

INTERNATIONAL COURT OF JUSTICE

**APPLICATION OF THE INTERNATIONAL CONVENTION ON THE  
ELIMINATION OF ALL FORMS OF RACIAL DISCRIMINATION**

**(ARMENIA v. AZERBAIJAN)**

REQUEST BY THE REPUBLIC OF ARMENIA  
FOR THE INDICATION OF PROVISIONAL MEASURES

27 DECEMBER 2022

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## I. INTRODUCTION

1. In accordance with Article 41 of the Statute of the Court and Article 73 of the Rules of Court, the Republic of Armenia (“Armenia”) urgently requests that the Court indicate provisional measures against the Republic of Azerbaijan (“Azerbaijan”) to preserve and protect rights enshrined in the International Convention on the Elimination of All Forms of Racial Discrimination (“CERD”).
2. On 12 December 2022, Azerbaijan orchestrated a blockade of the only road connecting the 120,000 ethnic Armenians in Nagorno-Karabakh with the outside world, thereby preventing anyone and anything from entering or exiting.<sup>1</sup> This blockade is ongoing as of the date of the present Request, and there are no signs that it will be lifted any time soon.
3. The situation is dire. More than twenty critically ill ethnic Armenians hospitalised in Nagorno-Karabakh have been slated to be transferred to medical facilities in Armenia for urgent medical care,<sup>2</sup> but with the exception of a small number of patients Azerbaijan permitted to be transported by the International Committee of the Red Cross (“ICRC”),<sup>3</sup> the blockade has rendered their transfers impossible. *One of the many patients Azerbaijan has not permitted to leave has already died*,<sup>4</sup> and the remainder are unable to receive the life-saving treatment they desperately need. The ethnic Armenians in Nagorno-Karabakh can also *no longer freely receive medicines*, virtually all of which they normally import from the outside world.<sup>5</sup> Other *humanitarian assistance* destined for the ethnic Armenians in Nagorno-Karabakh—provided by the United States, the European Union, and others—can now no longer be delivered. Indeed, the blockade has entirely prevented the delivery of the approximately **400 tons**

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<sup>1</sup> Russian Federation, Ministry of Defence, *News bulletin of the Ministry of Defense of the Russian Federation on the operations of the Russian peacekeeping forces in the area of the Nagorno-Karabakh conflict (as of December 13, 2022)* (13 December 2022) (**Annex 1**).

<sup>2</sup> See, e.g., Letter from “Republican Medical Center” CJSC of the Republic of Artsakh to Office of the Representative of Armenia before the European Court of Human Rights (15 December 2022) (**Annex 2**).

<sup>3</sup> See, e.g., “Critically ill Artsakh patients still need transfer to Armenia, minister tells ICRC”, *Panorama* (21 December 2022), available at <https://www.panorama.am/en/news/2022/12/21/Artsakh-patients-ICRC/2772547> (**Annex 67**).

<sup>4</sup> “Artsakh blockade continues for nine days: patient dies in hospital”, *News.am* (19 December 2022), available at <https://news.am/eng/news/735939.html> (**Annex 3**).

<sup>5</sup> Susan Badalian, “Karabakh Faces Shortage Of Basic Goods”, *Radio Free Europe/Radio Liberty* (15 December 2022), available at <https://www.azatutyun.am/a/32178505.html> (**Annex 4**).

*of essential goods* that are normally imported into Nagorno-Karabakh *on a daily basis*—including grain, flour, vegetables, and fruits<sup>6</sup>—with the only exception again being a small quantity of goods Azerbaijan recently permitted to be delivered by the ICRC.<sup>7</sup> On top of all this, ethnic Armenian families have been and remain forcibly separated, as the blockade was imposed when more than a thousand ethnic Armenians living in Nagorno-Karabakh were in Armenia or en route to Armenia, and none of them have been able to return.<sup>8</sup>

4. The worst may be yet to come. The 120,000 ethnic Armenians in Nagorno-Karabakh are now entirely encircled by Azerbaijan, completely cut off from access to the outside world. The Lemkin Institute for Genocide Prevention has reaffirmed its “Red Flag Alert for Genocide” in view of the blockade.<sup>9</sup> Genocide Watch, after having issued a “genocide warning” in September<sup>10</sup>—an alert reserved for situations where “the genocidal process has reached the stages of preparation by perpetrators and persecution of a targeted group”<sup>11</sup>—has declared that “[t]he 120,000 Armenian Christian residents of Nagorno Karabakh are now effectively under siege”.<sup>12</sup>

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<sup>6</sup> Human Rights Defender of the Republic of Armenia and Human Rights Ombudsman of the Republic of Artsakh, *Joint Ad Hoc Public Report: The Humanitarian Consequences of Blocking the Only Road Connecting Artsakh with Armenia and the World* (15 December 2022) (**Annex 5**), p. 2.

<sup>7</sup> See, e.g., Siranush Ghazanchyan, “ICRC delivers 10 tons of food supplies and medicine to Artsakh”, *Public Radio of Armenia* (25 December 2022), available at <https://en.armradio.am/2022/12/25/icrc-delivers-10-tons-of-icrc-food-supplies-and-medicine-to-artsakh/> (**Annex 66**).

<sup>8</sup> Human Rights Defender of the Republic of Armenia and Human Rights Ombudsman of the Republic of Artsakh, *Joint Ad Hoc Public Report: The Humanitarian Consequences of Blocking the Only Road Connecting Artsakh with Armenia and the World* (15 December 2022) (**Annex 5**), p. 8.

<sup>9</sup> Lemkin Institute for Genocide Prevention, *Red Flag Alert for Genocide: AZERBAIJAN* (15 December 2022), available at [https://www.lemkininstitute.com/\\_files/ugd/391abe\\_22be692d531c4134817cb6417ccdc931.pdf](https://www.lemkininstitute.com/_files/ugd/391abe_22be692d531c4134817cb6417ccdc931.pdf) (**Annex 6**).

<sup>10</sup> Genocide Watch, *Genocide Warning: Azerbaijan and Nagorno-Karabakh* (23 September 2022), available at <https://www.genocidewatch.com/single-post/genocide-warning-azerbaijan-and-nagorno-karabakh-september-2022> (**Annex 7**).

<sup>11</sup> Genocide Watch, *Genocide Alerts* (last visited 19 December 2022), available at <https://www.genocidewatch.com/copy-of-current-genocide-watch-aler> (**Annex 8**).

