

ANNEXURE 1

16

IN THE NATIONAL COMPANY LAW TRIBUNAL: NEW DELHI
PRINCIPAL BENCH

ITEM No. 01
(IB)-409(PB)/2017

IN THE MATTER OF:

Edelweiss Asset Reconstruction Co. Ltd ... Applicant/Petitioner
Vs
Net 4 India Limited Chandhiok & Mahajan ... Respondent

Order under Section 7 of Insolvency & Bankruptcy Code, 2016, CIRP.

Order delivered on 25.01.2021

CORAM:

SH. B.S.V. PRAKASH KUMAR
HON'BLE ACTG. PRESIDENT

SH. HEMANT KUMAR SARANGI
HON'BLE MEMBER (TECHNICAL)

PRESENT:

For the Applicant : Ms. Pallavi Mishra, Advocate
For the Respondent : Mr. Rajshekhar Rao, Mr. Raghav Kacker,
Ms. Anuradha Agnihotri, Ms. Manasa Sundarraman,
Ms. Spoorthi Cotha Advs. for R1- ICANN),
Mr. Prashant Mehta, Mr Rakesh Kumar,
Ms. Neha Tanwar, Advocates

ORDER

IA-5761/2020 – Internet Corporation:

PER : B.S.V. PRAKASH KUMAR, ACTG. PRESIDENT

It is an application filed by the Resolution Professional of the Corporate Debtor (Net4 India) u/s 14 r/w Sections 20, 25 & 60(5) of the Insolvency and Bankruptcy Code, 2016 (“**the Code**”) seeking directions as follows:

- a) Direct R1/ICANN, Internet Corporation for Assigned Names and Numbers, to not terminate the Registrar Accreditation Agreement (RAA) dated 14 October 2014;
- b) Direct R2/Public Interest Registry (PIR), to not terminate the Registry-Registrar Agreement (RRA) dated 19 April 2016;


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- c) Direct R3, Mr. Jasjit Singh Sawhney/suspended and promoter director, to immediately address all concerns of ICANN and PIR;*
- d) Direct R3 to pay the outstanding amount USD7663.18 to R1 in compliance of the order dated 25.09.2020 passed by this Adjudicating Authority and pay further dues accruing on regular basis;*
- e) Direct R3 to pay USD21796.35 to R2 in compliance of the order dated 25.09.2020 passed by this Adjudicating Authority and pay further dues accruing on regular basis;*
- f) Direct R3 & R4 to resolve all the compliance and domain renewal issues raised by R1 and R2 at the earliest.*

2. The Applicant submits that the Corporate Debtor entered into Corporate Insolvency Resolution Process (CIRP) on 08.03.2019. This Corporate Debtor is an internet domain registrar and web hosting company, to do this business; the Corporate Debtor is on 14.10.2014 accredited with R1/ICANN through Registrar Accreditation Agreement (RAA) and accredited with R2/PIR on 19.04.2016 through Registry Registrar Agreement.

3. R1/ICANN is a California based non-profit public benefit corporation incorporate governed by laws of California, USA. It is engaged in the business of coordination of Global Internet Systems of unique identifiers and ensuring the stability and secures operations of the internet's unique identifier systems, including but not limited to the Domain Name System (DNS) and Internet Protocol (IP) addresses.

4. Likewise, R2/PIR is a Reston (Senses-Designated Place), Virginia based not-for-profit created by Internet Society in 2002 to manage their .ORG top-level domain. It took over operations of .ORG in January 2003 and launched .NGO and .ONG top level domains in March 2015.

5. Basic function of these two entities is, to work as registry operators that operate generic top-level domains (gTLDs) such as ".com" and ".org" and are responsible for managing the definite lists/database of domain names registered with gTLDs that they operate.


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6. R3 is an erstwhile promoter director of the Corporate Director and also continuing as director in R4/Net4 Network Services Ltd, Pipetel Communications Private Ltd, Trak Online Net India Private Ltd and Net4 Communications Ltd.

7. R4 is a company called Net4 Network Services Ltd presently running the business of the Corporate Debtor based on a Master Reseller Agreement purported to have been executed by the Corporate Debtor in favour of R4 before this company petition was admitted.

8. Since modus operandi of this business being interrelated to the functioning of other companies, it is imperative to figure out design of this business. The corporate debtor is like a broker in stock exchange; here the corporate debtor positions itself as facilitator in between Domain Name Registry Operators and the registrants. It operates in accordance with the guidelines of the designated domain name registries. The registrars are companies such as the Corporate Debtor accredited by ICANN and PIR for processing and transferring the registration of the domain names allowing its consumers, businesses and organisations to obtain right to use and operate individual domain names with a particular gTLD. The end consumers, businesses and organisations, which service this business to their customers and public, are called registrants or domain name registrants or registered name holders. The registrars collect information about the registrants such as indentifying information, billing information, server addresses as part of the registration process. The corporate debtor from time to time pays license fees and other fees to the Registry Operators and collect fees from the registrants.

9. Since ICANN and PIR do not contact with the registrants directly, they entered into the Registrar Accreditation Agreement and Registry-Registrar Agreement with the Corporate Debtor to ensure the registries and the registrars comply with the core set of standards that provide


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registrants with certain level of protection including access to and control over their domain names and access to certain information about registered domain names.

10. To connect to this episode, we must know brief historical facts. The RP, ever since he has been appointed as IRP and then RP, has been pursuing all through to take the company and its assets into his custody, while doing so, though he could not lay his hands on the business already gone into the hands of R4, he has discovered that before the Corporate Debtor entered into CIRP, the Corporate Debtor was successfully doing this business through its websites Net4.com and Net4.in, having subsidiary companies namely, Net4 Network Services Limited (Net4), Pipetel Communications Private Limited. The Corporate Debtor being the registrar entering into agreements from time to time and accredited by ICANN and PIR, it has provided domain names to its consumers/registrants by collecting fees from thousands of its consumers. By the time the RP has taken charge of this Corporate Debtor, no business has remained in the company except one or two employees sitting in the registered office of the Corporate Debtor. On his pursuance, he has come to know that the management of the Corporate Debtor, especially the Promoter-Director (R3) transferred the Corporate Debtor's shareholding in R4 and Pipetel to Trak Online Network Private Limited through two shareholder agreements. Regarding the business of the Corporate Debtor, it was shown as transferred to R4 through Master Reseller Agreement, regarding websites through which the corporate debtor doing business, they were shown as belonging to the father of the Promoter-Director, by showing them so, they were transferred to R3 himself, therefore by transfer of the shareholding of its subsidiaries lying in the name of the Corporate debtor to Trak Online Network Private Limited; the business of the corporate debtor to R4 through Master Reseller Agreement and the trade mark rights vested


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with the Corporate Debtor were shown as transferred, the cumulative effect of all these is, by the time company was admitted into CIRP, entire business of the Corporate Debtor was diverted to its once upon a time subsidiary i.e. R4 and control over Net4 Network (R4) has been taken to Trak Online Network Private Limited owned and managed by R3. The applicant submits this has been done to ensure nothing is left in the company as on the date of admission. In a bid to discharge his functions, the RP filed Section 19 Petition seeking cooperation from R3, but of no avail. The Applicant says to uncover the masquerade set up by these transactions, he has filed another application u/s 43, 44, 45, 46, 48, 49, 66 & 67 of the Code assailing the fraudulent transactions; the said application is pending for adjudication before this Bench.

11. During the CIRP, the Applicant was receiving continuous non-compliance, non-renewal compliance from customers as well as R1 and R2 with respect to Whois accuracy, transfer policy, Expired Domain Deletion Policy (EDDP), Expired Registration Recovery Policy (ERRP).

12. Though Applicant receiving reminders of breaches from R1 and R2 and complaints from registrants, since the business of the Corporate Debtor including all revenues being solely managed by R3 and R4 and the funds do not come to the account of the Corporate Debtor, the Applicant has been repeatedly requesting R3 to rectify the non-compliances and defects, but R3, despite being requested, has not rectified the non-compliances, by which, the business still continuing in the name of the Corporate Debtor is put to jeopardy on account of such non-compliances.

13. The Applicant being constrained of inaction of R3 in rectifying such non-compliances, this Bench, upon being an application filed for a direction to cure all these non-compliances, directed R3 on 18.09.2020 to cure all the non-compliances, non-renewals including payment of outstanding dues to R1 and R2. Though direction has been


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given, R3 failed to cure all the non-compliances and non-renewals and have failed to make full payment to R1 and R2. Since this Bench has directed R3 to resolve all pending issues with R1 and R2 and to make the payments on or before 01.10.2020, R3 filed an affidavit dated 26.10.2020 stating that *"90% of the dues of the Registry have been paid"* and by giving an undertaking to pay the complete pending dues to R1 and R2 within three days.

14. As to the dues are concerned, R1 submits that as of 16.01.2021, the Corporate Debtor owed R1 USD7,663.18 in past due fees, which included invoices dating as far back as July 2020, and USD1,000 in current fees. On 20.01.2021, the Corporate Debtor paid USD 3,000 towards its past due fees; on 21.01.2021, the Corporate Debtor paid USD4,500 towards its past due fees, leaving USD163.18 overdue fees and USD1,000 in current fees unpaid.

15. R1 Counsel submits, most importantly, there is no indication that the Corporate Debtor has in place some system suggesting that it will not fall behind on future invoices, if the RAA is not terminated.

16. The Applicant submits on 10.2.2020, R1 sent a letter to the Applicant informing that the Corporate Debtor is in breach of ICANN RAA which inter alia includes:

- (a) failure of the Corporate Debtor to provide an interactive webpage and a port43;
- (b) providing free public query-based access to up-to-date concerning all active registered names;
- (c) failure to make registration data and records available upon request by the Respondent No.1 as required by Section 3.4.3 of the RAA;
- (d) failure to escrow gTLD registration data as required by Section 3.6 of the RAA;
- (e) failure to timely pay past dues accreditation fees as required by Section 3.9 of the RAA.


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17. In addition to the above, it was also informed that the Corporate Debtor has failed to provide records and information as requested by R1 to demonstrate compliances of the complaints raised by the customers with respect to unique "Auth Info Code" and remove the "Client Transfer Prohibited", transfer of Domain names to another registrar without the knowledge and consent of the registered name holder, renewal of expired domain name registration.

18. R1 has also raised additional concerns with respect to increase in number of complaints from the customers claiming that their domain transfer and renewal request is not being addressed by the Corporate Debtor despite repeated requests. To cure this problem, R1 gave time till 31.12.2020 to the Corporate Debtor and to provide requisite information, failing which, R1 may commence RAA termination process.

19. For the Applicant on behalf of the Corporate Debtor is neither in a position to clear the arrears nor in a position to cure the non-compliances because the business operations are in the hands of R3 and R4, the Applicant has been in the process of reminding R3 and R4 to make compliances as directed by R1 and R2 and the customers. Besides this, the applicant says, he keeps apprising R1 and R2 about the orders passed by this Bench from time to time. The concern of the Applicant herein is, in the event customers left the business running in the name of the Corporate Debtor, in the event ICANN and PIR terminated the agreements with the Corporate Debtor, no value would remain in this company to sell it as going concern which ultimately fails the creditors to realize their money and to meet the objective of selling the company as going concern.

20. Like R1 issued notice for termination of the RAA owing to non compliance, R2 also issued notice dated 15.12.2020 for termination of PIR and RRA for not making available sufficient funds for auto renewal of domain names informing that owing to continuous violation, 1,644


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domain names would expire on or before 30.12.2020. In the termination notice, R2 has given a period of 30 days i.e., by 14.01.2021 to make funds available of USD 21,796.35 for auto renewal of domain names, failing which, R2 would terminate the agreement in between R2 and the Corporate Debtor. Upon receipt of such notice, like in the past, the Applicant requested R3 to pay the outstanding dues of R2 as mentioned above.

21. In this context, this Applicant seeks in terms of Section 14 of the Code, no coercive action including termination of ICANN RAA and PIR RRA be permitted against the Corporate Debtor during the CIRP period for continuation of the Agreements. He says that termination of these arguments will not only be in breach of moratorium but will also cause hindrance to the RP to discharge his functions in terms of Section 20 r/w Section 25 of the Code. In view of the same, the Applicant has sought the reliefs as mentioned above.

22. Since this Bench has directed the parties to file their responses, R1 counsel has filed its written submissions stating that these submissions as well as its appearance before this Bench are without prejudice to the objections to the subject matter and territorial jurisdiction of this Bench because as per the Registrar Accreditation Agreement (RAA), the dispute in between the parties is governed by Californian Law, U.S.A. R1 does not own any party or bank account within the territorial jurisdiction of this Tribunal or in India and it does not have any agent for service of process, a mailbox or a registered address within the territorial jurisdiction of India, therefore Indian Law is not applicable to ICANN and it is not subject to the jurisdiction of Indian Courts or Tribunals. The same has even been reflected in the RAA. R1 counsel submits that though ICANN has communicated with the Corporate Debtor both verbally and in writing hundreds of times over one and half years, notifying it of its non-compliances with the RRA


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explaining what is required to address in each issue, as well as providing a deadline to do so, the Corporate Debtor failed to cure numerous breaches of the RAA, therefore ICANN is left with no choice but to issue notice of termination. The R1 counsel submits that as per Section 3.3.1 of the RAA, the Corporate Debtor shall provide free, public query-based access to the latest data on all active registered names that it has registered, through interactive webpage and a port43 Whois Portal. Since October 2020, the Corporate Debtor failed to provide access to this data to an interactive webpage and a port43 Whois service, on account of this breach, it has prevented registrants, internet users in general, law enforcement authorities, intellectual property owners and cyber security researchers from accessing critical information regarding domain names registered with the Corporate Debtor. When R1 ascertained the information based on the statement made by the Corporate Debtor that by 31.12.2020, upto date information was provided on the interactive webpage and port43 Whois Portal, as recent as 21.01.2021, the Whois searches of domain names registered with Net4 India using Net4 India's web based Whois service yield no results and only a notation that "no information found". R1 counsel further submits as per Section 3.4.3 of the RAA, the Corporate Debtor shall make registration data available for inspection and copying by ICANN upon request, which the Corporate Debtor has failed to make registration data available to ICANN. He says, the Corporate Debtor has prevented registrants from transferring their registered domain names from Net4 to another registrar. It has done so by not providing AUTH INFO Code to registrants and kept the status of registrants' domain names as "Client Transfer Prohibited", by which, registrants are stuck to the Corporate Debtor against their volition, which is in violation of ICANN's transfer policy as well as RAA.


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23. In some cases, the Corporate Debtor has failed to renew expired registrations. By not effectively permitting registrants to renew domain name registrations, the Corporate Debtor is putting registrants at risk of losing their registered domain names upon which they may have built their businesses, non profit institutions or educational websites. There are several instances, reflecting either restricting transfer of registrations or renewal requests, which R1 has separately placed along with its written submissions.

24. In view of these reasons, knowing full well that the Corporate Debtor would not be in a position to keep complying with the terms and conditions of the RAA, R1 will be constrained to terminate the RAA in the event the Corporate Debtor failed to provide an interactive webpage and an operable port43 Whois service within three (3) calendar days; to provide services that the registrants need in order to: transfer their domain name registrations; renew expired domain name registrations and ensure websites are re-activated upon renewal and update the registration data within three (3) calendar days and provide evidence to ICANN within three (3) calendar days that the domain names deesan.com, arhydraulicfittings.com, slkbima.com and arion.asia were transferred from the Corporate Debtor to Hosting Concepts B.V. d/b/a Registrar.eu, formerly known as Hosting Concepts B.V. d/b/a Open provider ("Open provider"), with the authorization of the Registrants and following the requirements of the Transfer Policy; to provide payment of all past and current accreditation dues within three (3) calendar days; to provide the evidence to ICANN that is specifically described and required in 10th December 2020 and 24th December 2020 Notices of Breach and related compliance notices, in order to demonstrate compliance within three (3) calendar days; to provide continued adherence to the terms of the RAA.


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25. As against the above factual situation and submissions of the Applicant and R1 counsel, R3 and R4 counsel submits that Master Reseller Agreement dated 26.10.2016, has duly authorized R4 to manage the web services business of the Corporate Debtor long prior to commencement of CIRP period, the Corporate Debtor is only a Master Reseller, the registered name holder is the customer of Master Reseller, therefore Net4 Network Services Limited (R4) is the company doing the business in terms of Master Reseller Agreement but not the Corporate Debtor. However, R3 and R4 counsel submits that in the interest of the customers and public at large, they have been doing all that is possible to resolve all the issues raised by either the customers and the registries.

26. To resolve the customer complaints, they provide email support for resolving the technical issues the customers facing through email addresses of customer support being corporatesupport@net4.in and renewals@net4.com. He says that the home page of Net4.com clearly shows that the website of Net4.com is fully functional and it has no operational issues, in respect to payment gateway, since it is fully functional, any person desirous of renewing its subscription with net4.com can easily access the same. In respect of the renewals and transfer of domain names, R3 and R4 counsel submits that it is fully functional and all issues in respect of the same have been resolved. He has further submitted R4 has also set up another email id to resolve any issues which are escalated either through ICANN/PIR or through RP being icannresolutions@net4.com. He has submitted that R3 and R4 and the RP are provided the contact number of Mr. Pankaj being 9650821618 in case any assistance is required for resolving any compliance which are escalated to the RP because Mr. Pankaj has been in regular touch on a daily basis with the RP to resolve the customer


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grievances. He says R4 has cleared the full dues shown as overdue in the application under reply for both R1 and R2.

27. He has further submitted that in the conference held between the RP and the counsel for the answering Respondents and ICANN, when the Applicant was asked to put forward Whois queries, the Applicant has only said that he would provide the screenshot of Whois not working but he has failed to do so, therefore it is clear that Whois working properly without any defect. He has further stated that in the video conferencing above stated, each specific issue was dealt with and answered by R3 and R4 side. A copy of MOM of the said video conferencing dated 21.01.2021 is annexed as Annexure-4 to these written submissions. He has stated that it is pertinent to mention that in large size of internet services operations, such as this, there are always planned and unplanned outages (even for companies like Google and Microsoft and there are systems and personnel in place to correct them swiftly).

28. Apart from all these things, R4 counsel stated that he is ready and willing to abide by any of the directions of this Bench in respect of addressing any grievances raised by R1 or R2 as well as from the customers. And R4 technical team is ready to have periodical video conferencing with the RP to resolve all the issues timely.

29. As to the allegations raised by the Applicant and R1, R3 and R4 counsel submits that, from their side it has been clarified by email dated 01.01.2021 that they dealt with interactive webpage and a port43 Whois service and they are also providing three public query-based access to upto date data concerning all active registered names sponsored by Net4 India for each top level domain (TLD) in which it is accredited. As to compliance of transfer policy, the "client transfer prohibited" status has been removed in the terms prescribed by Section I.A.5 of the transfer policy. R4 sends domain renewal reminder mailer on regular


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basis as per ICANN norms. The counsel submits that they have already mentioned in the email mentioned above, as *“we will ensure timely response all ICANN Contractual compliance matters in general, in future and are now specifically deputing a person for the same, who will coordinate with technical and other teams for the same”*. As to registered name holders requests, it has been mentioned as *“we suffered majorly due to loss of business and employee exits during the 4-5 months of lockdown, however have been rebuilding the teams to ensure timely response to customers. Whilst not completely in place we are making continuous improvements and will be back to normal in the next 4-6 weeks”*. In the said mail, it has also been stated that by using an automated process, R4 deposited gTLD registration data to approved escrow agent, if their data not been deposited; the same could be confirmed by R1 and R2. If any payment is left, R1 and R2 may send all the details invoice wise to ^{Contact Information Redacted}

30. By disclosing everything through mail dated 01.01.2021, it is apparent, R3 and R4 counsel says, R4 has not only resolved the issues but also formulated a proper customer care and other facilities for its customers so that any problem faced can be resolved and be attended without wasting time. He submits that R4 is in good relations with R1 and R2 and the RP is trying everything possible to wipe out all minor issues without any further delay, but whereas the RP is just trying to take advantage by magnifying regular day-to-day support issues to wrongfully takeover the running of the business which is governed by R4 through Master Reseller Agreement.

31. For us, it does not appear all is well, had there been everything going smoothly, R1 Counsel would not have filed long written submissions stating that the corporate debtor failed to adhere to the RAA and it is inclined to terminate the RAA.


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32. R3 & R4 Counsel submits that due to publication done in various newspapers by the RP, R4 business has been hampered and it has been facing a challenge to build up its reputation which has been tarnished due to the acts of the RP.

33. RP has come just now after CIRP has been initiated, but the corporate debtor went down even before this company petition was admitted and the corporate debtor failed to file financials from 2016 itself.

34. By filing submissions on behalf of R3 & R4, the counsel submits that the present application is not made on bonafide grounds, just adding to the litigation and litigation costs unnecessarily and to prejudice the Bench, hence sought for the dismissal of this application.

35. Upon looking at the conspectus in detail, one thing is evident that this business was once upon a time run by the Corporate Debtor itself, thereafter as on the date of admission of this Company Petition, the entire business and control of the Corporate Debtor over its subsidiaries has gone to Trak Online Network Private Limited.

36. Whether the Corporate Debtor business has lawfully been passed on to R4 and control of R4 to Trak Online Network Private Limited is a point not in consideration in this application, since the arguments were heard in fraudulent transaction application filed by the RP, those issues would be dealt with in that application.

37. With regard to the present issue, the endeavour shall be to ensure that this business has not been brought down either by the issues with R1 and R2 or by the issues with the customer base (registrants). It appears that R3 and R4 have made payments to the extent admitted by R1 and the Applicant. As to the balance payments, they shall be cleared as per the agreements in between the Corporate Debtor and R1 and R2.

38. Since the agreements with R1 & R2 are still running in the name of Corporate Debtor and the customers have also continued their


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registrations in the name of the Corporate Debtor, it is the bounden duty of this Bench to protect this business as stated under Section 20 and 25, because so long as the asset of the Corporate Debtor is shown in the name of it, it shall be construed as the business of the Corporate Debtor, therefore duty is cast upon R3 and R4 to keep paying dues as stipulated under the agreements and to provide services to the customers as per the terms mentioned in the agreements entered into with R1 and R2.

