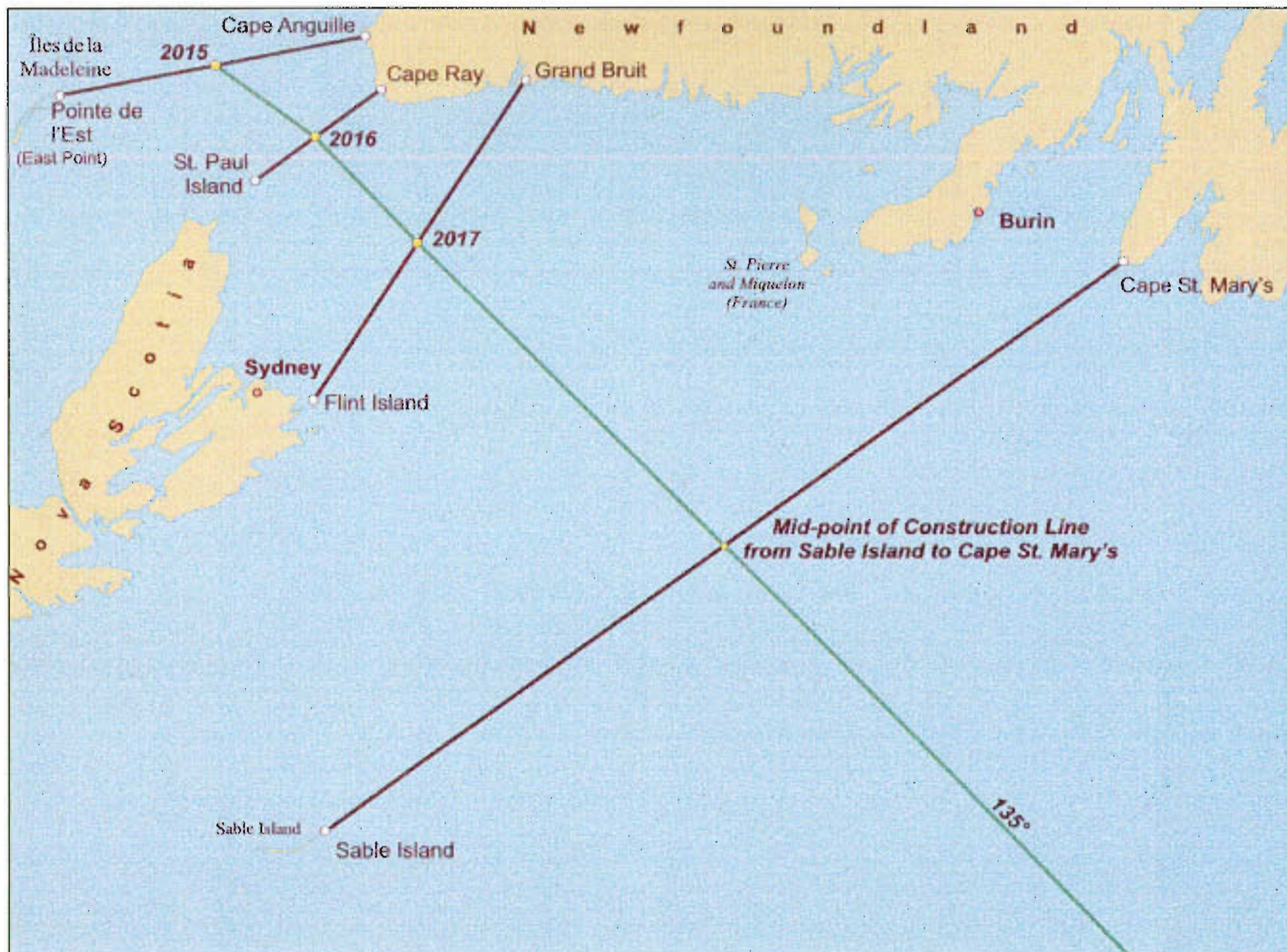


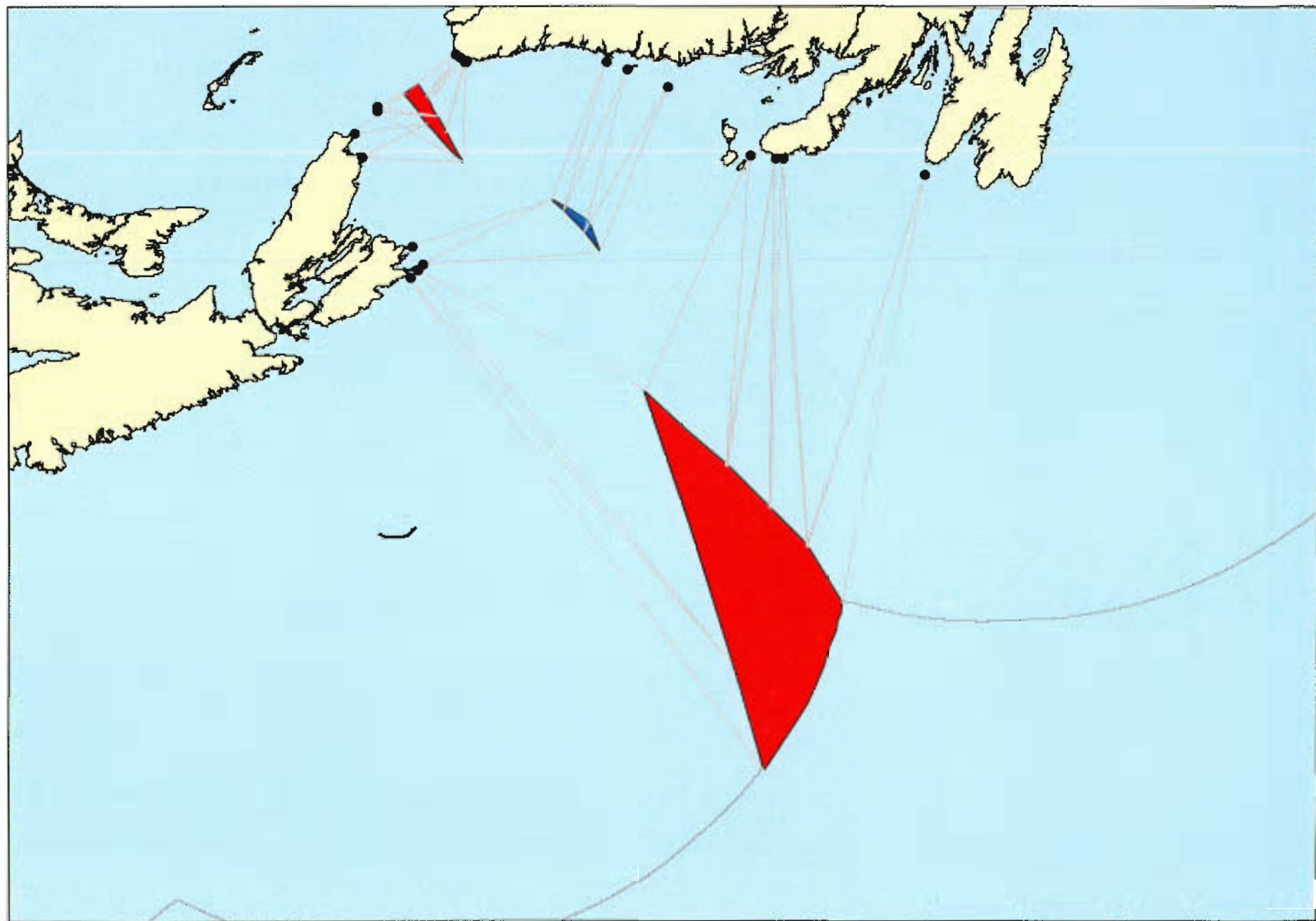
Nova Scotia Uses an Incidental Feature as the Pivotal Point for the Justification of its Line