<sup>12</sup> Genocide Watch, *Azerbaijan Blocks the Only Road into Nagorno-Karabakh* (14 December 2022), available at <https://www.genocidewatch.com/single-post/alert-azerbaijan-blocks-the-only-road-into-nagorno-karabakh> (**Annex 9**).

5. A number of States,<sup>13</sup> as well as the European Union,<sup>14</sup> have called upon Azerbaijan to lift the blockade against the ethnic Armenian population of Nagorno-Karabakh. Azerbaijan, however, has ignored their calls. In President Aliyev's words: "No-one can influence us. There may be calls, there may be some statements, but we don't need to pay attention to them."<sup>15</sup>

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<sup>13</sup> United States of America, Department of State, *Department Press Briefing – December 13, 2022* (13 December 2022), available at <https://www.state.gov/briefings/departments-press-briefing-december-13-2022/> (**Annex 10**) ("We made clear that the closure of the Lachin corridor has severe humanitarian implications. It sets back the peace process. We call on the Government of Azerbaijan to restore free movement through the corridor."); Canada, Global Affairs Canada, @CanadaFP, *Twitter* (14 December 2022), available at <https://twitter.com/CanadaFP/status/1603065230418153477> (**Annex 11**) ("We call on #Azerbaijan authorities to reopen the corridor and ensure freedom of movement to avoid any potential humanitarian impact."); Hellenic Republic, Ministry of Foreign Affairs, @GreeceMFA, *Twitter* (15 December 2022), available at <https://twitter.com/GreeceMFA/status/1603315921380163585> (**Annex 12**) ("Greece calls on Azerbaijani authorities to ensure freedom & security of movement & transport, in both directions along the Lachin corridor without any preconditions in compliance with the Tripartite Statement of 09.11.20"); Kingdom of the Netherlands, Ministry of Foreign Affairs, @DutchMFA, *Twitter* (15 December 2022), available at <https://twitter.com/DutchMFA/status/1603393867105050627> (**Annex 13**) ("We call on Azerbaijan to ensure freedom and security of movement ...."); Republic of Cyprus, Ministry of Foreign Affairs, *December 14, 2022 - Announcement of the Ministry of Foreign Affairs* (14 December 2022), available at <https://mfa.gov.cy/el/press-releases/2022/12/14/arm-az/> (**Annex 14**) ("The Ministry of Foreign Affairs of the Republic of Cyprus calls on Azerbaijan to immediately proceed to full reinstatement of the traffic and energy supply, so that further worsening of the humanitarian situation may be prevented in the area."); United States of America, Senate Foreign Relations Committee, @SFRCdems, *Twitter* (14 December 2022), available at <https://twitter.com/SFRCdems/status/1603047459084800001> (**Annex 15**) ("Democracies worldwide must swiftly condemn the coercive gas cuts & blockade by Aliyev & his proxies. Freedom of movement in #NagornoKarabakh must be restored."); Kingdom of the Netherlands, House of Representatives of the Dutch States-General, *Motion of MPs Van der Graaf et al.* (13 December 2022), available at <https://www.tweedekamer.nl/downloads/document?id=2022D53888> (**Annex 16**) ("[T]he House of Representatives ... requests the government in the European Council to urge for a joint call to Azerbaijan to cease the hostilities against the population of Nagorno-Karabakh and to open up the corridor ...."); Kingdom of the Netherlands, House of Representatives of the Dutch States-General, *Start of the afternoon meeting: VOTES (on motions submitted during the debate on the European Summit)* (14 December 2022), available at [https://www.tweedekamer.nl/debat\\_en\\_vergadering/plenaire\\_vergaderingen/details/activiteit?id=2022A09905](https://www.tweedekamer.nl/debat_en_vergadering/plenaire_vergaderingen/details/activiteit?id=2022A09905) (**Annex 17**) (showing the adoption of the proposed motion cited directly above).

<sup>14</sup> European Union, Delegation of the European Union to Armenia, *Armenia/Azerbaijan: Statement by the Spokesperson on the developments around the Lachin corridor* (13 December 2022), available at [https://www.eeas.europa.eu/eeas/armeniaazerbaijan-statement-spokesperson-developments-around-lachin-corridor\\_en?s=216](https://www.eeas.europa.eu/eeas/armeniaazerbaijan-statement-spokesperson-developments-around-lachin-corridor_en?s=216) (**Annex 18**) ("The EU calls on the Azerbaijani authorities to ensure freedom and security of movement along the corridor, in line with the trilateral statement of 9 November 2020. Restrictions to such freedom of movement cause significant distress to the local population and create humanitarian concerns."); European Union, Delegation for Relations with the South Caucasus, *Statement by the Chair of the Delegation for relations with the South Caucasus, MEP Marina KALJURAND on the blocking of the Lachin Corridor* (15 December 2022), available at <https://www.europarl.europa.eu/delegations/en/product/product-details/20221215DPU34841> (**Annex 19**) ("I am gravely concerned by the actions of the Azerbaijani state authorities and purported environmental protesters in the Lachin Corridor on 3 December and again since 12 December, resulting in the blocking of the road connecting Nagorno-Karabakh and Armenia, which is a vital supply line for the Armenian population of the region.").

<sup>15</sup> "Ilham Aliyev viewed conditions created at administrative building of Western Azerbaijan Community", *President of the Republic of Azerbaijan, Ilham Aliyev* (24 December 2022), available at <https://president.az/en/articles/view/58330> (**Annex 68**).

6. Armenia is therefore left with no choice but to ask the Court to indicate provisional measures to protect the rights in dispute as a matter of urgency.
7. In particular, Armenia requests that the Court indicate the following provisional measures:
  - “Azerbaijan shall cease its orchestration and support of the alleged ‘protests’ blocking uninterrupted free movement along the Lachin Corridor in both directions.”
  - “Azerbaijan shall ensure uninterrupted free movement of all persons, vehicles, and cargo along the Lachin Corridor in both directions.”

## II. THE FACTS COMPELLING THE REQUEST

8. The ongoing blockade is just the latest in a very long line of measures that Azerbaijan has taken to extinguish or expel all ethnic Armenians from Nagorno-Karabakh. During the 44-Day War in 2020, Azerbaijan forcibly displaced tens of thousands of ethnic Armenians from the territories it conquered; not a single one has been able to return.<sup>16</sup> At the end of the war, the Russian Federation sent peacekeepers to the region in order to—in the words of the decree authorizing the deployment—“prevent the mass death of the civilian population of Nagorno-Karabakh”.<sup>17</sup> Yet even after the peacekeepers were deployed, Azerbaijan has continued its efforts to extinguish and expel ethnic Armenians from the region.

