacy has played the part of the poor second cousin to oral advocacy but increasingly written advocacy has taken on a more significant and important role. Opening and closing submissions are usually filed in civil matters and in appeals written arguments must be filed before the hearing. The written argument thus provides an opportunity to persuade the Court before oral address has any role.

Written advocacy is not confined to submissions. The way in which cases are presented in the form of pleadings, affidavits and witness statements is also a form of advocacy. The techniques of writing effectively and persuasively apply just as much to those documents as they do to written submissions.

Persuasion starts with the Notice of Dispute; Originating Process and means used to defend proceedings such as responses and replies.

Invariably, the first contact that an arbitral tribunal has with the advocate is in the advocate's written documents:

- the notice of dispute, if the advocate has drafted it;
- the initiating process;
- the statement of claim;
- the response;

- witness statements;
- affidavits;
- submissions on arbitral procedures; interim measures or other matters.

Written advocacy generally needs to:

- be structured;
- be clearly expressed;
- identify with precision what it is seeking to be put before the tribunal;
- make efficient use of language.

Written advocacy in international arbitration is of paramount importance. Oral advocacy is significant, but because of the ways in which most arbitrations are structured, written advocacy assumes greater importance in these than most cases heard in Court.

Gibbs CJ observed:[1] *"...written words remain and the written outline of submissions remain visible when the sound of Counsel's voices no longer vibrates in the memory..."*

Written aspects of an arbitration that form part of the persuasion process include:

- the notice of dispute that will be delivered to the arbitrator(s);
- the statement of claim and/or terms of reference;
- the statement of defence;
- (perhaps) a rejoinder;
- submissions or outline of case;
- or response;
- comprehensive written submissions by each party at the conclusion of the evidence.

At the conclusion of the submission process, parties may have the right to file "post hearing" briefs.

Like the oral advocacy, the written advocacy needs to be pitched according to the:

- the nature and complexity of the case;
- the extent of the issues that are raised by the parties, including jurisdictional issues; applications for interim measures; any other interlocutory applications such as bifurcation of the proceedings and

[1] H T Gibbs, 'Appellate Advocacy' (1986) 60 ALJ 496, 497.

whether there are cross claims; counter claims or set offs.

Note: witness statements form part of the persuasion process. Statements that are properly drawn; concise and compliant with the rules of evidence that apply to the arbitration are persuasive in themselves.

Process of writing

The process of writing to persuade has other advantages. Good writing imposes a rigour in analysis by exposing the strengths and weaknesses of an argument and forcing an evaluation and re-evaluation of content. Writing out an argument helps the writer to understand his or her case, to define, refine and recast the matters that the Court must decide, to identify the facts that materially bear upon those matters and how best to present and express those facts, and weave them into the legal issues and arguments and how to put the legal argument.

Some techniques for effective and persuasive writing

Written advocacy is a skills based discipline, which is different to oral advocacy. For most people, good writing only comes with a great deal of effort and time consuming iterations of drafts. Perseverance is rewarded with a document that achieves the purpose for which the labours were intended.

People have different styles of writing and should write in style of writing with which they are comfortable. Whatever the style of writing, there are some techniques that are useful tools for effective and persuasive writing.

(i) Framing the question or answer

Identifying the issues in broad abstract terms does not meaningfully convey what the Court must decide. Expressing the issue as:

Did the defendant engage in misleading and deceptive conduct?

Of so, what damages is the plaintiff entitled to recover?

tells the Court nothing about the actual dispute or the matters to be decided.

The issue should identify for the Court what the Court must actually decide. Think about how to express the issue so that the judge understands what is in issue and why. A well framed issue provides the roadmap for the presentation of the facts and argument.

Think about how key facts can be used in defining the issue. By way of example:

"In New York, a person who knowingly purchases goods cannot bring a claim for breach of implied warranty. Sandra O'Kefee admitted that she purchased her 2003 Acura-the vehicle she claims the manufacture impliedly warranted – with more than 11,000 miles on the odometer. Did the trial court properly dismiss O'Keefe's claim for breach of implied warranty because the car was used when she bought it?"