Based on Figure 51, NS Memorial, Phase Two

Oral Presentation, Phase Two, Figure: 15

Total Area Attracted by NS & N&L Islands Using Equidistance



Total Area Attracted by Sable Island Using Equidistance

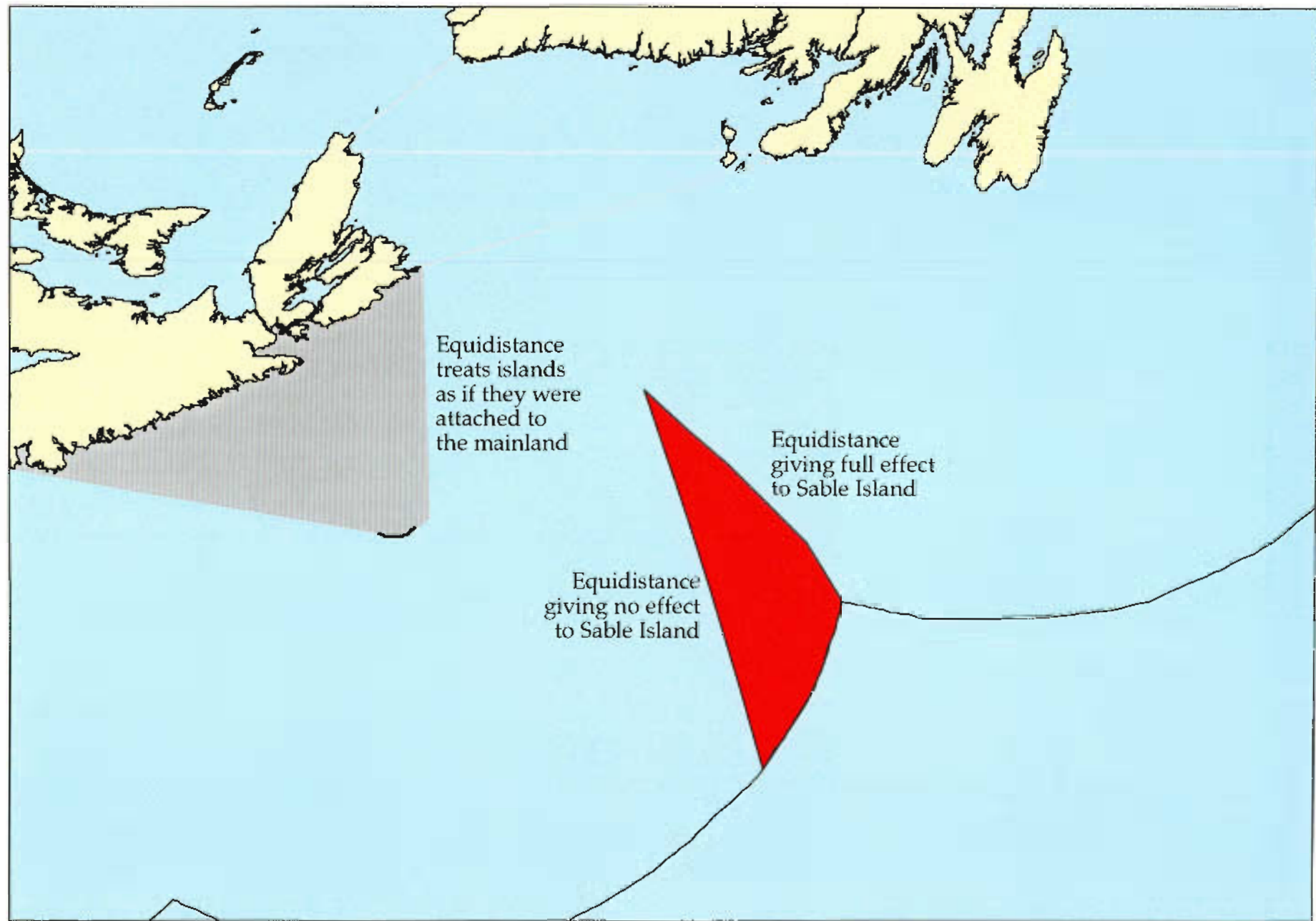
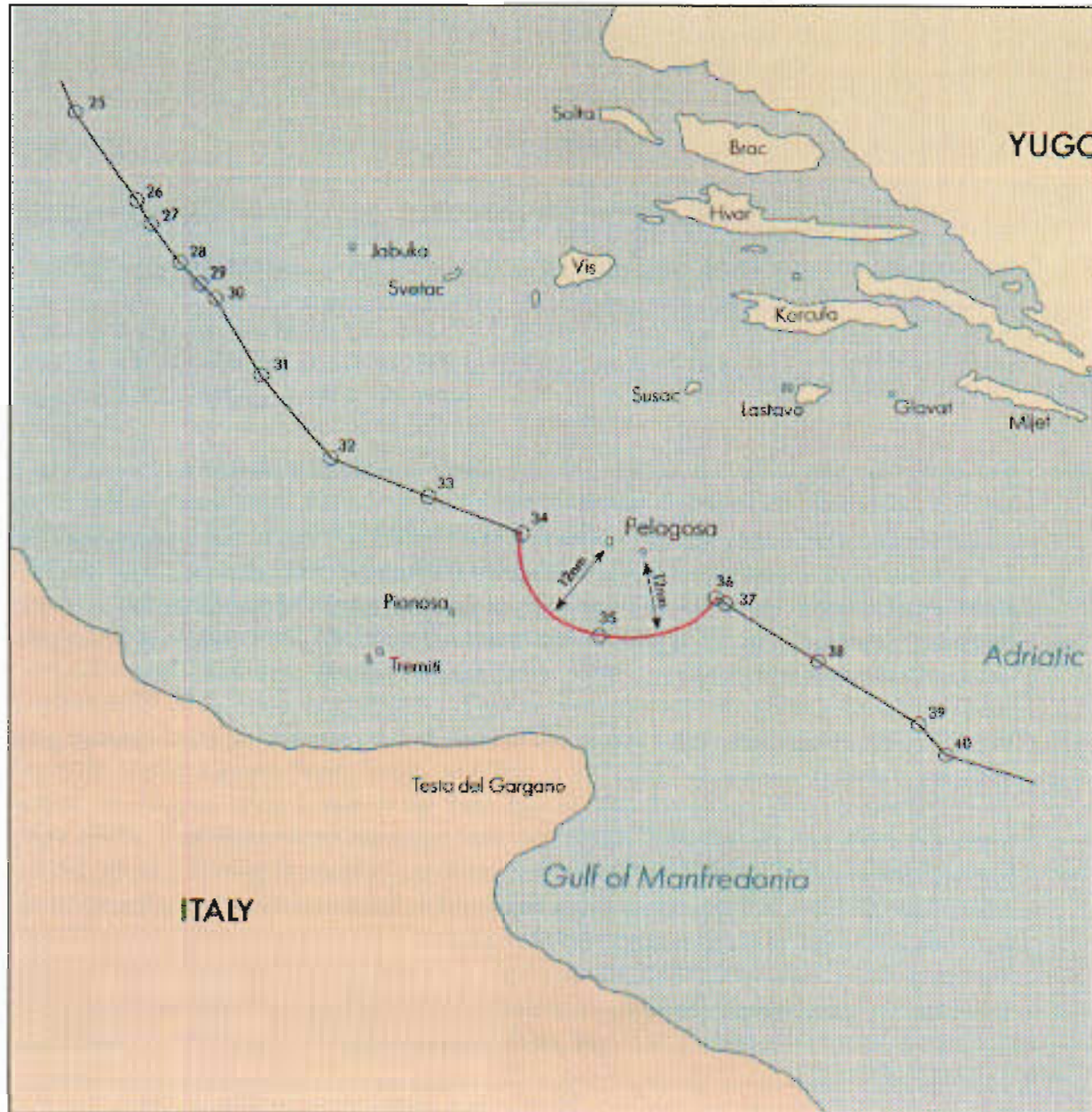


Figure14, N&L Memorial, Phase Two

Oral Presentation, Phase Two, Figure: 17

Semi-Enclaves Off Italy



Based on Figure 33, *Canada-France Memorial*

Oral Presentation, Phase Two, Figure: 18

Nova Scotia's Exaggerated Relevant Area of "Negotiated Overlapping Entitlements"