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<sup>16</sup> UN Sustainable Development Group, *Migration and Displacement in Armenia: Three Stories of loss and perseverance* (19 October 2021), available at <https://unsdg.un.org/latest/stories/migration-and-displacement-armenia-three-stories-loss-and-perseverance> (**Annex 20**); Siranush Ghazanchyan, “The rights of the Armenians of Artsakh have not yet been restored: MFA issues statement on World Refugee Day”, *Public Radio of Armenia* (20 June 2021), available at <https://en.armradio.am/2021/06/20/the-rights-of-the-armenians-of-artsakh-have-not-yet-been-restored-mfa-issues-statement-on-world-refugee-day/> (**Annex 21**); Siranush Ghazanchyan, “Occupied Hadrut an undeniable proof of Azerbaijan’s policy of hatred and ethnic cleansing against Armenians, Artsakh Ombudsman says”, *Public Radio of Armenia* (11 October 2021), available at <https://en.armradio.am/2021/10/11/occupied-hadrut-an-undeniable-proof-of-azerbajians-policy-of-hatred-and-ethnic-cleansing-against-armenians-artsakh-ombudsman-says/> (**Annex 22**).

<sup>17</sup> Russian Federation, *Decree of the Federation Council of the Federal Assembly of the Russian Federation on the use of a military unit of the Armed Forces of the Russian Federation in Nagorno-Karabakh* (18 November 2020), available at <http://council.gov.ru/activity/documents/121580/> (**Annex 23**).

9. Azerbaijan has done so by, among other things: threatening, attacking and infiltrating Armenian villages in violation of the ceasefire agreement;<sup>18</sup> forcibly displacing their residents, including all ethnic Armenians from the villages of Parukh, Berdzor, Aghavno, and Sus;<sup>19</sup> killing and intimidating ethnic Armenians in the vicinity of Azerbaijan's armed forces;<sup>20</sup> disrupting the supply of public utilities to Armenian households;<sup>21</sup> and blocking mobile communication and internet access in areas inhabited by ethnic Armenians.<sup>22</sup> Azerbaijan's objective has been clear and consistent: in the words of President Aliyev: "When did you come here? In 1994. Who lived here before then? Azerbaijanis did, *so leave*."<sup>23</sup>
10. After Azerbaijan's aggression in late 2020, the Berdzor-Lachin Corridor ("the Lachin Corridor") is the only strip of land connecting the 120,000 ethnic Armenians in Nagorno-Karabakh with Armenia, and thus also with the outside world. Just a single road traverses this mountainous corridor: the Goris-Stepanakert Highway. Since the

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<sup>18</sup> See, e.g., Russian Federation, Ministry of Defence, *Information bulletin of the Ministry of Defence of the Russian Federation on the activities of the Russian peacekeeping contingent in the zone of the Nagorno-Karabakh conflict (as of August 12, 2021)* (12 August 2021) (**Annex 24**); Russian Federation, Ministry of Defence, *News bulletin of the Ministry of Defense of the Russian Federation on the operations of the Russian peacekeeping forces in the area of the Nagorno-Karabakh conflict (as of November 9, 2021)* (9 November 2021) (**Annex 25**); Russian Federation, Ministry of Defence, *News bulletin of the Ministry of Defense of the Russian Federation on the operations of the Russian peacekeeping forces in the area of the Nagorno-Karabakh conflict (as of January 28, 2022)* (28 January 2022) (**Annex 26**).

<sup>19</sup> See, e.g., Marut Vanyan, "Nagorno-Karabakh: What does the future hold?", *Open Democracy* (15 April 2022), available at <https://www.opendemocracy.net/en/odr/nagorno-karabakh-what-does-the-future-hold/> (**Annex 27**); Taline Oundjian et al., "Armenians forced to evacuate Nagorno-Karabakh face uncertain future", *France 24* (12 September 2022), available at <https://www.france24.com/en/tv-shows/focus/20220912-armenians-forced-to-evacuate-nagorno-karabakh-face-uncertain-future> (**Annex 28**).

<sup>20</sup> See, e.g., Ani Avetisyan, "Nagorno-Karabakh civilian shot dead in apparent ceasefire violation", *OC Media* (11 October 2021), available at <https://oc-media.org/nagorno-karabakh-civilian-shot-dead-in-apparent-ceasefire-violation/> (**Annex 29**); "Another Karabakh Civilian Killed In Truce Violation", *Radio Free Europe/Radio Liberty* (8 November 2021), available at <https://www.azatutyun.am/a/31551472.html> (**Annex 30**); "Another Karabakh Armenian Civilian Killed", *Radio Free Europe/Radio Liberty* (3 December 2021), available at <https://www.azatutyun.am/a/31592697.html> (**Annex 31**).

<sup>21</sup> See, e.g., Simon Maghakyan, "Putin's Isn't the Only Regime Leveraging Fossil Fuels for Aggression", *Time* (4 April 2022), available at <https://time.com/6163908/nagorno-karabakh-gas-crisis/> (**Annex 32**); Emilio Luciano Cricchio, "For second time this winter, Azerbaijan cuts off supply of heating gas in Karabakh", *Civilnet* (23 March 2022), available at <https://www.civilnet.am/en/news/654604/for-second-time-this-winter-azerbaijan-cuts-off-supply-of-heating-gas-in-karabakh/> (**Annex 33**).

<sup>22</sup> Alvard Grigoryan, "Nagorno-Karabakh authorities blame Azerbaijani networks for mobile telephony interruptions", *Caucasian Knot* (29 August 2021), available at <https://eng.kavkaz-uzel.eu/articles/56580/> (**Annex 34**); Tigran Grigoryan, "The new escalation in Nagorno-Karabakh is part of Azerbaijan's long-term strategy", *Civilnet* (11 March 2022), available at <https://www.civilnet.am/en/news/653296/the-new-escalation-in-nagorno-karabakh-is-part-of-azerbajians-long-term-strategy/> (**Annex 35**).

<sup>23</sup> "Armenians living in Karabakh will have no status, no independence and no special privilege - President Ilham Aliyev", *Trend News Agency* (12 August 2022), available at <https://en.trend.az/azerbaijan/politics/3632251.html> (**Annex 36**) (emphasis added).

2020 war ended, all ethnic Armenians in Nagorno-Karabakh requiring medical treatment in the outside world must take this road. Likewise, all food, medical and medicine supplies, and other humanitarian assistance destined for the Armenians in Nagorno-Karabakh can only be delivered on this one road.

