# IN THE NATIONAL COMPANY LAW TRIBUNAL: NEW DELHI PRINCIPAL BENCH

Interlocutory Application No. 4012/2020 In Company Petition No. (IB)-409(PB)/2017

Order under Section 7 of Insolvency & Bankruptcy Code, 2016

#### In the matter of:

Mr. Vikram Bajaj

Applicant

(Resolution Professional for Net 4 India Ltd.)

#### And

In the matter of:

Edelweiss Asset Reconstruction Co. Ltd.

Applicant/petitioners

Vs

Net 4 India Ltd.

Respondent

### Order delivered on 25.09.2020

#### Coram:

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

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

### PRESENT:

For the RP

Ms. Pooja Mahajan, Ms. Mohana Nijwahan, Mr.

Gaurav Arora, Advs.

For the applicant

Ms. Pallavi Mishra, Adv. for Resolution Applicant

Ms. Shivangi Verma, Adv. for Edelweiss

For the respondent

Mr. Sumit Gupta, Adv. for R-3

Mr. Prashant Mehta, Mr. Rakesh, Advs. for R-1



### ORDER

- 1. It is an application filed by the RP seeking urgent orders as well as expedite hearing in other applications. The gist of the grievance is various domain Registrants complaining that they have not been getting services from the corporate debtor, likewise Registries making calls that they would not revive domain registrations and cancel the license of the Corporate Debtor unless dues are paid, since the corporate debtor has remained interface between Registrants and Registries, unless the respondents are immediately directed to clear the dues of the Registries and provide proper services to the Registrants, the Corporate Debtor could not survive and if solution is not provided, many domains providing services to the public at large will come to stand still.
- 2. At the outset, RP Counsel Ms. Pooja Mahajan has argued that R1/Promoter-Director Mr. Jasjit Singh Sawhney on 30.07.2020 gave an assurance to this Bench that he would comply with all the grievances and will not let any issue come before this Bench. But subsequent to such assurance, about 200 Registrants complained to the RP that the Corporate Debtor has failed to provide services as agreed in between them.



When this Bench has asked this Counsel as to why these 3. Registrants were asking the RP to resolve their issues when services are provided by some other company namely Track Online India Private Limited, the RP has expressed her predicament that originally this Corporate Debtor was an Accredited Registrar taking accreditations from Domain Name Registries and providing services to the Registrants. Earlier Net 4 Network Services Limited (Net 4 Network) was wholly owned subsidiary of the Corporate Debtor. She submits this Promoter director (R1) is in the Corporate Debtor and other companies. The RP discovered that the entire business and income of the Corporate Debtor has been diverted to Net 4 Network, thereafter 70% shareholding of the Corporate Debtor in Net4 Network was surreptitiously transferred to a related company called Track Online India Private Limited, which is another company of the same Promoter-Director and thereafter the business of the Corporate Debtor was on 20.10.2016 transferred to Net4 Network (once upon a time wholly owned subsidiary of the Corporate Debtor company) through Master Reseller Agreement (MSA), which has made Net4 Network "Master Reseller", therefore as on the date the Corporate Debtor has remained for name sake because its shareholding in Net4 Network was transferred leaving



no control over Net4 Network and then strategically business as well.

- 4. The net result is, the contracts with Registries and Registrants remained in the name of the Corporate Debtor but the business of the Corporate Debtor has slipped into the hands of the other companies of the Promoter-Director/Jasjit Singh Sawhney.
- 5. In this situation, the domain name Registries asking for their fees as per the terms of the contract of the Corporate Debtor entered with them. On the other hand, whenever work has not been done to the Registrants, they have been either sending complaints to the Corporate Debtor or directly to the domain name Registries. Though the corporate Debtor has contracts in its name, not even single pie has come to this Corporate Debtor after admission of the company under IBC, despite there is so called agreement in between the Corporate Debtor and Net4 Network indicating 25% of the revenue from the business shall be paid to the Corporate Debtor.
- 6. The RP Counsel has also mentioned that this business is not limited to providing services to some private agencies, it is in effect providing services to the public directly, if any delays happened in providing services, it is not about some company losing or gaining,



it is directly affecting the daily life of public of India, therefore the RP has filed this application hoping for a solution before hearing on Avoidance Application primarily assailing the transfer of shareholding of the Corporate Debtor to another Promoter Company namely Track Online India Private Limited and also about wholesale transfer of the business of the Corporate Debtor. She says unless that application is decided, real value of the Company will not come out. Net4 India Limited (CD), in the words of the RP, is made a dummy company after its shareholding in Net4 Network is taken out and its business was transferred to Net4 Network sometime before initiation of CIRP.

- 7. On elaborately hearing over the application from the Petitioner side, when the same is put to the Promoter-Director counsel Mr. Prashant Mehta and Mr. Rakesh Kumar, they categorically stated, as to the issues of the Registrants, the Respondents have been complying all along and they would comply with the pending issues as well and report to this Bench by 01.10.2020.
- 8. But as to the dues payable to Domain Name Registries such as Public Information Registry, ICM Registry, ICANN, and etc., they will report within five minutes after taking instructions from the



Promoter-Director of all these companies namely Net4 India Limited, Net 4 Network, Net 4 India-Domain Registrar Company and Trak Online India Private Limited.