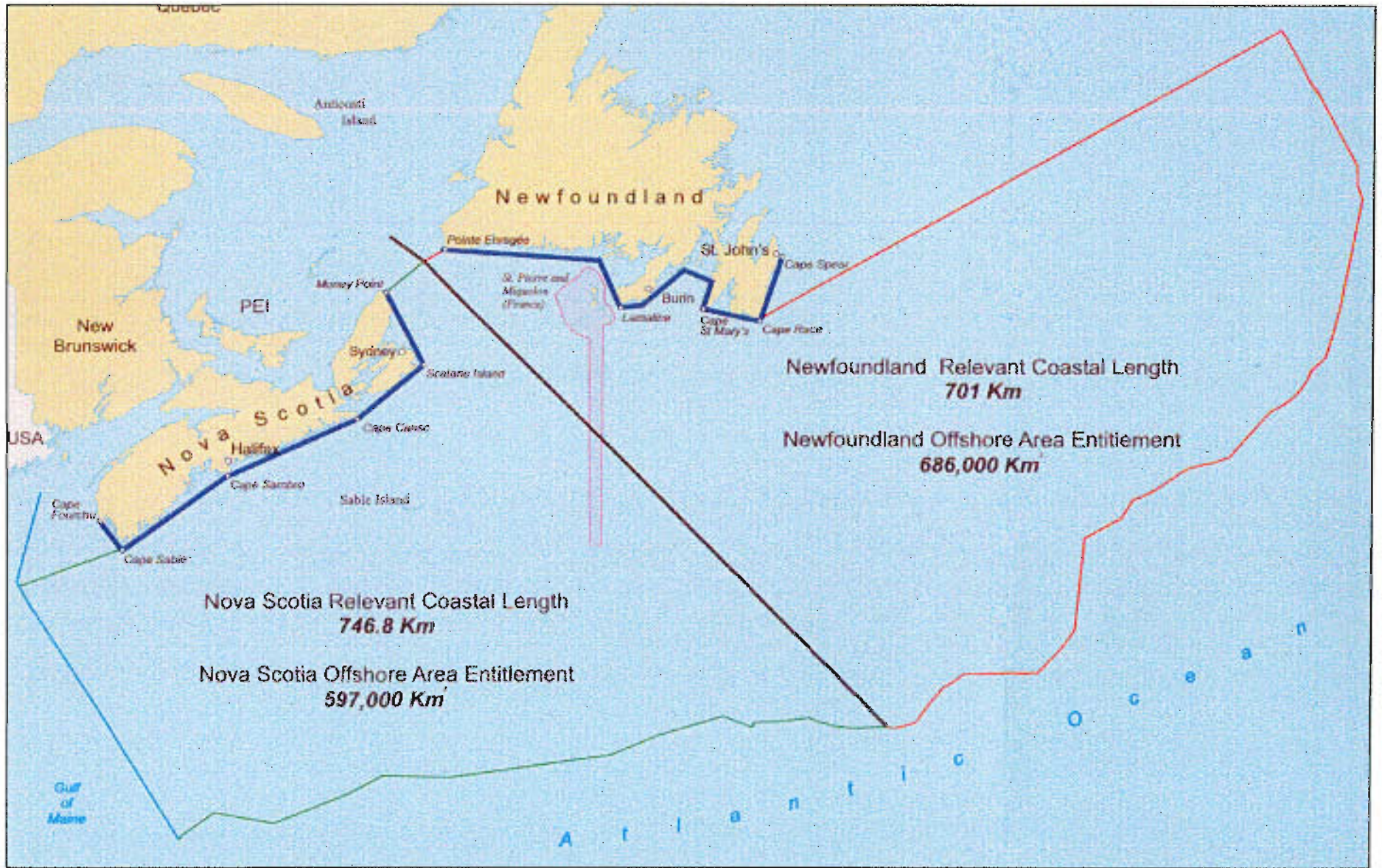
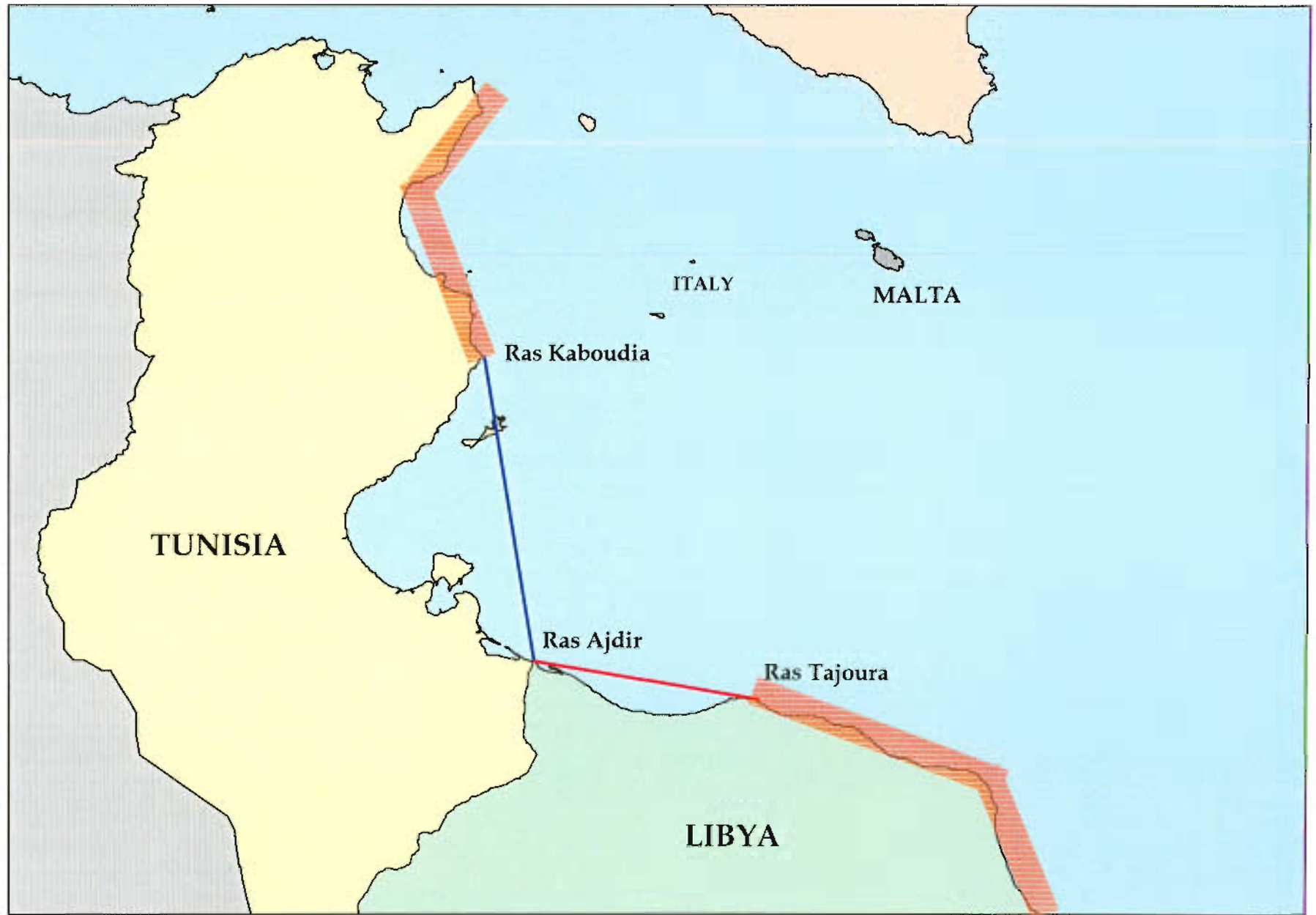


Figure 55, N&L Memorial, Phase Two

Oral Presentation, Phase Two, Figure: 19

Non-Relevant Coasts in *Tunisia-Libya*



Canada's Proposed "Converging Seaward Extensions" of Newfoundland and Nova Scotia