11. As the Court is aware, the 2020 war ended with the 9 November 2020 Trilateral Statement signed by Armenia, Azerbaijan, and the Russian Federation (“Trilateral Statement”).<sup>24</sup> Paragraph 3 of Trilateral Statement provides for the deployment of Russian peacekeepers “along the line of contact in Nagorno Karabakh and along the Lachin corridor”.<sup>25</sup> Paragraph 6 in turn provides in pertinent part:

The Lachin corridor (5 km wide) which will ensure the communication between Nagorno Karabakh and the Armenia and at the same time will circumvent the city of Shushi, shall remain under the control of the peacekeeping contingent of the Russian Federation. ...

The Republic of Azerbaijan shall guarantee safe movement of citizens, vehicles and cargo in both directions along the Lachin corridor.<sup>26</sup>

12. At around 10:30 a.m. on 12 December 2022, a large group of Azerbaijanis physically blocked the Goris-Stepanakert Highway near Shushi, entirely preventing the passage of all vehicles through the Lachin Corridor. These individuals presented themselves as “eco-activists”, but investigations have not revealed any of them to have a record of environmental activism.<sup>27</sup> In the words of one of Azerbaijan’s (actual) leading environmental activists:

It is clear as the sky that the protest of the “environmental activists” in Karabakh is a made-up story. ... Until today, I have not seen a single

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<sup>24</sup> Republic of Armenia, Office of the Prime Minister, *Statement by the Prime Minister of the Republic of Armenia, the President of the Republic of Azerbaijan and the President of the Russian Federation* (9 November 2020), available at <https://www.primeminister.am/en/press-release/item/2020/11/10/Announcement/> (**Annex 37**).

<sup>25</sup> *Ibid.*, para. 3.

<sup>26</sup> *Ibid.*, para. 6.

<sup>27</sup> Human Rights Defender of the Republic of Armenia and Human Rights Ombudsman of the Republic of Artsakh, *Joint Ad Hoc Public Report: The Humanitarian Consequences of Blocking the Only Road Connecting Artsakh with Armenia and the World* (15 December 2022) (**Annex 5**), pp. 4-6; CivilNet, “In the Footsteps of Azerbaijani ‘Environmentalists’. ‘Fake News of the week’”, *YouTube* (17 December 2022), available at [https://www.youtube.com/watch?v=zIK--NXj\\_9Q](https://www.youtube.com/watch?v=zIK--NXj_9Q) (**Annex 38**), timestamp 2:41-2:55; “Who really are Azerbaijan’s ‘environmental activists’ blockading Karabakh?”, *CivilNet* (14 December 2022), available at <https://www.civilnet.am/en/news/686152/> (**Annex 39**); Lusine Musayelian, “Who Are The Azerbaijani Eco-Activists?”, *Radio Free Europe/Radio Liberty* (14 December 2022), available at <https://www.azatutyun.am/a/32176325.html> (**Annex 40**).

person there caring at all about environmental issues. ... These guys are just executives of a custom tailored spectacle.

We have not seen these people when the Ministry of Environment and Natural Resources put forests, national parks and reserves for sale, or when all the forests were dug by bulldozers.<sup>28</sup>

13. Indeed, on 15 December, these alleged “eco-activists” suddenly started demanding that individual border and customs control posts be established on the border with Armenia in the Lachin direction<sup>29</sup>—a matter that has nothing to do with their alleged environmental concerns.
14. Video recordings and photographs from the area reveal that the alleged “eco-activists” in fact have another goal in mind. As seen below, many of them have been photographed proudly displaying the hand gesture of the Grey Wolves, an ultranationalist organization widely known and condemned for anti-Armenian violence and hate speech.<sup>30</sup>

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<sup>28</sup> Cavid Qara, *Facebook* (12 December 2022), available at <https://www.facebook.com/cavidqara1918/posts/pfbid03ZUxMbZs7dch1Q8t5ccVZjfneewiEwYhTJ1uZWLnSwcA6X8TkuLU94WZeDJT2UxJl> (**Annex 41**).

<sup>29</sup> Khayal Khatamzadeh, “Azerbaijani peaceful protesters on Lachin road change demands (VIDEO)”, *Trend News Agency* (15 December 2022), available at <https://en.trend.az/azerbaijan/politics/3682209.html> (**Annex 42**).

<sup>30</sup> French Republic, Ministry of the Interior, *Décret du 4 novembre 2020 portant dissolution d’un groupement de fait* (4 November 2020) (**Annex 43**) (“Considérant ... que plus récemment, en réaction à la mobilisation de la diaspora arménienne dans le cadre du conflit opposant l’Arménie à l’Azerbaïdjan, des membres appartenant à ce même groupement de fait ont commis plusieurs actions violentes ... ; que de nouvelles actions violentes ont été commises par des membres des « Loups gris » armés, notamment le 28 octobre à Vienne (Isère) et dans la nuit du 29 au 30 octobre à Dijon (Côte-d’Or), avec pour mot d’ordre d’en découdre avec les membres de la communauté d’origine arménienne ; que M. A a publié à plusieurs reprises, sur le réseau social Twitter, des propos appelant à la haine et à la violence à l’encontre des Arméniens ; qu’ainsi, il indiquait le 1er décembre 2018 que « Si les turcs avaient réellement fait ce génocide, je vous assure qu’il ne resterait plus d’Arméniens aujourd’hui » ; ... que, lors de la contre-manifestation organisée le 24 juillet 2020 à l’initiative des « Loups Gris », des militants ont été filmés proférant des insultes et des appels à « aller chercher les Arméniens », tandis que des violences ont ciblé des personnes identifiées comme d’origine arménienne et leurs biens ; que, lors des événements intervenus le 28 octobre 2020 dans l’Isère, des membres du groupement ont clamé des slogans tels que : « Ici, c’est la Turquie », « on va tuer les Arméniens », « Vous êtes où les Arméniens ? On est chez vous bandes de fils de pute » ; que d’autres propos provoquant à la haine et à la violence contre les personnes d’origine arménienne ou les Arméniens ont été tenus, tels que : « Arméniens, terroristes ! », « On va tuer les Arméniens » ou « Allahu akbar »”); “Turkish nationalist ‘Grey Wolves’ linked to targeting of Armenians in France”, *Ahval* (30 October 2020), available at <https://ahvalnews.com/grey-wolves/turkish-nationalist-grey-wolves-linked-targeting-armenians-france> (**Annex 44**) (“A group of about 250 people chanting threats against Armenians marched through Vienne and Décines-Charpieu, both near Lyon on Wednesday. The group displayed the wolf hand signal used by the Grey Wolves, and yelled threats like ‘We are going to kill the Armenians’, the mayor of Décines-Charpieu, Laurence Fautra, said in a statement.”).