"David Jackson will likely be convicted of capital murder and sentenced to death at next week's trial unless he can present evidence of his mental retardation. Jackson's expert on mental retardation must undergo emergency surgery to remove a cancer that his doctors have just discovered. Did the trial court abuse its discretion in denying Jackson's motion for a continuance to allow him time to find a new expert."[1]

Using the power of logic, issues can be framed in a way that identifies the question, delivers the answer to the question and the reasons for that answer.

(ii) The power of facts

The temptation often is to set out facts chronologically. Sometimes that may be appropriate but more often than not the materiality of the fact is not apparent and often a chronology will include all kinds of facts that simply do not bear upon the issue to be decided.
Only include facts that are relevant to your argument and present them in a way that makes it plain why they are relevant. Working out the facts to mention requires an understanding of your case. Once identified, use those facts in a way that gives them best effect. Sometimes that may be by way of narrative or by incorporating the facts into the legal analysis. Sometimes it may be in the way in which the issue is framed. Facts need careful choice and careful expression. How you order and present the facts can be a powerful tool for persuasion.

(iii) The architecture of writing

Structure is important. The document should provide an easy road map for the reader to follow so that the reader from the outset is able to follow the significance of what he or she is reading. Use the first few paragraphs to set the context and explain where the document is leading. Headings can also be useful.

- Proceed logically.
- Use simple expression.
- Good grammar, punctuation, use of paragraphs and different sentence lengths are basic tools.
- Choice of active or passive voice will have an impact. You should know the difference and know when to use which voice and why.
- Think about choice in expression. For example, expressing a positive in a negative way may have a more powerful impact or vice versa.

(iv) The order in which you present your arguments

- Lead with your argument, not your opponent's argument. By focusing on your opponent's argument you divert the Court's attention to that argument, not to the content of your own.
- It is often helpful to bear in mind the CRAC method: Conclusion, Rule, Analysis, Cases. By starting with the conclusion and the rule that informs

that conclusion, the reader is provided with an immediate context for the analysis that follows.

- When quoting from cases explain the relevance of the quote. Unless the relevance is explained, there is the danger that the reader will either gloss over the quote, ignore it altogether or misunderstand its relevance.

(v) Write for the reader

Always bear in mind the intended reader and write for that person or persons. If the intended reader is the Court the document can be used to provide a template for the Court for the way you contend that the Court should decide. Ask yourself the question: What does the Judge need to know and how can the material best be presented to the judge?

Written Submissions

"The advocate's central contribution lies in finding a place where the law and the facts will intersect to achieve the outcome sought by the client in the arbitration. Law and facts are critical inputs, but they are not the only source of the theory of the case. It is equally important that the advocate understands the client's business and the theory of the case leads to an award that achieves the desired business objective…"[2]

The basics of persuasive oral argument apply to written submissions, which answer the question of what the advocate is trying to achieve and in form.

Written submissions must help the decision maker to understand what has to be decided. Written submissions only achieve this if submissions are clear. To maximise clarity, the advocate should:

- set out clearly what the party contends for in the arbitration;
- identify why a particular decision should be arrived at by the tribunal;
- formulate each proposition of fact and law supported by the evidentiary material;
- organise the issues in a logical sequence;
- use clear, simple language, bearing in mind the aspects of communication referred to above;
- use short sentences;
- use numbered paragraphs;
- use appropriate headings;
- use an appropriate layout to ensure submissions are well set out and provide space for the decision maker to make notes;
- include cross-references to key documents.

Submissions should be coherent: i.e. have a coherent structure and be easy to read and understand.
A document that is well-structured and pleasant to the eye is likely to be more persuasive. The advocate in writing the submissions should:

[2] (Guillermo Aguilar Alvarez, 'Effective Written Advocacy' in R. Doak Bishop and Edward G. Kehoe (eds), *The Art of Advocacy in International Arbitration* (Juris, 2nd ed, 2010), 479.)