- 9. Accordingly, we have passed over the matter hoping, this promoter director would realize the urgency involved in the issues and raise to the occasion. In view thereof, this matter was passed over to get instructions from the Promoter-Director with regard to the second issue.
- 10. To the second issue, the Promoter-Director counsel has come back after pass over with a statement that the Promoter-Director Mr. Jasjit Singh Sawhney is not in a position to clear the following dues:

USD 14082 to ICM Registry Fee

USD 8185 to Public Information Registry

### USD 18,823.54 to ICANN

- 11. But the Promoter Director Counsel has simultaneously made another statement, in case three weeks' time is given, he would be in a position to reconcile after verifying the same with the said organisations mentioned above.
- 12. On hearing the submissions of the Promoter counsel over the second issue, we understand now the burning issue is, the services



have not been being properly provided to various registrants. From other side, if dues are not paid, Domain Registries will not revive agreements with the Corporate Debtor.

- 13. In this tricky situation, if this Promoter-Director takes three weeks, then various registrants providing services to the public including Government Agencies will suffer immensely.
- 14. In view thereof, if at all, any reconciliation that the Promoter-Director requires, he has to get it done within two days hereof and report to this Bench by 01.10.2020.
- 15. Tomorrow this Promoter-Director cannot come before this Bench saying that he could not get the statements from the said Registries such as Public Information Registry, ICANN, ICM, etc., therefore he could not pay. It is the look out of the Promoter-Director, who has taken everything upon himself and running the show single headedly without paying money to the Corporate Debtor as well as Registries. It is the bounden duty of him to clear the dues, therefore he shall pay the entire dues charged with a rider, in case any excess payment is made, that shall be refunded to him.



- 16. In view of the gravity in this case, we direct him to resolve this issue by 01.10.2020.
- 17. Accordingly, IA-4012/2020 is hereby disposed of.

(B.S.V PRAKASH KUMAR)
ACTG. PRESIDENT

Sd1-

(HEMANT KUMAR SARANGI) MEMBER (TECHNICAL)

25.09.2020 Aarti Makker

TRUECOPY



Codes:

SLS = Invoice

# AMNEXURE-2

#### **Names and Numbers**

12025 Waterfront Drive, Suite 300 Los Angeles, CA 90094-2536

Fax: +1-310-823-8649

# Voice: +1-310-301-5800

# **Customer Statement**

**Net 4 India Limited** D-25, Sector 3 Noida Uttar Pradesh 201301 India

**Statement Date: Customer Number:**  2020-12-10

RAR001007

PMT = Payment

Currency:

USD

Document No.	Code	Date 07.45	Due Date	Description	Amount Due 1,000.00	Credit	Balance 1,000.00
1100284260	SLS	2020-07-15	2020-08-14		1,000.00	200 50	
1100284260	PMT	2020-10-15		ICANN WIRE: 288471975: 5,000.00		680.50	319.50
1100293601	SLS	2020-07-31	2020-08-30		3,004.04		3,323.54
1100306179	SLS	2020-10-15	2020-11-14		1,000.00		4,323.54
1100310535	SLS	2020-10-31	2020-11-30		3,339.64		7,663.18

61-90 Days past due Total Current 1-30 Days past due 31-60 Days past due 0.00 0.00 7,663.18 0.00 4,339.64

FIN = Late Fee

CM = Credit Memo



10 December 2020

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#### TRANSMITTED VIA ELECTRONIC MAIL AND COURIER

#### RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Vikram Bajaj Net 4 India Limited (IANA #1007) D-25, Sector 3 Noida, Uttar Pradesh, 201301 India

308, Pearls Business Park Netaji Subhash Place, Pitampura Delhi, 110034 India

Email: bajaj.vikram@gmail.com

#### Dear Vikram Bajaj:

Please be advised that as of 10 December 2020, Net 4 India Limited ("Net 4 India") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 14 October 2019 ("RAA"). This breach results from:

- 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 querybased access to up-to-date data concerning all active registered names sponsored by Net 4 India for each top-level domain ("TLD") in which it is accredited, as required by Section 3.3.1 of the RAA.
- 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.

In addition, Net 4 India has been deemed noncompliant in the following area:

- Net 4 India's failure to escrow gTLD registration data, as required by Section 3.6 of the RAA.
- Net 4 India's failure to timely pay past due accreditation fees, as required by Section 3.9 of the RAA.

Please refer to the attachment for details regarding these breaches.

