

**ARIF HYDER ALI**

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3 June 2022

**VIA E-MAIL**

The Accountability Mechanisms Committee of the ICANN Board (**BAMC**)  
c/o Ms. J. Beckwith Burr

Internet Corporation for Assigned Names and Numbers  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094  
independentreview@icann.org

**Re: BAMC Submissions**

Dear Ms. Burr and Members of the BAMC:

We write on behalf of Altanovo Domains Limited (**Altanovo**) regarding the 19 May 2022 letter from Ms. Burr on behalf of the BAMC. The BAMC requested that Altanovo, Nu DotCo, LLC (**NDC**), and VeriSign, Inc. (**Verisign**) submit initial and reply briefs summarizing their claims in regard to the .WEB gTLD on, respectively, 15 July 2022 and 15 August 2022—specifically providing that “[i]f the parties feel as though additional time is needed, the BAMC asks that the parties confer and provide ICANN with new proposed submission dates.”<sup>1</sup>

Further to the BAMC’s request, Altanovo sought to negotiate a short two-week extension to the proposed deadlines, given that its lead counsel, Arif Ali, Alexandre de Gramont, and Ethan Litwin, all have longstanding international travel and hearing commitments in June and July that cannot be rescheduled. Under Altanovo’s proposed enlargement, opening submissions would be due on 29 July (instead of 15 July) and replies would be due on 29 August (instead of 15 August).<sup>2</sup>

Counsel for Verisign, responding on behalf of both NDC and Verisign, declined to confer with Altanovo and simply stated that it would not “support” the proposed enlargement.<sup>3</sup> Counsel for Verisign did not assert that the dates proposed by Altanovo would cause

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<sup>1</sup> Letter from BAMC to A. Ali, S. Marenbeg, and R. Johnston (19 May 2022), p. 2.

<sup>2</sup> See Communications between counsel for Altanovo and counsel for Verisign and NDC (27 May 2022 and 1 June 2022) (attached as Exhibit A hereto).

<sup>3</sup> *Id.*

Verisign/NDC any inconvenience; nor did Verisign/NDC propose other dates or any sort of compromise. Rather, counsel simply asserted that the schedule proposed by the BAMC was already “sufficient to accommodate counsel’s other commitments.”<sup>4</sup> Of course, the BAMC was unaware of counsel’s “other commitments” when it proposed the dates in its 19 May letter—which is why the BAMC specifically requested the parties to confer and advise the BAMC if additional time is needed. For the reasons stated above, Altanovo *does* need additional time. Neither Verisign nor NDC has provided any basis for the BAMC to conclude otherwise.

Accordingly, Altanovo requests the BAMC to enlarge the deadlines for the initial and reply submissions to **29 July 2022** and **29 August 2022**, respectively.<sup>5</sup>

Sincerely,



Arif Hyder Ali  
Counsel for Altanovo Domains Limited,  
f/k/a Afilias Domains No. 3 Limited

Cc: *Counsel for ICANN*  
Mr. John Jeffrey  
Ms. Amy Stathos  
ICANN General Counsel’s Office

Mr. Jeffrey A. LeVee  
Mr. Steven L. Smith  
Mr. Eric P. Enson  
Ms. Kelly M. Ozurovich  
Jones Day LLP

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<sup>4</sup> *Id.*

<sup>5</sup> Altanovo further reserves all of its rights and remedies in all available fora whether within or outside of the United States of America in regard to this matter.

*Counsel for Verisign*

Mr. Ronald L. Johnston

Mr. James S. Blackburn

Ms. Maria Chedid

Mr. Oscar Ramallo

Mr. John Muse-Fisher

Arnold & Porter Kaye Scholer LLP

*Counsel for NDC*

Mr. Steven Marenberg

Mr. Josh B. Gordon

Paul Hastings LLP

# **EXHIBIT A**

**From:** [Blackburn, James S.](#)  
**To:** [de Gramont, Alexandre](#); [Johnston, Ronald L.](#); [Chedid, Maria](#); [Ramallo, Oscar](#); [Steven Marenberg \(stevenmarenberg@paulhastings.com\)](#); [Hua, April](#); [Gordon, Josh](#); [Muse-Fisher, John](#)  
**Cc:** [Ali, Arif](#); [Attanasio, David](#); [Aviles Alfaro, Anna](#); [EXT elitwin@constantinecannon.com](#); [Wong, Rosey](#); [Defriez, Henry](#)  
**Subject:** RE: .WEB / BAMC Request for Submissions  
**Date:** Wednesday, June 1, 2022 4:25:13 PM

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[EXTERNAL EMAIL]

Alex,

ICANN provided the parties with a generous briefing schedule sufficient to accommodate counsel's other commitments. For this reason, Verisign and NDC do not support Altanovo's current request for a further extension.