- begin with a short introduction setting out what the advocate is seeking;
- set out the issues for decision; outline what is not in issue, if appropriate, and set out sufficient facts to enable the decision maker to compare with arguments on the law;
- develop the argument in favour of the advocate's case and deal with any arguments against;
- include a brief summary of why the tribunal should find in the advocate's favour;
- be concise, as concise written submissions are easier for the reader to understand. Too much detail not to the point may distract the reader from the main thesis of the submissions, particularly if the reader does not speak English;
- not overload the submissions with unnecessary case references or lengthy quotations. Pick the best authority; cite the case or annex a copy;
- try to pick the three strongest arguments in your favour on each issue and avoid long lists;
- use as few adverbs as possible;
- use short sentences and paragraphs.

If there are to be oral submissions, the advocate should leave some matters to be submitted orally. Put the first draft away and read it through afresh as if he or she were an arbitrator. Make amendments with short passages, removing anything lengthy or unnecessary. Written submissions usually precede oral addresses to the tribunal in international arbitration.

Accordingly, the introduction of the tribunal to the proceedings and to the advocate is usually a set of written submissions; case outlines or written openings and provide the first opportunity in the process of persuading the tribunal of the merits of the case of the respective parties, by establishing the credibility of the advocate and the merits and substance of the party's case.

Usually, there are directions made at the beginning stages of an arbitration that require that statements of evidence be exchanged together with comprehensive outlines of the respective party's position.

Most arbitrators will be annoyed or alienated by written submissions that have any of the following characteristics:

- **prolix** - including irrelevances; excessive quotation of fact or authority and failure to distil the essence of the argument;
- **issue overload** - too many points or issues resulting from a failure to reject weak points;
- **incoherence** - a lack of logical, unified concept of theme or an absence of interrelated organisation;
- **inaccuracy** - misstatement of fact or issue; omitting or misquoting authority or quoting out of context;
- **mechanical defect** - such as lack of an index; inadequate chronology; inaccurate references to authorities and transcripts; typographical errors; poor grammar and spelling and the failure to specify the relief sought and, more particularly, why the relief is sought.

Written submissions should:

- be brief; succinct and carefully use language. The written argument should bring material together in a comprehensive and logical manner. Unduly long written submissions deter readers from close and detailed reading, because they require lengthy periods of concentration;
- be logical. The arguments must develop logically and coherently with the stronger and most compelling argument presented first;
- be mindful that rhetoric and adjectival referencing are more in the province of oral argument "the touchstones are condensation and selection;"[3]
- contain propositional arguments;
- shortly state the proposition of law or fact to which the party contends, together with the factual or legal references that support the point. If critical material must be cited, it should be the shortest possible reference.
- use an annexure to the submissions if lengthy quotations or detailed references are required, rather than placing them in the main submission.
- Written submissions that are properly formatted are more easily absorbed and conducive to the persuasiveness of the document. Avoid complex numbering;

Systems

> *"the advocate's central contribution lies in finding the place where the facts and the law intersect to yield the outcome sought by the client in the arbitration ..."*[4]

Again, consideration of the audience is important because of substantial differences in language; legal education and therefore legal skills; life experiences and perceptions. The process of communicating the written message needs to be done with those matters in mind.
Further, the written document establishes the credibility of the advocate.
The persuasion process includes the credibility of the source from which the submission emanates.

Accuracy

Written submissions must be accurate and present an argument fairly. If not, the arbitrator is more likely to put them aside in favour of the opponent's submission.
Oral submissions speaking to inaccurate written submissions are not persuasive because they lack credibility.[5]

Comprehension

Submissions that omit important details or are selective to the extent of ignoring important

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[3] J. L. Glissan and S. W. Tilmouth, *Advocacy in Practice* (Lexisnexis, 3rd ed), 202

[4] Guillermo Aguilar Alvarez, 'Effective Written Advocacy' in R. Doak Bishop and Edward G. Kehoe (eds), *The Art of Advocacy in International Arbitration* (Juris, 2nd ed, 2010), 479, 203.

[5] Credibility and source needs to be identified

issues undermine the credibility of the act and the argument. All issues raised need to be dealt with.

The Law

The law needs to be identified clearly and fairly. Misrepresenting the law undermines the credibility of the advocate. Arbitrations are normally heard by experienced lawyers who have a grasp of an extensive body of law.