39. It is also pertinent to mention that Ministry of Electronics & Information Technology on 12.01.2021 informed that they are also receiving continuous complaints from the customers of the Corporate Debtor and for their complaints were not being redressed by the Corporate Debtor; it is causing financial as well as professional loss to them. In the letter, it has been stated as follows:

“Ministry of Electronics and Information Technology (MeitY) has been receiving numerous complaints from the registrants for renewal and retrieval of their domain names, as domain name registrant of Net4 India are not able to contact any appropriate person from Net4 India to shut down of services by Net4 India Ltd. causing financial as well as professional loss to the registrants”.

40. Another organisation namely NIXI (Registry for .in domains) has through press note permitted the customers of the Corporate Debtor to reach out to NIXI directly for any domain transfer requests mentioning as follows:

“In recent days the NIXI was informed that Net4 India, who is one of the registrar of NIXI for country code domain.IN is closing. NIXI investigated the matter and took following steps to ensure uninterrupted services to end users of .IN Domain:

...

For name server update, the end users may send mails to following email id to avail direct services (without help of Net4 India)


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NIXI has started permitting end users of .IN Domains to migrate to other registrars (Other than Net4 India)

A copy of the press note issued by NIXI is marked as Annexure 6”.

41. From one side R3 counsel says that the dues of R1 and R2 have been paid, but whereas the Applicant has received an email titled “violation notice – Net4 India Limited” on 22.01.2021 from R2 enclosing the list of 1427 domains have not been renewed due to in-sufficient funds in the account of the Corporate Debtor.

42. On the top of it, now it has become the concern of the Government to ensure all these issues are resolved, so that various customers of the Corporate Debtor including public domains will not suffer owing to the problems in between R3, R4 and the Corporate Debtor. Once the private dispute in between the creditors and debtor has an interface with public and it becomes public issue, then the Government is more concerned of the issue rather than these private parties. Exactly the same has happened in this case. Now at this juncture, immediate concern is, this business shall continue, for the reason it is still continuing as business of the corporate debtor though master reseller agreement purportedly come into existence, to that effect, agreements not being executed, character of relation of the corporate debtor with the Registry operators or with the registrants not being changed, all said and done, it is to be treated as business of the corporate debtor governed by the Code.

43. Regarding the reliefs (a) and (b), notwithstanding as to whether jurisdiction to deal with these issues relating to the agreements the Corporate Debtor entered into with R1 and R2, lies in India or elsewhere, looking at the far reaching implications likely to set in, if agreements R1 and R2 entered into are terminated, we hereby request R1 and R2 not to terminate these agreements at least until three months from hereof, so that the CIRP in progress is not hampered.

44. With regard to reliefs (c) to (f), it appears that R3 and R4 have cleared part of the dues payable to R1 and R2; they shall pay off the


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remaining dues, if any, as mentioned in the agreements entered into with R1 and R2. With regard to transfer of registrations with the registrar/corporate debtor to some other gaining registrar, looking at the extenuating circumstances such as Corporate Debtor getting into CIRP, R1 and R2, so long as dues are paid on time and services are provided on time to the Registered Name Holders (RNH), may act cautiously so that customer base of this registrar is not slipped into the hands of gaining registrars. Until the CIRP period is complete or until further orders, whichever is earlier, an SOP may be set up and follow the same by R3 & R4 counsel with the approval of the CoC taken by the RP. The same may be placed before this Bench within 15 days hereof and report compliance on fortnight basis.

45. In view of the above reasons, this IA-5761/2020 is hereby **disposed of.**

Sd/-
(B.S.V PRAKASH KUMAR)
ACTG. PRESIDENT

Sd/-
(HEMANT KUMAR SARANGI)
MEMBER (TECHNICAL)

25.01.2021


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26 February 2021

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

RE: NOTICE OF TERMINATION OF REGISTRAR ACCREDITATION AGREEMENT

Vikram Bajaj
Net 4 India Limited (IANA #1007)
[REDACTED]

Email:
[REDACTED]

Dear Vikram Bajaj:

Please be advised that as of 26 February 2021, Net 4 India Limited's ("Net 4 India") 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 14 October 2019 ("RAA") is terminated pursuant to Section 5.5.4 and Section 5.5.6 of the RAA. The termination shall become effective 13 March 2021, 15 calendar days from the date of this Termination Notice pursuant to the terms of the RAA.

The termination of the RAA is due to Net 4 India's repeated and consistent breaches of the RAA and failure to cure such breaches despite multiple notices from ICANN and opportunity to cure. In particular, Net 4 India: (1) failed to cure the breaches set forth in ICANN's 10 December 2020 Notice of Breach by the 31 December 2020 deadline; (2) failed to cure the breaches set forth in ICANN's 24 December 2020 Notice of Breach by the 14 January 2021 deadline; and (3) failed to cure the breaches set forth in ICANN's 29 January 2021 Notice of Breach by the 19 February 2021 deadline.

Termination Pursuant to Section 5.5.4 – Failure to cure breaches within 21 days of Notices of Breach:

As of 26 February 2021, the following breaches, all of which were identified in the 10 December 2020, 24 December 2020, and the 29 January 2021 Notices of Breach, remain uncured:

One World. One Internet
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1. **Net 4 India's failure to provide an interactive webpage and a port 43 Whois service**, also known as Registration Data Directory Service ("RDDS"), providing free public query-based access to up-to-date data concerning all active registered names sponsored by Net 4 India in any generic top-level domain ("TLD"), as required by Section 3.3.1 of the RAA. These services have been inoperative for more than four months.

On 27 October 2020, 1 November 2020, 4 November 2020 and 13 November 2020, ICANN sent notices to Net 4 India with specific examples illustrating its failure to provide these services and requested that Net 4 India resolve such breaches. On 1 November 2020, Net 4 India informed ICANN that the issue would be resolved by 2 November 2020. Net 4 India failed to resolve this issue and, as a result, the failure was incorporated into the 10 December 2020 Notice of Breach and remains uncured.

By failing to provide these services, Net 4 India deprives Registered Name Holders (also known as "Registrants") and Internet users, including law enforcement, intellectual property owners and cybersecurity researchers, access to critical information regarding the domain names under Net 4 India's management.

Additionally, Net 4 India's failure to operate RDDS has negatively impacted the processing of hundreds of individual complaints received by ICANN from Registered Name Holders and authorized representatives. In order to determine whether Net 4 India has honored requests by Registered Name Holders to renew their domain name registrations, ICANN (and Registered Name Holders) need access to Net 4 India's RDDS to view the "Registrar Registration Expiration Date"; however, Net 4 India's RDDS is not available and has not been available for more than four months. ICANN has reminded Net 4 India of its failure to provide RDDS on several occasions, including on (but not limited to) the following dates:

- 3 November 2020 (Case #00976469 and #00976449)
- 5 November 2020 (Case #00979679)
- 9 November 2020 (Case #00980225 and #00982457)
- 10 November 2020 (Case #00977130)
- 11 November 2020 (Case #00983275)
- 17 November 2020 (Case #00987151)
- 23 November 2020 (Case #00986557)
- 30 November 2020 (Case #00989686)
- 9 December 2020 (Case #00991921)
- 10 December 2020 (Case #00992460)
- 11 December 2020 (Case #00992547)
- 15 December 2020 (Case #00993555)
- 16 December 2020 (Case #00993823)
- 17 December 2020 (Case #00994118)
- 21 December 2020 (Case #00994820 and #00994941)
- 4 January 2021 (Case #00994090)

- 7 January 2021 (Case #00989686 and #0986009)
- 8 January 2021 (Case #00977574 and #00980341)
- 13 January 2021 (Case #00998065)
- 19 January 2021 (Case #01002512)
- 20 January 2021 (Case #01003218)
- 21 January 2021 (Case #01003622)
- 25 January 2021 (Case #01004653)
- 26 January 2021 (Case #01004755)
- 27 January 2021 (Case #01005276)
- 8 February 2021 (Case #01009115)
- 10 February 2021 (Case #01009789)
- 16 February 2021 (Case #01011139)
- 19 February 2021 (Case # 01011139)
- 23 February 2021 (Case # 01012935 and 01012948)

In the above cases, ICANN informed Net 4 India that due to its failure to provide RDDS, ICANN was unable to confirm whether the affected domain name registrations had been explicitly extended, as requested by the relevant Registrants at Expiration who resorted to ICANN's intervention so as not to lose their domain name registrations. Despite these communications, Net 4 India did not resolve the breaches, and Registrants at Expiration continue to be in the dark about their registrations.

2. Net 4 India's failure to make registration data and records available upon request by ICANN as required by Section 3.4.3 of the RAA.

For a Registered Name Holder to be able to initiate a transfer request of a gTLD domain name to a different registrar, the Registered Name Holder must obtain the AuthInfo code from the current registrar and provide it to his/her preferred registrar. Additionally, the domain name must not have the "ClientTransferProhibited" status enacted as this lock will prevent the transfer from proceeding. By not complying with Section I.A.5 of the Transfer Policy, Net 4 India is preventing the affected Registered Name Holders from exercising their rights to transfer their domain name registrations to a registrar of their choice. At the same time, Net 4 India is not providing the services needed for those Registered Name Holders to operate their domain names. These Registered Name Holders, many of whose online businesses and identities depend on their domain names, are "stuck" with Net 4 India, with no ability to manage their domain names or move them to another registrar.

By not providing all the records and information requested in the 10 December 2020, the 24 December 2020 and 29 January 2021 Notices of Breach pursuant to Section 3.4.3 of the RAA:

- (a) Net 4 India has failed to demonstrate compliance with Section I.A.5 of the Transfer Policy which mandates that, subject to ICANN specifications or policies and any applicable laws or regulations, the registrar provide the Registered Name Holder with the unique "AuthInfo" code and remove the "ClientTransferProhibited" within five (5)

calendar days of the Registered Name Holder's initial request if the registrar does not provide facilities for the Registered Name Holder to generate and manage their own unique "AuthInfo" code and to remove the "ClientTransferProhibited" status. In the 10 December 2020, the 24 December 2020 and the 29 January 2021 Notices of Breach, ICANN requested Net 4 India to provide evidence of having complied with Section I.A.5 of the Transfer Policy with respect to requests involving two hundred and nine (209) domain names. Net 4 India has not provided this evidence.

Please refer to Appendix A of this Termination Notice for a sample of the complaints received by ICANN in which Registered Name Holders and authorized representatives explain how Net 4 India's failure to provide contractually-required services is directly harming them.

- (b) Net 4 India has failed to demonstrate that the domain names *deesan.com*, *arhydraulicfittings.com*, *slkbima.com*, *arion.asia* and *capitalleague.biz* were transferred from Net 4 India to Hosting Concepts B.V. d/b/a Registrar.eu, formerly known as Hosting Concepts B.V. d/b/a Openprovider ("Openprovider"), with the authorization of the Registered Name Holders.

According to information available to ICANN, Net 4 India acts as a reseller for Openprovider. Despite multiple requests from ICANN Contractual Compliance, Net 4 India has not provided an explanation concerning the allegations that these domain names were transferred without the Registered Name Holders' authorization and were not in compliance with the RAA and Transfer Policy, nor has Net 4 India provided evidence of having followed the requirements prescribed by the Transfer Policy with respect to these transfers. Rather, the only response received by ICANN from Net 4 India was that the reseller "*can choose to move their customers to other registrars,*" which is simply not true and is not in compliance with the Transfer Policy.

- (c) Net 4 India has failed to demonstrate compliance with Section 2.2.5 of the Expired Registration Recovery Policy ("ERRP"), which mandates that beginning at the time of expiration and through the Domain Name System resolution interruption period described in ERRP Sections 2.2.2-.3, the Registrant at Expiration must be permitted by the registrar to renew the expired registration.

In the 10 December 2020, the 24 December 2020 and the 29 January 2021 Notices of Breach, ICANN requested specific evidence demonstrating completion of the renewal of fifteen (15) domain name registrations. Net 4 India failed to provide the required evidence.

A Registered Name Holder may use a domain name for the period of time for which it is registered, which can be from one to ten years. In order to keep using the domain name and any of the services associated with it (like a website or email service) the Registered Name Holder must be able to renew the domain name registration before it is expired and deleted. By not effectively permitting Registered Name Holders to renew domain name registrations and reflecting the renewal in Net

4 India's RDDS, Net 4 India is putting Registered Name Holders at risk of losing their domain names upon which they may have built their businesses, non-profit institutions and/or educational websites.

Please refer to Appendix A of this Termination Notice for a sample of complaints received from Registered Name Holders, and authorized representatives, explaining how Net 4 India's unresponsiveness is directly harming them.

3. Net 4 India's failure to timely pay past due accreditation fees, as required by Section 3.9 of the RAA.

As a condition of accreditation, Net 4 India is required to pay accreditation fees to ICANN. These fees consist of yearly fees (US\$4,000 per year) and variable fees, which are determined by the transaction type and volume of each registrar. Net 4 India and its court-appointed resolution professional have been provided customer statements and copies of pending invoices on several occasions.

Net 4 India has either failed to pay or failed to timely pay every invoice from April 2019 to the present. For those invoices where payment was finally made, such payments were long overdue – the delay in payments ranged from 28 days late to 412 days (over a year) late. In addition, Net 4 India has failed to fully pay the invoices issued on 31 October 2020 and 15 January 2021; and another invoice was issued on 31 January 2021 (with a 2 March 2021 due date). As of 26 February 2021, Net 4 India owes ICANN US\$1,163.18 in past due fees and US\$2,979.46 in current fees. Please refer to Appendix C of this Termination Notice for a summary of late-paid and unpaid invoices during the time period of April 2019 to present.

ICANN has provided Net 4 India with multiple notices and ample time to cure; nevertheless, Net 4 India has repeatedly breached its payment obligations under the RAA, has not cured this breach, and continues to owe ICANN past due fees.

Termination Pursuant to Section 5.5.6 – Three breaches within 12-month time period:

According to Section 5.5.6 of the RAA, if a registrar has been in fundamental and material breach of its obligations under the RAA at least three times within a 12 month period, ICANN may terminate the RAA. Net 4 India has been found in fundamental and material breach of its RAA obligations three times within less than a two month period. Accordingly, three Notices of Breach were issued on 10 December 2020, on 24 December 2020 and on 29 January 2021. All three Notices of Breach remain uncured.

Additional Noncompliance Issues (continuing and/or occurring after January 2021 Breach Notice):

Voluminous complaints from registrants regarding Net 4 India:

From 1 January 2020 to present, ICANN Global Support has fielded more than 2,600 communications from Net 4 India customers raising concerns about their registrations (often because Net 4 India would not or did not respond to its customers directly). The rate of communications received from reported Net 4 India customers increased sharply since the start of 2021, with more than half of these communications received in the last two months.

From 1 January 2020 to present, ICANN Contractual Compliance has received more than 2,600 formal complaints regarding Net 4 India (many of which involve several domain names); approximately 1,000 of these complaints were received in the last month. ICANN Contractual Compliance must review and vet every single incoming complaint. Once vetted, ICANN Contractual Compliance initiates a case, which is then communicated to Net 4 India. Currently, more than 400 cases remain unresolved; and hundreds of complaints are still under review, which, once vetted, will become more new cases. In addition, ICANN Contractual Compliance continues to receive more than 20 new complaints each day. And it is not known how many more complaints are pending with Net 4 India that have not yet been brought to ICANN's attention.

Registered Name Holders and authorized representatives have resorted to filing complaints with ICANN after numerous unsuccessful attempts to obtain Net 4 India's assistance in transferring or renewing domain names, updating registration data, managing domain names, and/or reactivating websites or defunct email addresses which online businesses and non-profit organizations depend upon. Many of those complaints involve numerous domain names – sometimes in the hundreds. Through these complaints, Registered Name Holders and authorized representatives explain to ICANN the multiple unsuccessful attempts to seek Net 4 India's assistance as well as the significant impact on Registered Name Holders. (See Appendix A.)

After receiving such a high volume of complaints regarding Net 4 India, ICANN published two blogs (on [17 November 2020](#) and [15 December 2020](#)) and an announcement on 29 January 2021 highlighting resources available for Registered Name Holders experiencing issues with their domain name registrations with Net 4 India. Desperate Registered Name Holders also reached out to ICANN through these blogs to express concerns regarding Net 4 India's inability or unwillingness to communicate with them or allow them to manage their domain name registrations. Please refer to Appendix B of this Termination Notice for a sample of those comments.

Net 4 India's unauthorized transfer of domain names to Openprovider:

As noted above and in all three Notices of Breach, Net 4 India has not provided an explanation concerning the allegations that five domain names (.deesan.com,

arhydraulicfittings.com, slkbima.com, arion.asia and capitalleague.biz) were transferred from Net 4 India to Openprovider without the authorization of the Registered Name Holders and were not in compliance with the RAA and Transfer Policy. In addition to those five unauthorized transfers, ICANN Contractual Compliance has been made aware of two additional unauthorized transfers of domain names from Net 4 India to Openprovider in the last month.

Net 4 India's increased unresponsiveness to its registrants and to ICANN:

Net 4 India has a pattern of not responding to Registered Name Holders' or ICANN's requests. As of the second week of January, Net 4 India and its court-appointed resolution professional stopped responding to compliance notices/inquiries from ICANN. ICANN Contractual Compliance continued contacting Net 4 India through the relevant cases, via email and telephone, where the process called for it, to no avail. Just in the last month, more than 600 compliance notices/inquiries and escalated notices within the more than 400 cases referenced above were sent to Net 4 India and its court-appointed resolution professional, with no response. Accordingly, following the 29 January 2021 Notice of Breach, Net 4 India has been eligible for subsequent additional breach notices as more than ninety new 3rd/Escalated and final notices involving multiple domain names remain unresolved.

Net 4 India has also failed to complete and provide the Request for Information ("RFI") requested within the framework of the audit that ICANN org recently launched in order to review how registrars are fulfilling their contractual obligations related to addressing reports of potentially abusive domains. On 1 February 2021, ICANN org requested that Net 4 India complete and provide the RFI responses by 22 February 2021. As of the date of this notice, Net 4 India has neither responded nor provided the information and records requested in the RFI.

ICANN has provided Net 4 India with multiple notices and ample time to cure its various breaches of the RAA and to address the hundreds of complaints ICANN has received from Net 4 India's Registered Name Holders. ICANN first issued notices regarding Net 4 India's breaches in 2019. Subsequently, through its letter dated 20 June 2019, ICANN modified its Notice of Suspension issued on 5 June 2019 to postpone the commencement of the suspension period. Despite this forbearance, Net 4 India has continued to violate its RAA obligations and failed to cure the breaches noted in the 10 December 2020, the 24 December 2020 and the 29 January 2021 Notices of Breach. These violations are directly harming the rights of thousands of Registered Name Holders. In order to protect the rights and interests of Net 4 India's remaining 80,000 registrants for gTLD domain names, ICANN is issuing the present Notice of Termination.

Domain Name Transition Process.

To ensure that Registered Name Holders can manage their domain name registrations with a qualified ICANN-accredited registrar, ICANN will commence the domain name transition process as explained below.



ICANN Logo License

Net 4 India is further advised that the logo license granted in the Logo License Specification to the RAA is revoked as of 13 March 2021. Please remove all ICANN trademarks, name, and logo from Net 4 India’s website and business materials that have been licensed to Net 4 India under the terms of that Specification by 13 March 2021.

Domain Name Transition Process

To protect domain name registrants, ICANN will follow the De-Accredited Registrar Transition Procedure to commence the domain name transition process and will solicit bids for a qualified ICANN-accredited registrar to manage the domain names currently managed by Net 4 India.

ICANN reserves all of its rights under the RAA. Please note the rights and obligations required to continue in effect after the expiration of the RAA, including but not limited to: Sections 3.4 Retention of Registered Name Holder and Registration Data; 3.9 Accreditation Fees; 5.8 Resolution of Disputes Under this Agreement; and 5.9 Limitations on Monetary Remedies for Violations of this Agreement.

Net 4 India has current and past due accreditation fees for the total outstanding amount of US\$4,142.64. Please immediately submit payment to ICANN Accounting. This does not include accrued fees for the period of 1 January 2021 through 14 October 2021 that become billable upon termination and once all transactions have been reported. Additionally, Net 4 India will be invoiced for the remainder of the yearly fees owed to ICANN and any variable fees corresponding to transactions reported through 13 March 2021. All these fees are required to be paid to ICANN pursuant to Section 3.9 of the RAA.

If you have questions or require assistance, please contact Leticia Castillo at, leticia.castillo@icann.org.

Sincerely,

[SIGNATURE REDACTED]

Jamie Hedlund
Senior Vice President, Contractual Compliance and Consumer Safeguards
Managing Director, Washington, DC Office

Cc: John O. Jeffrey, General Counsel and Secretary

APPENDIX A

This Appendix contains excerpts of complaints and communications submitted by Registered Name Holders, and authorized representatives, to ICANN explaining how Net 4 India's failure to provide contractually-required services is directly harming them. The following information has been redacted from the quotes below: domain names that are not included in a public Notice of Breach, reporters' contact details and payment amounts.

"i have paid [REDACTED]. It has not credited in my wallet of Net4India. I am not able to contact them in any communication mode. There are many small scale companies like me is in deep trouble. please help us in this pandemic time. I feel like suicide." (Complaint submitted on 4 September 2020)

"We are a reseller with the ICANN accredited registrar Net4India. Our CRN ID is [REDACTED].

We would like to update the whois data for all our domains as Net4 currently has outdated data on record and despite our several attempts to update the data through their website, it has failed to do so. Hence, are unable to update the whois record on the Net4 website from our end. Though the complaint/request has to update the data has been severally requested to Net4 in the past (for more that two years). The same could not be done due to the negligent/poor services (no services now) provided by Net4india.

This is only one of the many problems we are being faced with (as also by many others dealing with Net4 India) and practically no services are provided by Net4India that includes Renewal of domains, Deposition of required amounts to our wallet for all pending Renewals and almost all such requirements essential to safeguard the existing and pending Domain names as well as any attempt to update the status for the related issues.

