

Declaration of Jeffrey A. LeVee
Exhibit A

From: LeVee, Jeffrey A.
Sent: Monday, February 12, 2024 3:47 PM
To: Mike Rodenbaugh
Cc: Lobisser, Kelsey A.
Subject: RE: FW: GCCIX v. ICANN IRP - Motion to Dismiss

Mike:

Does it address the notion that GCCIX has been “deleted by law”? That would be especially helpful to clarify.

Thanks,

Jeff LeVee
Jones Day – Los Angeles
Office: 213.243.2572

From: Mike Rodenbaugh <mike@rodenbaugh.com>
Sent: Monday, February 12, 2024 2:29 PM
To: LeVee, Jeffrey A. <jlevee@JonesDay.com>
Subject: Re: FW: GCCIX v. ICANN IRP - Motion to Dismiss

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Hi Jeff, as discussed on the phone, this is what my client says they will have soon...

from the ministry of commerce... A statement saying regardless of the current registration status, the company is not liquidated and as such has all its rights and responsibilities including but not limited to the ability to ask for legal judgement on any issues affecting it. It's being signed and stamped and then translated and attested by ministry of foreign affairs as authentic.

I will forward any copy of this as soon as I receive it, even if not yet formally authenticated.

Thanks,
Mike



Mike Rodenbaugh

address: 548 Market Street, Box 55819
San Francisco, CA 94104

email: mike@rodenbaugh.com

phone: +1 (415) 738-8087

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On Mon, Feb 12, 2024 at 2:05 PM LeVee, Jeffrey A. <jlevee@jonesday.com> wrote:

Mike:

I'm on the line waiting for you to join. If I don't hear from you in a minute or two, I suppose we should reschedule. I'm available much of tomorrow, so send me some good times then.

Jeff LeVee

Jones Day – Los Angeles

Office: 213.243.2572

From: Mike Rodenbaugh <mike@rodenbaugh.com>
Sent: Thursday, February 8, 2024 11:08 AM
To: LeVee, Jeffrey A. <jlevee@JonesDay.com>
Subject: Re: FW: GCCIX v. ICANN IRP - Motion to Dismiss

2pm?



Mike Rodenbaugh

address: 548 Market Street, Box 55819
San Francisco, CA 94104

email: mike@rodenbaugh.com

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Declaration of Jeffrey A. LeVee
Exhibit B

From: Mike Rodenbaugh <mike@rodenbaugh.com>
Sent: Wednesday, February 14, 2024 1:02 PM
To: Gary Benton
Cc: LeVee, Jeffrey A.; Watne, Kelly M.; Jonathan Frost; Meghan Gleeson; docket@rodenbaugh.com; Lobisser, Kelsey A.; Crawford, Valrie W.; Prof. Catherine Kessedjian (Ckarbitre@outlook.fr); David Huebner; Tom Simotas
Subject: Re: GCCIX v. ICANN IRP - Motion to Dismiss Scheduling

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Dear Mr. Benton,

We are hoping that new information will result in ICANN withdrawing the motion to dismiss in the next week or two. However, if that does not happen and the motion goes forward, then Claimant requests also a Sur-Reply to ICANN's Reply Brief, as the parties and panel have previously agreed as to prior motions in this case by both sides. We would request the Sur-Reply to be due on April 26.

Kind regards,
Mike



Mike Rodenbaugh

address: 548 Market Street, Box 55819
San Francisco, CA 94104

email: mike@rodenbaugh.com

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On Tue, Feb 13, 2024 at 12:48 PM Gary Benton Contact Information Redacted wrote:

Dear Counsel,

Mr. LeVee, thank you for your email. All, I presume the dates below will be fine with the full Tribunal and will let you know if there are any further considerations.

As proposed, we'll also plan for the dates relating to the RFPs to be off calendar for now.

Let's leave on-calendar the 16 April 2024 Case Management Conference for now.

