

EXHIBIT A



Mike Rodenbaugh <mike@rodenbaugh.com>

RE: .GCC IRP

1 message

Enson, Eric P. <epenson@jonesday.com>

Thu, Sep 30, 2021 at 5:06 PM

To: Mike Rodenbaugh <mike@rodenbaugh.com>

Cc: "LeVee, Jeffrey A." <jlevee@jonesday.com>, "Watne, Kelly M." <kwatne@jonesday.com>, Jonathan Frost <jonathan@rodenbaugh.com>

Mike,

Thank you for speaking with me on Monday about the .GCC IRP. As we discussed, ICANN is seeking an agreement with GCCIX to stay the pending IRP while ICANN complies with the Board's 12 September 2021 resolution regarding the .GCC IRP and application. Pursuant to that resolution, ICANN will seek to have a dialogue with the GAC regarding any rationale for its consensus advice on the .GCC application. As I mentioned on Monday, ICANN does not know how, or whether, the GAC will engage on this issue or whether it will cause the ICANN Board to take action on the .GCC application, but ICANN is currently attempting to begin these discussions with the GAC. In that such discussions could fundamentally alter the pending IRP and that ICANN's dialogue with the GAC regarding its rationale is part of what your client is seeking in the IRP, ICANN believes it is in the parties' interests to temporarily stay the IRP while these events unfold. ICANN is seeking a preliminary stay of 6 months, which could be extended if progress is being made and the parties agree. Please let me know if your client is willing to enter into such a stay. And if you or your client have any particular questions about this process, please let me know and I will do my best to seek answers. Thank you.

Eric

Eric P. Enson

JONES DAY® - One Firm WorldwideSM

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San Francisco +1.415.963.6994

Mobile Contact Information Redacted**From:** Mike Rodenbaugh <mike@rodenbaugh.com>**Sent:** Friday, September 24, 2021 4:17 PM**To:** Enson, Eric P. <epenson@JonesDay.com>**Cc:** LeVee, Jeffrey A. <jlevee@JonesDay.com>; Watne, Kelly M. <kwatne@jonesday.com>; Jonathan Frost <jonathan@rodenbaugh.com>**Subject:** Re: .GCC IRP**** External mail ****

Hi Eric, yes 2pm on Mon is good for me.

Thanks,

Mike



Mike Rodenbaugh

address: [548 Market Street, Box 55819](#)
San Francisco, CA 94104

email: mike@rodenbaugh.com

phone: +1 (415) 738-8087

On Fri, Sep 24, 2021 at 9:10 AM Enson, Eric P. <epenson@jonesday.com> wrote:

Sure. Does 2 work?

Eric P. Enson
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Mobile Contact Information Redacted

From: Mike Rodenbaugh <mike@rodenbaugh.com>

Sent: Friday, September 24, 2021 9:09 AM

To: Enson, Eric P. <epenson@JonesDay.com>

Cc: LeVee, Jeffrey A. <jleee@JonesDay.com>; Watne, Kelly M. <kwatne@jonesday.com>; Jonathan Frost <jonathan@rodenbaugh.com>

Subject: Re: .GCC IRP

**** External mail ****

Hi Eric,

How about Monday afternoon?

Thanks,

Mike

**Mike Rodenaugh**

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

email: mike@rodenaugh.com

phone: +1 (415) 738-8087

On Thu, Sep 23, 2021 at 11:41 AM Enson, Eric P. <epenson@jonesday.com> wrote:

Mike,

Thanks for getting back to me. Can you and I discuss either this afternoon or tomorrow? I am open today after 2:30 and all day tomorrow. Thanks.

Eric

Eric P. Enson
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San Francisco +1.415.963.6994

Mobile Contact Information Redacted

From: Mike Rodenaugh <mike@rodenaugh.com>
Sent: Wednesday, September 22, 2021 12:38 PM
To: Enson, Eric P. <epenson@JonesDay.com>
Cc: LeVee, Jeffrey A. <jlevee@JonesDay.com>; Watne, Kelly M. <kwatne@jonesday.com>; Jonathan Frost <jonathan@rodenaugh.com>
Subject: Re: .GCC IRP

**** External mail ****

Hi Eric,

You have asked for our initial thoughts on the ICANN Board Resolution passed last weekend. Indeed I have plenty of thoughts about this and so does my client. We have expressed some of our initial thoughts in our brief yesterday (#11).