**Figure 1: Photograph of “eco-activists” with Grey Wolves hand gesture<sup>31</sup>**



**Figure 2: Photograph of “eco-activists” with Grey Wolves hand gesture<sup>32</sup>**

<sup>31</sup> Ararat Petrosyan, @araratpetrosian, *Twitter* (15 December 2022), available at <https://twitter.com/araratpetrosian/status/1603380459571912704> (**Annex 45**).

<sup>32</sup> Karabakh Records, @KarabakhRecords, *Twitter* (12 December 2022), available at <https://twitter.com/KarabakhRecords/status/1602428822913261576> (**Annex 46**). The photograph in fact depicts a dance that the “eco-activists” were engaging in while waving the Grey Wolves hand gesture, with a video clip of the dance having been published on the Facebook page of one of the “protesters”. Cavid Ismayil, *Facebook* (12 December 2022), available at <https://www.facebook.com/cavid.ismayil.9/videos/689920935976133> (**Annex 47**).



**Figure 3: Photograph of “eco-activists” with Grey Wolves hand gesture<sup>33</sup>**

15. In fact, many of the alleged “eco-activists” are well known for posting anti-Armenian hate speech publicly on social media. For example:

- **Mr. Fuad Salahov**, one of the “eco-activists”, posted on his Facebook a photograph of a patch depicting the notorious Ottoman genocidaire Enver Pasha with the inscription “Armenian, don’t run! You’ll die anyway, just exhausted”:



**Figure 4: Photograph posted on the Facebook page of an “eco-activist”<sup>34</sup>**

- **Ms. Nezaket Hesanova**, another “eco-activist”, has a Facebook page full of anti-Armenian content, including an image of an Azerbaijani soldier with a

<sup>33</sup> Varuzhan Geghamyan, @GVaruzhan, *Twitter* (12 December 2022), available at <https://twitter.com/GVaruzhan/status/1602374925574197249> (Annex 48).

<sup>34</sup> Fuad Salahov, *Facebook* (3 August 2022), available at <https://www.facebook.com/photo.php?fbid=3294376740819909> (Annex 49).

knife preparing to attack or cut off a geographical representation of Nagorno-Karabakh from the territory of Azerbaijan.



**Figure 5: Image posted on the Facebook page of an “eco-activist”<sup>35</sup>**

- **Mr. Telman Qasimov**, yet another “eco-activist”, also has a Facebook page replete with anti-Armenian content, including a photograph of an Azerbaijani soldier standing on an Artsakh flag.



**Figure 6: Photograph posted on the Facebook page of an “eco-activist”<sup>36</sup>**

<sup>35</sup> Nezaket Hesanova, *Facebook* (19 September 2021), *available at* <https://www.facebook.com/photo.php?fbid=914339066093497> (Annex 50).  
<sup>36</sup> Telman Qasimov, *Facebook* (8 December 2021), *available at* <https://www.facebook.com/photo/?fbid=2953849678208549> (Annex 51).

16. Online social media users have also applauded the blockade as an attack against ethnic Armenians. For example, one Twitter user writes: “Im [*sic*] so happy that you are blockaded you ugly armenian w\*\*\*\*.”<sup>37</sup>
17. There is compelling evidence that the Government of Azerbaijan orchestrated the alleged “protests”. This evidence includes, first and foremost, the fact that Azerbaijani citizens can enter the region only after receiving special permission from the Government,<sup>38</sup> meaning that the Government has granted all of the “eco-activists” such permission. By contrast, Azerbaijan has prohibited independent journalists from accessing the alleged “protests”.<sup>39</sup> In addition, it has been reported that the Government provided the “eco-activists” with tents to maintain their round-the-clock blockade.<sup>40</sup>
18. Moreover, many of the “eco-activists” have direct ties to the Government.<sup>41</sup> According to one investigation: “An examination of the websites ... by the persons blocking the Lachin corridor clearly shows that all of them are in one way or another affiliated with or financed by the Azeri state agency for assisting nongovernment organizations, which was created in 2021, at Aliyev’s instructions.”<sup>42</sup> In addition, the alleged leader of the “eco-activists”, Mr. Telman Qasimov, is an officer of Azerbaijan’s military special intelligence service. Many photographs of him expressing anti-Armenian hatred have been published online, including a photograph of him in Shushi in front of graffiti

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<sup>37</sup> @Ghbvcccyevlax1, *Twitter* (15 December 2022), *available at* <https://twitter.com/Ghbvcccyevlax1/status/1603529246449831936> (**Annex 52**). This Twitter account has been suspended since this post.

<sup>38</sup> “Can You Be Arrested Or Fined For Trespassing Demilitarized Zones?”, *BBC News* (10 February 2021), *available at* <https://www.bbc.com/azeri/azerbaijan-56015951> (**Annex 53**); “Who really are Azerbaijan’s ‘environmental activists’ blockading Karabakh?”, *CivilNet* (14 December 2022), *available at* <https://www.civilnet.am/en/news/686152/> (**Annex 39**).

<sup>39</sup> “Independent Journalists Were Not Allowed To Participate in the Protest on the Shusha-Khankendi Road”, *AZ Today* (15 December 2022), *available at* <https://aztoday.az/news/204495.html> (**Annex 54**).

<sup>40</sup> Heydar Isayev and Lilit Shahverdyan, “Azerbaijanis again block the road to Karabakh”, *Eurasianet* (12 December 2022), *available at* <https://eurasianet.org/azerbaijanis-again-block-the-road-to-karabakh> (**Annex 55**).

<sup>41</sup> Human Rights Defender of the Republic of Armenia and Human Rights Ombudsman of the Republic of Artsakh, *Joint Ad Hoc Public Report: The Humanitarian Consequences of Blocking the Only Road Connecting Artsakh with Armenia and the World* (15 December 2022) (**Annex 5**), pp. 4-6.