Case Theory/Case Concept

Marcus Stone writes:[6] *"a party's theory of the case is his consistent and integrated view of the undisputed facts, his version of the disputed facts, and what he must prove in the law for the verdict which is his objective. It represents a party's position, fully thought-out, rather than an assessment of the evidence."*

- As part of the preparation for the hearing, development of the concept of the case, or case theory is essential.
- It is, in reality, how the advocate wants the evidence to be and be seen b the tribunal at the conclusion of the evidence.
- It fits within the applicable law, and when the law is applied to evidence, will, hopefully, achieve the result the advocacy seeks. As the preparation advances, the case theory/concept is refined; modified and some parts are often abandoned.
- Some advocates prepare their final address before the case commences, and particularly, before the opening commences.
- In international commercial arbitration, it is important that the case theory/case concept is attracted to the diverse background of the tribunal member(s).
- Therefore, the identification of a case theory/concept is an important component of the persuasion process.

Ten Commandments of Written Advocacy in International Arbitration

During an excavation at the ICC Court of Arbitration's headquarters site in Paris, workers uncovered a stone tablet buried under boxes and boxes of petrified arbitration pleadings and exhibits. A team of archaeologists worked for months to decipher and then folly grasp the text of the tablet and its significance for international arbitration practitioners today.
A Break in the stone tablet leaves it unclear whether more commandments followed the tenth one. Perhaps excavation will uncover more of the ancients' wisdom in the future. For now, however, we must be satisfied with these ten which, as interpreted, by Barton Legum[7].hopefully provide some small guidance.

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[6] Marcus Stone, *Cross Examination in Criminal Trials* (Butterworths, 1988).

[7] Partner and Head of the Investment Treaty Arbitration Practice, Salans LLP, Paris, France. The author noted his admiration for the classic work by the late Irving Younger, Cicero on Cross-Examination in the Litigation Manual: Trial 387 (John G. Koeltl & John S.Kiernan eds.,3d ed.1999), which inspired

Commandment No. 1: SHORT SENTENCES.

Blessed are those who use few words.

Arbitrators are busy people. They often have many files running at once. They travel a great deal. Some read a pleading carefully only in the week or two immediately before the hearing. In that week, they also often have to deal with many other files. They occasionally suffer from jet lag and a compressed schedule when they finally read your brief. Many of the top arbitrators are not native English speakers.

All of this means that the most effective writing style is the one that is easy to understand, not the one with the most elegant or beautifully turned phrases. The simple reality is that it is easier for the brain to process short sentences, and short paragraphs, than long ones. Shorter is better for communication. And communication is the reason the client asks us to prepare a brief in the first place.

John Smith' in ordinary speech, for example- we simply refer to him as 'Smith' or 'Mr. Smith'.

If you do need to define a term for essential reasons of precision, then at least select an abbreviation that reminds the reader of what is being abbreviated. For example, if the term to be defined is 'ABC Engineering and Design Investment Brazil Incorporated', define it as 'ABC Brazil' or 'ABC Engineering' – not as 'AEDIBI'.[1]

Commandment No. 2: KEEP IT INTERNATIONAL.

The common tongue is understood by all.

One of the great challenges of international arbitration n is that of framing your argument terms persuasive to an arbitrator who grew up in a different legal system and national culture than you did. Meeting this challenge requires consciousness of the differences between your national and legal culture and that of the arbitrators. As a general rule, if you are not sure if a given concept translates, find another way of expressing it.

One potentially dangerous area is that of sports analogies. I have heard a US lawyer make extended references in oral argument to 'getting to third base' and 'hitting a home run'. Lacking a background in the basics of baseball, the European arbitrators on the tribunal were baffled. I have also heard English barristers make references to sticky wickets' that similarly served more to mystify rather than clarify.

Another difficult area is civil procedure in national court systems. It is sometimes tempting for counsel to refer to a procedural device in their national system to describe what they wish to accomplish in a request for an arbitral procedural order. The difficulty is that national systems differ in important ways, and a word used to translate a concept in one system may be entirely inadequate outside the context of that system. As one example, the French word *'proces'* is often translated by the English word 'trial'. For a US lawyer 'trial' signifies the hearing on the merits. But for a French lawyer *'proces'* designates the entire procedure, from the filing of the complaint until the final judgment. A French lawyer and a US lawyer discussing 'pre-trial' disclosure may have quite different things in mind.