The Resolution appears to instruct ICANN Org to try to stay the IRP so the Org can engage the GAC in a discussion that is indefinite at least in scope, intention, duration and any potential effect (if any) of any foreseeable outcome. We would need a specific proposal in writing from ICANN that addresses those aspects with specificity, in order to

begin to evaluate whether this Resolution could have any effect on the IRP. We note that our client's IRP claims center on ICANN's past behavior, none of which is remedied by this Resolution.

Please let us know if and when you have such a proposal.

Thanks,

Mike



Mike Rodenbaugh

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

email: mike@rodenbaugh.com

phone: +1 (415) 738-8087

On Mon, Sep 20, 2021 at 10:01 AM Enson, Eric P. <epenson@jonesday.com> wrote:

Mike,

Any thoughts on this? Thanks.

Eric

Eric P. Enson
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Mobile Contact Information Redacted

From: Enson, Eric P.
Sent: Wednesday, September 15, 2021 9:24 AM
To: 'Mike Rodenbaugh' <mike@rodenbaugh.com>
Cc: LeVee, Jeffrey A. <jlevee@jonesday.com>
Subject: RE: .GCC IRP

Mike,

The resolution can be found at: <https://www.icann.org/resources/board-material/resolutions-2021-09-12-en#2.b>

Let me know when you can discuss. Thanks.

Eric

Eric P. Enson
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San Francisco +1.415.963.6994

Mobile Contact Information Redacted

From: Mike Rodenbaugh <mike@rodenbaugh.com>
Sent: Monday, September 13, 2021 10:47 AM
To: Enson, Eric P. <epenson@JonesDay.com>
Cc: LeVee, Jeffrey A. <jlevee@JonesDay.com>
Subject: Re: .GCC IRP

**** External mail ****

Hi Eric, I'm free at 12:30 if that works?



Mike Rodenbaugh

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

email: mike@rodenbaugh.com

phone: +1 (415) 738-8087

On Mon, Sep 13, 2021 at 9:22 AM Enson, Eric P. <epenson@jonesday.com> wrote:

Mike,

Following up on this. Can you speak this morning?

Eric

Eric P. Enson
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San Francisco +1.415.963.6994

Mobile Contact Information Redacted

From: Enson, Eric P.
Sent: Sunday, September 12, 2021 12:20 PM
To: mike@rodenbaugh.com
Cc: LeVee, Jeffrey A. <jlevee@JonesDay.com>
Subject: .GCC IRP

Mike,

Do you have time tomorrow to discuss the .GCC IRP? I am free all day, except 11-12 and 1-2. Earlier in the day would be better for me. Thanks.

Eric

Sent with BlackBerry Work
(www.blackberry.com)

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EXHIBIT B

Bahrain, 15th April 2013

Dr. Stephen D. Crocker, Chair, ICANN Board of Directors
Mr. Cherine Chalaby, Chair, ICANN Board gTLD Committee
Cc: Heather Dryden, Chair, Government Advisory Committee

Re: GAC Advice regarding application for .GCC (1-1936-2101)

Dear Dr. Crocker and Mr. Chalaby,

Following the publication of the 11th April GAC Communiqué from the Beijing ICANN meeting, I understand that the GAC has issued formal advice regarding the New gTLD application for .GCC, suggesting (without any reasoning) that the application be rejected. Obviously, this is a matter of substantial concern for my shareholders and me, as we have invested substantial time and finances in our application, in reliance on ICANN's process and rules as set forth in the Final Applicant Guidebook. We do not consider such unsubstantiated advice of the GAC to be justified, and so we must pursue this matter further.

As an initial matter, the Applicant Guide Book states that for the Board to be able to consider GAC Advice, it must be submitted "by the close of the Objection Filing period". As this deadline passed on 13th March, we presume you will reject this advice as untimely. We would appreciate clarity from the Board on this point.

Although we reject outright this GAC Advice as being untimely, and reserve all rights relating to this matter, we call on the GAC to disclose its full justification and reasoning for issuing the advice, as well any and all documents that it considered in formulating that advice. It is of the utmost importance that these details be revealed, in the interests of complete openness and transparency, and in order for the applicant and the Board to fully understand the situation. We respectfully request the ICANN Board to ensure that this information is obtained and published as a matter of urgency.

We have received a Legal Rights Objection from the Cooperation Council for the Arab States of the Gulf (CCASG), and intend to respond to that objection via the WIPO process. The GAC and Board should allow that process to conclude before making any determination about our application.

I look forward to your urgent response.

Regards

A handwritten signature in black ink, appearing to read 'Fahad AlShirawi', written over a horizontal line.

Fahad AlShirawi
CEO, GCCIX WLL
dotgcc@gccix.net