<sup>42</sup> CivilNet, “In the Footsteps of Azerbaijani ‘Environmentalists’. ‘Fake News of the week’”, *YouTube* (17 December 2022), *available at* [https://www.youtube.com/watch?v=zIK--NXj\\_9Q](https://www.youtube.com/watch?v=zIK--NXj_9Q) (**Annex 38**), timestamp 2:41-2:55.

saying “Our goal is Iravan” (Yerevan), and raising his arm making the Grey Wolves hand gesture.<sup>43</sup>

19. Not surprisingly, Azerbaijan has steadfastly refused to take any action whatsoever to disperse the “protesters”. To the contrary, its Ministry of Foreign Affairs and Parliament have supported and sought to justify the “protests”, as well as their Government’s own inaction.<sup>44</sup> And recently, Azerbaijan ominously deployed special forces alongside the blockaded road; they have no clear purpose other than to intimidate.<sup>45</sup>
20. As intended, the blockade is having catastrophic consequences on the Armenian population in Nagorno-Karabakh. Most prominently, more than twenty critically ill ethnic Armenians hospitalised in Nagorno-Karabakh have been slated to be transferred to medical facilities in Armenia for urgent medical care, but the blockade has rendered their free transfer impossible.<sup>46</sup> One of them has already died,<sup>47</sup> and the remainder—with the exception of a small number whom Azerbaijan recently permitted to be transferred through the ICRC<sup>48</sup>—are unable to receive the life-saving treatment they desperately need. The names of just some of these ethnic Armenians and their diagnoses are listed in the letter from the Republican Medical Center of the Republic of Artsakh at Annex 2.

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<sup>43</sup> Human Rights Defender of the Republic of Armenia and Human Rights Ombudsman of the Republic of Artsakh, *Joint Ad Hoc Public Report: The Humanitarian Consequences of Blocking the Only Road Connecting Artsakh with Armenia and the World* (15 December 2022) (**Annex 5**), p. 5; Telman Qasimov, *Facebook* (8 November 2021), <https://www.facebook.com/photo.php?fbid=2933295810263936> (**Annex 56**).

<sup>44</sup> Republic of Azerbaijan, Ministry of Foreign Affairs, No:582/22, *Commentary of the Press Service Department of the Ministry of Foreign Affairs on the statement of the Ministry of Foreign Affairs of Armenia dated December 13, 2022* (13 December 2022), available at <https://www.mfa.gov.az/en/news/no58222> (**Annex 57**); “Azerbaijan’s Parliament supports peaceful protests near Shusha”, *Azernews* (16 December 2022), available at <https://www.azernews.az/nation/203715.html> (**Annex 58**).

<sup>45</sup> Nagorno Karabakh Observer, @NKObserver, *Twitter* (16 December 2022), available at <https://twitter.com/NKObserver/status/1603827977564848142> (**Annex 59**); The Azeri Times, @AzeriTimes, *Twitter* (25 December 2022), available at <https://twitter.com/AzeriTimes/status/1607068294359519232> (**Annex 65**) (and video available at **Annex 65V**).

<sup>46</sup> Letter from “Republican Medical Center” CJSC of the Republic of Artsakh to Office of the Representative of Armenia before the European Court of Human Rights (15 December 2022) (**Annex 2**).

<sup>47</sup> “Artsakh blockade continues for nine days: patient dies in hospital”, *News.am* (19 December 2022), <https://news.am/eng/news/735939.html> (**Annex 3**).

<sup>48</sup> See, e.g., “Critically ill Artsakh patients still need transfer to Armenia, minister tells ICRC”, *Panorama* (21 December 2022), available at <https://www.panorama.am/en/news/2022/12/21/Artsakh-patients-ICRC/2772547> (**Annex 67**).

21. The blockade is also preventing the import of food, medical and medicine supplies, and other humanitarian assistance into Nagorno-Karabakh. Prior to the blockade, approximately 400 tons of essential goods—including grain, flour, vegetables, and fruits—were imported into Nagorno-Karabakh from Armenia on a daily basis.<sup>49</sup> Now, again with the exception of a small quantity Azerbaijan recently permitted to be delivered by the ICRC,<sup>50</sup> none of this can get through, causing shortages in these essential goods. Medicines, which Nagorno-Karabakh normally sources entirely from the outside world, can also no longer be delivered without the facilitation of the ICRC.<sup>51</sup> The Ministry of Health of the Republic of Artsakh has warned that local hospitals could soon face a shortage of medicine and other life-saving medical supplies.<sup>52</sup> Unsurprisingly, civilians have been stockpiling groceries and basic medicines, leaving supermarkets and grocery stores with empty shelves.<sup>53</sup> The blockade has furthermore closed off all trade between the Armenians in Nagorno-Karabakh and the outside world, rendering their livelihoods economically unsustainable.
22. In addition, families remain separated, given that the blockade was imposed when more than a thousand civilians of Nagorno-Karabakh were either already in Armenia or en route to Armenia, none of whom have been able to return.<sup>54</sup> Among other things, when the blockade was imposed, a large number of ethnic Armenian children living in

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<sup>49</sup> Human Rights Defender of the Republic of Armenia and Human Rights Ombudsman of the Republic of Artsakh, *Joint Ad Hoc Public Report: The Humanitarian Consequences of Blocking the Only Road Connecting Artsakh with Armenia and the World* (15 December 2022) (**Annex 5**), p. 2.

<sup>50</sup> See, e.g., Siranush Ghazanchyan, “ICRC delivers 10 tons of food supplies and medicine to Artsakh”, *Public Radio of Armenia* (25 December 2022), available at <https://en.armradio.am/2022/12/25/icrc-delivers-10-tons-of-icrc-food-supplies-and-medicine-to-artsakh/> (**Annex 66**).

<sup>51</sup> Susan Badalian, “Karabakh Faces Shortage Of Basic Goods”, *Radio Free Europe/Radio Liberty* (15 December 2022), available at <https://www.azatutyun.am/a/32178505.html> (**Annex 4**); Siranush Ghazanchyan, “ICRC delivers 10 tons of food supplies and medicine to Artsakh”, *Public Radio of Armenia* (25 December 2022), available at <https://en.armradio.am/2022/12/25/icrc-delivers-10-tons-of-icrc-food-supplies-and-medicine-to-artsakh/> (**Annex 66**).

<sup>52</sup> Susan Badalian et al., “Armenia Decries Azeri Blockade Of Karabakh (UPDATED)”, *Radio Free Europe/Radio Liberty* (13 December 2022), available at <https://www.azatutyun.am/a/32174346.html> (**Annex 60**).

<sup>53</sup> Susan Badalian, “Karabakh Faces Shortage Of Basic Goods”, *Radio Free Europe/Radio Liberty* (15 December 2022), available at <https://www.azatutyun.am/a/32178505.html> (**Annex 4**).