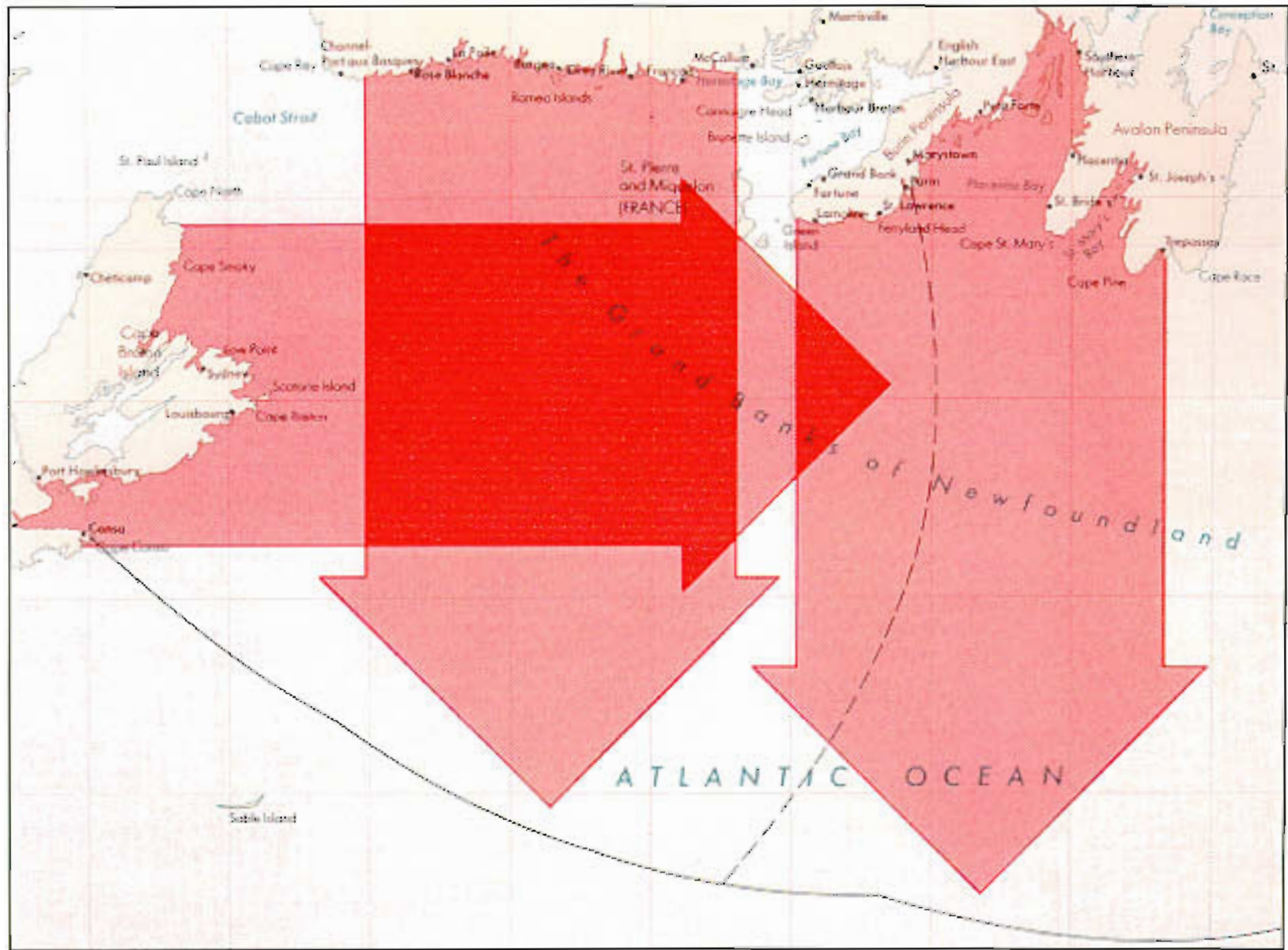
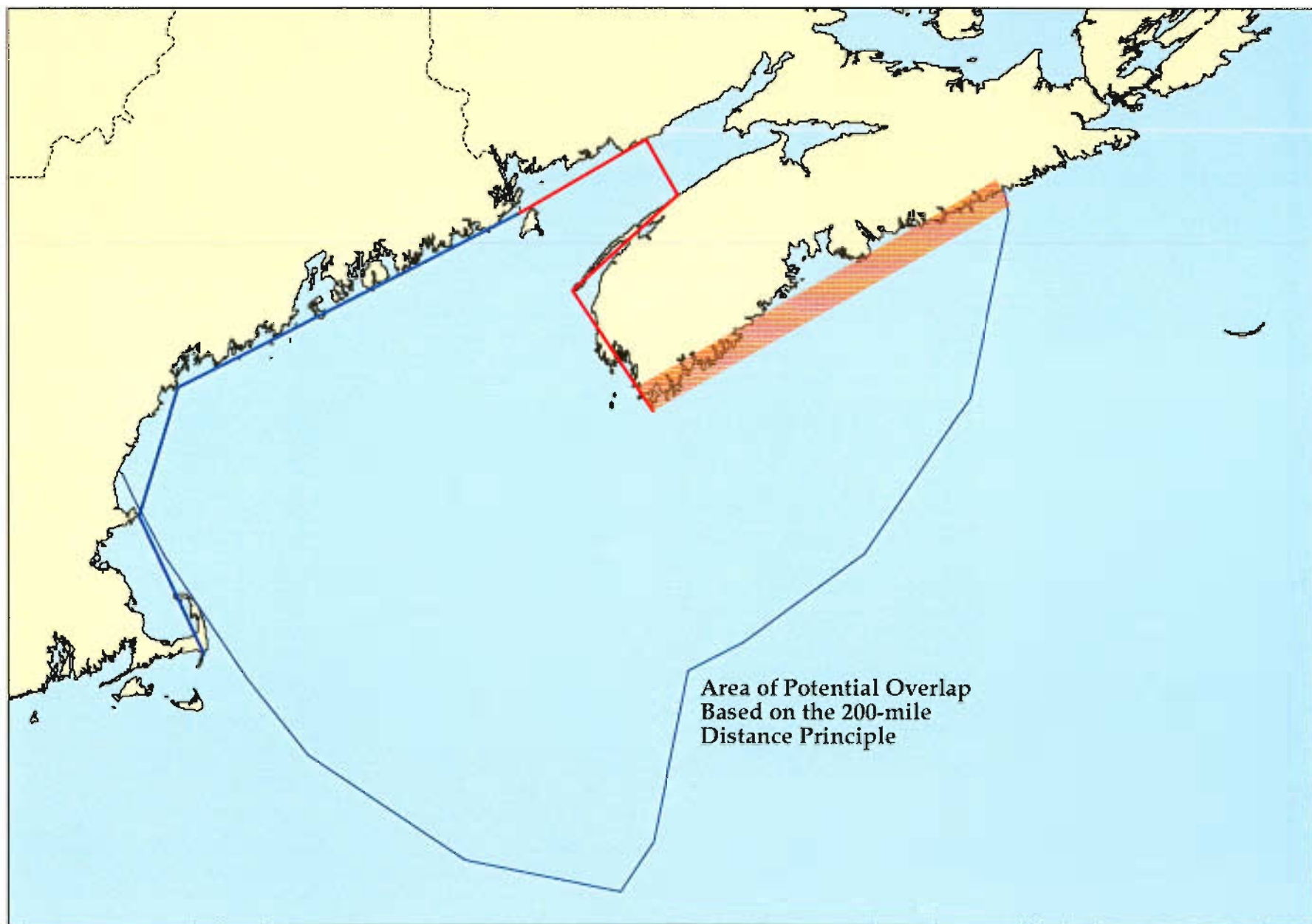