That despite our several complaints and reminders through e-mail as well as personal contacts and through telephonic requests and messages , no one at the Net4 is either trying to help out to resolve the matter which has put us to a worst uncertainty and apprehension to loose our valuable Domain names and incur a big business loss.

In view of the facts as mentioned above we request you to take up the matter and direct the company Net4India to resolve the issue at an earliest and streamline the services those required.

We request you to please intervene immediately and take up the matter urgently so as to avoid any unwanted litigation and legal complications those might arise if the issue remains unattended." (Complaint submitted on 8 October 2020)

"Since Net4 India is now Bankrupt and Unable to reach nor responding to my query raise thru Ticket no. [REDACTED] 9/25/2020 on dated 25 Sep 2020, but no one is responding, neither their office attending my queries via email, Support System(Ticket), Helpline Number(Phone),

etc.

Since the I want to transfer my domain [REDACTED] to [REDACTED] and without Net4India Authorisation code via Control Panel I am unable to do so and since my domain is getting expires in next month by 15th of Nov 2020 and after that i loose my business related my website and this website is only my bread and butter I am approaching your office for change of domain registrar.

As they are not providing nor responding, I approaching your office for immediate and urgent action to save my website." (Complaint submitted on 9 October 2020)

"Domain Name [REDACTED] was Registered with Net4 on 24 May 2001 (attached are Screenshots of Net4 Website with (i) date of Registration and (ii) Successful Payment towards Oder [REDACTED] on 18 FEB 2010 for Renewal of 9 years, and image of Bank statement with Payment details for 13 April 2010; Reminder for Renewal dated 25 MAR 2019, Order for Renewal dated 09 May 2019 for a period of 10 years, and Receipt dated 09 May 2019). We tried to Transfer our Domain Name to a different Registrar on 9 OCT 2020

As required we tried to generate an Authorisation Code from Net4; Message Received Email sent to Registrant Email address. (Image Attached)

On Checking, Registrant Email Address is showing as [REDACTED] which does not exist anymore because the Email provider shut down. (image attached)

We tried to change it on the Net4 site and received an email with the changes listed and the notice that if we should make this change, we will be locked in for 60 days and will not be able to change Registrar until that time (Email attached).

I would like to point out that as per the RABT details on the Net4 website, the Registrant Name and Organisation are correct - we need to change the email address and telephone number.

We are extremely worried about how we will be impacted if the Net4 Website goes down. As a Not-for-Profit that has lost everything during this global pandemic, we are dependent on our website for our livelihood through donations. Please help us." (Complaint submitted on 11 October 2020)

"We are registered owner of domain name [REDACTED] from Net4 and regularly paying our renewal fees on time to time. our renewal expiry date was 07.10.2020, but we already paid on 16.09.2020 well before in time. but till Net4 site showing it as renewal in process. we are trying to contact them very hard but no avail . there is no one to look after our numerous complaints at Net4. Our business is getting suffering too much now. We have also tried to transfer the domain name but no authorised code is provided by them . Kindly help us in getting out of this problem. we shall be highly obliged." (Complaint submitted on 14 October 2020)

"In July 2020 we had renewed our domain by making payment to Net4 Network Services Limited, but few days latter we were not able to access our emails. When we tried contacting

Net4 customer care their was no response and later we came to know that the company Net4 Network Services Limited has closed down.

Our company [REDACTED]. is a reputed firm Exporting [REDACTED] from India. Due to this pandemic survival of the Business was as it is difficult and with the unethical situation by Net4 , we could not access to your emails and lost all prevailing business communications that resulted in huge cancelation of our Export Orders." (Complaint submitted on 2 November 2020)

"We have our .com domains on net4india and aren't able to transfer them to another provider. We aren't getting the authorisation code from net4india. No one is responding from net4india anywhere. Pls help us. We can't afford to lose our websites and emails, it will be a nightmare. Pls help us!" (Complaint submitted on 2 November 2020)

"Net4india has closed down due to bankruptcy and are not responding to renewal requests and calls. our domain names [REDACTED] and [EXPIRED] expired on Oct 11 2020. Even after renewal fees were paid they are not getting renewed. we wish to transfer the domain names to a new registrar. For our .in domain names NIXI has agreed to give auth codes for transfer of our domain names to a new registrar. Who will give us the auth codes for transfer of .com domain names? Kindly help urgently as our sites are down and we donot know how to transfer our domain to a new registrar...regards." (Complaint submitted on 8 November 2020)

"Sir, I run a small IT company in [REDACTED], I have been associated with Net4India for the past fifteen years. Suddenly Net4India has stopped working after that my all Domain & website are not working. I cannot even transfer domain to [REDACTED] without getting code from #net4india. Is it possible for all my domains to move net4india to [REDACTED]..ONLINE PAYMENT [REDACTED] On December 18, 2020 I also made a recharge of [REDACTED] after that i do not see the recharge amount in my account....Would you help me What to do, I am unable to understand anything with folded hands" (Complaint submitted on 7 January 2021)

"I am the Registrar in Net4.com and have the complete account details, but i have [not] been able to get the Auth Code to transfer the domain from Net4.com to [REDACTED]. All our emails will be down in 2 to 3 days time due to this" (Complaint submitted on 1 December 2020)

"The domain belongs to a leading international hospital in India. We have raised multiple helpdesk tickets with Net4India to change our email ID and to transfer our domain to another registrar, but net4india has failed to respond to our tickets and legal notices sent from our legal department. I therefore request assistance from ICANN for transferring our domain as otherwise it is likely to disrupt important communication with patients." (Complaint submitted on 17 November 2020)

"Hello ICANN Compliance team,

We are waiting for your response on the "Very Very Urgent Help Request". Please note our domain renewal date 4th January 2021 (as per Net4 website) is already crossed.

We seek your help guidance to move next step forward to transfer domain from Net4 to New Registrar. [REDACTED]

Please note we currently ONLY Concentrating on our LIVE domains which could be huge impact to business. Rest of the 11 domains we will take it later stage." (Communication submitted to ongoing complaint on 7 January 2021)

"The contact email ID registered in the Registrant, Administrative, Billing and Technical (RABT) contact details for the domain [REDACTED] is not functional and I am not able to change the contact email ID. Further the Domain and the Email services expired on 09.Dec.2020. I tried reaching out to Net4India for assistance but received no response even after multiple calls and emails." (Complaint submitted on 9 December 2020).

"Our domain name [REDACTED] hosted in Net4.com domain registrar is to expire on Dec 24, 2020. We have placed an order to renew the same on Nov 29, 2020. for duration of 3 year. Order reference number is [REDACTED].

Till date there is no change in order status or domain name is renewed. We are unable to contact Net4 domain registrar by any means - be it email, trouble ticket, phone. We are facing the situation of loosing our domain name. Ours is a charity organization operating for more than 10 years under this domain name." (Complaint submitted on 10 January 2021)

"This is concerning the registrar - NET4INDIA, based at India. www.net4.in We have our domain and emails through them and this company has become bankrupt and the services are affected. We want to shift our domain & emails to some other service provider but surprisingly Net4 has locked the domain and are also NOT providing the Auth Code to be able to transfer. Kindly help as it his affecting our business badly and are going through a lot of problem.

There is absolutely no reply from this company- neither on phone or emails." (Complaint submitted on 12 January 2021)

"MY DOAMIN NAME [REDACTED] IS NOT WORKING SINCE PAST FEW DAYS. YESTERDAY WAS THE RENEWAL DAY, I RENEWED MY DOMAIN NAME SUCESSFULLY BUT THE ITS STILL SHOWING UNDER PROCESS. I AM GETTING SO MANY PROBLEMS IN E-MAIL (INCOMING & OUTGOING SERVER), I AM NOT ABLE TO SEND OR RECEIVE EMAILS WHICH EFFECTS OUR DAY TO DAY ACTIVITIES & BUSINESS ALSO. KINDLY SOLVE THIS PROBLEM IMMEDIATELY." (Complaint submitted on 13 January 2021)

"I had my domain [REDACTED] with Net4india since 2008. Last week I had renewed the domain and the hosting package with them as per their request, this was done on December 3rd 2020. Yesterday my mail [REDACTED] stopped working. It was then that I realised the problem Net4india was in.

My problem is, that I am a small business entrepreneur and a lot of my work is on email as an Executive coach. This is the primary contact for me. I am unable to shift the domain to any other registrar so that I can get my mail working again.

I was told that you could probably help me in releasing this domain so the work can continue.

DO let me know if this is possible and what other options I have as this is a very busy week for me, and in this pandemic I can't afford to lose business.

I have access to the dashboard and have tried to add in the DNS line so that gmail can access this, not sure if that is a work around. Please let me know any tech solutions you might be having so I have access to my mail." (Complaint submitted on 28 December 2020)

"I am unable to get the domain transfer authorization code despite repeated requests and retrieval procedure followed. My website is inactive and it is not functioning, causing great anguish. Need help to get my AUTH code for domain transfer." (Complaint submitted on 31 December 2020)

"I THINK NET 4 INDIA HAS GONE BANKRUPT - THAT IS THE REASON FOR THIS PROBLEM - PLEASE HELP AS MY OFFICIAL EMAILS ON MY DOMAIN HAVE STOPPED WORKING !!!" (Complaint submitted on 28 December 2020)

"At present only few domains are visible at my panel against both CRNIDs on net4.com, rest domains are vanished, RABT details are not displaying, just for your reference, I have sent two attachment in my last email, where it was shown that all 7 domains [REDACTED] are all active till the date (i.e. 28 Jan 2021) and successfully renewed, last year but not working now and facing business loss."

"Net4.com had stopped access to my account, so am unable to renew it before expiry date. They provided fake numbers or their website which does not exist, fake emails which bounce instantly, failed chat support and creation of trouble ticketing." (Complaint submitted on 18 November 2020)

"Currently I have my business email & domain with Registrar NET4 but for last few months I am facing continues issues with incoming & outgoing of emails. I have registered many complaints in their website, I tried calling to their customer care but their numbers does not work and I have written many emails but no response. Today I visited their Chennai office and its closed, security guard says they have closed the office and many other registrant is coming to complaint about their issues. My business is getting affected everyday and I need to resolve this issue. Please help me to transfer my domain to Godaddy. Kindly do the needful." (Complaint submitted on 25 January 2021)



"We have requested for Domain transfer Authentication code for our domain [REDACTED] at Net4india.com. Till now there is no response, and we are unable to reach the net4india support due to customer care number barred and support mails also not working. As our domain is business critical and website going down always and there is no support from net4india." (Complaint submitted on 25 January 2021)

"For last few months we are continuously facing problem the our Domain Service Provider net4. There is no response from the representative of the Net4. We cannot contact them at all. For last weeks days few of our mailbox was not working & this saturday the whole webmail mail w.r.t our domain stopped working. Now mails are not coming at all. And we try to contact the customer care / representative / engineer etc of Net4, no one is responding. We are in mess as whole of mail services is down. Since we have being using the domain name [REDACTED] for long time, we have registered on almost for all our service with [REDACTED] mail ids. As we know we are not going to get any services from Net4 for now, we need to move to another service provider so our services remain intact. for that we require Authorisation Code for transfer. How do we get it? No one is reposnding. Request you to provide us the Authorisation Code for transfer of Domain" (Complaint submitted on 25 January 2021)"

"We tried to generate auth code from Registrar portal but it was unsuccessful so then sent email and there was no response to any email. We are also tried to contact contact numbers mentioned on Net4 website but unfortunately no one is receiving phones as well. We tried multiple ways to contact Net4 but every time we didn't get any response. We are stuck very badly as we even not able to make any changes in DNS records. Kindly help us to transfer domain names to another registrar by providing auth code." (Complaint submitted on 27 January 2021)

"[...] All the relevant details I have already mentioned in my earlier email/complaint. I believe the renewal for [REDACTED] was successful. I requested on 19 Jan 2021 to Net4India to generate AuthInfo Code to transfer my domains. On the same day I received an email from Net4India to confirm my request for transfer. I immediately confirmed my request for transfer. But till date I have not received any Authinfo code on my registered email [REDACTED]. I am also attaching herewith all the aforesaid communication/transaction.

If you have any further query please write to me. The last email reminder from net4India was on 29 Oct 2019 and after that as yearly practice, I had renewed my these domains on 26 Nov 2019 which was expired on 28 Dec 2020 I also confirm that I did not receive any communication from Net4India in the year 2020 with regard to my renewal neither a month nor a week before and not 5 days after.

I am an Practicing advocate in Supreme Court of India due to unprofessional conduct of Net4India my work has suffered a lot, You are requested to Please do the needful on urgent basis and apprise me the progress you have made regarding my case." (Communication submitted to ongoing complaint on 6 February 2021)

"Since the last year, I have been trying to transfer my domains to another registrar due to the current registrar not at all responding to the emails, chats and phone as well. I have been facing issues with the renewal and domain name process as well. Checked with the registrar's current status, As I came to know net4india is about to shut down and stopped all communications and functional process as well. This is really a threat to my domains. In this regard, I request you to please intervene and provide the solution to move my domains to the other registrar before the domains

expiry. One domain is going to expire by March 2021, so kindly do needful" (Complaint submitted on 28 January 2021)

"My client is holding a domain in the name of [REDACTED] with Net4 India Limited. we have been contacting Icann & nixi India for the past 2 months, still we don't receive any authorize code. The Domain is a religious site and there is huge issues from Ministry of Vatican & Archdiocese of Madras and Mylapore. Pls arrange us authorize code asap, and help us" (Complaint submitted on 28 January 2021)

"I had registered these domains from net4 india and without any prior notice net4 india stopped responding to all means of communication i.e. email, phone. Also their payment gateway is shut from long time resulting in my domains in redemption period from long time. Please help as [REDACTED] is educational domain." (Complaint submitted on 9 February 2021)

"Net4 india is not responding to any means of communication my two domains already expired and i am unable to retrieve its auth code as they are not renewing and responding to any means of communication. Please help. This domain is about to expire on 22 feb before that i need to transfer it otherwise i will become bankrupt." (Complaint submitted on 9 February 2021)

"The Reseller in India Net4india.com has Suddenly seized/stopped all operations in India. The domains were on our name and they were supposed to renew on its own, however net4india.com has not done so. They are completely vanished, their offices have also shut down and they are not responding to calls or emails." (complaint submitted on 12 February 2021)

"While retrieving the authorisation code, the control panel says that it is in process and I will receive the code via email which never happened. I am scared to loose my websites parked on Net4 India. All my website are in trouble now. I've been calling them, emailing them but there's no response and the complaint done on control panel is also not reflecting anymore. Please help as all my websites are active and it's a situation that I realised late! Hope you'll understand and provide me a necessary action to be get my domain back. Thanks in advance." (Complaint submitted on 17 February 2021)

"We tried to generate AUTH code from Registrar portal but it was unsuccessful so then sent email and there was no response to any email. We are also tried to contact contact numbers mentioned on Net4 website but unfortunately no one is receiving phones as well. We tried multiple ways to contact Net4 but every time we didn't get any response. We are stuck very badly as we even not able to make any changes in DNS records. Kindly help us to transfer domain names to another registrar by providing AUTH code." (Complaint submitted on 19 February 2021)

"We paid domain renewal payment for said domain for 10 years on 11th Feb 2020 (Order renewal reference: [REDACTED]) to registrar via their website. They accepted the payment, but our domain name was not renewed and it expired on 13th July 2020. The status of the order is showing "In progress" from the date we renewed till today.

The registrar is not responding, via support call phone numbers or via their Help desk system. The domain name [REDACTED] is our primary business website and is critical for my business. We tried for about till date we are writing this complain. we are checking net4 no gst number but not working Please help us to resolve the issue as my business depends on it." (Complaint submitted on 19 February 2021)

"I paid the renewal fee on 2nd January 2021. the status on the registrar website says Renewal Request in Progress but the registration has expired and my domain name does not resolve over Internet so both email and websites have stopped working." (Complaint submitted on 23 February 2021)

APPENDIX B

This Appendix contains the links to ICANN's blogs referenced on page 6 of the Termination Notice and a sample of the comments made by Registered Name Holders, and authorized representatives, to express concerns regarding Net 4 India's inability or unwillingness to communicate with them or allow them to manage their domain name registrations. The following information has been redacted from the quotes below: domain names that are not included in a public Notice of Breach, reporters' contact details and payment amounts.

Blog: [ICANN Support for Registrants and Those Impacted by Net 4 India Limited](#)

Blog: [ICANN Issues Breach Notice to Net 4 India Limited; Continues Support for Registrants](#)

"I am having 10 domains in Net 4 India. Not response over mail, phone & ticket, Now I am getting problem to transfer to service provider. Need help." (Posted on 4 December 2020)

"I am struggling to contact Net 4 India on phone and mails. No response from them and +91-11-45980000 is not working. As per internet search, Net 4 India Limited shutdown the offices across India without informing customers and partners which is void of ICANN code of conduct. They are not allowing to renew the domains and not even providing domain Auth-Code so as to prevent domain transfer. ICANN Please help us to list Net 4 India Limited on Bulk Transfer Page." (Posted on 5 December 2020)

"Please help me to transfer more than 40 domains from Net 4 India limited as early as possible as my domains are getting expired. Please list Net 4 India Limited on Bulk Transfer page. ICANN Please do the needful." (Posted on 5 December 2020)

"I Have more than 150 Domains Under Net4 India some of them are under redemption and some are expired & some are in near expiry. Please ICANN help me to transfer all my domains from Net 4 India limited as early as possible as my domains are getting expired. Please list Net 4 India Limited on Bulk Transfer page. ICANN Please do the needful." (Posted on 8 December 2020)

"Looks like ICANN continues monitoring Net 4 India Limited till we all will be finished, our all domains get expire. Mr. Jamie Hedlund please wake up and do not let us die. We are suffering

every day and day by day situation will be worsen for Net 4 India customers/users. Please take concrete action and do not let ICANN becomes I CANNOT...." (Posted 9 December 2020)

"I am [REDACTED] we having 2 accounts -in Net4-india with 8 + 3 Domain , as Net4 team not responding .. we not able to renewed our some of Domain and -in that 2 Domain also got expired. now there is total 6 + 3 = 9 Domain is there ; I logged in to there console for Auth CODE request but that also not happening from many weeks .. we tried .. Need your help in this to get Auth Code of all our Domain -in Net4 so we can transfer it to other DNS provider below is the list we have 2 accounts with you [REDACTED] please help us to get Ath-CODE for all our above DOMAIN asap..." (Posted on 12 January 2021)

"We tried contact Net4India but there is no response on phone/email. Please help us...All my domains are down." (Posted on 28 December 2020)

"Tired of contacting Net4. No response anyway. Various tickets opened, emails send which bounced back, no contacts. Renewed my two domains in Sept'20 for 5yrs, payment done but order status yet not updated. Getting afraid whether my domain if not renewed, our company's all emails and hosting services will get stop which will lead to huge business loss. Please help how can I transfer my 3 domain from Net4 to other service provider as not getting any help from net4 in any matter. Thanking you" (Posted on 30 December 2020)

"Hi. I have 15 domains registered on Net4. I am trying to get my contact details updated on Net4 Website. I also tried to generate authorization code but there is no response from Net4. I tried visiting their office, which is closed now. The call center/backend number +91-11-45980000 is also not working. I also wrote to corporatesupport at net4 dot in on 27th October 2020 and there is no response from them till date. Please help as I need the domains to get transferred to another vendor as soon as possible. I tried to update the name server for one domain. The same does not get updated. I had to take a separate domain on another vendor to host my website. When I renewed my website or purchase a new one, I am not even able to get the GST invoice. Neither the same gets updated on the GST Site against my GST number which is already updated on my Net4 login. I feel so trapped with net4 as I need the domain for my work." (Posted on 30 December 2020)

"Hi. I have 13 domains and two hostings registered on Net4. I paid online for renewal 3 of my domains but they have NOT been renewed and the same are now past the due date. I also tried to generate authorization codes on their site to move my domains to other providers but the same has been repeatedly unsuccessful. Emails and Phones are not being responded to and their help desk does not work. I believe that their office in Delhi too is shut. The call center/backend number +91-11-45980000 is also not working. Some of these domains have been with me for almost two decades and I am concerned that some squatters may capture them due to this criminal negligence by Net4. Please help me transfer all 13 of my domains to another vendor as soon as possible so that I can maintain continuity of my web sites and retain



my domains. Please treat this as urgent. I have already submitted a complaint on your website and await your response. This complaint is to re-enforce my submission and also let the world know of the activities being carried out by Net4 India, leading to disruptions in my online activities." (Posted on 13 January 2021)

"We are health care service provider based out of Chennai. Our hospital is GBR Fertility Centre And Hospitals and our website [REDACTED] is down. Our domain is registered with Net4India and it was due for renewal on 19 Jan 2020 but then we have renewed the same well in advance for another 3 years. But then since yesterday the web site is down and also none of the incoming mails from other domain mail id's are getting delivered. In the Net4India portal it says "Domain Renewal Request in Progress". All our patients are facing major challenges to sharing their medical reports. Apart from this we have 6 more domains registered with them. Our CRN ID is CRN ID [REDACTED]. Since yesterday we have been trying to reach Net4India and there is no response. Being a healthcare service provider this is very critical to us and we not knowing what to do as we are caught unaware of all the things happening with Net4India. We are also trying to move the domain to another vendor and even for that we need need to get an authorization code from them and when they are not responding we are not knowing what to do? Is there any resolution for the same." (Posted on 21 January 2021)

"Dear Sir/Madam,, complaint is 01000086 I have given a request on January 12 ,2021 to get the Authorization Code for transferring my domain from Net4india to another service provider, as because Net4india is closed and also no response from them. My professional email is also not working now. Please help do the needful. So may I know the process of my request, This is my third email please do the needful as soon as possible. Looking forward to hear you back." (Posted on 25 January 2021)

"We have few domains in net4india. Frequently, we had tried to contact with their technical person through the number i.e. 011-45980000. But msg received "Incoming facility on this number has been barred". Also, we had visited to their office at "303A, 3rd Floor Plot No.-3. Pocket H Market, Sarita Vihar, South Delhi". But their office does not exist there. Even, I have talked to other Registrar to transfer the existing domain from Net4india. But then need Auth code which we are unable to get it from Net4india. Please suggest how we can resolve this issue." (Posted on 25 January 2021)

"Pls support to provide [REDACTED] authorization code via registrant email ID. Pls note we are neither able to change registrant email not able to receive authorization code. All our business emails are down.please help on this Ph no.[REDACTED]. ICANN please help me to unlock domains ASAP". (Posted on 23 January 2021)

"We have a few domains with Net4india.com, also we have an email account with Net4, from the last 3 weeks my email account which is under Net4 panel all are not working, so we decided to transfer the domain, As per rule we expect the auth code within 5-7 days, but now almost 12 days but still no reply from net4india. we are unable to contact the Net4 team, they are not responding to email. please give the authorization code to transfer the domain, so we can create an emails, start working. Please do needful." (Posted on 27 January 2021)



"Hi we more than 10 domain with net4india , unable to get epp code to transfer to new provider. our emails or down because we cant able to renew it or transfer." (Posted on 27 January 2021)

"Hi Facing Same issue with net 4 Please refund my payment because Net 4 India closed services & office not traceable office helpline phone not working 01145980000 and my wallet till not working. " (Posted on 1 February 2021)

"Dear Concern, We are not able to Transfer our domain from Net4.com We have also filled complaint form in this regard. Kindly help to resolve this issue. my 3 domain transfer 1) [REDACTED] 2) [REDACTED] 3) [REDACTED] Regard Pardeep Kumar 0171-2600801" (Posted on 5 February 2021)

"As a reseller of Net4 from over 10 years, I have 80+ domains for which I am totally stuckup as getting no response or contact from Net4 and now not even details of the domains being shown in the panel. Need to get authorisation codes for transfer. ICANN Case No. is 01005439 but not getting any update on that. My contact is [REDACTED], If somebody can help, please do contact. Thanks" (Posted on 4 February 2021)

"In NET4.in MY CRN ID [REDACTED], I failed to contact NET4. All the trouble ticket in was deleted by NET4. There mailbox is full. I failed to renew my domain and I already lost my domain [REDACTED] which was my domain for more than 10 years. It was my huge loss. My another 4 domains are there. [REDACTED] and [REDACTED] are not working. Can any body guide me. I have not filed any case. how to file case. I am from West Bengal, India." (Posted on 22 February 2021)

APPENDIX C

This Appendix provides a summary of the ICANN invoices issued to Net 4 India during the time period of April 2019 to present. For those invoices that Net 4 India finally provided payment, such payment was overdue by 28 - 412 days. The remaining invoices (dated 31 October 2020 and 15 January 2021) remain overdue and/or unpaid. Net 4 India owes ICANN US\$1,163.18 in past due fees and US\$2,979.46 in current fees.