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By not providing the records and information requested in the compliance cases detailed in the chronologies below, each case comprising a different number of affected domain names, Net 4 India has failed to:

- 1. 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 provides the Registered Name Holder ("RNH") with the unique "AuthInfo" code and remove the "ClientTransferProhibited" within five (5) calendar days of the RNH's initial request if the registrar does not provide facilities for the RNH to generate and manage their own unique "AuthInfo" code and to remove the "ClientTransferProhibited" status. In addition, with respect to the domain names deesan.com, arhydraulicfittings.com and slkbima.com Net 4 India has failed to provide:
  - a. An explanation addressing the allegations that the domain names 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"), without the knowledge or authorization of the RNHs; and
  - b. Records to demonstrate compliance with Section I.A.3 of the Transfer Policy. Specifically, that through the mandatory Form of Authorization ("FOA"), Net 4 India confirmed the RNHs' intent to transfer each domain name when the relevant notice of pending transfer was received from the registry operator.
- 2. 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 ("RAE") must be permitted by the registrar to renew the expired registration. In its responses to the compliance cases, Net 4 India provided the 'Registry Expiry Date' displayed through the relevant Registry's RDDS, also known as Whois service, as evidence that the domain names had been renewed. However, on repeated occasions, ICANN explained to Net 4 India that the 'Registry Expiry Date' is not indicative of an explicit extension of the registration by your registrar and highlighted the 'Registrar Registration Expiration Date' which, while you registrar's RDDS was operative, indicated the domain name registrations remained expired. ICANN then requested specific evidence of the domain names registration renewals completed by your registrar, Net 4 India did not respond to this request in any of the cases below.

### Additional Concerns

Over the past few months, the number of complaints ICANN Contractual Compliance has received from RNHs, and authorized representatives, asserting that Net 4 India is exhibiting a pattern of non-response to domain transfer and renewal requests has steadily increased. While addressing the relevant compliance cases, Net 4 India's responses to ICANN Contractual Compliance have also regularly been untimely and incomplete.

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Further, due to unavailability of a registrar Whois/RDDS output by Net 4 India, ICANN is unable to currently confirm Net 4 India's compliance with Whois formatting requirements.

ICANN requests that Net 4 India cure these breaches by 31 December 2020, 21 days from the date of this letter, by taking the following actions:

- Provide an interactive webpage and a port 43 Whois service providing free public querybased access to up-to-date data concerning all active registered names sponsored by Net 4 India for each TLD in which it is accredited.
- To demonstrate compliance with the Transfer Policy:
  - a. For each of the following domain names in Appendix A, provide:
    - The Registration Data for the data elements Registrant Name, Registrant Organization, where applicable, and Registrant Email.
    - ii. Evidence that each of the RNHs has been provided with the corresponding AuthInfo code and, where applicable, the "ClientTransferProhibited" status has been removed in the terms prescribed by Section I.A.5 of the Transfer Policy.
  - For the domain names deesan.com, arhydraulicfittings.com and slkbima.com provide:
    - An explanation concerning the circumstances under which the domain names were transferred from Net 4 India to Openprovider.
    - A copy of the FOA Net 4 India sent to the RNHs prior to the domain names' transfer from Net 4 India to Openprovider.
    - Explanation and evidence regarding the method by which the AuthInfo codes were provided to the RNHs, and the dates they were provided.
  - c. For the domain names in Appendix B, provide:
    - i. Confirmation whether Net 4 India Limited has received from the relevant RNHs/RAEs AuthInfo code requests and/or requests to remove the "ClientTransferProhibited" status; and, if confirmed, please provide:
    - The Registration Data for the data elements Registrant Name, Registrant Organization, where applicable, and Registrant Email.
    - iii. Evidence that each of the RNHs has been provided with the corresponding AuthInfo code and, where applicable, the "ClientTransferProhibited" status has been removed in the terms prescribed by Section I.A.5 of the Transfer Policy.
- To demonstrate compliance with the ERRP:

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- a. For each of the following domain names in Appendix B, provide:
  - Evidence that the domain names have been renewed (such as a copy of your Registrar's RDDS/Whois output showing the updated "Registrar Registration Expiration Date", or system logs showing a successful renew command sent to the registry operator).
  - ii. Copies of any communications between your registrar and RNHs/RAEs, or authorized representatives, relating to renewal requests.
- Provide ICANN the corrective and preventative action(s) that Net 4 India will take, with implementation date(s), to address:
  - a. Its pattern of incomplete and untimely responses to ICANN Contractual Compliance matters in general.
  - b. Its pattern of untimely responses to RNHs' requests seeking assistance from your registrar prior to, and without the need of, submitting a complaint to ICANN Contractual Compliance.
- Deposit gTLD registration data on a weekly basis to an approved escrow agent and ensure that the deposits meet the required specifications.
- 6. Pay all past and currently due accreditation fees.

If Net 4 India fails to timely cure the breaches and provide the information requested by 31 December 2020, ICANN may commence the RAA termination process.

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

Sincerely,

Jamie Hedlund

Jan V Hallel

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

Cc: John O. Jeffrey, General Counsel and Secretary

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### ATTACHMENT

#### Failure to provide an interactive webpage and port 43 Whois service

Section 3.3.1 of the RAA requires registrars to provide an interactive webpage and a port 43 Whois service providing free public query-based access to up-to-date data concerning all active registered names sponsored by the registrar. Net 4 India's failure to provide these RDDS/Whois services is a breach of Section 3.3.1 of the RAA.

# Failure to make registered name holder and registration data available for inspection and copying

Sections 3.4.2 and 3.4.3 of the RAA requires registrars to maintain RNH and registration data, and to make those records available to ICANN upon reasonable notice. Net 4 India's failure to provide the requested registration records and data related to the domain names in the compliance notices detailed in the chronologies below is a breach of Section 3.4.3 of the RAA.