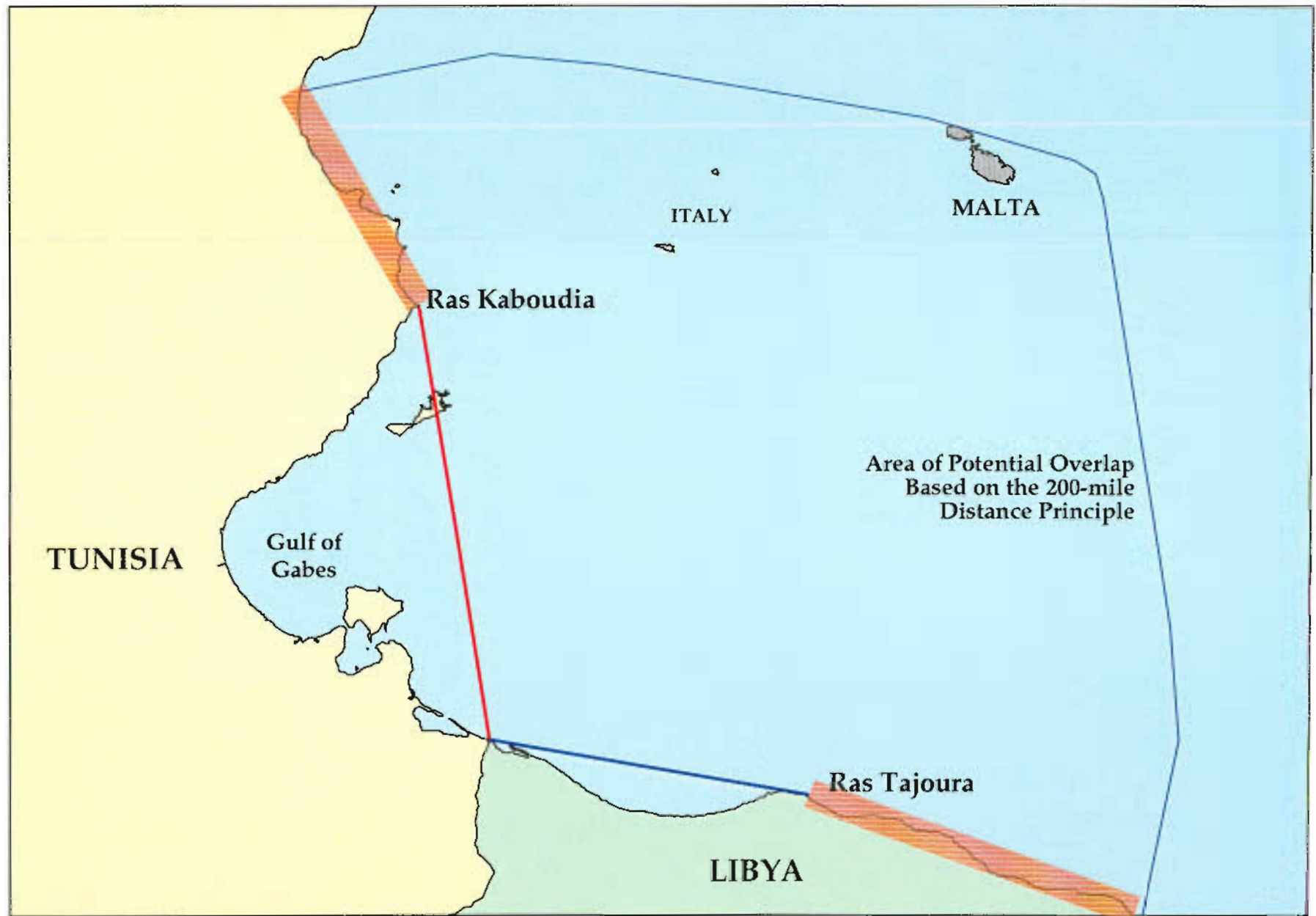
Figure 19, N&L Memorial, Phase Two

Oral Presentation, Phase Two, Figure: 21

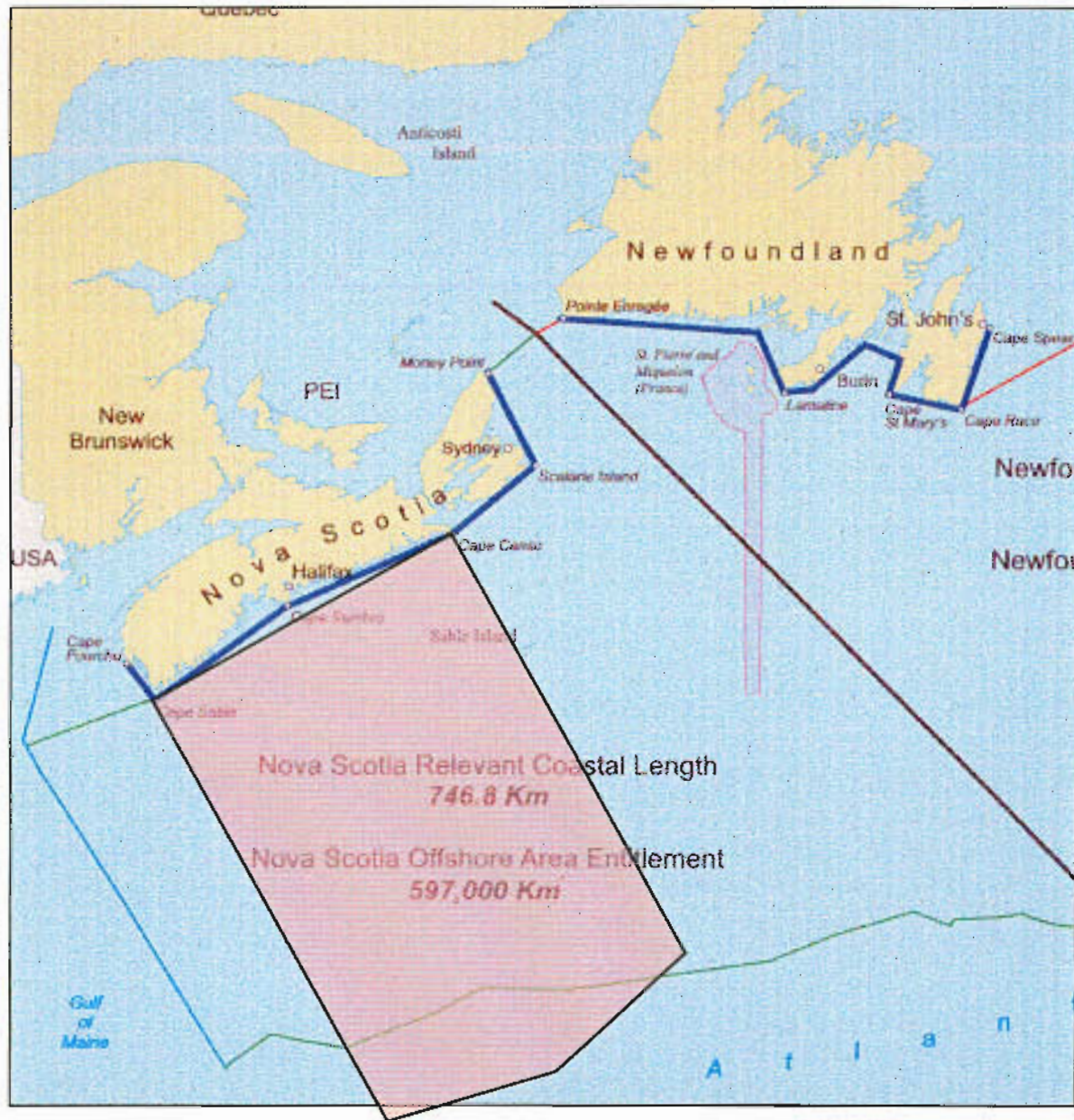
The Area of Overlap Using Radial Projections in the *Gulf of Maine*
Encompasses Coasts That Were Determined to be Irrelevant



The Area of Overlap Using Radial Projections in the *Tunisia-Libya*
Encompasses Coasts That Were Not Determined to be Irrelevant



Nova Scotia Coasts West of Cape Canso Do Not Project Into the Area to be Delimited



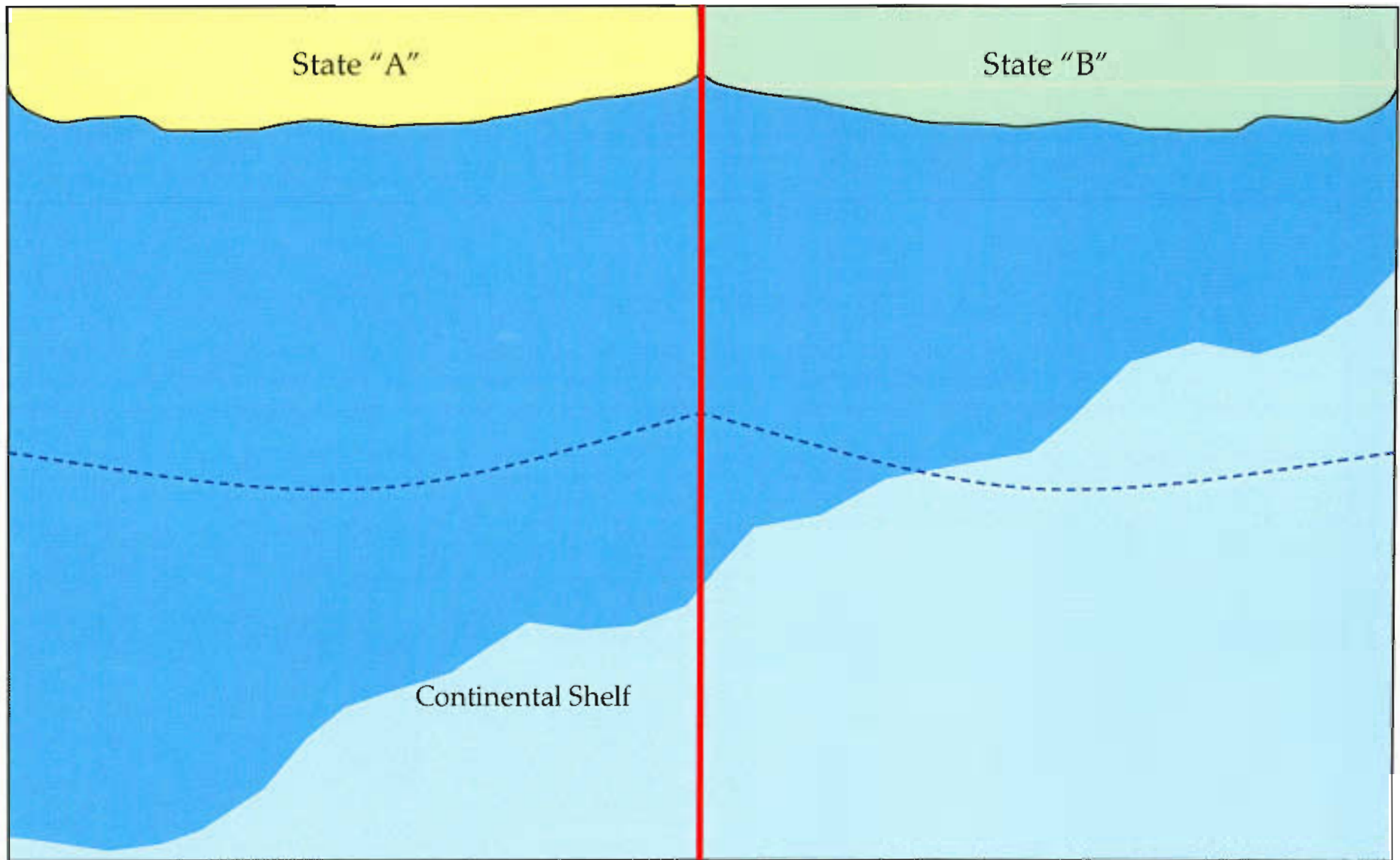
Based on Figure 55, NS Memorial, Phase Two.

