

Subject: ICANN (Matter ID: LA20200500139)

Date: Wednesday, January 29, 2020 at 5:32:11 PM Pacific Standard Time

From: Rabkin, Jeffrey

To: Sandra Barrientos

CC: Calla, Diana L.

Sandra -

It was nice to speak with you earlier today. I am writing to confirm, per our discussion, that we agreed that ICANN will prioritize the production of documents responsive to requests number 3, 4, and 5 set forth in your January 23, 2020 letter to ICANN's Board of Directors. We will produce documents in unredacted form to the extent possible, though as we discussed some of the documents were sent to ICANN in redacted form and thus will still contain some redactions when we produce them to you. We will make productions of Bates-stamped PDFs, but can revisit the production format at a later date if you need a different format or if we determine we will be producing a large number of emails or other document types not easily converted to PDFs. Finally, you also agreed that, until further notice, ICANN need not produce documents or materials called for in the other requests. Please let me know if this email does not accurately describe your understanding of our discussion. We all look forward to working with you on this matter.

--- Jeff

Jeff Rabkin

Partner

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