#### Failure to escrow gTLD registration data

Section 3.6 of the RAA requires registrars to submit an electronic copy of the data described in Sections 3.4.1.2 through 3.4.1.5 of the RAA to ICANN or, at the registrar's expense, to a reputable escrow agent mutually approved by the registrar and ICANN. Registrars shall submit the data on a schedule, under the terms, and in a format specified by ICANN. Net 4 India's weekly deposits due on 26 November 2020 and 3 December 2020 were not made which is a breach of Section 3.6 of the RAA.

#### Failure to pay accreditation fees

Section 3.9 of the RAA requires registrars to timely pay accreditation fees to ICANN, consisting of yearly and variable fees. Net 4 India owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA.

#### APPENDIX A

terraquests.com
saralindia.com
mysetu.org
ai4i4.com
ai4machines.com
al4Marine.com
ai4Processes.com
aicompetent.com
aifortell.com
aistcw.com
amarjeetrewari.com
amarjeetrewari.net
amarjitrewari.net

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andthentherewaslight.com appliedresearchinstitute.com appliedresearchinstitute.net appliedresearchinternational.com appliedresearchinternational.net ariebiz.com ariedu.com arieducation.com arimach.com ariprocess.com arisimulation.com arisimulation.net ariworld.com ariworld.net cockpitguru.com dnasimulation.com educationdna.com eneemrana.com firstillusion.com gauravrewari.com gauravrewari.net greenneemrana.com guru4fun.com guru4games.com gurucockpit.com gurucrane.com gurudevice.com gurudollar.com gurudollars.com gurudrive.com guruearn.com gurufastfood.com gurufather.com guruforfun.com guruforgames.com gurumachine.com gurumachines.com gurumove.com gurunewspaper.com gurunuts.com guruoptics.com gurupaint.com gururide.com gurusail.com

gurusgod.com gurushoot.com

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gurusimulations.com gurusimulator.com gurustay.com gurutrain.com guruvr.com guruwings.com headsandhunters.com in2simulation.com in2simulation.net indianseafarer.com insidesimulation.com insidesimulation.net intosimulation.com intosimulation.net intusimulation.net intwosimulation.com intwosimulation.net iriscrane.com irisdefence.com irisdrilling.com irisdriving.com irismarine.com irisoffshore.com japanneemrana.com marinegurukul.com marinegurukul.net maritimegurukul.com mydreamserver.net myneemrana.com naomirewari.com naomirewari.net natasharewari.com natasharewari.net navigationguru.com navyguru.com neeemranasohos.com neemrana1.com neemranaboulevard.com neemranacentral.com neemranacentralpark.com neemranacountry.com neemranacountryresorts.com neemranacountryside.com neemranaeducation.com neemranaespacia.com

neemranaestates.com

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neemranaexotica.com neemranafortview.com neemranagardens.com neemranagardenvillas.com neemranagrand.com neemranaheights.com neemranahomes.com neemranahub.com neemranainstitute.com neemranajapan.com neemranaparadise.com neemranarealestate.com neemranaregal.com neemranaresort.com neemranaresorts.com neemranaroyale.com neemranasoho.com neemranasplendour.com neemranatimes.com neemranatowers.com neemranauniversity.com neemranavillas.com neemranawoods.com nextoceanstrategy.com oceanadmin.com oceanadministrator.com oceanadministrator.net oceandatabase.com oceandatabase.net oceandatabases.com oceandatabases.net oceangov.com oceangov.net oceangovern.com oceangovern.net oceangovernance.com oceangovernance.net oceanguru.com oceanguru.net oceangurukul.com oceannext.com oceansdatabase.com oceansdatabase.net oneneemrana.com ourdreamserver.com

rewarifamily.com

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TROPCOPY

rewarifamily.net sagarmala.com sagarmala.net shippingdna.com shravanrewari.com shravanrewari.net shyamsundersinghrewari.com shyamsundersinghrewari.net simulationdna.com snbone.com thednaofeducation.com thednaofsimulation.com tronicsAi.com virtualcrane.com virtualcrane.net virtualneemrana.com vrneemrana.com weareinneemrana.com weareneemrana.com

#### APPENDIX B

bhombu.com
hyglassindia.com
medkem.com
keralacanoetourism.com
prasannalakshmiauditorium.com
taxikerala.org
gajanand.com
gajanandfoods.com
dmmetals.com
customercarehelpline.com

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### **CHRONOLOGIES**

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### Chronology (00983396):

Date of Notice	Deadline for Response	Details
27-Oct-2020	3-Nov-2020	ICANN sent 1st compliance notice via email to bajaj vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com.
1-Nov-2020	N/A	Email received from Registrar ( <u>icannresolutions@net4.com</u> ) insufficient to demonstrate compliance.
1-Nov-2020	3-Nov-2020	ICANN sent follow-up compliance notice via email to icannresolutions@net4.com and bajaj.vikram@gmail.com. No response received from Registrar.
4-Nov-2020	11-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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 bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

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# Chronology (00986617):

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Date of Notice	Deadline for Response	Details
14-Nov-2020	17-Nov-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
19-Nov-2020	26-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com.
27-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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 bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and 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 ( <u>icannresolutions@net4.com</u> ) insufficient to demonstrate compliance.
8-Dec-2020	8-Dec-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com 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	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

