

**BY REGISTERED POST/BY EMAIL**

To,  
Mr. ABC  
R/o- BB, India.

**SUBJECT: NOTICE FOR INVOKING ARBITRATION UNDER CLAUSE ..... OF AGREEMENT EXECUTED BETWEEN MY CLIENT AND .....(NAME OF THE OPPOSITE PARTY IN THE AGREEMENT).**

Sir(s),

Upon instruction and on behalf of my client, Mr....., R/o ....., I the undersigned serve you this notice, contents of which are as under:

1. My client is .....(state who your client is and what kind of business activities are going on between your client and the opposite party to the agreement).
2. State brief facts which show that dispute has arisen between the parties to the agreement.
3. The aforesaid acts and events therefore make it abundantly clear that the [other side] are unwilling to comply with their obligations under the [Agreement/Contract] to indemnify Our Client against all damages incurred or suffered by Our Client based upon, resulting from or relating to any breach of warranty, undertaking or any obligation of the [other side] as well as with respect to any amount of tax liability incurred by, imposed upon, due from or payable by [other side], in relation to the period upto and including the Closing Date of the [Agreement/Contract], as set out hereinabove and under various communications issued in this regard.
4. Thus, Our Client states that disputes have arisen between the parties and further repeated attempts to amicably settle the disputes regarding the non-payment of amounts due to them have been made. Therefore, bearing in mind the situation as set out hereinabove, Our Client is left with no other alternative but to invoke arbitration in accordance with Clause [ ] of the [Agreement/Contract]. The said arbitration clause is reproduced below for your ready reference:  
*“Write the whole arbitration clause in the agreement”.*
5. In terms of Clause [ ] of the [Agreement/Contract] (reproduced above) we on behalf of Our Client nominate [•] as the arbitrator on behalf of Our Client. You are therefore requested to nominate the arbitrator on your

behalf and inform us of the same within a period of 30 (thirty) days from the date of receipt of the present notice, failing which Our Client shall be constrained to file appropriate proceedings in this regard, which please note.

OR

Hence, By way of the present notice my client duly invokes the arbitration clause for settlement of the dispute and accordingly, it is incumbent upon your goodself to suggest the names of the learned individuals for the appointment of the impartial and independent sole arbitrator and inform the same to my client within a period of 30 (thirty) days from the date of receipt of the present notice, failing which my client shall be constrained to file appropriate proceedings in this regard, which your good self may please note.

Yours Truly

**(.....)**  
Advocate