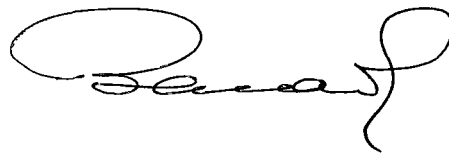


FINAL SUBMISSIONS

The 53rd Tomimaru Case

The Russian Federation requests the International Tribunal for the Law of the Sea to decline to make the orders sought in paragraph 1 of the Application of Japan. The Russian Federation requests the Tribunal to make the following orders:

- (a) that the Application of Japan is inadmissible;
- (b) alternatively, that the allegations of the Applicant are not well-founded and that the Russian Federation has fulfilled its obligations under paragraph 2 of Article 73 of the United Nations Convention on the Law of the Sea.



Evgeny Zagaynov
Agent for the Government of the Russian Federation

23 July 2007