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# Chronology (00986008):



Date of Notice	Deadline for Response	Details
11-Nov-2020	17-Nov-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
23-Nov-2020	30-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
27-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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 bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] om, jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

## Chronology (00979893):

Date of Notice	Deadline for Response	Details	
9-Oct-2020	16-Oct-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, icannresolutions@net4.com,[EMAIL REDACTED] om, jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.	20

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Date of Notice	Deadline for Response	Details
20-Oct-2020	27-Oct-2020	ICANN sent 2nd compliance notice via email to bajaj vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] I, jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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 bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

## Chronology (00977571):

Date of Notice	Deadline for Response	Details
28-Sep-2020	5-Oct-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
15-Oct-2020	22-Oct-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at TELEPHONEREDACTED 3. 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 +91 01145789408 and at TELEPHONEREDACTED 3. 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
30-Nov-2020	7-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] 1, jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

# Chronology (00971966):

Date of Notice	Deadline for Response	Details
31-Aug-2020	7-Sep-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com and shikha.90712@gmail.com
2-Sep-2020	N/A	Email received from Registrar (bajaj vikram@gmail.com) outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAIL REDACTED]  1, jasjit.s@net4india.com
		and jasjit.s@net4.com.  ICANN re-sent 1st compliance notice via email to
3-Sep-2020	N/A	bajaj.vikram@gmail.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
3-Sep-2020	N/A	Email received from Registrar (bajaj.vikram@gmail.com) insufficient to demonstrate compliance.
17-Sep-2020	24-Sep-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar
18-Sep-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at ITELEPHONEREDACTED. 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
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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 bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

# Chronology (00972641):

Date of Notice	Deadline for Response	Details
3-Sep-2020	10-Sep-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com.
4-Sep-2020	N/A	Email received from Registrar (bajaj.vikram@gmail.com) insufficient to demonstrate compliance.
18-Sep-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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 <sup>nd</sup> compliance notice via email to bajaj.vikram@gmail.com, [EMAIL REDACTED] shikha.90712@gmail.com, jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
20-Oct-2020	27-Oct-2020	ICANN sent a follow-up compliance notice to via email to bajaj.vikram@gmail.com, shikha 90712@gmail.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com, pankaj.s@net4.com and jasjit.s@net4.com. No response received from Registrar.

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Date of Notice	Deadline for Response	Details
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at TELEPHONEREDACTED 3. 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 bajaj vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

# Chronology (00976977):

Date of Notice	Deadline for Response	Details
25-Sep-2020	2-Oct-2020	ICANN sent 1st compliance notice via email to icannresolutions@net4.com, bajaj.vikram@gmail.com, shikha.90712@gmail.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com.
30-Sep-2020	N/A	Email received from Registrar (icannresolutions@net4.com) insufficient to demonstrate compliance.
5-Oct-2020	12-Oct-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com, [EMAIL REDACTED] shikha.90712@gmail.com and icannresolutions@net4.com. No response received from Registrar.
18-Oct-2020	26-Oct-2020	ICANN sent 2 <sup>nd</sup> compliance notice to via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, icannresolutions@net4.com and [EMAIL REDACTED] . No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at TELEPHONEREDACTED 3. 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
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

## Chronology (00978716):

Date of Notice	Deadline for Response	Details
5-Oct-2020	12-Oct-2020	ICANN sent 1st compliance notice via email to icannresolutions@net4.com, bajaj.vikram@gmail.com, shikha.90712@gmail.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com.
19-Oct-2020	26-Oct-2020	ICANN sent 2nd compliance notice via email to icannresolutions@net4.com, bajaj.vikram@gmail.com, shikha.90712@gmail.com, [EMAIL REDACTED] , jasjit.s@net4india.com and jasjit.s@net4.com.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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 bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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.

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Date of Notice	Deadline for Response	Details
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

# Chronology (00975973):

Date of Notice	Deadline for Response	Details
21-Sep-2020	28-Sep-2020	ICANN sent 1st compliance notice via email to bajaj vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] icannresolutions@net4.com.
22-Sep-2020	N/A	Email received from Registrar (icannresolutions@net4.com) insufficient to demonstrate compliance.
5-Oct-2020	12-Oct-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED]  icannresolutions@net4.com. No response received from Registrar.
26-Oct-2020	2-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] icannresolutions@net4.com. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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 bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4.com, [EMAIL REDACTED] icannresolutions@net4.com. No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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.

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Date of Notice	Deadline for Response	Details
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

# Chronology (00976043):

Date of Notice	Deadline for Response	Details
21-Sep-2020	28-Sep-2020	ICANN sent 1st compliance notice via email to bajaj vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] and icannresolutions@net4.com.
22-Sep-2020	N/A	Email received from Registrar ( <u>icannresolutions@net4.com</u> ) insufficient to demonstrate compliance.
6-Oct-2020	13-Oct-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] icannresolutions@net4.com. No response received from Registrar.
26-Oct-2020	2-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] 1, icannresolutions@net4.com. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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 bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] and icannresolutions@net4.com. No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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.