Thank you and best regards,

Gary Benton, Chair

Gary L. Benton, C.Arb, FCI Arb, FColl Arb

US and International Arbitrator

Gary Benton Arbitration

t: +1.650.283.5949

e: Contact Information Redacted

From: LeVee, Jeffrey A. <jlevee@JonesDay.com>

Date: Tuesday, February 13, 2024 at 7:36 AM

To: Gary Benton Contact Information Redacted >, Mike Rodenbaugh <mike@rodenbaugh.com>, Watne, Kelly M. <kwatne@jonesday.com>, Jonathan Frost <jonathan@rodenbaugh.com>, Meghan Gleeson <meghan@rodenbaugh.com>, docket@rodenbaugh.com <docket@rodenbaugh.com>, Lobisser, Kelsey A. <klobisser@jonesday.com>, Crawford, Valrie W. <vcrawford@JonesDay.com>

Cc: Prof. Catherine Kessedjian Contact Information Redacted David Huebner

Contact Information Redacted >, Tom Simotas Contact Information Redacted

Subject: RE: GCCIX v. ICANN IRP - Motion to Dismiss

Mr. Chairman and Members of the Panel:

Mr. Rodenbaugh and I spoke yesterday afternoon and agreed on a briefing schedule in conjunction with ICANN's motion to dismiss as follows:

ICCIX's opposition shall be due on 15 March 2024.

ICANN's reply shall be due on 5 April 2024.

In the meantime, the parties will defer the discovery deadlines previously established. Mr. Rodenbaugh and I will discuss those deadlines in due course.

Regards,

Jeff LeVee

Jones Day – Los Angeles

Office: 213.243.2572

From: Gary Benton **Contact Information Redacted**

Sent: Wednesday, February 7, 2024 1:06 PM

To: LeVee, Jeffrey A. <jlevee@JonesDay.com>; Mike Rodenbaugh <mike@rodenbaugh.com>; Watne, Kelly M. <kwatne@jonesday.com>; Jonathan Frost <jonathan@rodenbaugh.com>; Meghan Gleeson <meghan@rodenbaugh.com>; docket@rodenbaugh.com; Lobisser, Kelsey A. <klobisser@jonesday.com>; Crawford, Valrie W. <vcrawford@JonesDay.com>

Cc: Prof. Catherine Kessedjian **Contact Information Redacted** David Huebner

Contact Information Redacted; Tom Simotas **Contact Information Redacted**

Subject: Re: GCCIX v. ICANN IRP - Motion to Dismiss

Dear Counsel,

Thank you, Mr. LeVee. Would the parties please confer on how to address this motion, including as to any agreed briefing schedule, and report to the Tribunal accordingly.

I would anticipate that Claimant's counsel should be able to share their views on the scheduling and stay of information exchange proposed below by next Tuesday at the latest.

Best regards,

Declaration of Jeffrey A. LeVee
Exhibit C

From: LeVee, Jeffrey A.
Sent: Monday, February 19, 2024 7:16 AM
To: Mike Rodenbaugh
Cc: Lobisser, Kelsey A.
Subject: RE: GCCIX v. ICANN IRP - Motion to Dismiss Scheduling - Surreply / CMC

Mike:

I had thought you would be sending me whatever you have obtained from Bahrain, so I am pinging you to let you know that I have not received anything yet. I'm looking forward to the possibility of being speechless!

Thanks,

Jeff LeVee
Jones Day – Los Angeles
Office: 213.243.2572

From: Mike Rodenbaugh <mike@rodenbaugh.com>
Sent: Thursday, February 15, 2024 2:46 PM
To: Gary Benton <gary@garybentonarbitration.com>
Cc: LeVee, Jeffrey A. <jlevee@JonesDay.com>; Watne, Kelly M. <kwatne@jonesday.com>; Jonathan Frost <jonathan@rodenbaugh.com>; Meghan Gleeson <meghan@rodenbaugh.com>; docket@rodenbaugh.com; Lobisser, Kelsey A. <klobisser@jonesday.com>; Crawford, Valrie W. <vcrawford@JonesDay.com>; Prof. Catherine Kessedjian Contact Information Redacted David Huebner Contact Information Redacted Tom Simotas
Subject: Re: GCCIX v. ICANN IRP - Motion to Dismiss Scheduling - Surreply / CMC

