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.”¹

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).²

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.³ Counsel for Verisign did not assert that the dates proposed by Altanovo would cause

² See Communications between counsel for Altanovo and counsel for Verisign and NDC (27 May 2022 and 1 June 2022) (attached as Exhibit A hereto).
³ 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.” 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.  

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

\[4 \text{ Id.} \]

\[5 \text{ Altanovo further reserves all of its rights and remedies in all available fora whether within or outside of the United States of America in regard to this matter.} \]
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
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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Alexandre de Gramont
Partner
Dechert LLP
1900 K Street N.W.
From: de Gramont, Alexandre  
Sent: Friday, May 27, 2022 3:31 PM  
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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

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