[REDACTED]



[REDACTED]

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CHRONOLOGIES OF COMPLIANCE NOTICES IN THE 10 DECEMBER 2020 AND 24 DECEMBER 2020 BREACH NOTICES THAT REMAIN UNCURED (CASES)

In the 1st, 2nd, 3rd and follow-up compliance inquiries and notices detailed in the corresponding chronologies below, ICANN notified Net 4 India of the violations associated with the case, including the affected domain names and the relevant ICANN policies and agreements. Each communication requested the evidence, information and actions needed from Net 4 India to become compliant. All notices subsequent to each 1st inquiry or 1st notice constituted an additional attempt by ICANN to obtain evidence of compliance from Net 4 India. All telephone call details below described further attempts from ICANN to communicate to Net 4 India the urgency of the cases and to make an ICANN Contractual Compliance staff member available to address any questions in order to assist Net 4 India in becoming compliant and assist the relevant Registered Name Holders. All these attempts were unsuccessful.

Chronology (Case # 00983396):

Date of Notice	Deadline for Response	Details
27-Oct-2020	3-Nov-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
1-Nov-2020	N/A	Email received from Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
1-Nov-2020	3-Nov-2020	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from Registrar.
4-Nov-2020	11-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.



Date of Notice	Deadline for Response	Details
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021		To date, Net 4 India has not cured the violations in the Notice of Breach.

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Chronology (Case # 00986617):

Date of Notice	Deadline for Response	Details
14-Nov-2020	17-Nov-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
19-Nov-2020	26-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED]
27-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
2-Dec-2020	8-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and left voicemail with complaint details. ICANN called Compliance Contact at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
8-Dec-2020	8-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] and jasjit.s@net4.com. No response received from Registrar.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]

Date of Notice	Deadline for Response	Details
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00986008):

Date of Notice	Deadline for Response	Details
11-Nov-2020	17-Nov-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.

Date of Notice	Deadline for Response	Details
23-Nov-2020	30-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
27-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
2-Dec-2020	8-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and left voicemail with complaint details. ICANN called Compliance Contact at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.

Date of Notice	Deadline for Response	Details
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00979893):

Date of Notice	Deadline for Response	Details
9-Oct-2020	16-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
20-Oct-2020	27-Oct-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
14-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.

Date of Notice	Deadline for Response	Details
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00977571):

Date of Notice	Deadline for Response	Details
28-Sep-2020	5-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.

Date of Notice	Deadline for Response	Details
15-Oct-2020	22-Oct-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and a [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
30-Nov-2020	7-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Compliance Contact at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.

Date of Notice	Deadline for Response	Details
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00971966):

Date of Notice	Deadline for Response	Details
31-Aug-2020	7-Sep-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
2-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAILS REDACTED]
3-Sep-2020	N/A	ICANN re-sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
3-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
17-Sep-2020	24-Sep-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Sep-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.



Date of Notice	Deadline for Response	Details
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.



Date of Notice	Deadline for Response	Details
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00972641):

Date of Notice	Deadline for Response	Details
3-Sep-2020	10-Sep-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
4-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Sep-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Sep-2020	1-Oct-2020	ICANN sent 2 nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
20-Oct-2020	27-Oct-2020	ICANN sent a follow-up compliance notice to via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

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Date of Notice	Deadline for Response	Details
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00976977):



Date of Notice	Deadline for Response	Details
25-Sep-2020	2-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
30-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
5-Oct-2020	12-Oct-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Oct-2020	26-Oct-2020	ICANN sent 2 nd compliance notice to via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]

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Date of Notice	Deadline for Response	Details
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00978716):

Date of Notice	Deadline for Response	Details
5-Oct-2020	12-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
19-Oct-2020	26-Oct-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED]
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.



Date of Notice	Deadline for Response	Details
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.

Date of Notice	Deadline for Response	Details
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00975973):

Date of Notice	Deadline for Response	Details
21-Sep-2020	28-Sep-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
22-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
5-Oct-2020	12-Oct-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
26-Oct-2020	2-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.

Date of Notice	Deadline for Response	Details
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] and
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] and
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00976043):

Date of Notice	Deadline for Response	Details
21-Sep-2020	28-Sep-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
22-Sep-2020	N/A	Email received from Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
6-Oct-2020	13-Oct-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
26-Oct-2020	2-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] and

Date of Notice	Deadline for Response	Details
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] and
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00977573):

Date of Notice	Deadline for Response	Details
28-Sep-2020	5-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from the Registrar.

Date of Notice	Deadline for Response	Details
6-Oct-2020	13-Oct-2020	ICANN sent 2 nd compliance notice via email to [EMAILS REDACTED] No response received from the Registrar.
12-Oct-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
14-Oct-2020	N/A	Email indicating the compliance case had been closed was mistakenly sent to [EMAIL REDACTED]
29-Oct-2020	5-Nov-2020	ICANN sent follow-up compliance notice to [EMAIL REDACTED] explaining the error and requesting a full response to the compliance case.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] and No response received from the Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] and
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] and
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]

Date of Notice	Deadline for Response	Details
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Ticket # MDZ-368-16882):

Date of Notice	Deadline for Response	Details
25-Aug-2020	1-Sep-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]. No response received from Registrar. No response received from the Registrar.
2-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAILS REDACTED]. No response received from the Registrar.
4-Sep-2020	4-Sep-2020	ICANN re-sent 1st compliance notice via email to [EMAILS REDACTED]. No response received from the Registrar.
4-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.

Date of Notice	Deadline for Response	Details
18-Sep-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
21-Sep-2020	28-Sep-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from the Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from the Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
27-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] and
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] and
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]

Date of Notice	Deadline for Response	Details
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Ticket # NMC-663-14600):

Date of Notice	Deadline for Response	Details
19-Aug-2020	26-Aug-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]. No response received from Registrar.
28-Aug-2020	4-Sep-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED]. No response received from Registrar.
2-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAILS REDACTED]
4-Sep-2020	4-Sep-2020	ICANN re-sent 2nd compliance notice via email to [EMAILS REDACTED]
4-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.

Date of Notice	Deadline for Response	Details
18-Sep-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
22-Sep-2020	N/A	ICANN re-sent 2nd compliance notice via email to [EMAILS REDACTED] with immediate response requested. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from the Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.

Date of Notice	Deadline for Response	Details
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00984013):

Date of Notice	Deadline for Response	Details
30-Oct-2020	6-Nov-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED] No response received from Registrar.
13-Nov-2020	20-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.

Date of Notice	Deadline for Response	Details
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
24-Dec-2020	14-Jan-2021	ICANN issued Notice of Breach to Registrar.
24-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
28-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00980845):

Date of Notice	Deadline for Response	Details
14-Oct-2020	21-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]

Date of Notice	Deadline for Response	Details
21-Oct-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
19-Nov-2020	26-Nov-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
4-Dec-2020	11-Dec-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
24-Dec-2020	14-Jan-2021	ICANN issued Notice of Breach to Registrar.
24-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
28-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.

Date of Notice	Deadline for Response	Details
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00977040):

Date of Notice	Deadline for Response	Details
25-Sep-2020	2-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
29-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
21-Oct-2020	28-Oct-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] No response received from Registrar
10-Nov-2020	17-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and left voicemail. ICANN called Compliance Contact at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.

Date of Notice	Deadline for Response	Details
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
24-Dec-2020	14-Jan-2021	ICANN issued Notice of Breach to Registrar.
24-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
28-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00976900):

Date of Notice	Deadline for Response	Details
24-Sep-2020	1-Oct-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
10-Nov-2020	17-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.

Date of Notice	Deadline for Response	Details
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
10-Dec-2020	17-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact Compliance and Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
24-Dec-2020	14-Jan-2021	ICANN issued Notice of Breach to Registrar.
24-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
28-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.

Date of Notice	Deadline for Response	Details
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00976469):

Date of Notice	Deadline for Response	Details
22-Sep-2020	29-Sep-2020	ICANN sent 1st compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
1-Oct-2020	8-Oct-2020	ICANN sent 2nd compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
13-Oct-2020	20-Oct-2020	ICANN re-sent 1st compliance inquiry via email to [EMAILS REDACTED]
20-Oct-2020	N/A	Email from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
3-Nov-2020	10-Nov-2020	ICANN sent follow-up compliance inquiry via email to [EMAILS REDACTED]. No response received from Registrar.
16-Nov-2020	23-Nov-2020	ICANN sent follow-up compliance inquiry via email to [EMAILS REDACTED]
16-Nov-2020	23-Nov-2020	ICANN re-sent follow-up compliance inquiry via email to [EMAILS REDACTED]. No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.

24-Nov-2020	1-Dec-2020	ICANN sent 3rd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
8-Dec-2020	15-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
21-Dec-2020	6-Jan-2021	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
13-Jan-2021	20-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.

29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00977574):

Date of Notice	Deadline for Response	Details
28-Sep-2020	5-Oct-2020	ICANN sent 1st compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
15-Oct-2020	22-Oct-2020	ICANN sent 2nd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Primary and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide Registrar with the complaint details or to leave a voicemail.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
20-Nov-2020	26-Nov-2020	ICANN sent 3rd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.

3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
4-Dec-2020	11-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to [EMAILS REDACTED] No response received from Registrar.
14-Dec-2020	21-Dec-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
8-Jan-2021	15-Jan-2021	ICANN sent a 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary

		Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00982277):

Date of Notice	Deadline for Response	Details
21-Oct-2020	28-Oct-2020	ICANN sent 1st compliance inquiry via email to [EMAILS REDACTED]
8-Nov-2020	N/A	Email from Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
24-Nov-2020	1-Dec-2020	ICANN sent 2nd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail.
4-Dec-2020	11-Dec-2020	ICANN sent 3rd compliance inquiry via email to [EMAILS REDACTED]
6-Dec-2020	N/A	Email from Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
8-Dec-2020	11-Dec-2020	ICANN sent follow-up compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to

		[EMAILS REDACTED] No response received from Registrar.
8-Jan-2021	15-Jan-2021	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
21-Jan-2021	28-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00982175):

Date of Notice	Deadline for Response	Details
21-Oct-2020	28-Oct-2020	ICANN sent 1st compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.

2-Nov-2020	9-Nov-2020	ICANN sent 2nd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Primary and Compliance Contact at +91 [TELEPHONE REDACTED] No answer and no ability to leave a voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No ability to provide Registrar with the complaint details or to leave a voicemail.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail.
20-Nov-2020	26-Nov-2020	ICANN sent 3rd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail.
4-Dec-2020	11-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to [EMAILS REDACTED] No response received from Registrar.
14-Dec-2020	21-Dec-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.

8-Jan-2021	15-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00984400):

Date of Notice	Deadline for Response	Details
2-Nov-2020	9-Nov-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
13-Nov-2020	20-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at

		[TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
22-Jan-2021	28-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00986557):

Date of Notice	Deadline for Response	Details
13-Nov-2020	20-Nov-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
23-Nov-2020	30-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED]

		No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
10-Dec-2020	17-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00987371):

Date of Notice	Deadline for Response	Details
18-Nov-2020	25-Nov-2020	ICANN sent 1st compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.



30-Nov-2020	7-Dec-2020	ICANN sent 2nd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
8-Dec-2020	15-Dec-2020	ICANN sent 3rd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to [EMAILS REDACTED] No response received from Registrar.
5-Jan-2021	12-Jan-2021	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
13-Jan-2021	20-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at

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		[TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00988897):

Date of Notice	Deadline for Response	Details
26-Nov-2020	3-Dec-2020	ICANN sent 1st compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
4-Dec-2020	11-Dec-2020	ICANN sent 2nd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
4-Jan-2021	11-Jan-2021	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to [EMAILS REDACTED] No response received from Registrar.

12-Jan-2021	19-Jan-2021	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED]. No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
20-Jan-2021	27-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED]. No response received from Registrar.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
28-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and provided Primary Contact with complaint details.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00992182):

Date of Notice	Deadline for Response	Details
9-Dec-2020	16-Dec-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]. No response received from Registrar.
18-Dec-2020	5-Jan-2021	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED]

		No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Jan-2021	15-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00993354):

Date of Notice	Deadline for Response	Details
15-Dec-2020	22-Dec-2020	ICANN sent 1st compliance notice via email [EMAILS REDACTED] No response received from Registrar.

Date of Notice	Deadline for Response	Details
4-Jan-2021	11-Jan-2021	ICANN sent 2nd compliance notice via email [EMAILS REDACTED] No response received from Registrar.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details and no ability to leave a voicemail.
12-Jan-2021	19-Jan-2021	ICANN sent 3rd compliance notice via email [EMAILS REDACTED] No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details and no ability to leave a voicemail.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
28-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and provided Primary Contact with complaint details.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00977648):

Date of Notice	Deadline for Response	Details
29-Sep-2020	6-Oct-2020	ICANN sent 1st compliance notice via email [EMAILS REDACTED] No response received from Registrar.
7-Oct-2020	14-Oct-2020	ICANN sent 2nd compliance notice via email [EMAILS REDACTED]
7-Oct-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
8-Oct-2020	15-Oct-2020	ICANN sent follow-up compliance notice via email [EMAILS REDACTED]
13-Oct-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
19-Oct-2020	26-Oct-2020	ICANN sent follow-up compliance notice via email [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
25-Nov-2020	2-Dec-2020	ICANN sent follow-up compliance notice via email [EMAILS REDACTED] No response received from Registrar.

Date of Notice	Deadline for Response	Details
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and left voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email [EMAILS REDACTED] No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00987386):

Date of Notice	Deadline for Response	Details
18-Nov-2020	25-Nov-2020	ICANN sent 1st compliance notice via email [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	10-Dec-2020	ICANN sent 2nd compliance notice via email [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
14-Dec-2020	21-Dec-2020	ICANN sent 3rd compliance notice via email [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
19-Jan-2021	26-Jan-2021	ICANN sent follow-up compliance notice via email [EMAILS REDACTED] No response received from Registrar.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.

29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

BY ELECTRONIC MAIL

27 February 2021

To:
Mr. Vikram Bajaj
Resolution Professional, Net 4 India Limited (IANA #1007)
308, Pearls Business Park
Netaji Subhash Place, Pitampura
Delhi, 110034
India
Email: Contact Information Redacted

Sub: Termination of Registrar Accreditation Agreement with Net 4 India

Dear Sir,

We write on behalf of our client, the Internet Corporation for Assigned Names and Numbers (ICANN).

We write further to ICANN's notice dated 26 February 2021, by which the 2013 Registrar Accreditation Agreement entered into between Net 4 India (**Net 4**) and ICANN dated 14 October 2019 (**RAA**) was terminated (**Notice of Termination**). The contents of the Notice of Termination are self-explanatory. Although you should have received the Notice of Termination, a copy is annexed to this letter as **Annexure**.

You will appreciate that over the last several months, ICANN has been making its best efforts to co-operate with you and Net 4. ICANN has given Net 4 multiple opportunities over many months to cure the numerous breaches of the RAA. Despite ICANN's extended efforts to work with you and Net 4 to help ensure the breaches are cured, Net 4's breaches of the RAA remain uncured and in fact, ICANN continues to receive scores of new complaints daily about Net 4. ICANN's efforts in this regard are briefly set out:

1. **Multiple Breach Notices:** To date, ICANN has issued three breach notices to Net 4 (notices dated 10 December 2020, 24 December 2020 and 29 January 2021) requiring Net 4 to cure its breaches. Each time, ICANN has reiterated its rights to terminate if the breaches are not cured. Separate from the formal breach notices, ICANN has reached out to you and Net 4 hundreds of times over email and via telephone to remind Net 4 of its obligations to remedy the breaches, but to no avail. Indeed, since mid-January, ICANN has received no response at all from either you or Net 4 regarding resolution of these breaches.
2. **Without prejudice appearance before NCLT:** Despite not being bound to appear before Indian courts and tribunals, ICANN appeared before the National Company Law Tribunal, New Delhi (NCLT) in proceedings initiated by you *inter alia* seeking directions against ICANN to refrain from terminating the RAA (**Application**). ICANN appeared without prejudice to its objection as to the lack of jurisdiction of Indian courts

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and tribunals over it, only with a view to cooperate with all relevant parties and resolve the issues and harm suffered by hundreds, if not thousands, of registrants of domain names under Net 4's control (referred to as Registered Name Holders).

3. **Co-operation with Net 4 India as requested by NCLT:** As you are aware, the NCLT was pleased to dispose of the Application by its order dated 25 January 2021 (**Order**). In disposing of the Application, the NCLT did not grant the relief as sought by you, i.e., it did not direct ICANN not to terminate the RAA. Instead, the NCLT merely requested ICANN to refrain from terminating the RAA for three months from the date of the Order. The NCLT also observed that ICANN may act cautiously and ensure that the customer base of Net 4 is not slipped into the hands of gaining registrars "*so long as dues are paid on time and services are provided on time to the Registered Name Holders*". Alongside these requests, the NCLT issued directions that an SOP be set up, approved by the Committee of Creditors (to be taken by you), and placed before the NCLT within 15 days, and that you report on Net 4's compliance to the NCLT on a fortnightly basis.
4. **Co-operation subsequent to the Order of the NCLT:** Out of respect to the spirit of the Order and without prejudice to its rights, ICANN refrained from terminating the RAA for over a month. ICANN tried to reach out to you and Net 4, imploring resolution of the outstanding breaches so that there would be no need to terminate the RAA. But, as set forth above, neither you nor Net 4 responded. ICANN also notes that the SOP was to be placed before the NCLT on or before 9 February 2021. As far as ICANN is aware, to date: (i) no SOP has been formulated or approved by the Committee of Creditors; (ii) no SOP has been placed before the NCLT; and (iii) there is no compliance reported to the NCLT. Despite ICANN's extensive efforts to reach out to you and Net 4 regarding the various outstanding breaches and ongoing harm to registrants, there has been no substantive response or cooperation from you or Net 4. On the contrary, ICANN continues to receive new complaints on a daily basis. Net 4 thus continues to be in breach of the RAA despite the lapse of one month from the date of the Order.

As elaborated in the Notice of Termination, ICANN continues to receive hundreds of fresh complaints from Registered Name Holders who are unable to renew their domain names or transfer to another registrar. Indeed, ICANN Global Support has fielded more than 1,400 communications in just the *last two months* from Net 4 customers raising concerns about their registrations (as compared to approximately 1,250 such communications for the entire year of 2020). And, of the more than 2,600 complaints received by ICANN Contractual Compliance since 1 January 2020, approximately 1,000 were received in just the last month.

The cooperation extended by ICANN was entirely without prejudice to its rights and solely to assist you and Net 4 to tide over the difficulties faced on account of ongoing insolvency proceedings, "*so long as dues are paid on time and services are provided on time to the Registered Name Holders*". That said, Net 4 has failed in its cooperation: no SOP has been submitted; no compliance has been reported to the NCLT; Net 4 has failed to pay its dues to ICANN (currently past due in the amount of US\$1,163.18); Net 4 has failed to cure the breaches noted in the three Notices of Breach; and Net 4 has failed to provide timely services to its Registered Name Holders. As you will appreciate, ICANN has responsibilities to Registered Name Holders. Net 4's breaches of the RAA have caused grave damage and losses to hundreds, if not thousands, of Registered

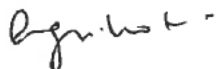
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Name Holders (including small businesses, educational institutions and non-profit organisations). ICANN cannot be expected to stand idle (and the NCLT did not issue such directions to ICANN) while such damages and losses continue to grow daily. Therefore, ICANN had no option but to take action as available to it under the contract and terminate the RAA. You will appreciate that ICANN has acted in utmost good faith throughout this process and that the termination has been taken as a last resort measure, and in the interest of members of the public when no resolution seemed forthcoming.