Oral Presentation, Phase Two, Figure: 24

Alleged N&L Misuse of Precedents

- Newfoundland's entire focus on geographic features to the exclusion of other circumstances, already discussed above, is supported by the fact that geography was a dominant consideration in other cases. It does not mention that those cases involved jurisdictional zones which are entirely from offshore areas;
- The outer limits of the "relevant area" examined in Newfoundland's Phase Two Memorial are restricted to 200 nautical miles, for no other reason than that the same was done in the *St. Pierre and Miquelon Award*. This, of course fails to acknowledge that this was an appropriate limit in that arbitration only because the dispute itself was limited to the parties' 200 nautical mile zones;

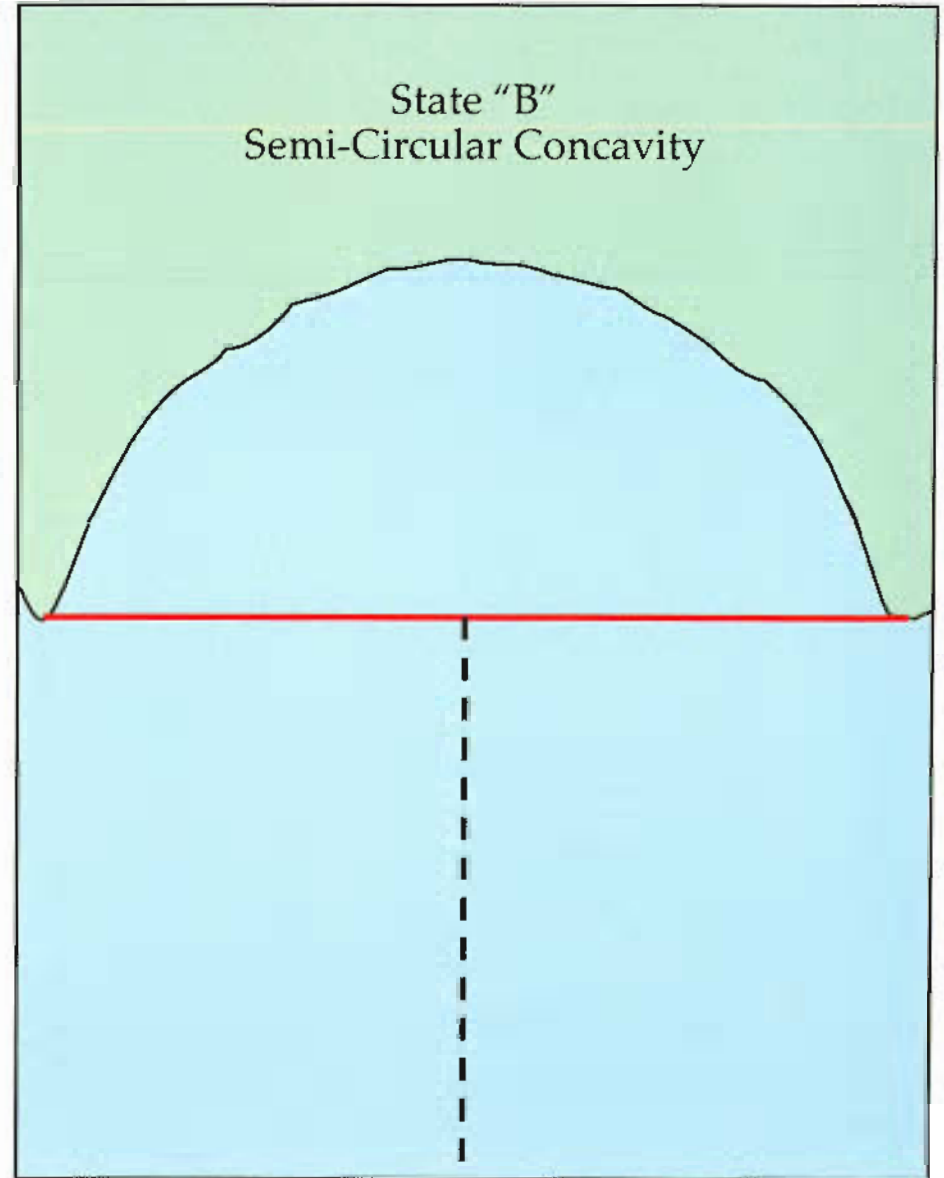
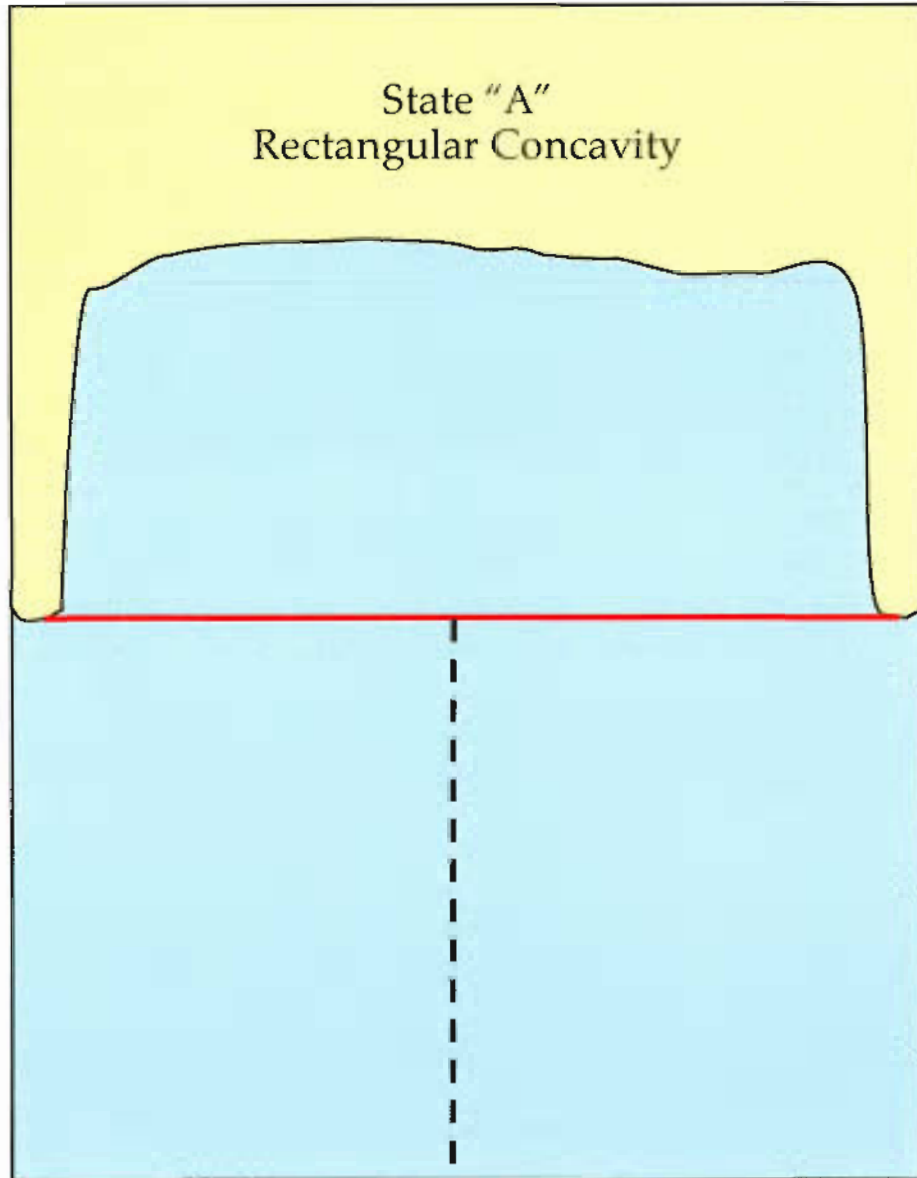
Proportionality Based on the Outer Limit of a Broad Shelf is Prone to Distortion



