IN THE MATTER OF AN INDEPENDENT REVIEW PROCESS BEFORE THE INTERNATIONAL CENTRE FOR DISPUTE RESOLUTION

DONUTS INC.	ICDR Case No.
Claimant,	
V.	
INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS,	
Respondent.	

REQUEST FOR EMERGENCY RELIEF (APPLICATION FREEZE)

BY DONUTS INC.

RE NEW gTLD APPLICATIONS

FOR .SPORTS, .SKI and .RUGBY

THE IP & TECHNOLOGY LEGAL GROUP, P.C.
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http://newgtlddisputes.com

Attorneys for Claimant DONUTS INC.

Claimant Donuts Inc. ("Donuts"), on behalf of itself and its subsidiaries Steel Edge, LLC, Wild Lake, LLC and Atomic Cross, LLC, applicants for new gTLDs .SPORTS, .SKI and .RUGBY, respectively (the "Subject Domains"), hereby moves for emergency interim relief, pending final resolution on the merits of its Request for Independent Review Process ("IRP") regarding the Subject Domains, on the following grounds:

- experts to serve this role, notwithstanding the requirement in Article IV of its Bylaws that it do so; and
- Each of the Subject Domains has been applied for by the competitors who objected to Donuts' applications for the Subject Domains SportAccord, FIS and IRB, respectively. The objections eliminated all other applicants from competing for the Subject Domains, save for those objectors. Because ICANN could imminently sign registry agreements with each objector that could moot all or part of Donuts' IRP request, emergency relief is needed to preserve the remedies sought in this IRP proceeding.

In light of the foregoing, Donuts hereby moves that, effective immediately, (i) the status of all applications for .SPORTS, .SKI and .RUGBY be placed "on hold," and (ii) the Board stay all contracting and delegation processes pertaining to same.

Donuts bases this motion on facts and arguments set forth in Donuts' accompanying IRP Request and supporting documents, any and all other files and records of this proceeding, and such other evidence and argument as the Tribunal may consider in connection with this request.

DATED: October 8, 2014 Respectfully submitted,

THE IP and TECHNOLGY LEGAL GROUP, P.C.

By: /dcm/
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