This letter has been issued as a matter of courtesy and without prejudice to any right or remedy available to ICANN under law, contract or equity.

Yours faithfully,



Anuradha Agnihotri
Partner


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26 February 2021

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

RE: NOTICE OF TERMINATION OF REGISTRAR ACCREDITATION AGREEMENT

Vikram Bajaj
[REDACTED]

Email:
[REDACTED]

Dear Vikram Bajaj:

Please be advised that as of 26 February 2021, Net 4 India Limited's ("Net 4 India") 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 14 October 2019 ("RAA") is terminated pursuant to Section 5.5.4 and Section 5.5.6 of the RAA. The termination shall become effective 13 March 2021, 15 calendar days from the date of this Termination Notice pursuant to the terms of the RAA.

The termination of the RAA is due to Net 4 India's repeated and consistent breaches of the RAA and failure to cure such breaches despite multiple notices from ICANN and opportunity to cure. In particular, Net 4 India: (1) failed to cure the breaches set forth in ICANN's 10 December 2020 Notice of Breach by the 31 December 2020 deadline; (2) failed to cure the breaches set forth in ICANN's 24 December 2020 Notice of Breach by the 14 January 2021 deadline; and (3) failed to cure the breaches set forth in ICANN's 29 January 2021 Notice of Breach by the 19 February 2021 deadline.

Termination Pursuant to Section 5.5.4 – Failure to cure breaches within 21 days of Notices of Breach:

As of 26 February 2021, the following breaches, all of which were identified in the 10 December 2020, 24 December 2020, and the 29 January 2021 Notices of Breach, remain uncured:

1. **Net 4 India's failure to provide an interactive webpage and a port 43 Whois service**, also known as Registration Data Directory Service ("RDDS"), providing free public query-based access to up-to-date data concerning all active registered names sponsored by Net 4 India in any generic top-level domain ("TLD"), as required by Section 3.3.1 of the RAA. These services have been inoperative for more than four months.

On 27 October 2020, 1 November 2020, 4 November 2020 and 13 November 2020, ICANN sent notices to Net 4 India with specific examples illustrating its failure to provide these services and requested that Net 4 India resolve such breaches. On 1 November 2020, Net 4 India informed ICANN that the issue would be resolved by 2 November 2020. Net 4 India failed to resolve this issue and, as a result, the failure was incorporated into the 10 December 2020 Notice of Breach and remains uncured.

By failing to provide these services, Net 4 India deprives Registered Name Holders (also known as "Registrants") and Internet users, including law enforcement, intellectual property owners and cybersecurity researchers, access to critical information regarding the domain names under Net 4 India's management.

Additionally, Net 4 India's failure to operate RDDS has negatively impacted the processing of hundreds of individual complaints received by ICANN from Registered Name Holders and authorized representatives. In order to determine whether Net 4 India has honored requests by Registered Name Holders to renew their domain name registrations, ICANN (and Registered Name Holders) need access to Net 4 India's RDDS to view the "Registrar Registration Expiration Date"; however, Net 4 India's RDDS is not available and has not been available for more than four months. ICANN has reminded Net 4 India of its failure to provide RDDS on several occasions, including on (but not limited to) the following dates:

- 3 November 2020 (Case #00976469 and #00976449)
- 5 November 2020 (Case #00979679)
- 9 November 2020 (Case #00980225 and #00982457)
- 10 November 2020 (Case #00977130)
- 11 November 2020 (Case #00983275)
- 17 November 2020 (Case #00987151)
- 23 November 2020 (Case #00986557)
- 30 November 2020 (Case #00989686)
- 9 December 2020 (Case #00991921)
- 10 December 2020 (Case #00992460)
- 11 December 2020 (Case #00992547)
- 15 December 2020 (Case #00993555)
- 16 December 2020 (Case #00993823)
- 17 December 2020 (Case #00994118)
- 21 December 2020 (Case #00994820 and #00994941)
- 4 January 2021 (Case #00994090)

- 7 January 2021 (Case #00989686 and #0986009)
- 8 January 2021 (Case #00977574 and #00980341)
- 13 January 2021 (Case #00998065)
- 19 January 2021 (Case #01002512)
- 20 January 2021 (Case #01003218)
- 21 January 2021 (Case #01003622)
- 25 January 2021 (Case #01004653)
- 26 January 2021 (Case #01004755)
- 27 January 2021 (Case #01005276)
- 8 February 2021 (Case #01009115)
- 10 February 2021 (Case #01009789)
- 16 February 2021 (Case #01011139)
- 19 February 2021 (Case # 01011139)
- 23 February 2021 (Case # 01012935 and 01012948)

In the above cases, ICANN informed Net 4 India that due to its failure to provide RDDS, ICANN was unable to confirm whether the affected domain name registrations had been explicitly extended, as requested by the relevant Registrants at Expiration who resorted to ICANN's intervention so as not to lose their domain name registrations. Despite these communications, Net 4 India did not resolve the breaches, and Registrants at Expiration continue to be in the dark about their registrations.

2. Net 4 India's failure to make registration data and records available upon request by ICANN as required by Section 3.4.3 of the RAA.

For a Registered Name Holder to be able to initiate a transfer request of a gTLD domain name to a different registrar, the Registered Name Holder must obtain the AuthInfo code from the current registrar and provide it to his/her preferred registrar. Additionally, the domain name must not have the "ClientTransferProhibited" status enacted as this lock will prevent the transfer from proceeding. By not complying with Section I.A.5 of the Transfer Policy, Net 4 India is preventing the affected Registered Name Holders from exercising their rights to transfer their domain name registrations to a registrar of their choice. At the same time, Net 4 India is not providing the services needed for those Registered Name Holders to operate their domain names. These Registered Name Holders, many of whose online businesses and identities depend on their domain names, are "stuck" with Net 4 India, with no ability to manage their domain names or move them to another registrar.

By not providing all the records and information requested in the 10 December 2020, the 24 December 2020 and 29 January 2021 Notices of Breach pursuant to Section 3.4.3 of the RAA:

- (a) Net 4 India has failed to demonstrate compliance with Section I.A.5 of the Transfer Policy which mandates that, subject to ICANN specifications or policies and any applicable laws or regulations, the registrar provide the Registered Name Holder with the unique "AuthInfo" code and remove the "ClientTransferProhibited" within five (5)

calendar days of the Registered Name Holder's initial request if the registrar does not provide facilities for the Registered Name Holder to generate and manage their own unique "AuthInfo" code and to remove the "ClientTransferProhibited" status. In the 10 December 2020, the 24 December 2020 and the 29 January 2021 Notices of Breach, ICANN requested Net 4 India to provide evidence of having complied with Section I.A.5 of the Transfer Policy with respect to requests involving two hundred and nine (209) domain names. Net 4 India has not provided this evidence.

Please refer to Appendix A of this Termination Notice for a sample of the complaints received by ICANN in which Registered Name Holders and authorized representatives explain how Net 4 India's failure to provide contractually-required services is directly harming them.

- (b) Net 4 India has failed to demonstrate that the domain names *deesan.com*, *arhydraulicfittings.com*, *slkbima.com*, *arion.asia* and *capitalleague.biz* were transferred from Net 4 India to Hosting Concepts B.V. d/b/a Registrar.eu, formerly known as Hosting Concepts B.V. d/b/a Openprovider ("Openprovider"), with the authorization of the Registered Name Holders.

According to information available to ICANN, Net 4 India acts as a reseller for Openprovider. Despite multiple requests from ICANN Contractual Compliance, Net 4 India has not provided an explanation concerning the allegations that these domain names were transferred without the Registered Name Holders' authorization and were not in compliance with the RAA and Transfer Policy, nor has Net 4 India provided evidence of having followed the requirements prescribed by the Transfer Policy with respect to these transfers. Rather, the only response received by ICANN from Net 4 India was that the reseller "*can choose to move their customers to other registrars,*" which is simply not true and is not in compliance with the Transfer Policy.

- (c) Net 4 India has failed to demonstrate compliance with Section 2.2.5 of the Expired Registration Recovery Policy ("ERRP"), which mandates that beginning at the time of expiration and through the Domain Name System resolution interruption period described in ERRP Sections 2.2.2-.3, the Registrant at Expiration must be permitted by the registrar to renew the expired registration.

In the 10 December 2020, the 24 December 2020 and the 29 January 2021 Notices of Breach, ICANN requested specific evidence demonstrating completion of the renewal of fifteen (15) domain name registrations. Net 4 India failed to provide the required evidence.

A Registered Name Holder may use a domain name for the period of time for which it is registered, which can be from one to ten years. In order to keep using the domain name and any of the services associated with it (like a website or email service) the Registered Name Holder must be able to renew the domain name registration before it is expired and deleted. By not effectively permitting Registered Name Holders to renew domain name registrations and reflecting the renewal in Net

4 India's RDDS, Net 4 India is putting Registered Name Holders at risk of losing their domain names upon which they may have built their businesses, non-profit institutions and/or educational websites.

Please refer to Appendix A of this Termination Notice for a sample of complaints received from Registered Name Holders, and authorized representatives, explaining how Net 4 India's unresponsiveness is directly harming them.

3. Net 4 India's failure to timely pay past due accreditation fees, as required by Section 3.9 of the RAA.

As a condition of accreditation, Net 4 India is required to pay accreditation fees to ICANN. These fees consist of yearly fees (US\$4,000 per year) and variable fees, which are determined by the transaction type and volume of each registrar. Net 4 India and its court-appointed resolution professional have been provided customer statements and copies of pending invoices on several occasions.

Net 4 India has either failed to pay or failed to timely pay every invoice from April 2019 to the present. For those invoices where payment was finally made, such payments were long overdue – the delay in payments ranged from 28 days late to 412 days (over a year) late. In addition, Net 4 India has failed to fully pay the invoices issued on 31 October 2020 and 15 January 2021; and another invoice was issued on 31 January 2021 (with a 2 March 2021 due date). As of 26 February 2021, Net 4 India owes ICANN US\$1,163.18 in past due fees and US\$2,979.46 in current fees. Please refer to Appendix C of this Termination Notice for a summary of late-paid and unpaid invoices during the time period of April 2019 to present.

ICANN has provided Net 4 India with multiple notices and ample time to cure; nevertheless, Net 4 India has repeatedly breached its payment obligations under the RAA, has not cured this breach, and continues to owe ICANN past due fees.

Termination Pursuant to Section 5.5.6 – Three breaches within 12-month time period:

According to Section 5.5.6 of the RAA, if a registrar has been in fundamental and material breach of its obligations under the RAA at least three times within a 12 month period, ICANN may terminate the RAA. Net 4 India has been found in fundamental and material breach of its RAA obligations three times within less than a two month period. Accordingly, three Notices of Breach were issued on 10 December 2020, on 24 December 2020 and on 29 January 2021. All three Notices of Breach remain uncured.

Additional Noncompliance Issues (continuing and/or occurring after January 2021 Breach Notice):

Voluminous complaints from registrants regarding Net 4 India:

From 1 January 2020 to present, ICANN Global Support has fielded more than 2,600 communications from Net 4 India customers raising concerns about their registrations (often because Net 4 India would not or did not respond to its customers directly). The rate of communications received from reported Net 4 India customers increased sharply since the start of 2021, with more than half of these communications received in the last two months.

From 1 January 2020 to present, ICANN Contractual Compliance has received more than 2,600 formal complaints regarding Net 4 India (many of which involve several domain names); approximately 1,000 of these complaints were received in the last month. ICANN Contractual Compliance must review and vet every single incoming complaint. Once vetted, ICANN Contractual Compliance initiates a case, which is then communicated to Net 4 India. Currently, more than 400 cases remain unresolved; and hundreds of complaints are still under review, which, once vetted, will become more new cases. In addition, ICANN Contractual Compliance continues to receive more than 20 new complaints each day. And it is not known how many more complaints are pending with Net 4 India that have not yet been brought to ICANN's attention.

Registered Name Holders and authorized representatives have resorted to filing complaints with ICANN after numerous unsuccessful attempts to obtain Net 4 India's assistance in transferring or renewing domain names, updating registration data, managing domain names, and/or reactivating websites or defunct email addresses which online businesses and non-profit organizations depend upon. Many of those complaints involve numerous domain names – sometimes in the hundreds. Through these complaints, Registered Name Holders and authorized representatives explain to ICANN the multiple unsuccessful attempts to seek Net 4 India's assistance as well as the significant impact on Registered Name Holders. (See Appendix A.)

After receiving such a high volume of complaints regarding Net 4 India, ICANN published two blogs (on [17 November 2020](#) and [15 December 2020](#)) and an announcement on 29 January 2021 highlighting resources available for Registered Name Holders experiencing issues with their domain name registrations with Net 4 India. Desperate Registered Name Holders also reached out to ICANN through these blogs to express concerns regarding Net 4 India's inability or unwillingness to communicate with them or allow them to manage their domain name registrations. Please refer to Appendix B of this Termination Notice for a sample of those comments.

Net 4 India's unauthorized transfer of domain names to Openprovider:

As noted above and in all three Notices of Breach, Net 4 India has not provided an explanation concerning the allegations that five domain names (deesan.com,

arhydraulicfittings.com, slkbima.com, arion.asia and capitalleague.biz) were transferred from Net 4 India to Openprovider without the authorization of the Registered Name Holders and were not in compliance with the RAA and Transfer Policy. In addition to those five unauthorized transfers, ICANN Contractual Compliance has been made aware of two additional unauthorized transfers of domain names from Net 4 India to Openprovider in the last month.

Net 4 India's increased unresponsiveness to its registrants and to ICANN:

Net 4 India has a pattern of not responding to Registered Name Holders' or ICANN's requests. As of the second week of January, Net 4 India and its court-appointed resolution professional stopped responding to compliance notices/inquiries from ICANN. ICANN Contractual Compliance continued contacting Net 4 India through the relevant cases, via email and telephone, where the process called for it, to no avail. Just in the last month, more than 600 compliance notices/inquiries and escalated notices within the more than 400 cases referenced above were sent to Net 4 India and its court-appointed resolution professional, with no response. Accordingly, following the 29 January 2021 Notice of Breach, Net 4 India has been eligible for subsequent additional breach notices as more than ninety new 3rd/Escalated and final notices involving multiple domain names remain unresolved.

Net 4 India has also failed to complete and provide the Request for Information ("RFI") requested within the framework of the audit that ICANN org recently launched in order to review how registrars are fulfilling their contractual obligations related to addressing reports of potentially abusive domains. On 1 February 2021, ICANN org requested that Net 4 India complete and provide the RFI responses by 22 February 2021. As of the date of this notice, Net 4 India has neither responded nor provided the information and records requested in the RFI.

ICANN has provided Net 4 India with multiple notices and ample time to cure its various breaches of the RAA and to address the hundreds of complaints ICANN has received from Net 4 India's Registered Name Holders. ICANN first issued notices regarding Net 4 India's breaches in 2019. Subsequently, through its letter dated 20 June 2019, ICANN modified its Notice of Suspension issued on 5 June 2019 to postpone the commencement of the suspension period. Despite this forbearance, Net 4 India has continued to violate its RAA obligations and failed to cure the breaches noted in the 10 December 2020, the 24 December 2020 and the 29 January 2021 Notices of Breach. These violations are directly harming the rights of thousands of Registered Name Holders. In order to protect the rights and interests of Net 4 India's remaining 80,000 registrants for gTLD domain names, ICANN is issuing the present Notice of Termination.

Domain Name Transition Process.

To ensure that Registered Name Holders can manage their domain name registrations with a qualified ICANN-accredited registrar, ICANN will commence the domain name transition process as explained below.

ICANN Logo License

Net 4 India is further advised that the logo license granted in the Logo License Specification to the RAA is revoked as of 13 March 2021. Please remove all ICANN trademarks, name, and logo from Net 4 India's website and business materials that have been licensed to Net 4 India under the terms of that Specification by 13 March 2021.

Domain Name Transition Process

To protect domain name registrants, ICANN will follow the De-Accredited Registrar Transition Procedure to commence the domain name transition process and will solicit bids for a qualified ICANN-accredited registrar to manage the domain names currently managed by Net 4 India.

ICANN reserves all of its rights under the RAA. Please note the rights and obligations required to continue in effect after the expiration of the RAA, including but not limited to: Sections 3.4 Retention of Registered Name Holder and Registration Data; 3.9 Accreditation Fees; 5.8 Resolution of Disputes Under this Agreement; and 5.9 Limitations on Monetary Remedies for Violations of this Agreement.

Net 4 India has current and past due accreditation fees for the total outstanding amount of US\$4,142.64. Please immediately submit payment to ICANN Accounting. This does not include accrued fees for the period of 1 January 2021 through 14 October 2021 that become billable upon termination and once all transactions have been reported. Additionally, Net 4 India will be invoiced for the remainder of the yearly fees owed to ICANN and any variable fees corresponding to transactions reported through 13 March 2021. All these fees are required to be paid to ICANN pursuant to Section 3.9 of the RAA.

If you have questions or require assistance, please contact Leticia Castillo at leticia.castillo@icann.org.

Sincerely,

[SIGNATURE REDACTED]

Jamie Hedlund
Senior Vice President, Contractual Compliance and Consumer Safeguards
Managing Director, Washington, DC Office

Cc: John O. Jeffrey, General Counsel and Secretary

APPENDIX A

This Appendix contains excerpts of complaints and communications submitted by Registered Name Holders, and authorized representatives, to ICANN explaining how Net 4 India's failure to provide contractually-required services is directly harming them. The following information has been redacted from the quotes below: domain names that are not included in a public Notice of Breach, reporters' contact details and payment amounts.

"I have paid [REDACTED]. It has not credited in my wallet of Net4India. I am not able to contact them in any communication mode. There are many small scale companies like me is in deep trouble. please help us in this pandemic time. I feel like suicide." (Complaint submitted on 4 September 2020)

"We are a reseller with the ICANN accredited registrar Net4India. Our CRN ID is [REDACTED].

We would like to update the whois data for all our domains as Net4 currently has outdated data on record and despite our several attempts to update the data through their website, it has failed to do so. Hence, are unable to update the whois record on the Net4 website from our end. Though the complaint/request has to update the data has been severally requested to Net4 in the past (for more that two years). The same could not be done due to the negligent/poor services (no services now) provided by Net4india.

This is only one of the many problems we are being faced with (as also by many others dealing with Net4 India) and practically no services are provided by Net4India that includes Renewal of domains, Deposition of required amounts to our wallet for all pending Renewals and almost all such requirements essential to safeguard the existing and pending Domain names as well as any attempt to update the status for the related issues.

That despite our several complaints and reminders through e-mail as well as personal contacts and through telephonic requests and messages , no one at the Net4 is either trying to help out to resolve the matter which has put us to a worst uncertainty and apprehension to loose our valuable Domain names and incur a big business loss.

in view of the facts as mentioned above we request you to take up the matter and direct the company Net4India to resolve the issue at an earliest and streamline the services those required.

We request you to please intervene immediately and take up the matter urgently so as to avoid any unwanted litigation and legal complications those might arise if the issue remains unattended." (Complaint submitted on 8 October 2020)

"Since Net4 India is now Bankrupt and Unable to reach nor responding to my query raise thru Ticket no. [REDACTED] 9/25/2020 on dated 25 Sep 2020, but no one is responding, neither their office attending my queries via email, Support System(Ticket), Helpline Number(Phone),

etc.

Since the I want to transfer my domain [REDACTED] to [REDACTED] and without Net4India Authorisation code via Control Panel I am unable to do so and since my domain is getting expires in next month by 15th of Nov 2020 and after that i loose my business related my website and this website is only my bread and butter I am approaching your office for change of domain registrar.

As they are not providing nor responding, I approaching your office for immediate and urgent action to save my website." (Complaint submitted on 9 October 2020)

"Domain Name [REDACTED] was Registered with Net4 on 24 May 2001 (attached are Screenshots of Net4 Website with (i) date of Registration and (ii) Successful Payment towards Oder [REDACTED] on 18 FEB 2010 for Renewal of 9 years, and image of Bank statement with Payment details for 13 April 2010; Reminder for Renewal dated 25 MAR 2019, Order for Renewal dated 09 May 2019 for a period of 10 years, and Receipt dated 09 May 2019). We tried to Transfer our Domain Name to a different Registrar on 9 OCT 2020

As required we tried to generate an Authorisation Code from Net4; Message Received Email sent to Registrant Email address. (Image Attached)

On Checking, Registrant Email Address is showing as [REDACTED] which does not exist anymore because the Email provider shut down. (image attached)

We tried to change it on the Net4 site and received an email with the changes listed and the notice that if we should make this change, we will be locked in for 60 days and will not be able to change Registrar until that time (Email attached).

I would like to point out that as per the RABT details on the Net4 website, the Registrant Name and Organisation are correct - we need to change the email address and telephone number.

We are extremely worried about how we will be impacted if the Net4 Website goes down. As a Not-for-Profit that has lost everything during this global pandemic, we are dependent on our website for our livelihood through donations. Please help us." (Complaint submitted on 11 October 2020)

"We are registered owner of domain name [REDACTED] from Net4 and regularly paying our renewal fees on time to time. our renewal expiry date was 07.10.2020, but we already paid on 16.09.2020 well before in time. but till Net4 site showing it as renewal in process. we are trying to contact them very hard but no avail . there is no one to look after our numerous complaints at Net4. Our business is getting suffering too much now. We have also tried to transfer the domain name but no authorised code is provided by them . Kindly help us in getting out of this problem. we shall be highly obliged." (Complaint submitted on 14 October 2020)

"In July 2020 we had renewed our domain by making payment to Net4 Network Services Limited, but few days latter we were not able to access our emails. When we tried contacting

Net4 customer care there was no response and later we came to know that the company Net4 Network Services Limited has closed down.