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Date of Notice	Deadline for Response	Details
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

### Chronology (00977573):

Date of Notice	Deadline for Response	Details
28-Sep-2020	5-Oct-2020	ICANN sent 1st compliance notice via email to bajaj vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED]  icannresolutions@net4.com. No response received from the Registrar.
6-Oct-2020	13-Oct-2020	ICANN sent 2 <sup>nd</sup> compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] icannresolutions@net4.com. No response received from the Registrar.
12-Oct-2020	N/A	Email received from Registrar (icannresolutions@net4.com) insufficient to demonstrate compliance.
14-Oct-2020	N/A	Email indicating the compliance case had been closed was mistakenly sent to bajaj.vikram@gmail.com
29-Oct-2020	5-Nov-2020	ICANN sent follow-up compliance notice to bajaj.vikram@gmail.com explaining the error and requesting a full response to the compliance case.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at TELEPHONEREDACTED 3. 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 bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] and icannresolutions@net4.com. No response received from the Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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.

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Date of Notice	Deadline for Response	Details
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

### Chronology (MDZ-368-16882):

Date of Notice	Deadline for Response	Details
25-Aug-2020	1-Sep-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com. No response received from Registrar. No response received from the Registrar.
2-Sep-2020	N/A	Email received from Registrar (bajaj.vikram@gmail.com) outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from the Registrar.
4-Sep-2020	4-Sep-2020	ICANN re-sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com and [EMAIL REDACTED]  1. No response received from the Registrar.
4-Sep-2020	N/A	Email received from Registrar ( <u>bajaj.vikram@gmail.com</u> ) insufficient to demonstrate compliance.
18-Sep-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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 bajaj.vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] and icannresolutions@net4.com. No response received from the Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] and icannresolutions@net4.com. No response received from the Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at TELEPHONEREDACTED 1. 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 +91 01145789408 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	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

# Chronology (NMC-663-14600):

Date of Notice	Deadline for Response	Details
19-Aug-2020	26-Aug-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com. No response received from Registrar.
28-Aug-2020	4-Sep-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com. No response received from Registrar.
2-Sep-2020	N/A	Email received from Registrar (bajaj.vikram@gmail.com) outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAIL REDACTED] , jasjit.s@net4india.com
4-Sep-2020	4-Sep-2020	and jasjit.s@net4.com.  ICANN re-sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , jasjit.s@net4.com , jasjit.s@net4india.com, [EMAIL REDACTED]  1.
4-Sep-2020	N/A	Email received from Registrar ( <u>bajaj.vikram@gmail.com</u> ) insufficient to demonstrate compliance.
18-Sep-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at TELEPHONEREDACTED 1. 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
22-Sep-2020	N/A	ICANN re-sent 2nd compliance notice via email to bajaj vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED]
		icannresolutions@net4.com with immediate response requested. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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 bajai.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, [EMAIL REDACTED] icannresolutions@net4.com. No response received from the Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 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	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

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# E-39URSANA

#### **ICANN Notice**

Vikram Bajaj Contact Information Redacted To: Prashant Mehta Contact Information Redacted Contact Information Redacted Cc: Pooja Mahajan Contact Information Redacted Tue, Dec 15, 2020 at 9:32 AM

· icannresolutions · Contact Information Redacted

Mr. Prashant Mehta / Mr. Jasjit Sawhney

Please refer to the undertaking given by you before Hon'ble NCLT to resolve all compliance issues. Further please refer to the directions of Hon'ble NCLT to resolve all compliance issues and pay outstanding fee of ICANN by Oct 31, 2020.

ICANN has issued a notice highlighting non compliances and pending tickets for domain renewal and threatening that RAA shall be terminated if same are nit addressed by Dec 31,2020. The attached notice received from ICANN clearly reflects that the directions of Hon'ble NCLT have not been complied with. You are advised to take immediate steps to resolve the same and clear the outstanding dues of ICANN.

You are further advised to send a detailed report for each of the domain listed in the notice within 2 days so that same can be apprised to ICANN.

Sincerely,

Vikram Bajaj Resolution Professional Net4 India Ltd.

hedlund-to-bajaj-10dec20.pdf 378K



#### BY ELECTRONIC MAIL

Net 4 India Limited Pearls Business Park Netaji Subhash Place, Pitampura Delhi, India Contact Information Redacted

SUBJECT: NOTICE OF TERMINATION OF Registry-Registrar Agreement

To Whom it May Concern:

As you know, Net 4 India Limited ("Net4India") and Public Interest Registry are parties to a Registry-Registrar Agreement (the "RRA") dated April 19, 2016. The RRA sets forth your responsibilities as a .ORG accredited Registrar. Section 4.3 of the RRA provides that:

In the event Registrar has insufficient funds deposited or available through the letter of credit or credit facility with PIR, PIR may do any or all of the following: (a) stop accepting new initial or renewal registrations, or registrations associated with transfers of sponsorship, from Registrar; (b) delete the domain names associated with any negative balance incurred or invoice not paid in full from the Registry database (c) give written notice of termination of this Agreement pursuant to Subsection 9.2.1; and (d) pursue any other remedy under this Agreement.

