Ideální struktura memoriálu podle předloňských vítězných memoriálů – mohou se zlehka samozřejmě měnit v závislosti na straně:

Part I – JURISDICTION:

* JURISDICTION UNDER THE ICSID CONVENTION
  + Nationality
  + Consent
  + Scope
* JURISDICTION UNDER THE BERISTAN-OPULENTIAN BIT
  + Definition of Investment
  + Umbrella clause (contractual x treaty dispute)
  + Waiting period
* CONCLUSION OF JURISDICTION

Part II – MERITS:

* ATTRIBUTION TO THE STATE
* UMBRELLA CLAUSE
* FAIR AND EQUITABLE TREATMENT (Arbitrariness, Legitimate Expectations, Predictability, Consistency, Bad faith)
* EXPROPRIATION
* UNJUSTIFIED, ARBITRARY AND DISCRIMINATORY MEASURES
* (FULL PROTECTION AND SECURITY)
* NATIONAL SECURITY DEFENSE
* CONCLUSION OF MERITS