

## TO THE ADMINISTRATIVE CONTENTIOUS CHAMBER OF THE SUPERIOR COURT OF JUSTICE OF MADRID

**Mrs. MARTA SANZ AMARO**, Solicitor of the Courts of Madrid, with the number 670, on behalf of **GREEN PEACE ESPAÑA**, which I certify by copying deed of power that I attach herewith as **document number one**, acting \_\_\_\_\_ under the legal direction of **Ms. LAURA DÍAZ ROMÁN** Collegiate no. 27,094 of the Illustrious College of Madrid, before the Chamber I appear and as best proceeds in Law

I say

**First.-** That by means of this letter, I **SUBMIT A CONTENTIOUS APPEAL ADMINISTRATIVE** under art. 25 of the Contentious Jurisdiction Law Administrative, within the legal term, in accordance with article 46 of Law 29/1998, against the Resolution of the General Director of Commercial Policy of March 10, 2020, signed on June 22, 2020 and notified to this party on June 24, 2020, which denies access to public information requested by my represented on March 9, 2020, registration number 001-041739, in which requested access to the following information:

*“Copy of the administrative file or files referring to each of the authorizations or licenses granted for the export of artillery ammunition manufactured by EXPAL SYSTEMS destined for the United Arab Emirates and/ or Arabia Saudi, between the year 2017 and the present.*

*In particular, and without prejudice to the delivery of all the documents that are have been included in such file, the following are specifically requested documents:*

*- The authorization or licenses granted.*

- *Documents containing detailed information on the evaluation carried out based on the requirements of article 7 of the Trade Agreement of weapons.*
- *The minutes of the meeting of the Interministerial Trade Regulatory Board Exterior of Defense Material and Dual Use -JIMDDU-, in which the decision to authorize such export.*
- *Documents stating the reasoned decision of the favorable JIMDDU to the granting of export authorizations, in the event that this end is not recorded in the minutes referred to in the previous paragraph".*

Attached is the Resolution of March 10, 2020 as **document number** \_\_\_\_\_

**From.**

**Second.-** That in application of the provisions of article 10.1 m) of the Ritual Law of this jurisdiction, and the resource instruction contained in the challenged Resolution, the jurisdiction to hear this appeal corresponds to the Chamber of the Contentious-Administrative of the High Court of Justice of Madrid.

However, in the event that this is not understood, it will proceed to send the actions to the competent court, in application of the provisions of the article 7.3 of the Law of this Jurisdiction.

**Third.-** That at the meeting of the Board of Directors of the GREENPEACE Association SPAIN, held on July 22, 2020, it was agreed to file a contentious appeal administrative against the aforementioned resolution.

Attached is a certification of the aforementioned agreement, Resolution of the registration of the holders of the Board of Directors of GREENPEACE ESPAÑA in the Registry National Associations and the Statutes of the Association, respectively, as **documents number three, four and five.**

**Fourth.-** That, having notified the challenged Resolution to this party on the 24th of

June 2020, the appeal filed is within the term established in article 46.1 of the LJCA.

**Fifth.-** That, for the purposes set forth in article 40 et seq. of the Law on Contentious-Administrative Jurisdiction, it is stated that the amount of the appeal is indeterminate.

In view of the foregoing,

**TO THE CHAMBER I REQUEST** that, having presented this brief and the documents that are accompanied, please admit them and have filed a contentious appeal **against the Resolution of March 10, 2020 of the Director General of Commercial Policy of the Ministry of Industry, Commerce and Tourism**, by which denies access to the information requested on March 9, 2020 number of registration 001-041739, and after the mandatory procedures, claim the file administrative of said body in order that it be revealed to me for formalize the claim.

**ANOTHER I SAY** That this party is interested and so,

**I REQUEST THE COURT** to have me appear and appear in the representation indicated, ordering the successive proceedings to be understood with me.

In Madrid, on August 21, 2020



Signed Laura Diaz Roman  
Ltd. ICAM 27,094