The RRA also provides in Section 9.2.1 that PIR may terminate the RRA for cause:

In the event that either party materially breaches any of its obligations under this Agreement and such breach is not substantially cured within thirty calendar days after written notice thereof is given by the other party, then the non-breaching party may, by giving written notice thereof to the other party, terminate this Agreement as of the date specified in such notice of termination.

Net4India has been violating Section 4.3 of the RRA since September 17, 2020. You were notified of your insufficient funds again on November 12, December 1, and December 9.

As of the date of this correspondence, 1644 domains will expire on or before December 30, 2020, which would require a minimum deposit of sixteen thousand three hundred and twenty-four dollars and ninety two cents (\$16,324.92 USD) to sufficiently fund your account. Note, this dollar figure does not account for additional renewals which may continue to increase. PIR anticipates that the names expiring in January will increase this minimum to twenty one thousand seven hundred and ninety-six dollars and thirty-five cents (\$21,796.35 USD).



The RRA also provides in Section 9.2.5 that PIR may terminate the RRA for insolvency proceedings:

Either party may terminate this Agreement if the other party is adjudged insolvent or bankrupt, or if proceedings are instituted by or against a party seeking relief, reorganization or arrangement under any laws relating to insolvency, or seeking any assignment for the benefit of creditors, or seeking the appointment of a receiver, liquidator or trustee of a party's property or assets or the liquidation, dissolution or winding up of a party's business.

PIR is aware that insolvency proceedings were commenced against Net4India in April 2019 (National Company Law Tribunal: New Delhi Principal Bench, Item No. 101, (IB)-409(PB)/2017, In the Matter of Edelweiss Asset Reconstruction Co. Ltd v. Net 4 India Limited) and continue as of the date of this correspondence.

Your insufficient funds and insolvency proceedings are material breaches of your obligations in the RRA. If you do not immediately cure these material breaches and bring your account current by January 14, 2021 (the "**Termination Date**"), which is 30 days from this correspondence, PIR will terminate the RRA of Net4India pursuant to Sections 4.3(c), 9.2.1, and 9.2.5 effective immediately upon the Termination Date.

Sincerely

Anand Vora Vice President, Business Affairs





# ANNEXURES 5

### Notice of termination of Registry-Registrar Agreement

53

Vikram Bajaj Contact Information Redacted
To: Prashant Mehta Contact Information Redacted
Contact Information Redacted

Cc: Pooja Mahajan Contact Information Redacted

Wed, Dec 16, 2020 at 2:44 PM

icannresolutions

Mr. Prashant Mehta / Mr. Jasjit Sawhney

The undersigned is in receipt of notice dated 15-12-2020 from Public Interest Registry for termination of Registry-Registrar Agreement on account of outstanding of USD 16324.92 for renewal of 1644 domains. Further an amount of USD 21796.35 USD is required to be deposited taking in accounts domains coming for renewal upto January 2021.

In this regard, please refer to the undertaking given before the Hon'ble NCLT to resolve all compliance and domain renewal issues and further order of Hon'ble NCLT dated September 25, 2020 (attached) wherein Mr. Jasjit Sawhney was directed to clear the dues of Public Interest Registry, ICANN and others. The dues of PIR amounting to USD 21796.35 need to be paid immediately as the non-payment can lead to termination of Registry-Registrar Agreement, which shall put in jeopardy the business of Net 4 India Ltd. and domain rights of thousands of customers. Accordingly, you are advised to pay the dues of USD 21796.35 to PIR immediately under confirmation to the undersigned, failing which I shall be constrained to reachout to Hon'ble NCLT for appropriate directions.

Sincerely,

Vikram Bajaj Resolution Professional Net 4 India Ltd.

------ Forwarded message ------

From: Anand Vora Contact Information Redacted

Date: Wed, Dec 16, 2020 at 4:33 AM

Subject: Notice of termination of Registry-Registrar Agreement

To: Contact Information Redacted

Cc: PIR Registry Services and Customer Operations Contact Information Redacted

Hello Jasjit and Vikram,

Attached please find notice of termination of your Registry-Registrar Agreement with Public Interest Registry.

Please review the attached notice for further details. Feel free to reach out to us if you have questions.

Best,

ΑV



Anand Vora | Vice President, Business Affairs

https://mail.google.com/mail/u/0?ik=c3f89173d1&view=pt&search=all&permmsgid=msg-a%3Ar-3259222647169139553&dsqt=1&simpl=msg-a%3Ar-3... 1/2



Contact Information Redacted | www.thenew.org | Power your inspiration. Connect your world.



Net4India RRA Termination Notice (Cause)signed.pdf



ANNEXURES 6

12/21/2020

Gmail - Re: [Ext] Re: Legal Notice on behalf of Mr. Vikram Bajaj, Resolution Professional of Net 4 India Limited



Vikram Bajaj Contact Information Redacted

### Re: [Ext] Re: Legal Notice on behalf of Mr. Vikram Bajaj, Resolution Professional of Net 4 India Limited

Leticia Castillo <leticia.castillo@icann.org>

Sat, Dec 19, 2020 at 4:55 AM

To: Vikram Bajaj Contact Information Redacted Cc: Howard Li <a href="howard.li@icann.org">howard.li@icann.org</a>, Valerie Heng <valerie.heng@icann.org</a>, Contact Information Redacted Contact Information Redacted ICANN Compliance <compliance@icann.org>, Pooja Mahajan Contact Information Redacted Samiran Gupta <samiran gupta@icann.org>, Jonathan Denison <jonathan.denison@icann.org>

Dear Vikram,

Thank you for your email informing that the hearings have again been postponed, this time until 5 January 2021.