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Dear Mr. Benton, I can only dream of a day that I might render Mr. LeVee speechless..., but after many years litigating with him and his team, I suspect it is as likely to happen as some of my other dreams, like scoring the winning goal in the World Cup or playing guitar with the Rolling Stones...

Thank you re the Sur-reply. Will the panel be issuing a new procedural order with all the new dates?



Mike Rodenbaugh

address: 548 Market Street, Box 55819
San Francisco, CA 94104

email: mike@rodenbaugh.com

phone: +1 (415) 738-8087

Declaration of Jeffrey A. LeVee
Exhibit D

From: Mike Rodenbaugh <mike@rodenbaugh.com>
Sent: Monday, March 18, 2024 7:41 PM
To: Gary Benton
Cc: LeVee, Jeffrey A.; Watne, Kelly M.; Jonathan Frost; Meghan Gleeson; docket@rodenbaugh.com; Lobisser, Kelsey A.; Crawford, Valrie W.; Prof. Catherine Kessedjian (Ckarbitre@outlook.fr); David Huebner; Tom Simotas
Subject: Re: GCCIX v. ICANN IRP - Motion to Dismiss

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Dear Mr. Benton,

GCCIX intends to maintain its business, and is taking corrective action as to its corporate status in Bahrain. It would have no interest in continuing the IRP if it did not intend to operate the .GCC TLD, as it has hoped to do for more than 12 years now. However, we believe this is beside the point given the Bahraini corporate law explained in our Opposition. Because GCCIX is not dissolved, it maintains full ability to exercise its legal rights in this IRP.

Kind regards,
Mike



Mike Rodenbaugh

address: 548 Market Street, Box 55819
San Francisco, CA 94104

email: mike@rodenbaugh.com

phone: +1 (415) 738-8087

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On Sun, Mar 17, 2024 at 1:43 PM Gary Benton Contact Information Redacted > wrote:

Dear Counsel,

Thank you, received.

Mr. Rodenbaugh, speaking just for myself, and apart from the legal arguments which will be given due consideration, your client's intention to do business, including whether it intends to take corrective action, is unclear to me. I do hope this will be addressed in the course of this motion.

Best regards,

Gary Benton, Chair

Gary L. Benton, C.Arb, FCI Arb, FColl Arb

US and International Arbitrator

Gary Benton Arbitration

t: +1.650.283.5949

e: Contact Information Redacted

From: Mike Rodenbaugh <mike@rodenbaugh.com>

Date: Friday, March 15, 2024 at 5:25 PM

To: Gary Benton Contact Information Redacted >

Cc: LeVee, Jeffrey A. <jleee@jonesday.com>, Watne, Kelly M. <kwatne@jonesday.com>, Jonathan Frost <jonathan@rodenbaugh.com>, Meghan Gleeson <meghan@rodenbaugh.com>, docket@rodenbaugh.com <docket@rodenbaugh.com>, Lobisser, Kelsey A. <klobisser@jonesday.com>, Crawford, Valrie W. <vcrawford@jonesday.com>, Prof. Catherine Kessedjian Contact Information Redacted, David

Huebner Contact Information Redacted, Tom Simotas^{Contact Information Redacted}

Subject: Re: GCCIX v. ICANN IRP - Motion to Dismiss Scheduling - Surreply / CMC

Dear Mr. Benton, Professor Kessedjian, and Ambassador Huebner, and ICANN Counsel,

Please find attached Claimant's Opposition to ICANN's Motion to Dismiss the pending IRP Request, and the supporting Declaration of Abdullah Sayyar with Exhibits.

Kind regards,

Mike