Regards,  
Jim

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**From:** de Gramont, Alexandre <Alexandre.deGramont@dechert.com>  
**Sent:** Wednesday, June 1, 2022 12:13 PM  
**To:** Johnston, Ronald L. <Ronald.Johnston@arnoldporter.com>; Chedid, Maria <Maria.Chedid@arnoldporter.com>; Blackburn, James S. <James.Blackburn@arnoldporter.com>; Ramallo, Oscar <Oscar.Ramallo@arnoldporter.com>; Steven Marenberg (stevenmarenberg@paulhastings.com) <stevenmarenberg@paulhastings.com>; Hua, April <aprilhua@paulhastings.com>; Gordon, Josh <joshgordon@paulhastings.com>; Muse-Fisher, John <John.Muse-Fisher@arnoldporter.com>  
**Cc:** Ali, Arif <Arif.Ali@dechert.com>; Attanasio, David <David.Attanasio@dechert.com>; Aviles Alfaro, Anna <Anna.AvilesAlfaro@dechert.com>; EXT elitwin@constantinecannon.com <elitwin@constantinecannon.com>; Wong, Rosey <Rosey.Wong@dechert.com>; Defriez, Henry <Henry.Defriez@dechert.com>  
**Subject:** RE: .WEB / BAMC Request for Submissions

External E-mail

Dear Colleagues,

I am following up on my email below. Please let us know your position on our proposed enlargement. Again, we are happy to speak if you have questions or want to discuss.

Best, Alex

Alexandre de Gramont  
Partner

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**From:** de Gramont, Alexandre  
**Sent:** Friday, May 27, 2022 3:31 PM  
**To:** Johnston, Ronald L. <[Ronald.Johnston@arnoldporter.com](mailto:Ronald.Johnston@arnoldporter.com)>; Chedid, Maria <[Maria.Chedid@arnoldporter.com](mailto:Maria.Chedid@arnoldporter.com)>; Blackburn, James S. <[James.Blackburn@arnoldporter.com](mailto:James.Blackburn@arnoldporter.com)>; [oscar.ramallo@arnoldporter.com](mailto:oscar.ramallo@arnoldporter.com); Steven Marenberg ([stevenmarenberg@paulhastings.com](mailto:stevenmarenberg@paulhastings.com)) <[stevenmarenberg@paulhastings.com](mailto:stevenmarenberg@paulhastings.com)>; Hua, April <[aprilhua@paulhastings.com](mailto:aprilhua@paulhastings.com)>; Gordon, Josh <[joshgordon@paulhastings.com](mailto:joshgordon@paulhastings.com)>; [John.Muse-Fisher@arnoldporter.com](mailto:John.Muse-Fisher@arnoldporter.com)  
**Cc:** Ali, Arif <[Arif.Ali@dechert.com](mailto:Arif.Ali@dechert.com)>; Attanasio, David <[David.Attanasio@dechert.com](mailto:David.Attanasio@dechert.com)>; Aviles Alfaro, Anna <[Anna.AvilesAlfaro@dechert.com](mailto:Anna.AvilesAlfaro@dechert.com)>; EXT [elitwin@constantinecannon.com](mailto:elitwin@constantinecannon.com) <[elitwin@constantinecannon.com](mailto:elitwin@constantinecannon.com)>; Wong, Rosey <[Rosey.Wong@dechert.com](mailto:Rosey.Wong@dechert.com)>; Defriez, Henry <[Henry.Defriez@dechert.com](mailto:Henry.Defriez@dechert.com)>  
**Subject:** .WEB / BAMC Request for Submissions

Dear Colleagues,

We write in reference to the 24 May 2022 letter from Ms. J. Beckwith Burr on behalf of the BAMC, requesting submissions from Altanovo, Verisign, and NDC regarding .WEB. Due to other commitments, we would like to propose a two-week enlargement of the deadlines. Thus, under our proposal, opening submissions would be due on **29 July 2022**; reply submissions would be due on **29 August 2022**.

Please let us know if we may represent to the BAMC that our proposal is unopposed. We are happy to speak by phone if you have questions or want to discuss further.

Thanks, and best regards, Alex

Alexandre de Gramont  
Partner

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