Our company [REDACTED], is a reputed firm exporting [REDACTED] from India. Due to this pandemic survival of the business was as it is difficult and with the unethical situation by Net4, we could not access your emails and lost all prevailing business communications that resulted in huge cancellation of our export orders." (Complaint submitted on 2 November 2020)

"We have our .com domains on net4india and aren't able to transfer them to another provider. We aren't getting the authorisation code from net4india. No one is responding from net4india anywhere. Pls help us. We can't afford to lose our websites and emails, it will be a nightmare. Pls help us!" (Complaint submitted on 2 November 2020)

"Net4india has closed down due to bankruptcy and are not responding to renewal requests and calls. our domain names [REDACTED] and [EXPIRED] expired on Oct 11 2020. Even after renewal fees were paid they are not getting renewed. we wish to transfer the domain names to a new registrar. For our .in domain names NIXI has agreed to give auth codes for transfer of our domain names to a new registrar. Who will give us the auth codes for transfer of .com domain names? Kindly help urgently as our sites are down and we don't know how to transfer our domain to a new registrar...regards." (Complaint submitted on 8 November 2020)

"Sir, I run a small IT company in [REDACTED], I have been associated with Net4India for the past fifteen years. Suddenly Net4India has stopped working after that my all Domain & website are not working. I cannot even transfer domain to [REDACTED] without getting code from #net4india. Is it possible for all my domains to move net4india to [REDACTED]..ONLINE PAYMENT [REDACTED] On December 18, 2020 I also made a recharge of [REDACTED] after that I do not see the recharge amount in my account....Would you help me What to do, I am unable to understand anything with folded hands" (Complaint submitted on 7 January 2021)

"I am the Registrar in Net4.com and have the complete account details, but I have [not] been able to get the Auth Code to transfer the domain from Net4.com to [REDACTED]. All our emails will be down in 2 to 3 days time due to this" (Complaint submitted on 1 December 2020)

"The domain belongs to a leading international hospital in India. We have raised multiple helpdesk tickets with Net4India to change our email ID and to transfer our domain to another registrar, but net4india has failed to respond to our tickets and legal notices sent from our legal department. I therefore request assistance from ICANN for transferring our domain as otherwise it is likely to disrupt important communication with patients." (Complaint submitted on 17 November 2020)

"Hello ICANN Compliance team,

We are waiting for your response on the "Very Very Urgent Help Request". Please note our domain renewal date 4th January 2021 (as per Net4 website) is already crossed.

We seek your help guidance to move next step forward to transfer domain from Net4 to New Registrar. [REDACTED]

Please note we currently ONLY Concentrating on our LIVE domains which could be huge impact to business. Rest of the 11 domains we will take it later stage." (Communication submitted to ongoing complaint on 7 January 2021)

"The contact email ID registered in the Registrant, Administrative, Billing and Technical (RABT) contact details for the domain [REDACTED] is not functional and I am not able to change the contact email ID. Further the Domain and the Email services expired on 09.Dec.2020. I tried reaching out to Net4India for assistance but received no response even after multiple calls and emails." (Complaint submitted on 9 December 2020).

"Our domain name [REDACTED] hosted in Net4.com domain registrar is to expire on Dec 24, 2020. We have placed an order to renew the same on Nov 29, 2020. for duration of 3 year. Order reference number is [REDACTED].

Till date there is no change in order status or domain name is renewed. We are unable to contact Net4 domain registrar by any means - be it email, trouble ticket, phone. We are facing the situation of loosing our domain name. Ours is a charity organization operating for more than 10 years under this domain name." (Complaint submitted on 10 January 2021)

"This is concerning the registrar - NET4INDIA, based at India. www.net4.in We have our domain and emails through them and this company has become bankrupt and the services are affected. We want to shift our domain & emails to some other service provider but surprisingly Net4 has locked the domain and are also NOT providing the Auth Code to be able to transfer. Kindly help as it his affecting our business badly and are going through a lot of problem.

There is absolutely no reply from this company- neither on phone or emails." (Complaint submitted on 12 January 2021)

"MY DOAMIN NAME [REDACTED] IS NOT WORKING SINCE PAST FEW DAYS. YESTERDAY WAS THE RENEWAL DAY, I RENEWED MY DOMAIN NAME SUCESSFULLY BUT THE ITS STILL SHOWING UNDER PROCESS. I AM GETTING SO MANY PROBLEMS IN E-MAIL (INCOMING & OUTGOING SERVER), I AM NOT ABLE TO SEND OR RECEIVE EMAILS WHICH EFFECTS OUR DAY TO DAY ACTIVITIES & BUSINESS ALSO. KINDLY SOLVE THIS PROBLEM IMMEDIATELY." (Complaint submitted on 13 January 2021)

"I had my domain [REDACTED] with Net4india since 2008. Last week I had renewed the domain and the hosting package with them as per their request, this was done on December 3rd 2020. Yesterday my mail [REDACTED] stopped working. It was then that I realised the problem Net4india was in.

My problem is, that I am a small business entrepreneur and a lot of my work is on email as an Executive coach. This is the primary contact for me. I am unable to shift the domain to any other registrar so that I can get my mail working again.

I was told that you could probably help me in releasing this domain so the work can continue.

DO let me know if this is possible and what other options I have as this is a very busy week for me, and in this pandemic I can't afford to lose business.

I have access to the dashboard and have tried to add in the DNS line so that gmail can access this, not sure if that is a work around. Please let me know any tech solutions you might be having so I have access to my mail." (Complaint submitted on 28 December 2020)

"I am unable to get the domain transfer authorization code despite repeated requests and retrieval procedure followed. My website is inactive and it is not functioning, causing great anguish. Need help to get my AUTH code for domain transfer." (Complaint submitted on 31 December 2020)

"I THINK NET 4 INDIA HAS GONE BANKRUPT - THAT IS THE REASON FOR THIS PROBLEM - PLEASE HELP AS MY OFFICIAL EMAILS ON MY DOMAIN HAVE STOPPED WORKING !!!" (Complaint submitted on 28 December 2020)

"At present only few domains are visible at my panel against both CRNIDs on net4.com, rest domains are vanished, RABT details are not displaying, just for your reference, I have sent two attachment in my last email, where it was shown that all 7 domains [REDACTED] are all active till the date (i.e. 28 Jan 2021) and successfully renewed, last year but not working now and facing business loss."

"Net4.com had stopped access to my account, so am unable to renew it before expiry date. They provided fake numbers or their website which does not exist, fake emails which bounce instantly, failed chat support and creation of trouble ticketing." (Complaint submitted on 18 November 2020)

"Currently I have my business email & domain with Registrar NET4 but for last few months I am facing continues issues with incoming & outgoing of emails. I have registered many complaints in their website, I tried calling to their customer care but their numbers does not work and I have written many emails but no response. Today I visited their Chennai office and its closed, security guard says they have closed the office and many other registrant is coming to complaint about their issues. My business is getting affected everyday and I need to resolve this issue. Please help me to transfer my domain to Godaddy. Kindly do the needful." (Complaint submitted on 25 January 2021)

"We have requested for Domain transfer Authentication code for our domain [REDACTED] at Net4india.com. Till now there is no response, and we are unable to reach the net4india support due to customer care number barred and support mails also not working. As our domain is business critical and website going down always and there is no support from net4india." (Complaint submitted on 25 January 2021)

"For last few months we are continuously facing problem the our Domain Service Provider net4. There is no response from the representative of the Net4. We cannot contact them at all. For last weeks days few of our mailbox was not working & this saturday the whole webmail mail w.r.t our domain stopped working. Now mails are not coming at all. And we try to contact the customer care / representative / engineer etc of Net4, no one is responding. We are in mess as whole of mail services is down. Since we have being using the domain name [REDACTED] for long time, we have registered on almost for all our service with [REDACTED] mail ids. As we know we are not going to get any services from Net4 for now, we need to move to another service provider so our services remain intact. for that we require Authorisation Code for transfer. How do we get it? No one is reposnding. Request you to provide us the Authorisation Code for transfer of Domain" (Complaint submitted on 25 January 2021)"

"We tried to generate auth code from Registrar portal but it was unsuccessful so then sent email and there was no response to any email. We are also tried to contact contact numbers mentioned on Net4 website but unfortunately no one is receiving phones as well. We tried multiple ways to contact Net4 but every time we didn't get any response. We are stuck very badly as we even not able to make any changes in DNS records. Kindly help us to transfer domain names to another registrar by providing auth code." (Complaint submitted on 27 January 2021)

"[...] All the relevant details I have already mentioned in my earlier email/complaint. I believe the renewal for [REDACTED] was successful. I requested on 19 Jan 2021 to Net4India to generate AuthInfo Code to transfer my domains. On the same day I received an email from Net4India to confirm my request for transfer. I immediately confirmed my request for transfer. But till date I have not received any Authinfo code on my registered email [REDACTED]. I am also attaching herewith all the aforesaid communication/transaction.

If you have any further query please write to me. The last email reminder from net4India was on 29 Oct 2019 and after that as yearly practice, I had renewed my these domains on 26 Nov 2019 which was expired on 28 Dec 2020 I also confirm that I did not receive any communication from Net4India in the year 2020 with regard to my renewal neither a month nor a week before and not 5 days after.

I am an Practicing advocate in Supreme Court of India due to unprofessional conduct of Net4India my work has suffered a lot, You are requested to Please do the needful on urgent basis and apprise me the progress you have made regarding my case." (Communication submitted to ongoing complaint on 6 February 2021)

"Since the last year, I have been trying to transfer my domains to another registrar due to the current registrar not at all responding to the emails, chats and phone as well. I have been facing issues with the renewal and domain name process as well. Checked with the registrar's current status, As I came to know net4india is about to shut down and stopped all communications and functional process as well. This is really a threat to my domains. In this regard, I request you to please intervene and provide the solution to move my domains to the other registrar before the domains

expiry. One domain is going to expire by March 2021, so kindly do needful" (Complaint submitted on 28 January 2021)

"My client is holding a domain in the name of [REDACTED] with Net4 India Limited. we have been contacting Icann & nixi India for the past 2 months, still we don't receive any authorize code. The Domain is a religious site and there is huge issues from Ministry of Vatican & Archdiocese of Madras and Mylapore. Pls arrange us authorize code asap, and help us" (Complaint submitted on 28 January 2021)

"I had registered these domains from net4 india and without any prior notice net4 india stopped responding to all means of communication i.e. email, phone. Also their payment gateway is shut from long time resulting in my domains in redemption period from long time. Please help as [REDACTED] is educational domain." (Complaint submitted on 9 February 2021)

"Net4 india is not responding to any means of communication my two domains already expired and i am unable to retrieve its auth code as they are not renewing and responding to any means of communication. Please help. This domain is about to expire on 22 feb before that i need to transfer it otherwise i will become bankrupt." (Complaint submitted on 9 February 2021)

"The Reseller in India Net4india.com has Suddenly seized/stopped all operations in India. The domains were on our name and they were supposed to renew on its own, however net4india.com has not done so. They are completely vanished, their offices have also shut down and they are not responding to calls or emails." (complaint submitted on 12 February 2021)

"While retrieving the authorisation code, the control panel says that it is in process and I will receive the code via email which never happened. I am scared to lose my websites parked on Net4 India. All my website are in trouble now. I've been calling them, emailing them but there's no response and the complaint done on control panel is also not reflecting anymore. Please help as all my websites are active and it's a situation that I realised late! Hope you'll understand and provide me a necessary action to be get my domain back. Thanks in advance." (Complaint submitted on 17 February 2021)

"We tried to generate AUTH code from Registrar portal but it was unsuccessful so then sent email and there was no response to any email. We are also tried to contact contact numbers mentioned on Net4 website but unfortunately no one is receiving phones as well. We tried multiple ways to contact Net4 but every time we didn't get any response. We are stuck very badly as we even not able to make any changes in DNS records. Kindly help us to transfer domain names to another registrar by providing AUTH code." (Complaint submitted on 19 February 2021)

"We paid domain renewal payment for said domain for 10 years on 11th Feb 2020 (Order renewal reference: [REDACTED]) to registrar via their website. They accepted the payment, but our domain name was not renewed and it expired on 13th July 2020. The status of the order is showing "In progress" from the date we renewed till today.

The registrar is not responding, via support call phone numbers or via their Help desk system. The domain name [REDACTED] is our primary business website and is critical for my business. We tried for about till date we are writing this complain. we are checking net4 no gst number but not working Please help us to resolve the issue as my business depends on it." (Complaint submitted on 19 February 2021)

"I paid the renewal fee on 2nd January 2021. the status on the registrar website says Renewal Request in Progress but the registration has expired and my domain name does not resolve over Internet so both email and websites have stopped working." (Complaint submitted on 23 February 2021)

APPENDIX B

This Appendix contains the links to ICANN's blogs referenced on page 6 of the Termination Notice and a sample of the comments made by Registered Name Holders, and authorized representatives, to express concerns regarding Net 4 India's inability or unwillingness to communicate with them or allow them to manage their domain name registrations. The following information has been redacted from the quotes below: domain names that are not included in a public Notice of Breach, reporters' contact details and payment amounts.

Blog: [ICANN Support for Registrants and Those Impacted by Net 4 India Limited](#)
Blog: [ICANN Issues Breach Notice to Net 4 India Limited; Continues Support for Registrants](#)

"I am having 10 domains in Net 4 India. Not response over mail, phone & ticket, Now I am getting problem to transfer to service provider. Need help." (Posted on 4 December 2020)

"I am struggling to contact Net 4 India on phone and mails. No response from them and +91-11-45980000 is not working. As per internet search, Net 4 India Limited shutdown the offices across India without informing customers and partners which is void of ICANN code of conduct. They are not allowing to renew the domains and not even providing domain Auth-Code so as to prevent domain transfer. ICANN Please help us to list Net 4 India Limited on Bulk Transfer Page." (Posted on 5 December 2020)

"Please help me to transfer more than 40 domains from Net 4 India limited as early as possible as my domains are getting expired. Please list Net 4 India Limited on Bulk Transfer page. ICANN Please do the needful." (Posted on 5 December 2020)

"I Have more than 150 Domains Under Net4 India some of them are under redemption and some are expired & some are in near expiry. Please ICANN help me to transfer all my domains from Net 4 India limited as early as possible as my domains are getting expired. Please list Net 4 India Limited on Bulk Transfer page. ICANN Please do the needful." (Posted on 8 December 2020)

' Looks like ICANN continues monitoring Net 4 India Limited till we all will be finished, our all domains get expire. Mr. Jamie Hedlund please wake up and do not let us die. We are suffering

every day and day by day situation will be worsen for Net 4 India customers/users. Please take concrete action and do not let ICANN becomes I CANNOT...." (Posted 9 December 2020)

"I am [REDACTED] we having 2 accounts -in Net4-india with 8 + 3 Domain , as Net4 team not responding .. we not able to renewed our some of Domain and -in that 2 Domain also got expired. now there is total 6 + 3 = 9 Domain is there ; I logged in to there console for Auth CODE request but that also not happening from many weeks .. we tried .. Need your help in this to get Auth Code of all our Domain -in Net4 so we can transfer it to other DNS provider below is the list we have 2 accounts with you [REDACTED] please help us to get Ath-CODE for all our above DOMAIN asap..." (Posted on 12 January 2021)

"We tried contact Net4India but there is no response on phone/email. Please help us...All my domains are down." (Posted on 28 December 2020)

"Tired of contacting Net4. No response anyway. Various tickets opened, emails send which bounced back, no contacts. Renewed my two domains in Sept'20 for 5yrs, payment done but order status yet not updated. Getting afraid whether my domain if not renewed, our company's all emails and hosting services will get stop which will lead to huge business loss. Please help how can I transfer my 3 domain from Net4 to other service provider as not getting any help from net4 in any matter. Thanking you" (Posted on 30 December 2020)

"Hi. I have 15 domains registered on Net4. I am trying to get my contact details updated on Net4 Website. I also tried to generate authorization code but there is no response from Net4. I tried visiting their office, which is closed now. The call center/backend number +91-11-45980000 is also not working. I also wrote to corporatesupport at net4 dot in on 27th October 2020 and there is no response from them till date. Please help as I need the domains to get transferred to another vendor as soon as possible. I tried to update the name server for one domain. The same does not get updated. I had to take a separate domain on another vendor to host my website. When I renewed my website or purchase a new one, I am not even able to get the GST invoice. Neither the same gets updated on the GST Site against my GST number which is already updated on my Net4 login. I feel so trapped with net4 as I need the domain for my work." (Posted on 30 December 2020)

"Hi. I have 13 domains and two hostings registered on Net4. I paid online for renewal 3 of my domains but they have NOT been renewed and the same are now past the due date. I also tried to generate authorization codes on their site to move my domains to other providers but the same has been repeatedly unsuccessful. Emails and Phones are not being responded to and their help desk does not work. I believe that their office in Delhi too is shut. The call center/backend number +91-11-45980000 is also not working. Some of these domains have been with me for almost two decades and I am concerned that some squatters may capture them due to this criminal negligence by Net4. Please help me transfer all 13 of my domains to another vendor as soon as possible so that I can maintain continuity of my web sites and retain

my domains. Please treat this as urgent. I have already submitted a complaint on your website and await your response. This complaint is to re-enforce my submission and also let the world know of the activities being carried out by Net4 India, leading to disruptions in my online activities." (Posted on 13 January 2021)

"We are health care service provider based out of Chennai. Our hospital is GBR Fertility Centre And Hospitals and our website [REDACTED] is down. Our domain is registered with Net4India and it was due for renewal on 19 Jan 2020 but then we have renewed the same well in advance for another 3 years. But then since yesterday the web site is down and also none of the incoming mails from other domain mail id's are getting delivered. In the Net4India portal it says "Domain Renewal Request in Progress". All our patients are facing major challenges to sharing their medical reports. Apart from this we have 6 more domains registered with them. Our CRN ID is CRN ID [REDACTED]. Since yesterday we have been trying to reach Net4India and there is no response. Being a healthcare service provider this is very critical to us and we not knowing what to do as we are caught unaware of all the things happening with Net4India. We are also trying to move the domain to another vendor and even for that we need need to get an authorization code from them and when they are not responding we are not knowing what to do? Is there any resolution for the same." (Posted on 21 January 2021)

"Dear Sir/Madam,, complaint is 01000086 I have given a request on January 12 ,2021 to get the Authorization Code for transferring my domain from Net4india to another service provider, as because Net4india is closed and also no response from them. My professional email is also not working now. Please help do the needful. So may I know the process of my request, This is my third email please do the needful as soon as possible. Looking forward to hear you back." (Posted on 25 January 2021)

"We have few domains in net4india. Frequently, we had tried to contact with their technical person through the number i.e. 011-45980000. But msg received "Incoming facility on this number has been barred". Also, we had visited to their office at "303A, 3rd Floor Plot No.-3. Pocket H Market, Sarita Vihar, South Delhi". But their office does not exist there. Even, I have talked to other Registrar to transfer the existing domain from Net4india. But then need Auth code which we are unable to get it from Net4india. Please suggest how we can resolve this issue." (Posted on 25 January 2021)

"Pls support to provide [REDACTED] authorization code via registrant email ID. Pls note we are neither able to change registrant email not able to receive authorization code. All our business emails are down.please help on this Ph no.[REDACTED]. ICANN please help me to unlock domains ASAP". (Posted on 23 January 2021)

"We have a few domains with Net4india.com, also we have an email account with Net4, from the last 3 weeks my email account which is under Net4 panel all are not working, so we decided to transfer the domain, As per rule we expect the auth code within 5-7 days, but now almost 12 days but still no reply from net4india. we are unable to contact the Net4 team, they are not responding to email. please give the authorization code to transfer the domain, so we can create an emails, start working. Please do needful." (Posted on 27 January 2021)

"Hi we more than 10 domain with net4india , unable to get epp code to transfer to new provider. our emails or down because we cant able to renew it or transfer." (Posted on 27 January 2021)

"Hi Facing Same issue with net 4 Please refund my payment because Net 4 India closed services & office not traceable office helpline phone not working 01145980000 and my wallet till not working. " (Posted on 1 February 2021)

"Dear Concern, We are not able to Transfer our domain from Net4.com We have also filled complaint form in this regard. Kindly help to resolve this issue. my 3 domain transfer 1) [REDACTED] 2) [REDACTED] 3) [REDACTED] Regard Pardeep Kumar 0171-2600801" (Posted on 5 February 2021)

"As a reseller of Net4 from over 10 years, I have 80+ domains for which I am totally stuckup as getting no response or contact from Net4 and now not even details of the domains being shown in the panel. Need to get authorisation codes for transfer. ICANN Case No. is 01005439 but not getting any update on that. My contact is [REDACTED], If somebody can help, please do contact. Thanks" (Posted on 4 February 2021)

"in NET4.in MY CRN ID [REDACTED], I failed to contact NET4. All the trouble ticket in was deleted by NET4. There mailbox is full. I failed to renew my domain and I already lost my domain [REDACTED] which was my domain for more than 10 years. It was my huge loss. My another 4 domains are there. [REDACTED] and [REDACTED] are not working. Can any body guide me. I have not filed any case. how to file case. I am from West Bengal, India." (Posted on 22 February 2021)

APPENDIX C

This Appendix provides a summary of the ICANN invoices issued to Net 4 India during the time period of April 2019 to present. For those invoices that Net 4 India finally provided payment, such payment was overdue by 28 - 412 days. The remaining invoices (dated 31 October 2020 and 15 January 2021) remain overdue and/or unpaid. Net 4 India owes ICANN US\$1,163.18 in past due fees and US\$2,979.46 in current fees.