Latin phrases are another complexity. Some lawyers believe that if they express a

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him toformat of his article.

concept in Latin, they establish its universality. But not all educational systems in recent decades have valued training in classical languages. As a result, unless your arbitration tribunal is composed of ancient Romans, it is best to express your argument in English terms that you are confident the arbitrators will understand.
The test: if an arbitrator has to get up to look for a dictionary or run a Google search to understand your argument, you are not communicating well.

Commandment No. 3: TOPIC SENTENCES.

Blessed are the paragraphs that begin with the point they seek to make.

Legal arguments are better understood when the reader knows where you are going before you get there. The organization of your argument is stronger and clearer when each paragraph begins with a topic sentence: a sentence that makes or announces the main point of the paragraph.

Legal writing is not like that of a novel – there is no benefit in hiding the point of your narrative until the end, when it surprises the reader. Knowing what the point is in advance allows your argument to fall neatly in place in the mind of the reader- even a reader who, like many arbitrators, is studying your brief when recovering from a long flight, in between conference calls on procedural issues in other cases.

Commandment No.4: PARTY NAMES.

Thou shalt describe the parties by their names and not by by their procedural position.

Every case has at least one claimant and one respondent. Describing the parties as 'Claimant' or 'Respondent' does not help the arbitrator remember who they are. Even counsel has trouble keeping this straight. I cannot count the number of arguments by opposing counsel I have seen garbled by applying the wrong procedural appellation to their own client.

Moreover, the bland appellations 'Claimant' and 'Respondent' undo all of the efforts an advocate makes to characterize her client as the 'good guy' and the opposing party as the 'bad guy'. The story comes alive when real names are used in a way that it cannot with procedural appellations.

Commandment No. 5: DO NOT GET PERSONAL.

Thou shalt not use you' and we' in legal writing.

Attorneys, in the interest of their clients, are sometimes required to take tough positions in arbitrations, particularly in procedural correspondence. It is sometimes tempting in correspondence with opposing counsel to refer to counsel or their client as 'you', and to oneself or one's own client as 'we'.
Do not do this. As attorneys, everything we do in an arbitration is on behalf of our clients. None of us likes to feel that we are being accused of misconduct or bad faith. The effect on the blood pressure of the ordinary lawyer of a statement 'you are seeking to delay the proceedings in bad faith' is measurably different from that of 'ABC Corporation is seeking to delay the proceedings in bad faith.' Keep it professional. Refer to the parties, not to counsel, in correspondence and in pleadings.

Commandment No. 6: MINIMIZE ABBREVIATIONS.

Thou shalt abbreviate only when essential.

An arbitrator's attention to your arguments is a precious thing. Do not reduce the impact of your arguments by making the arbitrator engage in an exercise of memorizing a succession of abbreviations so that she can make sense of your points. Define an abbreviation only when it is essential to do so. It is not essential in contexts where one would not do so in ordinary speech. We do not stop to define: John Smith' in ordinary speech, for example- we simply refer to him as 'Smith' or 'Mr. Smith'.

If you do need to define a term for essential reasons of precision, then at least select an abbreviation that reminds the reader of what is being abbreviated. For example, if the term to be defined is 'ABC Engineering and Design Investment Brazil Incorporated', define it as 'ABC Brazil' or 'ABC Engineering'-not as 'AEDIBI'.

Commandment No. 7: DO NOT MAKE YOUR OPPONENT'S ARGUMENT.

Blessed are those who make on their own arguments, and not those if their adversary.

There is a temptation, particularly in responsive pleadings and submissions, to begin a responsive argument by summarizing the point in question. This is necessary to a certain extent. The Tribunal must know which of your adversary's points you are addressing in order to understand your point in response. There are ways to do this, and ways not to do this.

The path not to be taken is to begin by summarizing your opponent's argument, and then responding to it. Doing so is confusing for the Tribunal, which expects you to make your client's argument. It is also dangerous- because many times you will be capable of stating your opponents' argument in a clearer and more effective manner than they.

The righteous path is to begin the argument by stating that the adversary's point is wrong. For example: 'ABC Corporation errs in suggesting that the sun rises in the west' or 'ABC's argument that the sun rises in the west is without merit'.