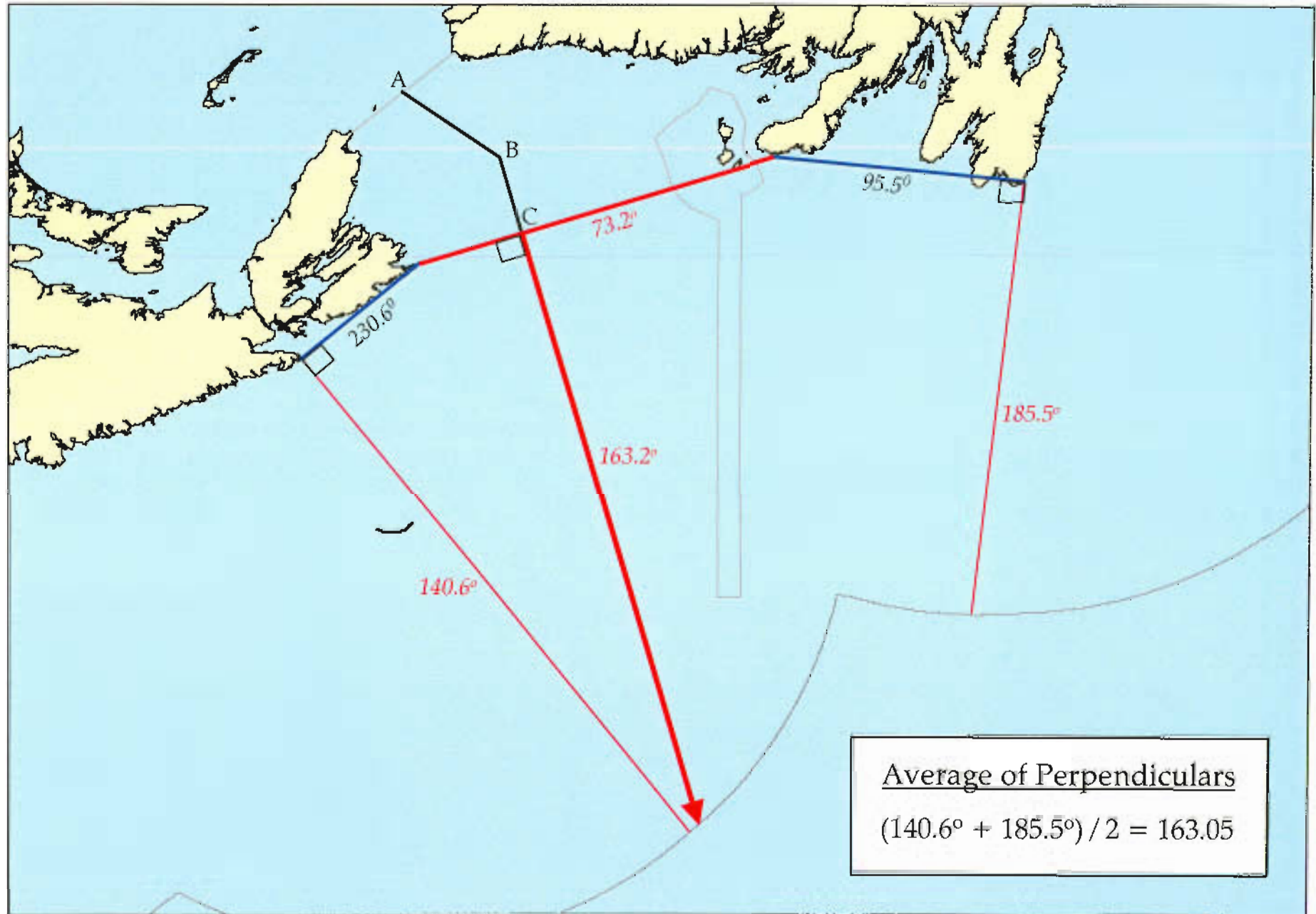
Alleged N&L Misuse of Precedents

- The use of perpendiculars to coastal directions to define the outer limits of the relevant area, as applied by Newfoundland, is largely unsupported in international law. Newfoundland does, however, refer to the use of this method in the *Case Concerning the Maritime Delimitation Between the State of Eritrea and the Government of the republic of Yemen*, while neglecting to consider that the perpendiculars were applied to opposite coasts in the case, thus crossing over a median line with minimal effect on either party, and were not extended seaward over long distances.

The Perpendicular to a Closing Line Respects the Geography of a Semi-Circular Concavity Just as Accurately as it Represents the Geography of a Rectangular Concavity



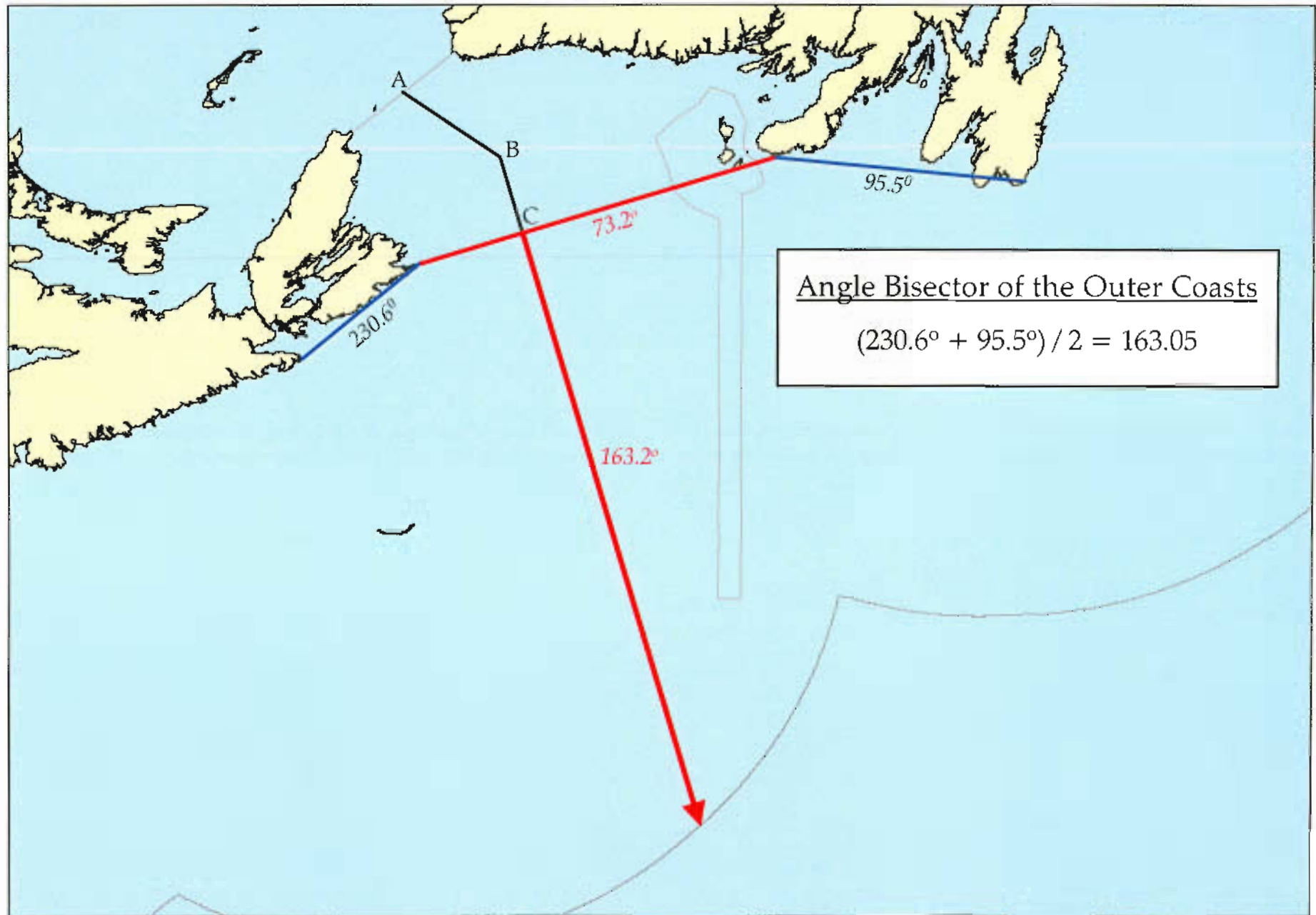
A Perpendicular Reflects the Basic Structure of the Coastal Geography in the Outer Area