[REDACTED]



[REDACTED]

TRUE COPY

CHRONOLOGIES OF COMPLIANCE NOTICES IN THE 10 DECEMBER 2020 AND 24 DECEMBER 2020 BREACH NOTICES THAT REMAIN UNCURED (CASES)

In the 1st, 2nd, 3rd and follow-up compliance inquiries and notices detailed in the corresponding chronologies below, ICANN notified Net 4 India of the violations associated with the case, including the affected domain names and the relevant ICANN policies and agreements. Each communication requested the evidence, information and actions needed from Net 4 India to become compliant. All notices subsequent to each 1st inquiry or 1st notice constituted an additional attempt by ICANN to obtain evidence of compliance from Net 4 India. All telephone call details below described further attempts from ICANN to communicate to Net 4 India the urgency of the cases and to make an ICANN Contractual Compliance staff member available to address any questions in order to assist Net 4 India in becoming compliant and assist the relevant Registered Name Holders. All these attempts were unsuccessful.

Chronology (Case # 00983396):

Date of Notice	Deadline for Response	Details
27-Oct-2020	3-Nov-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
1-Nov-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
1-Nov-2020	3-Nov-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
4-Nov-2020	11-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.

Date of Notice	Deadline for Response	Details
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021		To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00986617):

Date of Notice	Deadline for Response	Details
14-Nov-2020	17-Nov-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
19-Nov-2020	26-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED]
27-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
2-Dec-2020	8-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Compliance Contact at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
8-Dec-2020	8-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]

Date of Notice	Deadline for Response	Details
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00986008):

Date of Notice	Deadline for Response	Details
11-Nov-2020	17-Nov-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.



Date of Notice	Deadline for Response	Details
23-Nov-2020	30-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
27-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
2-Dec-2020	8-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and left voicemail with complaint details. ICANN called Compliance Contact at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.

Date of Notice	Deadline for Response	Details
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00979893):

Date of Notice	Deadline for Response	Details
9-Oct-2020	16-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
20-Oct-2020	27-Oct-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
14-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.

Date of Notice	Deadline for Response	Details
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00977571):

Date of Notice	Deadline for Response	Details
28-Sep-2020	5-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.

Date of Notice	Deadline for Response	Details
15-Oct-2020	22-Oct-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
30-Nov-2020	7-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and left voicemail with complaint details. ICANN called Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.

Date of Notice	Deadline for Response	Details
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00971966):

Date of Notice	Deadline for Response	Details
31-Aug-2020	7-Sep-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
2-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAILS REDACTED]
3-Sep-2020	N/A	ICANN re-sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
3-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
17-Sep-2020	24-Sep-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Sep-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.

Date of Notice	Deadline for Response	Details
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.

Date of Notice	Deadline for Response	Details
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00972641):

Date of Notice	Deadline for Response	Details
3-Sep-2020	10-Sep-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
4-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Sep-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Sep-2020	1-Oct-2020	ICANN sent 2 nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
20-Oct-2020	27-Oct-2020	ICANN sent a follow-up compliance notice to via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

Date of Notice	Deadline for Response	Details
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00976977):

Date of Notice	Deadline for Response	Details
25-Sep-2020	2-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
30-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
5-Oct-2020	12-Oct-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Oct-2020	26-Oct-2020	ICANN sent 2 nd compliance notice to via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTE] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]

Date of Notice	Deadline for Response	Details
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00978716):

Date of Notice	Deadline for Response	Details
5-Oct-2020	12-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
19-Oct-2020	26-Oct-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED]
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

Date of Notice	Deadline for Response	Details
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.

Date of Notice	Deadline for Response	Details
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00975973):

Date of Notice	Deadline for Response	Details
21-Sep-2020	28-Sep-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
22-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
5-Oct-2020	12-Oct-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
26-Oct-2020	2-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.

Date of Notice	Deadline for Response	Details
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00976043):

Date of Notice	Deadline for Response	Details
21-Sep-2020	28-Sep-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
22-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
6-Oct-2020	13-Oct-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
26-Oct-2020	2-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]

Date of Notice	Deadline for Response	Details
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00977573):

Date of Notice	Deadline for Response	Details
28-Sep-2020	5-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from the Registrar.

Date of Notice	Deadline for Response	Details
6-Oct-2020	13-Oct-2020	ICANN sent 2 nd compliance notice via email to [EMAILS REDACTED] No response received from the Registrar.
12-Oct-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
14-Oct-2020	N/A	Email indicating the compliance case had been closed was mistakenly sent to [EMAIL REDACTED]
29-Oct-2020	5-Nov-2020	ICANN sent follow-up compliance notice to [EMAIL REDACTED] explaining the error and requesting a full response to the compliance case.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3 rd compliance notice via email to [EMAILS REDACTED] No response received from the Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]

Date of Notice	Deadline for Response	Details
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Ticket # MDZ-368-16882):

Date of Notice	Deadline for Response	Details
25-Aug-2020	1-Sep-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]. No response received from Registrar. No response received from the Registrar.
2-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAILS REDACTED]. No response received from the Registrar.
4-Sep-2020	4-Sep-2020	ICANN re-sent 1st compliance notice via email to [EMAILS REDACTED]. No response received from the Registrar.
4-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.

Date of Notice	Deadline for Response	Details
18-Sep-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
21-Sep-2020	28-Sep-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from the Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from the Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
27-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]

Date of Notice	Deadline for Response	Details
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Ticket # NMC-663-14600):

Date of Notice	Deadline for Response	Details
19-Aug-2020	26-Aug-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
28-Aug-2020	4-Sep-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
2-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAILS REDACTED]
4-Sep-2020	4-Sep-2020	ICANN re-sent 2nd compliance notice via email to [EMAILS REDACTED]
4-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.

Date of Notice	Deadline for Response	Details
18-Sep-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
22-Sep-2020	N/A	ICANN re-sent 2nd compliance notice via email to [EMAILS REDACTED] with immediate response requested. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from the Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	31-Dec-2020	ICANN issued Notice of Breach to Registrar.
11-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
16-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
18-Dec-2020	31-Dec-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
21-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
23-Dec-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED]
24-Dec-2020	N/A	ICANN re-forwarded the Notice of Breach to the email addresses [EMAILS REDACTED]
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.

Date of Notice	Deadline for Response	Details
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
31-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00984013):

Date of Notice	Deadline for Response	Details
30-Oct-2020	6-Nov-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED] No response received from Registrar.
13-Nov-2020	20-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

Date of Notice	Deadline for Response	Details
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
24-Dec-2020	14-Jan-2021	ICANN issued Notice of Breach to Registrar.
24-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
28-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00980845):

Date of Notice	Deadline for Response	Details
14-Oct-2020	21-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]

Date of Notice	Deadline for Response	Details
21-Oct-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
19-Nov-2020	26-Nov-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
4-Dec-2020	11-Dec-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
24-Dec-2020	14-Jan-2021	ICANN issued Notice of Breach to Registrar.
24-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
28-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.

Date of Notice	Deadline for Response	Details
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00977040):

Date of Notice	Deadline for Response	Details
25-Sep-2020	2-Oct-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED]
29-Sep-2020	N/A	Email received from Registrar [EMAIL REDACTED]) insufficient to demonstrate compliance.
21-Oct-2020	28-Oct-2020	ICANN sent follow-up compliance notice via email to [EMAILS REDACTED] No response received from Registrar
10-Nov-2020	17-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail. ICANN called Compliance Contact at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

Date of Notice	Deadline for Response	Details
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
24-Dec-2020	14-Jan-2021	ICANN issued Notice of Breach to Registrar.
24-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
28-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED]) insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED]) regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (Case # 00976900):

Date of Notice	Deadline for Response	Details
24-Sep-2020	1-Oct-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED] No response received from Registrar.
10-Nov-2020	17-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.

Date of Notice	Deadline for Response	Details
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
10-Dec-2020	17-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] no response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact Compliance and Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
24-Dec-2020	14-Jan-2021	ICANN issued Notice of Breach to Registrar.
24-Dec-2020	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
28-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
30-Dec-2020	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
30-Dec-2020	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.

Date of Notice	Deadline for Response	Details
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00976469):

Date of Notice	Deadline for Response	Details
22-Sep-2020	29-Sep-2020	ICANN sent 1st compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
1-Oct-2020	8-Oct-2020	ICANN sent 2nd compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
13-Oct-2020	20-Oct-2020	ICANN re-sent 1st compliance inquiry via email to [EMAILS REDACTED]
20-Oct-2020	N/A	Email from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
3-Nov-2020	10-Nov-2020	ICANN sent follow-up compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
16-Nov-2020	23-Nov-2020	ICANN sent follow-up compliance inquiry via email to [EMAILS REDACTED]
16-Nov-2020	23-Nov-2020	ICANN re-sent follow-up compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.

24-Nov-2020	1-Dec-2020	ICANN sent 3rd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail.
8-Dec-2020	15-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
21-Dec-2020	6-Jan-2021	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail.
13-Jan-2021	20-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail.



29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
27-Jan-2021	N/A	Email received from Registrar [EMAIL REDACTED] regarding the insolvency proceedings in India.
27-Jan-2021	N/A	Email received from Registrar's representative [EMAIL REDACTED] regarding the insolvency proceedings in India.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00977574):

Date of Notice	Deadline for Response	Details
28-Sep-2020	5-Oct-2020	ICANN sent 1st compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
15-Oct-2020	22-Oct-2020	ICANN sent 2nd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Primary and Compliance Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No ability to provide Registrar with the complaint details or to leave a voicemail.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail.
20-Nov-2020	26-Nov-2020	ICANN sent 3rd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.

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3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
4-Dec-2020	11-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to [EMAILS REDACTED] No response received from Registrar.
14-Dec-2020	21-Dec-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
8-Jan-2021	15-Jan-2021	ICANN sent a 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary

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		Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00982277):

Date of Notice	Deadline for Response	Details
21-Oct-2020	28-Oct-2020	ICANN sent 1st compliance inquiry via email to [EMAILS REDACTED]
8-Nov-2020	N/A	Email from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
24-Nov-2020	1-Dec-2020	ICANN sent 2nd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail.
4-Dec-2020	11-Dec-2020	ICANN sent 3rd compliance inquiry via email to [EMAILS REDACTED]
6-Dec-2020	N/A	Email from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
8-Dec-2020	11-Dec-2020	ICANN sent follow-up compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to

		[EMAILS REDACTED] No response received from Registrar.
8-Jan-2021	15-Jan-2021	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail.
21-Jan-2021	28-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00982175):

Date of Notice	Deadline for Response	Details
21-Oct-2020	28-Oct-2020	ICANN sent 1st compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.

2-Nov-2020	9-Nov-2020	ICANN sent 2nd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Primary and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide Registrar with the complaint details or to leave a voicemail.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
20-Nov-2020	26-Nov-2020	ICANN sent 3rd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
4-Dec-2020	11-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to to [EMAILS REDACTED] No response received from Registrar.
14-Dec-2020	21-Dec-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

8-Jan-2021	15-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00984400):

Date of Notice	Deadline for Response	Details
2-Nov-2020	9-Nov-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
13-Nov-2020	20-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at

		[TELEPHONEREDACTED], No answer and no ability to leave a voicemail.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
22-Jan-2021	28-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00986557):

Date of Notice	Deadline for Response	Details
13-Nov-2020	20-Nov-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
23-Nov-2020	30-Nov-2020	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED]

		No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
10-Dec-2020	17-Dec-2020	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00987371):

Date of Notice	Deadline for Response	Details
18-Nov-2020	25-Nov-2020	ICANN sent 1st compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.

30-Nov-2020	7-Dec-2020	ICANN sent 2nd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
8-Dec-2020	15-Dec-2020	ICANN sent 3rd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to [EMAILS REDACTED] No response received from Registrar.
5-Jan-2021	12-Jan-2021	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
13-Jan-2021	20-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED].

		[TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00988897):

Date of Notice	Deadline for Response	Details
26-Nov-2020	3-Dec-2020	ICANN sent 1st compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
4-Dec-2020	11-Dec-2020	ICANN sent 2nd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance inquiry via email to [EMAILS REDACTED] No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
4-Jan-2021	11-Jan-2021	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to [EMAILS REDACTED] No response received from Registrar.

12-Jan-2021	19-Jan-2021	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
20-Jan-2021	27-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
28-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and provided Primary Contact with complaint details.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00992182):

Date of Notice	Deadline for Response	Details
9-Dec-2020	16-Dec-2020	ICANN sent 1st compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
18-Dec-2020	5-Jan-2021	ICANN sent 2nd compliance notice via email to [EMAILS REDACTED]

		No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Jan-2021	15-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAILS REDACTED] No response received from Registrar.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00993354):

Date of Notice	Deadline for Response	Details
15-Dec-2020	22-Dec-2020	ICANN sent 1st compliance notice via email [EMAILS REDACTED] No response received from Registrar.

Date of Notice	Deadline for Response	Details
4-Jan-2021	11-Jan-2021	ICANN sent 2nd compliance notice via email [EMAILS REDACTED] No response received from Registrar.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details and no ability to leave a voicemail.
12-Jan-2021	19-Jan-2021	ICANN sent 3rd compliance notice via email [EMAILS REDACTED] No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details and no ability to leave a voicemail.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
28-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and provided Primary Contact with complaint details.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.



Chronology (00977648):

Date of Notice	Deadline for Response	Details
29-Sep-2020	6-Oct-2020	ICANN sent 1st compliance notice via email [EMAILS REDACTED] No response received from Registrar.
7-Oct-2020	14-Oct-2020	ICANN sent 2nd compliance notice via email [EMAILS REDACTED]
7-Oct-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
8-Oct-2020	15-Oct-2020	ICANN sent follow-up compliance notice via email [EMAILS REDACTED]
13-Oct-2020	N/A	Email received from Registrar [EMAIL REDACTED] insufficient to demonstrate compliance.
19-Oct-2020	26-Oct-2020	ICANN sent follow-up compliance notice via email [EMAILS REDACTED] No response received from Registrar.
10-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
25-Nov-2020	2-Dec-2020	ICANN sent follow-up compliance notice via email [EMAILS REDACTED] No response received from Registrar.

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Date of Notice	Deadline for Response	Details
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and left voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email [EMAILS REDACTED] No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at + [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

Chronology (00987386):

Date of Notice	Deadline for Response	Details
18-Nov-2020	25-Nov-2020	ICANN sent 1st compliance notice via email [EMAILS REDACTED], No response received from Registrar.
3-Dec-2020	10-Dec-2020	ICANN sent 2nd compliance notice via email [EMAILS REDACTED], No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
14-Dec-2020	21-Dec-2020	ICANN sent 3rd compliance notice via email [EMAILS REDACTED], No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
19-Jan-2021	26-Jan-2021	ICANN sent follow-up compliance notice via email [EMAILS REDACTED], No response received from Registrar.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.



ICANN

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29-Jan-2021	19-Feb-21	ICANN issued Notice of Breach to Registrar.
29-Jan-2021	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
26-Feb-2021	N/A	To date, Net 4 India has not cured the violations in the Notice of Breach.

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Vikram Bajaj
Insolvency Professional
IBBI/IPA-002/IP-N00003/2016-2017/10003

ANNEXURE 4

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Contact Information
Redacted

1-3-2021

Mr. Jamie Hedlund,
Senior Vice President,
Contractual Compliance and Consumer Safeguards
Internet Cooperation for Assigned Names and Numbers
E-mail: jamie.hedlund@icann.org

Ms. Leticia Castillo
E-mail: leticia.castillo@icann.org.

Also:
Ms. Anuradha Agnihotri
Partner
Trilegal
E-mail: Contact Information Redacted

Dear Madam

Subject- Response to your Termination Notice dated 26 February 2021
Ref.- Termination Notice dated 26 February 2021 and Letter dated 27 February 2021

This is in response to your Termination Notice dated 16 February 2021 for terminating the Registrar Accreditation Agreement (“RAA”) dated 14 October 2014 between Net4 India Limited (“Net4”/ “Corporate Debtor”) and Internet Cooperation for Assigned Names and Numbers (“ICANN”). I write to you on behalf of the Corporate Debtor, in the capacity of the Resolution Professional of the Corporate Debtor appointed vide order dated 3 September 2019 of the Hon’ble National Company Law Tribunal, Principal Bench (“NCLT”).

At the outset, I do acknowledge the continuous co-operation extended by ICANN in the course of corporate insolvency resolution process (“CIRP”) of the Corporate Debtor and as a result of which, the CIRP could result in approval of a resolution plan by the Committee of Creditors. Further, it may also be pertinent to highlight that I have been in close communication with ICANN since the inception of the CIRP and have also been updating ICANN on developments on the CIRP, from time to time.

As you are already aware, the Hon’ble NCLT, had, at length heard the issues between the Corporate Debtor, ex-Promoter of the Corporate Debtor and ICANN in the application filed by me, bearing IA No. 5761 of 2020, in the month of December 2020. The Hon’ble NCLT took cognizance of the extenuating circumstances in the present case and your notices dated 10 December 2020 and 24 December 2020, along with the fact that the NCLT had reserved orders in another application IA No. 1756 of 2019 (regarding diversion of business of the Corporate

Debtor, including transfer of domain names, trademarks etc.). Taking note of all the above, vide its order dated 25 January 2021, the Hon'ble NCLT directed as under:

"Regarding the reliefs (a) and (b), notwithstanding as to whether jurisdiction to deal with these issues relating to the agreements the Corporate Debtor entered into with R1 and R2, lies in India or elsewhere, looking at the far reaching implications likely to set in, if agreements R1 and R2 entered into are terminated, we hereby request R1 and R2 not to terminate these agreements at least until three months from hereof, so that the CIRP in progress is not hampered."

Therefore, as is evident, the Hon'ble NCLT requested ICANN to not terminate the RAA with the Corporate Debtor. Further, I am also in close contact with the ex-Promoter to cure all breaches of the RAA at the earliest. However, despite the same, another notice dated 29 January 2021 was issued by ICANN to the Corporate Debtor on lines of the previous notices of breach dated 10 December 2020 and 24 December 2020 in quick succession, without allowing adequate time me to take suitable remedial measures to cure the breaches. Such an act from ICANN does not reflect the true-spirit of co-operation as suggested in your instant communique'. As may be noted there is barely a gap of 20-25 days between the successive notices. It would also not be out of place to mention that the notice dated 29 January 2021 and now the Termination Notice has been issued immediately after the order of Hon'ble NCLT dated 25 January 2021, which, most certainly, is against the spirit of the directions of the Hon'ble NCLT. It may also be noted that the Hon'ble NCLT, did not give any findings on your pleadings with respect to the jurisdiction and thus the same does not absolve the Hon'ble NCLT of its jurisdiction to adjudicate upon the issues arising out of the RAA.

Further, as regards the outstanding dues of ICANN, it is noted from the accounts statement provided by you that pursuant to directions of Hon'ble NCLT, a payment of USD 4500 was made on 22 January 2021, post which the outstanding balance was only USD 163.18. Further, bills have been raised on 15 January 2021 for USD 1000 with due date of 14 February 2021 and another bill was issued on 31 January 2021 for USD 2979.46, with due date of 2 March 2021 (notably, this has not even become due for payment yet). You may note that all the previous dues as stated in earlier notices dated 10 December 2020 and 24 December 2020 have been paid and the total outstanding dues, as on date, are only USD 1163.18, pertaining to the invoice dated 15 January 2021.

As regards, customer compliance tickets, a large number of domain renewal/ authorisation code requests are being addressed on a daily basis and email/ website related issues have also been addressed for many customers. However, I have been advised by the technical team that while giving priority to redressing the customer issues, the response in respect of same may not have been sent to ICANN for closure of Compliance Tickets. You would appreciate that contiguous notices being sent by ICANN which are in public domain, also have unsettling affect on customers leading to a larger spurt in requests for authorisation code. I shall also arrange to send an update on the ICANN compliance tickets shortly.

Further, as regards, the directions for submitting SOPs are concerned, I would like to inform that the outline for SOPs was provided and response on the same with draft SOPs has also been received. The draft SOPs are being discussed for finalization with the suspended management of the Corporate Debtor. The SOPs highlight additional human resources and infrastructure being put in place. The draft SOPs/ response received is annexed herewith.

In view of the forestated developments, I reiterate you to permit at least 3 months' time for completion of the CIRP, in compliance with the letter and spirit of the directions of the Hon'ble NCLT vide order dated 25 January 2021. It goes without saying I'm trying my best for expeditious resolution of customer issues as well as timely payment of ICANN dues. Considering the advanced stage of CIRP, the issues can be resolved shortly with some hand holding and forbearance and accordingly request you to withdraw your notice dated 26 February 2021.



Vikram Bajaj
Resolution Professional
Net4 India Limited



SOP - Customer Support – Website Not Functioning

- 1.) Customer Calls/emails/Opens TT.
- 2.) Call/email/TT is taken/opened by Support Executive (assigned by the CRM Helpdesk).
- 3.) Website not functioning has the following major categorisations, to be ascertained by support executive and then passed on to relevant process owner:
 - a.) **Site Not Opening at all**
 - b.) **Payment Gateway not working**
 - c.) **Customer panel no opening/logging in**

3a.) Site Not Opening at all

Assigned to Systems – Mukesh Upadhyay/Pawan Panday to determine cause within 30 mins of ticket assigned.

Likely Causes:

- i) **Sever Problem** – Assigned to NOC engineer + Windows Lead – TTR to be given to customers via email back or call back within 3 hours.
- ii) **DNS Problem** – Assigned to Linux Lead – TTR to be intimated to customers within 3 hours
- iii) **Application loading Problem:** Assigned to Product Development and Engineering Lead (Pankaj Shukla) – TTR to be given to customers within 3 hours
- iv) **Hardware Problem** – Assigned to NOC engineer at relevant Location + Systems Head + Operations Manager.
 - Local NOC Engineer to coordinate with Systems Lead/Head to ascertain exact hardware problem – Problem to be exactly ascertained within 2 hours – TTR to be intimated to customers within 3 hours.
In case of need of hardware replacement, there could be a slightly extended time, however in a vast majority of cases, server only needs to be restarted.
- v.) **Network Problem/Down** – Assigned to Network Head – Shailendra Shukla and Network Lead – Samir Khan – NOC team to revert with TTR within 1 hour – Customer informed TTR within 3 hours.
In case of Network problem from Service Provider end we provide TTR basis the information received from the service provider.