<sup>54</sup> Human Rights Defender of the Republic of Armenia and Human Rights Ombudsman of the Republic of Artsakh, *Joint Ad Hoc Public Report: The Humanitarian Consequences of Blocking the Only Road Connecting Artsakh with Armenia and the World* (15 December 2022) (**Annex 5**), p. 8; “Nagorno Karabakh remains blockaded by Azerbaijan over 48 hours, children separated from families”, *Armenpress* (14 December 2022), available at <https://armenpress.am/eng/news/1099584.html> (**Annex 61**); “Tatoyan Foundation Urges Immediate Steps to Unblock Artsakh-Armenia Road”, *The Armenian Mirror-Spectator* (15 December 2022), available at <https://mirrorspectator.com/2022/12/15/tatoyan-foundation-urges-immediate-steps-to-unblock-artsakh-armenia-road/> (**Annex 62**).

Nagorno-Karabakh had been attending a contest in Armenia, and are now unable to return to their homes and be reunited with their parents.<sup>55</sup>

23. Timed to coincide with the blockade, on 13 December 2022, Azerbaijan—once again<sup>56</sup>—cut off the supply of natural gas to Nagorno-Karabakh without any advance warning, leaving homes, businesses, hospitals, and schools without heat in the midst of a freezing winter.<sup>57</sup> Medical facilities were forced to suspend scheduled surgeries to save energy and medicine.<sup>58</sup> All schools in Nagorno-Karabakh that use natural gas for heating were shut down.<sup>59</sup> The streets of ethnic Armenian settlements emptied, with local gas stations supplying fuel only to ambulances, public buses, and other authorised vehicles.<sup>60</sup>
24. Due to international pressure, the supply of natural gas was restored on 16 December 2022, but the blockade of the Lachin Corridor remains in effect to this day. Without Court intervention, the ongoing irreparable prejudice to the rights in dispute will continue.

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<sup>55</sup> Human Rights Defender of the Republic of Armenia and Human Rights Ombudsman of the Republic of Artsakh, *Joint Ad Hoc Public Report: The Humanitarian Consequences of Blocking the Only Road Connecting Artsakh with Armenia and the World* (15 December 2022) (**Annex 5**), p. 8.

<sup>56</sup> Simon Maghakyan, “Putin’s Isn’t the Only Regime Leveraging Fossil Fuels for Aggression”, *Time* (4 April 2022), available at <https://time.com/6163908/nagorno-karabakh-gas-crisis/> (**Annex 32**); Emilio Luciano Cricchio, “For second time this winter, Azerbaijan cuts off supply of heating gas in Karabakh”, *Civilnet* (23 March 2022), available at <https://www.civilnet.am/en/news/654604/for-second-time-this-winter-azerbaijan-cuts-off-supply-of-heating-gas-in-karabakh/> (**Annex 33**).

<sup>57</sup> Kirill Krivosheev, “Russian Peacekeepers Find Themselves Sidelined in Nagorno-Karabakh”, *Carnegie Endowment for International Peace* (15 December 2022), available at <https://carnegieendowment.org/politika/88651> (**Annex 63**); Mark Dovich, “Azerbaijan cuts gas to Karabakh following two-day blockade of region”, *Civilnet* (13 December 2022), available at <https://www.civilnet.am/en/news/685926/azerbaijan-cuts-gas-to-karabakh-following-two-day-blockade-of-region/> (**Annex 64**).

<sup>58</sup> Human Rights Defender of the Republic of Armenia and Human Rights Ombudsman of the Republic of Artsakh, *Joint Ad Hoc Public Report: The Humanitarian Consequences of Blocking the Only Road Connecting Artsakh with Armenia and the World* (15 December 2022) (**Annex 5**), p. 7; Susan Badalian, “Karabakh Faces Shortage Of Basic Goods”, *Radio Free Europe/Radio Liberty* (15 December 2022), available at <https://www.azatutyun.am/a/32178505.html> (**Annex 4**).

<sup>59</sup> Human Rights Defender of the Republic of Armenia and Human Rights Ombudsman of the Republic of Artsakh, *Joint Ad Hoc Public Report: The Humanitarian Consequences of Blocking the Only Road Connecting Artsakh with Armenia and the World* (15 December 2022) (**Annex 5**), p. 8; Susan Badalian, “Karabakh Faces Shortage Of Basic Goods”, *Radio Free Europe/Radio Liberty* (15 December 2022), available at <https://www.azatutyun.am/a/32178505.html> (**Annex 4**).

<sup>60</sup> Susan Badalian, “Karabakh Faces Shortage Of Basic Goods”, *Radio Free Europe/Radio Liberty* (15 December 2022), available at <https://www.azatutyun.am/a/32178505.html> (**Annex 4**).

### **III. PRIMA FACIE JURISDICTION**

25. The Court “may indicate provisional measures only if the provisions relied on by the Applicant appear, *prima facie*, to afford a basis on which its jurisdiction could be founded, but need not satisfy itself in a definitive manner that it has jurisdiction as regards the merits of the case”.<sup>61</sup>
26. In its Order of 7 December 2021 on the indication of provisional measures in the present case, the Court “conclude[d] that, *prima facie*, it has jurisdiction pursuant to Article 22 of CERD to entertain the case to the extent that the dispute between the Parties relates to the ‘interpretation or application’ of the Convention”.<sup>62</sup> This conclusion applies as well to the present Request.

### **IV. THE RIGHTS WHOSE PROTECTION IS SOUGHT AND THE LINK BETWEEN SUCH RIGHTS AND THE MEASURES REQUESTED**

27. The Court has “the power to indicate, if it considers that circumstances so require, any provisional measures which ought to be taken to preserve the respective rights of either party”.<sup>63</sup> The Court at this stage “is not called upon to determine definitively whether the rights which Armenia wishes to see protected exist”.<sup>64</sup> Rather, it need only decide whether the rights claimed by Armenia on the merits, and for which it is seeking protection, are “plausible” and linked to the provisional measures requested.<sup>65</sup>
28. The Court in its Order of 7 December 2021 observed that Armenia in the present proceedings “asserts rights under Articles 2, 3, 4, 5, 6 and 7 of CERD”.<sup>66</sup> The present Request seeks the preservation and protection of a number of rights under CERD for the benefit of the ethnic Armenians in Nagorno-Karabakh, including but not necessarily limited to:

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<sup>61</sup> *Application of the International Convention on the Elimination of All Forms of Racial Discrimination (Armenia v. Azerbaijan), Provisional Measures, Order of 7 December 2021*, para. 15.

<sup>62</sup> *Ibid.*, para. 43.

<sup>63</sup> Statute of the International Court of Justice, art. 41(1).

