



Mediation is a non-binding process. The mediator assists the parties in working out a solution that is acceptable to them. If you would like the ICDR to contact the other parties to determine whether they wish to mediate this matter, please check this box . *There is no additional administrative fee for this service.*

Date: **June 3, 2021**

To: Name (of the party on which the request is to be served): <b>ICANN</b>		Nationality: <b>USA</b>	
Address: <b>12025 Waterfront Drive, Suite 300</b>			
City: <b>Los Angeles</b>	State/Province: <b>CA</b>	Country: <b>USA</b>	Postal Code: <b>90094-2536</b>
Telephone:	Facsimile:	Email: <b>independentreview@icann.org</b>	
Name of Representative: (if known) <b>Jeff LeVee</b>		Name of Firm: (if applicable) <b>Jones Day</b>	
Address: <b>555 Flower St.</b>			
City: <b>Los Angeles</b>	State/Province: <b>CA</b>	Country: <b>USA</b>	Postal Code: <b>90071</b>
Telephone:	Facsimile:	Email: <b>jlevee@jonesday.com</b>	
The named claimant, a party to an arbitration agreement contained in a written contract, dated _____ providing for arbitration under the <input type="checkbox"/> International Dispute Resolution Procedures <input type="checkbox"/> Commercial Arbitration Rules and Mediation Procedures (AAA) <input type="checkbox"/> Procedures for Cases under the UNCITRAL Arbitration Rules <input checked="" type="checkbox"/> Other (please specify): <b>ICANN Independent Review Process</b> hereby demands arbitration.			
Nature of the Dispute: (attach additional sheets, if necessary) <b>Claimant seeks Independent Review of ICANN actions and inaction</b>			
The Claim or Relief Sought: (the amount, if any) <b>Order that ICANN has violated its Bylaws, and that ICANN must remedy those violations</b>			
Type of Business: Claimant <b>Information Technology</b>		Respondent: <b>Public Benefit Corporation</b>	
Claimant's Request Number of Arbitrators: <b>Three</b>		Place of Arbitration: <b>TBD</b>	Language: <b>English</b>
You are hereby notified that copies of our arbitration agreement and this <b>Notice</b> are being filed with the International Centre for Dispute Resolution, with a request that it commence administration of the arbitration. Under the rules, you may file a Statement of Defense within the time specified in the rules after notice from the administrator.			
Name of Claimant: <b>GCCIX W.L.L.</b>		Nationality: <b>Kingdom of Bahrain</b>	
Address: (to be used in connection with this case) <b>Contact Information Redacted</b>			
City: <b>Contact Information Redacted</b>	State/Province:	Country: <b>Contact Information Redacted</b>	Postal Code: <b>Contact Information Redacted</b>
Telephone:	Facsimile:	Email: <b>Contact Information Redacted</b>	
Name of Representative: (if known) <b>Mike Rodenbaugh</b>		Name of Firm: (if applicable) <b>Rodenbaugh Law</b>	
Address: <b>548 Market St., Box 55819</b>			
City: <b>San Francisco</b>	State/Province: <b>CA</b>	Country: <b>USA</b>	Postal Code: <b>94104</b>
Telephone: <b>415.738.8087</b>	Facsimile:	Email: <b>mike@rodenbaugh.com</b>	
Notice: To begin proceedings, please file online at <b>www.adr.org/fileonline</b> . You will need to upload a copy of this Demand and the Arbitration Agreement, and pay the appropriate fee.			
Signature: (may be signed by a representative) <b>/s/ Mike Rodenbaugh</b>		Title: <b>Counsel</b>	Date: <b>June 3, 2021</b>

***If you have any questions, please contact the International Centre for Dispute Resolution at 1.888.855.9575 or +1.212.484.4181 or visit our website at www.icdr.org.***