3.b) Payment Gateway not working

Assigned to PDE Lead – Pankaj Shukla – to identify exact issue and solve or assign to downstream process owner.

Likely Causes:


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- i) **DNS problem:**
Assign to Systems Windows Lead- Pawan Panday
TTR to be informed to customers with 3 hours. In case of the most common issue of log file overload, resolution should be within an hour.
- ii) **Application error**
Assign to PDE lead- Punkaj Shukla
TTR to be informed to customer within 3 hours
- iii) **Payment gateway Provider problem**
Assigned to PDE lead and Accounts lead (to liase with payment gateway provider)
TTR to be provided within 3 hours, based on the fact that the payment agteway provider has a 3 hour time frame in the SLA with them.
- iv) **Hardware Problem**
Assigned to Network Head – Shailendra Shukla and Network Lead – Samir Khan – NOC team to revert with TTR within 1 hour – Customers informed TTR within 3 hours.

3.d) Customer panel not opening/logging in

Assigned to PDE Lead – Pankaj Shukla – to identify exact issue and solve or assign to downstream process owner.

Likely Causes:

- i) **Application server down**
Assigned to NOC engineer + Windows Lead – TTR to be given to customers via email back or call back within 3 hours.

In case of server hardware failure:
Assigned to NOC engineer at relevant Location + Systems Head + Operations Manager.
Local NOC Engineer to coordinate with Systems Lead/Head to ascertain exact hardware problem – Problem to be exactly ascertained within 2 hours – TTR to be intimated to customers within 3 hours.
- ii) **AAA sever problem:**
Assign to PDE Lead+ Linux Lead
TTR to be reverted to customers within 3 hours
- iii) **Customer password not retrieving/resetting**
Assign to PDE lead + Linux Email Lead - Check mail server status for automated mailers. Provide TTR to customer within 3 hours.


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SOP - Customer Support – Email Related Issues

- 1.) Customer Calls/emails/Opens TT for Email related problems.
- 2.) Call/email/TT is taken/opened by Support Executive (assigned by the CRM Helpdesk).
- 3.) Email related issues has the following major categorisations, to be ascertained by support executive and then passed on to relevant process owner:
 - a.) Problem Sending email
 - b.) Problem receiving email
 - c.) Problem logging in to webmail or email password not authenticating
 - d.) Webmail website not opening
 - e.) SPAM Mail not being filtered

3a.) Problem Sending email

Support executive to go through the email setup, i.e. all the server addresses are correct and if still doesn't work:

Assign to Linux Email Lead or MS Exchange lead based on the type of email

Email lead to check status of the relevant SMTP servers

Likely Issues:

- i) Smtip server Log overload
Email Lead to assign or execute: back up and clean up of log file clean up. TTR to be given to customer within 3 hours. In most cases Time to resolution of no greater than 5 hours.
- ii) Smtip queue overload
Email Lead to assign or execute: queue push process by diverting and distributing queue to other smtp servers. TTR to be given to customer within 3 hours. In most cases Time to resolution of no greater than 5 hours.
- iii) 1 or more Smtip sever software down
Email lead to assign server restart to NOC team to hard boot in case they are not able to remote restart. TTR to be given to customer within 3 hours. In most cases Time to resolution of no greater than 5 hours.
- iv) 1 or more Smtip Server Hardware down
Email lead to assign to relevant NOC team. NOC team to revert on cause within 1 hour. For internally rectifiable issues. TTR to be given to customer within 3 hours. In most cases Time to resolution of no greater than 5 hours.
Where hardware/AMC vendor is called out TTR to be provided in 5 hours but Time to resolution to be 24 hours



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3b.) Problem receiving email

Support executive to go through the email setup, i.e. all the pop server addresses and setting are correct and if still doesn't work:

Assign to Linux Email Lead or MS Exchange lead based on the type of email

Email lead to check status of the relevant POP servers hosting the domain of the complaining customer.

Likely Issues:

- i) **POP server queue overload**
Email Lead to assign or execute: queue push process by diverting and distributing queue to other POP servers. TTR to be given to customer within 3 hours. In most cases Time to resolution of no greater than 5 hours.(this may however, increase by 3 hours in case has been caused by a mass spam attach on a particular domain on that server)

- ii) **1 or more POP sever software down**
Email lead to assign POP server restart to NOC team to hard boot in case they are not able to remote restart. TTR to be given to customer within 3 hours. In most cases Time to resolution of no greater than 5 hours.

- iii) **1 or more POP Server Hardware down**
Email lead to assign to relevant NOC team. NOC team to revert on cause within 1 hour. For internally rectifiable issues. TTR to be given to customer within 3 hours. In most cases Time to resolution of no greater than 5 hours.
Where hardware/AMC vendor is called out TTR to be provided in 5 hours but Time to resolution to be 24 hours.

3.c,d) Problem logging in to webmail or email password not authenticating

Support executive to identify wether it is password issue and try and reset the same by guiding customer online. If it doesn't work then

Likely Issues:

- i) **AAA server not authenticating:**
Assign to PDE Lead+ Linux Lead
TTR to be reverted to customers within 3 hours

- ii) **Webmail down:**
Assign to PDE lead and Linux Email Lead


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In case of webmail application – PDE lead to execute with relevant team leader and provide TTR to customer within 3 hours.

In case of POP / SMTP integration with Webmail – Linux Email lead to execute rectifications and also provide TTR to customer within 3 hours.

iii) **Webmail website not resolving**

Assign to Linux Lead to check DNS servers and revert TTR to customer within 3 hours. In most cases resolution should not be beyond 5 hours.

3.e) SPAM Mail not being filtered

Assign to Linux email Lead. Ascertain issue on Anti spam server or Anti Spam Software.

In case of server provide TTR within 3 hours with resolution within 5 hours in most cases.

In case of software, liase with Anti Spam vendor and revert to customer based on the TTR provided by vendor.



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SOP - Customer Support – Domain Renewal /Auth Code

- 1.) Customer Calls/emails/Opens TT.
- 2.) Call/email/TT is taken/opened by Support Executive (assigned by the CRM Helpdesk).
- 3.) In the first instance, depending on the detail of the problem provided by customer. Executive to send the link to the self help video for domain renewals.
- 4.) Domain Renewal/Auth Code has the following major categorisations, to be ascertained by support executive and then passed on to relevant process owner:
 - a.) Unable to log in to panel to renew
 - b.) Unable to pay in order to renew
 - c.) How to Request Auth Code
 - d.) Requested Auth code but not received

3a.) Unable to log in to panel to renew

Assigned to PDE Lead – Pankaj Shukla – to assign to relevant L2 support identify exact issue and solve or assign to downstream process owner.

Likely Causes:

- i) Application server down
Assigned to NOC engineer + Windows Lead – TTR to be given to customers via email back or call back within 3 hours.

In case of server hardware failure:
Assigned to NOC engineer at relevant Location + Systems Head + Operations Manager.
Local NOC Engineer to coordinate with Systems Lead/Head to ascertain exact hardware problem – Problem to be exactly ascertained within 2 hours – TTR to be intimated to customers within 3 hours.
- ii) AAA sever problem:
Assign to PDE Lead+ Linux Lead
TTR to be reverted to customers within 3 hours
- iii) Customer password not retrieving/resetting
Assign to PDE lead + Linux Email Lead - Check mail server status for automated mailers. Provide TTR to customer within 3 hours.



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3b.) Unable to pay in order to renew

Assigned to PDE Lead – Pankaj Shukla – to identify exact issue and solve or assign to downstream process owner.

Likely Causes:

- i) **DNS problem:**
Assign to Systems Windows Lead- Pawan Panday
TTR to be informed to customers with 3 hours. In case of the most common issue of log file overload, resolution should be within an hour.
- ii) **Application error**
Assign to PDE lead- Pankaj Shukla
TTR to be informed to customer within 3 hours
- iii) **Payment gateway Provider problem**
Assigned to PDE lead and Accounts lead (to liase with payment gateway provider)
TTR to be provided within 3 hours, based on the fact that the payment gateway provider has a 3 hour time frame in the SLA with them.
- iv) **Hardware Problem**
Assigned to Network Head – Shailendra Shukla and Network Lead – Samir Khan – NOC team to revert with TTR within 1 hour – Customers informed TTR within 3 hours.

3c.) How to Request Auth Code:

- Customer support executive to immediately provide customer and domain information to sales team to try and retain customer.
- Customer support executive to send the screen shots and video link to customer along with explaining the process to the customer

3d.) Requested Auth code but not received:

- Assign to L2 (overseen by PDE Lead)
- L2 to verify that authcode request has been initiated through the panel for that domain.
- If request received L2 to a send the authcode manually via email to registrant email id. (TTR 5 hours if received before 12pm or NBD)
 - + Escalate to PDE lead and Linux email lead as to why authcode not sent out as an automated mailer or whether it landed in spam mailbox of customer.


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- If authcode request not been generated by customer then L2 to assign back to Customer Support executive to revert to customer to generate authcode and guide them how to do so


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a. Please send details of payments made to ICANN / PIR (with amount / date of payment)

Details of payments sent to ICANN and PIR have been submitted at the last date of hearing and same is also a part of the order of the honourable tribunal.

However the same is attached herewith for your reference.

b. Please send a shared Google Sheet (to be updated daily):

We would prefer to work with a word doc with changes and comments captured party wise in Track Changes.

1. List of total complaints received from ICANN/ PIR till date and further to be updated daily - the list be updated with all fresh complaints/ further escalations, with columns [Complaint receipt date, Domains Involved, Issues Raised, Notice No. i.e 1st notice/2nd notice etc., Response Date, Status - Resolved/ Unresolved) (the list be shared with RP/ ICANN)

We have been sending the same periodically in an excel sheet since October to yourself. Copy of all the excel sheets sent is attached herewith. We would like to suggest here that as part of the SOP, keeping in mind close follow ups and with the end goal of customer satisfaction in mind, that the frequency of the same be once a week and the day be every Saturday. The owner of this process would be Mr Pankaj Shukla.

2. List of total complaints/ request received from Customers till date and further to be updated daily - the list be updated with all fresh complaints/ further escalations - with status resolved / unresolved (the list be shared with RP)

Working on generating such a list would be highly time consuming and focussing our energies in the wrong areas. You will surely appreciate the same if/once you are aware of the intricacies of the support operation.

For example a vast majority of emails or calls received are not complaints, but customers who require assistance with some self service functions that are available in the customer panel. All domain, hosting and email functions are changeable/deletable/addable by


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customers through the customer login that can be accessed with the username and password.

In order for us to focus our energies on complaints arising out of any issue on our end, we suggest we only look at firstly genuine complaints arising out of any service issues and also only those genuine complaints where the Trouble Ticket is reopened by the customer after receiving a response/solution form our end.

c. Please send SOPs for resolution of various issues and for performance of various functions, so that the same may be placed before the COC for approval. The SOPs must include but not limited to:

1. Mechanism and Timeline for Payment to Vendors including

-ICANN,
-Registries

Whilst we have almost always paid on time and regularly. However if there may have been any delay, it would be on account of delayed/non receipt of invoices from ICANN/Registries/RP. It is a matter of record that we have even paid in the past without undertaking any reconciliation (as we have not till date even received all the invoices) upon RPs request and or direction of the hon. tribunal.

Here we would like to nominate Mr Dheer Singh Bisht as the process owner Contact Information Redacted

Further the invoices can be paid on or prior to when they come due, provided we receive the invoices at least 14 days prior to the due date. Otherwise the invoices will get paid within 14 days of receiving the same.

We assure you that customers will not face in issue as a result of any kind of delayed payments on our part.

-Data Hosting Service Providers,

The only service provider currently active is STT, which is providing data center service. Whilst we have been making continuous payments since December 2020, however on account of covid related lockdown


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period, STT is still considering our request for issuing a credit note for 3 months billing, which they have provided to most of their other customers and the said request is pending at the end of STT. Once this request is approved/declined/part approved, the payments will be made according to any agreed payment plan (even though we continue to pay on account)

- Other Vendors and Service Providers,

All service providers currently providing services to the master reseller, that could in any way impact the provision of services to the customers are within the agreed payment terms/schedules.

- Employees etc.,

Payments to employees have been paid up to date. However, the payments to certain employees who were not discharging their functions fully, during the covid lockdown period were not paid as per the company policy and in accordance with law. The company is currently negotiating with employees to come to an amicable solution for the said period.

with turn around time for payment from receipt of invoice

3. Mechanism and Timeline for handling ICANN/ customer requests/ complaints including maintenance of logs as advised at point b above incld.

We will endeavour to respond to all ICANN requests within 72 hours (Please note ICANN themselves normally give 1 week or more)

Not clear what you mean by maintenance of logs. If you mean the data escrow deposits, those have already been streamlined and we anticipate no issue. In case there is, then the same will be also addressed within 72 hours.

- Phone Numbers/ Email IDs where requests can be addressed by customers,

We are not in favour of setting up multiple email ids for different types of complaints and support and technical team handle multiple type of problems and there is a process in place for the same, which is run on Microsoft CRM helpdesk module. We shall be sending you shortly the entire process flow for the same to shortly as we are already deep into


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the process of streamlining the same, in light of current manpower and customer issues, with the end goal of providing better services and lower resolution times. We have had a new person join this Monday and he is just getting to grips with the same.

You shall get these by Wednesday 17th February

With reference to the phone number, we have already mentioned that we do not currently provide telephone support. Having said that we are targeting to restart telephone support by 8th of March and will update you the single national telephone number as soon as we get it from the telecom service provider.

- Call Center set up for receiving Customer Complaints icld. size of team manning the same with details

As mentioned, there is already a Helpdesk software in place and we are getting the national number. In addition the technical teams, we have shortlisted and given offers to 3 Customer Support executives and 1 Customer Support Manager. The joining date for the manager is 15-2-21, 2 executives will join within the next 2 weeks and 2 will join in 1st week of March.(1 executive is already in place, whilst in the mean time the technical teams on Systems and engineering have been handling the customer complaints directly)

- Details of Team Members with their phone no./ mail id deputed for handling various issues like –

- **Problems in functioning of website www.net4.com :** Pankaj Shukla Contact Information Redacted
- **Payment related issues on website :** Pawan Panday Contact Information Redacted + Pankaj Shukla
- **E- mail related issues :** Barkatullah Ansari Contact Information Redacted + Mukesh Upadhyay Contact Information Redacted
- **Domain renewal issues :** Pankaj Shukla + Customer Support Manager
- **Authorization Code requests :** Pankaj Shukla + Customer Support Manager

Please also further refer to the attached detailed SOPs with timelines for the problems listed above and also some more common problems identified based on a detailed drill down. You are requested to only


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intimate the relevant process owner as defined in the detailed SOP and not based on the above generic classification

- Turnaround time for resolution of various issues

The problems identified above are extremely generic and will not have a common TTR time to resolution. In the details of the CRM that are being provided there is a categorisation of over 100 specific types of problems and issues and time lines attached to each one.

Please find attached the detailed SOP for major customer support issues, including but not limited to those laid out by yourself

4. List of Present Domains registered with Net 4 and due date of renewal and mechanism for renewal of domains and payment for same

The mechanism for the renewal of the domain is actually quite simple.

1.) We send out a renewal mailer and upon clicking the link, the customer has to enter their username and password, choose the duration of renewal and pay.

2.) Customer can log in to the net4 panel, choose domain, duration and pay for renewal.

(screen shots attached)

5. List of Domain Names where Auth Code has been provided to the customers in year 2019, 2020 and 2021

We fail to understand how customers who have already been given auth codes and gone to another registrar has anything to do with the crux of the directions of the court, i.e. to come up with a SOP so as to ensure that customers/public at large are not inconvenienced. Reference in this regard is made to para 44 of the order dated 25-1-21

6. Communication strategy for informing customers of various steps taken by Net4 and sharing details of Customer Support call center/ email ids/ turnaround time expected.


TRUE COPY

This would be done via email, pop up on the website and pop up on the customer panel. More importantly, we are in the process of making 6-8 self help videos for the main functions, that are not problems but enquiries or help related. This would substantially reduce the pressure on the support and technical teams, which in turn will ensure that customers who have genuine problems are dealt with far faster.

7. Details of Internal Review Mechanism set up for resolution of the issues, which must be headed by Mr. Jasjit Sawhney

Whilst Mr Sawhney will more likely than not be involved in such reviews, it can not be something that is insisted upon and is quite surprising what such a specific request has to with a SOP.

The review mechanism, is also somewhat built in to the help desk software with various levels of escalations at each process failure or deviation and the same can be discussed upon the detailed process flow of the help desk becoming available.

Mr Sawhney will continue to oversee any deviations from the TTR matrix and significant issues that customers may face.

8. Weekly meeting with RP to review the progress and issues, which must be attended by Mr. Jasjit Sawhney assisted by technical team.

Agreed, however, in order for it to be productive the CoC is requested to flag of issues by Sunday, for a meeting to be held at 5pm on Tuesdays. Given the number of issues it would be more desirable to change this to a bi weekly meeting after the first two meetings.

Hope you will find you concerns raised addressed appropriately and we look forward to developing and implementing any process that would be in line with directions of the court, with the ultimate goal to ensure that customers and public at large is not inconvenienced.

With Best regards

Net4 - Legal Team



TRUE COPY

9 Attachments


TRUE COPY

Gaurav Arora

From: Jamie Hedlund <jamie.hedlund@icann.org> on behalf of Jamie Hedlund
Sent: 04 March 2021 05:42
To: Vikram Bajaj; Leticia Castillo; Contact Information Redacted
Cc: Pooja Mahajan; Mohana Nijhawan; Gaurav Arora; Shikha Chaudhary RCA
Subject: Re: [Ext] Reply to ICANN Notice dated 26-2-2021

Dear Mr. Vikram Bajaj:

We are in receipt of your letter dated 1 March 2021. The numerous bases for termination of Net 4 India's Registrar Accreditation Agreement (RAA) are set forth in the 26 February 2021 Notice of Termination as well as in ICANN counsel's communication to you on 27 February 2021. If you have any questions about the process following the termination effective date, please see the document "De-Accredited Registrar Transition Procedure" available at <https://www.icann.org/en/system/files/files/dartp-11jul13-en.pdf>.

Sincerely,

Mr. Jamie Hedlund
Senior Vice President, Contractual Compliance and Consumer Safeguards
Managing Director, Washington, DC Office
Internet Corporation for Assigned Names and Numbers (ICANN)
www.icann.org

From: Vikram Bajaj Contact Information Redacted
Date: Monday, March 1, 2021 at 8:56 AM
To: Jamie Hedlund <jamie.hedlund@icann.org>, Leticia Castillo <leticia.castillo@icann.org>, Contact Information Redacted
Cc: Pooja Mahajan Contact Information Redacted, Mohana Nijhawan Contact Information Redacted, Gaurav Arora Contact Information Redacted, Shikha Chaudhary RCA
Subject: [Ext] Reply to ICANN Notice dated 26-2-2021

Dear All

Please refer to the notice dated 26-2-2021 issued by ICANN.

Please find attached my response to the same with a request to withdraw the same at the earliest, in view of directions of Hon'ble NCLT vide order dated 25-1-2021.

Yours Sincerely

Vikram Bajaj
Resolution Professional
Net4 India Ltd.


TRUE COPY

VAKALATNAMA

BEFORE THE NATIONAL COMPANY LAW TRIBUNAL,
PRINCIPAL BENCH AT NEW DELHI

CA NO. ___ OF 2019

IN

CP (IB)-409 (PB)/2017

194

IN THE MATTER OF:

Edelweiss Asset Reconstruction Company Limited
Versus
Net 4 India Limited

...Applicant/Financial Creditor

...Respondent/Corporate Debtor

KNOW ALL to whom these presents shall come that I, Mr. Vikram Bajaj, Resolution Professional of Net 4 India Limited, do hereby appoint:

**Ms. Pooja Mahajan, Mr. Karan S. Chandhiok, Mr. Vikram Sobti, Ms. Mohana Nijhawan,
Ms. Megha Pathak, Ms. Mahima Singh, Mr. Mehul Parti, Ms. Swati Seth,
Mr. Savar Mahajan, Mr. Ashwani Malhotra and Mr. Gaurav Arora**

of
Chandhiok & Mahajan
C-524 Defence Colony,
New Delhi - 110024



called the advocate(s) to be my/our Advocate in the above noted case authorized to appear and plead in the above-noted case in this Court or in any other Court in which the case is pending and also in the appellate Court including High Court subject to payment of the fee by me/ us.

To verify and present pleadings, appeals cross objections or petitions for withdrawal, compromise or other petitions or affidavits or other documents as may be proper for the prosecution of the said case in all its stages.

To receive back documents to admit and/or deny the documents of opposite party. To receive back or compromise the said case or submit to arbitration any differences or disputes touching or in any manner relating to the said case.

To take execution proceedings.

To draw and receive money, cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.

To appoint and instruct any other Legal Practitioner, authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think it to do so and to sign the Power of Attorney on our behalf.

And I/We the undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and purposes.

And I/We undertake that I / we or my /our duly authorized agent would appear in the Court on all hearings and will inform the Advocates for appearance when the case is called.

And I /we undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case. The adjournment costs whenever ordered by the Court shall be of the Advocate which he shall receive and retain himself.

And I /we the undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the Advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. I/We hereby agree that once the fee is paid. I /we will not be entitled for the refund of the same in any case whatsoever. If the case lasts for more than three years, the advocate shall be entitled for additional fee equivalent to half of the agreed fee for every addition three years or part thereof.

IN WITNESS WHEREOF I/We do hereunto set my /our hand to these presents the contents of which have been understood by me/us on this ___ day of June 2019.

Accepted subject to the terms of fees.

[Signature]
ADVOCATE

[Signature]
I identify the signature of the client

[Signature]
CLIENT

[Signature] 01/29/2017
[Signature] 01/17/2014
[Signature] 01/18/2017

[Signature] 01/15/2015
[Signature] 01/22/2012

[Signature] 01/31/2018
[Signature] 01/26/2012