Commandment No.8: FACTS SHOULD SHOW, NOT TELL.

Blessed are those whose facts lead to the road of righteousness

The fact section of a brief should have a tone different from the argument. It should state the facts in a neutral, non-committal tone. It should not tell the reader what conclusion to draw from the facts that are stated. It should carefully select the facts to be discussed and present them in a way that leads the reader to the conclusion that your client is right and the adversary is wrong. It should show, not tell.

This approach is most effective. A conclusion that the arbitrator reaches herself will be more persuasive to the arbitrator than a conclusion you tell the arbitrator to reach. That is just the way human minds are.

As a general rule, the fact section should be organized chronologically, since that is the presentation that is generally easiest to follow. It should tell a story and touch upon the themes important to the case. As a general rule, the facts discussed should be limited to those that are used in the argument that follows. But the tone should at all times remain factual and neutral, without drifting over into argument.

Commandment No. 9: NO SUPERLATIVES.

Thy words shall not try too hard.

When arbitrators read a pleading, they read it critically. As they read it, they ask themselves whether what you have written makes sense in light of their experience, the other party's assertions and their knowledge of the law and the record. A good pleading is one that withstands a critical read without making the arbitrator pause even once.
Superlatives provide a ready target for an arbitrator's critical read but only
rarely are necessary to make the point. An opponent's point may indeed be very, very bad. But one typically needs to establish only the point's lack of merit–adding the superlative is unnecessary. In those rare cases where it is necessary or desirable to convey a stronger degree of emphasis, it is almost always better to do so through careful selection of nouns and adjectives than through the addition of a superlative.

Commandment No. 10: LETTERS BEGIN WITH WHAT YOU WANT AND WHO YOU ARE.

They who state their wishes early and clearly shall be heard.

Always begin a procedural letter to the tribunal with what you are asking. A busy tribunal chair should not have to wait until halfway through your letter before she begins to understand why you have written. The discipline of stating the request in the first line also helps focus your thinking and makes your request more effective.

It is also useful always to begin with a clause stating on whose behalf you are acting. You of course remember who your client is and what their role is in the arbitration. An arbitrator with twenty cases in progress, however, may not immediately and always recall which lawyer acts for which party. This is not something to leave to chance.

CONCLUSION

The Written Claim or Counter Claim should ideally begin with Contents/Index of the document then giving out the executive summary of the case, followed by submissions on legal and factual issues ending up with conclusion of a brief which provides both a quick summary of the attorney's/advocate's case and a statement as to the relief sought (deny the grievance or make the grievant whole). The summary portion of the conclusion should be short, and in most cases will be a simple one or two sentence statement of the basic theory of the case. It is not necessary to summarize all of the arguments presented in the body of the brief.
The conclusion of the brief should also inform the arbitrator what action the advocate is requesting, such as affirm, deny, cease and desist order, or a make whole remedy. Identifying the action that the advocate is requesting should not be considered just a formality. The relief one or both of the parties wants may not be clear, especially when the issues are relatively complex. It is discouraging, to say the least, for advocates to find that they won the case on its merits, just to find that the remedy provided by the arbitrator is inadequate. To help protect against such an eventuality, the advocate ought be clear and persuasive as to expected relief.
Good brief writing integrates proper form and style with a good sense of persuasiveness. While a technically well- written brief can do much to advance the cause of the advocate, a failure to fully understand the psychology of

persuasion will, in turn, do much to undermine the brief. Two concluding observations are presented with the above point in mind. First, arbitrators generally are not persuaded by heavy sarcasm or material which denigrates the other party. Phrases such as "the absurd position of my opponent" or "the ridiculous interpretation of contract language as offered by the employer" detract from the persuasiveness of the advocate's case. Second, arbitrators do not like to be threatened. Veiled threats such as "only a person who lacks an understanding of the process could agree with my opponent" may not be intended as intimidation but read as such and work against the advocate's interest.

Style and form that help to establish clarity, combined with material that is both well-reasoned and persuasive, are the keys to effective brief writing. Attorneys/Advocates who write the brief with these goals in mind will do much to advance the cause of their clients.

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