



April 30, 2012

**VIA E-MAIL ONLY (CARDENASC@ADR.ORG)**

Caroline Cardenas LLM  
International Centre for Dispute Resolution  
1633 Broadway, Tenth Floor  
New York, NY 10019

Re: **Manwin Licensing International, S.A.R.L. v. Internet Corporation for Assigned Names and Numbers; Case No. 50 117 T 00812 11**

Dear Ms. Cardenas:

As you know, the parties previously agreed, and you approved, that the Internet Corporation for Assigned Names and Numbers ("ICANN") would file its response to Manwin Licensing International, S.A.R.L.'s ("Manwin") request for independent review proceeding on May 4, 2012.

The parties are continuing their discussions about the process for selecting arbitrators.

The parties agree that each party will select one arbitrator, and that those arbitrators in turn will select a third, who shall be the Chairman. The parties also agree that each arbitrator will be a true neutral, with whom there shall be no ex parte communications (other than on purely procedural matters such as availability, conflicts, and willingness to serve).

The parties disagree about the order in which their respective arbitrators should be selected. ICANN believes that claimant Manwin should select its arbitrator first, followed by ICANN's selection of its arbitrator. Manwin believes that the arbitrators should be simultaneously selected by both parties.

The parties suggest that this dispute be resolved by the ICDR.

If you concur, the parties propose that: (1) each party will prepare a letter of not longer than one page setting forth its position on the order of the arbitrator selection; and (2) the issue will then be decided by the ICDR.

Caroline Cardenas LLM  
April 30, 2012  
Page 2

Please let us know if this is acceptable to you. If so, we propose to send you our respective one-page letters by not later than 5:00 p.m. Pacific Time on Monday, May 7, 2012.

Sincerely,



Kevin E. Gaut  
of  
MITCHELL SILBERBERG & KNUPP LLP  
ON BEHALF OF CLAIMANT



Kate Wallace  
of  
JONES DAY  
ON BEHALF OF RESPONDENT