<sup>64</sup> *Application of the International Convention on the Elimination of All Forms of Racial Discrimination (Armenia v. Azerbaijan), Provisional Measures, Order of 7 December 2021*, para. 45.

<sup>65</sup> *Ibid.*, para. 45.

<sup>66</sup> *Ibid.*, para. 46.

- the right to have Azerbaijan fulfil its obligation to pursue by all appropriate means and without delay a policy of eliminating racial discrimination in all its forms and promoting understanding among all races under Article 2(1);
- the right to be free from racial discrimination sponsored, defended, or supported by Azerbaijan under Article 2(1)(b);
- the right to be free from anything that strengthens racial division under Article 2(1)(e); and
- the right to have Azerbaijan fulfil its obligations to prohibit and to eliminate racial discrimination in all its forms and to guarantee the right of everyone, without distinction as to race, colour, or national or ethnic origin, to equality before the law under Article 5, in particular in the enjoyment of the following rights:
  - i. the right to security of person and protection by the State against violence or bodily harm under Article 5(b);
  - ii. the right to freedom of movement and residence within the border of the State under Article 5(d)(i);
  - iii. the right to leave any country, including one's own, and to return to one's country under Article 5(d)(ii), including the right to be reunited with family<sup>67</sup>; and
  - iv. the right to public health, medical care, social security and social services under Article 5(e)(iv).

29. All of these rights are more than plausible. In fact, they are expressly and explicitly enshrined in the CERD, to which both Armenia and Azerbaijan have acceded. Moreover, there is no doubt that the blockade has both the “purpose” and “effect” of impairing the enjoyment and exercise by ethnic Armenians of their human rights on an

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<sup>67</sup> *Application of the International Convention on the Elimination of All Forms of Racial Discrimination (Qatar v. United Arab Emirates), Provisional Measures, Order of 23 July 2018*, para. 69.

equal footing with other ethnic groups.<sup>68</sup> Indeed, ethnic Armenians living in Nagorno-Karabakh are targeted simply because they are Armenian. The CERD-prohibited discriminatory purpose of the blockade is obvious from the simple fact that the only human beings benefitting from the road are ethnic Armenians, and that Azerbaijan's conduct since its commencement of the 44-Day War has been unequivocally designed to force them to leave. It is moreover indisputable that the disastrous effects of the blockade are inflicted entirely on ethnic Armenians.

30. Finally, the rights for which protection is sought are plainly linked to the provisional measures requested because the measures, if indicated, would safeguard these very rights.

## **V. RISK OF IRREPARABLE PREJUDICE AND URGENCY**

31. The Court has the power to indicate provisional measures “when irreparable prejudice could be caused to rights which are the subject of judicial proceedings or when the alleged disregard of such rights may entail irreparable consequences”.<sup>69</sup> This power will be exercised “only if there is urgency, in the sense that there is a real and imminent risk that irreparable prejudice will be caused to the rights claimed before the Court gives its final decision”.<sup>70</sup> This “condition of urgency is met when the acts susceptible of causing irreparable prejudice can ‘occur at any moment’ before the Court makes a final decision on the case”.<sup>71</sup>
32. The Court has found in past cases in which the CERD was at issue that “the rights stipulated in Article 5 (a), (b), (c), (d) and (e) are of such a nature that prejudice to them is capable of causing irreparable harm”.<sup>72</sup> The same is true of the rights for which Armenia seeks protection under Article 2.
33. Indeed, Azerbaijan's disregard for the rights in question are already causing and will continue to cause irreparable prejudice and consequences for the ethnic Armenians in

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<sup>68</sup> See International Convention on the Elimination of All Forms of Racial Discrimination (adopted 21 December 1965, opened for signature 7 March 1966, entered into force 4 January 1969), 660 UNTS 195, art. 1(1).

<sup>69</sup> *Application of the International Convention on the Elimination of All Forms of Racial Discrimination (Armenia v. Azerbaijan), Provisional Measures, Order of 7 December 2021*, para. 69.

<sup>70</sup> *Ibid.*, para. 70.

<sup>71</sup> *Ibid.*

<sup>72</sup> *Ibid.*, para. 81.

Nagorno-Karabakh. Numerous critically ill ethnic Armenians hospitalized in Nagorno-Karabakh requiring urgent medical care in Armenia are at imminent risk of death, and another has already died.<sup>73</sup> The general inability to import food, medical and medicine supplies, and other humanitarian assistance also causes irreparable prejudice and consequences for the health and lives of the individuals in question, as the Court has recognised in the past.<sup>74</sup> The Court has furthermore held in its jurisprudence that irreparable consequences of psychological distress may arise when individuals are subject to temporary or potentially ongoing separation from their families.<sup>75</sup>

34. The condition of urgency is also met because all of this irreparable prejudice and these irreparable consequences can occur at any moment before the Court makes a final decision on the case, as the blockade remains ongoing as of the date of the present Request.

## **VI. PROVISIONAL MEASURES REQUESTED**

35. For the foregoing reasons, Armenia respectfully requests that the Court indicate the following provisional measures:
- “Azerbaijan shall cease its orchestration and support of the alleged ‘protests’ blocking uninterrupted free movement along the Lachin Corridor in both directions.”
  - “Azerbaijan shall ensure uninterrupted free movement of all persons, vehicles, and cargo along the Lachin Corridor in both directions.”
36. In addition to the above, Armenia also requests, pursuant to Article 74(4) of the Rules of Court, that the President, pending the Court’s decision on Armenia’s request, call upon Azerbaijan to act in such a way as will enable any order the Court may make on the request to have its appropriate effects.

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<sup>73</sup> “Artsakh blockade continues for nine days: patient dies in hospital”, *News.am* (19 December 2022), available at <https://news.am/eng/news/735939.html> (**Annex 3**).

<sup>74</sup> *Alleged Violations of the 1955 Treaty of Amity, Economic Relations, and Consular Rights (Islamic Republic of Iran v. United States of America)*, Provisional Measures, Order of 3 October 2018, paras. 90-91.

<sup>75</sup> *Application of the International Convention on the Elimination of All Forms of Racial Discrimination (Qatar v. United Arab Emirates)*, Provisional Measures, Order of 23 July 2018, para. 69.

37. Armenia reserves the right to revise, supplement, or amend the terms of this Request, as well as the grounds invoked. Armenia furthermore certifies that all translations of annexes submitted herewith are, to the best of its knowledge and belief, a true and correct rendering of the text in the original language.

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Agent of the Republic of Armenia