Based on Figure 23, N&L Memorial, Phase Two

Oral Presentation, Phase Two, Figure: 29

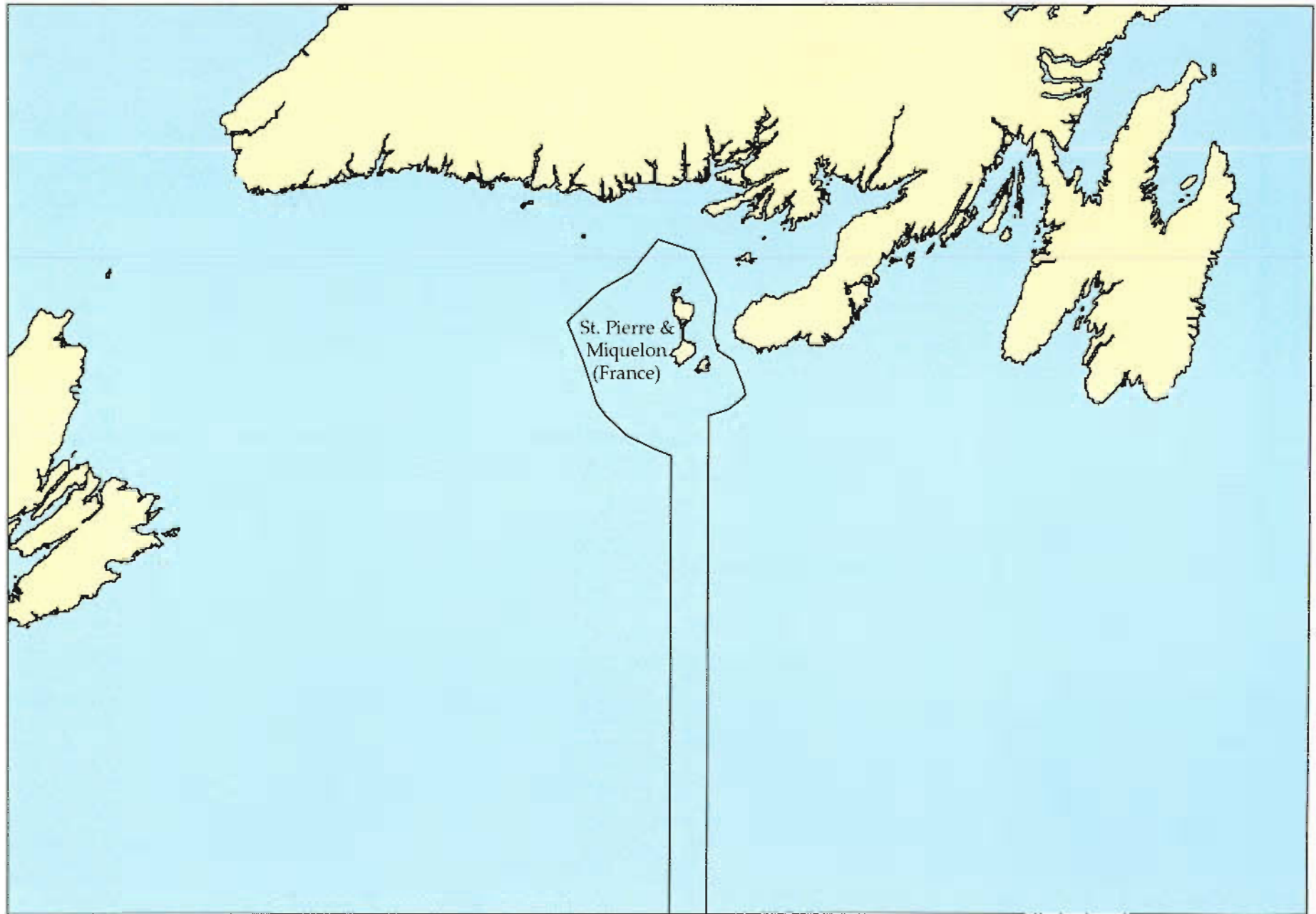
A Perpendicular Reflects the Basic Structure of the Coastal Geography in the Outer Area



Based on Figure 23, N&L Memorial, Phase Two

Oral Presentation, Phase Two, Figure: 30

The St. Pierre & Miquelon "Mushroom"



Canada's Proposed "Converging Seaward Extensions" of Newfoundland and Nova Scotia

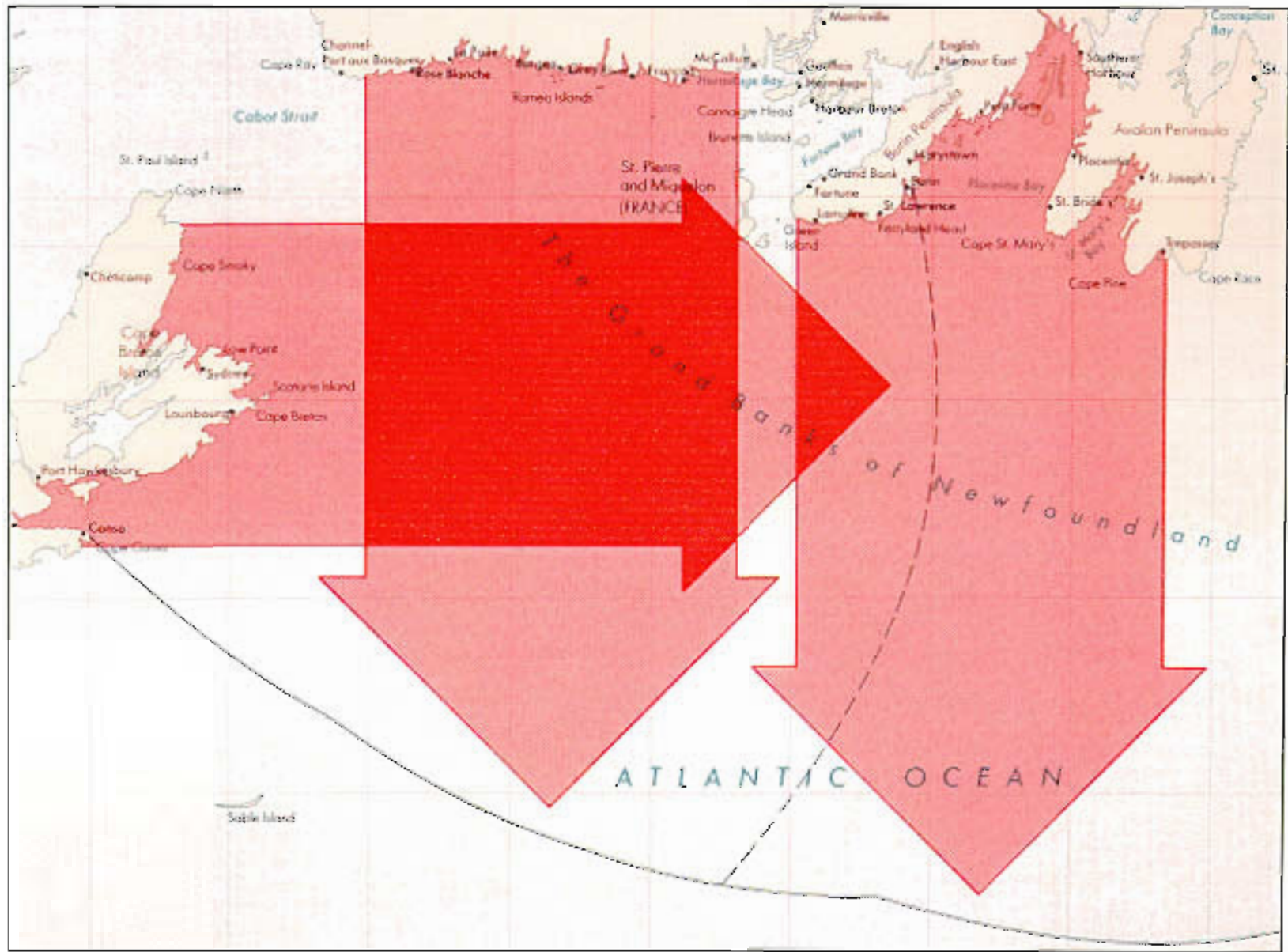


Figure 19, N&L Memorial, Phase Two

Oral Presentation, Phase Two, Figure: 32

Purported Distinctions With Canada-France

- The **fundamentally different nature and origin of the legal zones in question**, as well as their extent (“offshore areas” reaching to the edge of the continental margin in this case, as opposed to a 200 mile EEZ in the *St. Pierre and Miquelon Award*);
- The **different resources** at issue (oil and gas exclusively vs. primarily fisheries);
- The **impact of other delimitations** in the region (none of any consequence in the *St. Pierre and Miquelon Award*);
- The nature and history of the parties **conduct** (nothing in the *St. Pierre and Miquelon Award* approaching the sort of “agreement” that Newfoundland itself acknowledges was reached by the parties in this case).