Please note that all violations included in the Notice of Breach issued against Net 4 India Limited on 10 December 2020 must be fully cured by 31 December 2020.

The amount of complaints that ICANN is receiving from registrants who are unable to manage their domain names registrations with Net 4 India Limited continues to increase. As of 17 December 2020, 10AM PST, more than 140 compliance cases remained in process with Net 4 India Limited while more than 150 new complaints are under review to be sent to your registrar. Further, we continue receiving new complaints daily. Net 4 India Limited has continuously failed to demonstrate compliance with the Registrar Accreditation Agreement with respect to numerous compliance cases addressing these complaints and other violations. Accordingly, the relevant and unresolved compliance cases have continued to escalate in accordance with ICANN Contractual Compliance Approach and Processes resulting in the 10 December 2020 Notice of Breach. Additional breach notices may be issued as more unresolved complaints continue to escalate.

ICANN requests you to please send any communication regarding the 10 December 2020 Notice of Breach to the email you received delivering the Notice of Breach itself and not through this email thread. For your convenience, I will send you another communication through the Notice of Breach email so that you can send any subsequent related communications to such thread and they are properly documented in the corresponding case.

Sincerely,

Leticia Castillo

ICANN Contractual Compliance

From: Vikram Bajaj Contact Information Redacted Date: Wednesday, December 16, 2020 at 1:50 AM To: Leticia Castillo <leticia.castillo@icann.org>

Cc: Howard Li <a href="howard.li@icann.org">howard.li@icann.org</a>, Valerie Heng <valerie.heng@icann.org>, ICANN Compliance Contact Information Redacted

<compliance@icann.org>, Pooja Mahajan Contact Information Redacted Samiran Gupta

<samiran.gupta@icann.org>, Jonathan Denison <jonathan.denison@icann.org>

TRIFCOPY

12/21/2020

Gmail - Re: [Ext] Re: Legal Notice on behalf of Mr. Vikram Bajaj, Resolution Professional of Net 4 India Limited

Subject: Re: [Ext] Re: Legal Notice on behalf of Mr. Vikram Bajaj, Resolution Professional of Net 4 India Limited

Dear Leticia

The hearing in the matter was scheduled on 10th and 11th Dec 2020, however the matter could not be taken up and is now scheduled for hearing on 5-1-2021, for hearing on approval of the resolution plan. The order on avoidance application was reserved and expected to be pronounced shortly. In the meantime, we are trying to address and assist customers with domain renewal/ transfer issues. I'm sure that the issues would be addressed once the order on avoidance application are pronounced.

I have also come across your notice dated 10-12-2020, issued by Jamie Hedulan, highlighting various breaches of RAA. While I'm trying my best to coordinate and resolve the issues and the Hon'ble NCLT has also issued commensurate directions vide order dated 25-9-2020(attached) to resolve the issues, however I shall be able to address the same more comprehensively and expeditiously once the orders on avoidance application are pronounced. Thanks for your continued support.

Sincerely

Vikram Bajaj

Resolution Professional

Net 4 India Ltd.

On Tue, Dec 8, 2020 at 6:48 AM Leticia Castillo <leticia.castillo@icann.org> wrote:

Dear Vikram,

Thank you for your email. Please provide another update on the progress of the proceedings by 14 December 2020.

As ICANN has repeatedly shared with you in the past, please keep in mind that any request for a Registrar change of control/ownership or any Registrar Accreditation Agreement ("RAA") assignment request must comply with the terms and requirements of Net 4 India Limited's RAA and ICANN's procedures. Information regarding a registrar's change of ownership or control can be found in Section 7.3 of the RAA [icann.org].

Attached to this email you will find Net 4 India Limited's customer statement that reflects the fees owed to ICANN as of 4 December 2020. The amount is \$7,663.18. For your convenience, attached to this email are the invoices that remain

Invoice number 1100284260

https://mail.google.com/mail/u/0?ik=c3f89173d1&view=pt&search=all&permmsgid=msg-f%3A1686460342410042674&simpl=msg-f%3A1686460342.... 2/55



ANNEXURE TO

57

12/21/2020

Gmail - Notice of termination of Registry-Registrar Agreement



Vikram Bajaj Contact Information Redacted

### Notice of termination of Registry-Registrar Agreement

Vikram Bajaj < Contact Information Redacted

Wed, Dec 16, 2020 at 12:48 PM

To: Anand Vora

Cc: PIR Registry Services and Customer Operations Contact Information Redacted

Dear Sir

Please refer to your appended notice.

As noted by you Net 4 India Ltd. is undergoing CIRP under Insolvency and Bankruptcy Code, 2016 (IBC, 2016). Section 14 of IBC, 2016 imposes a moratorium which prohibits coercive action for recovery of dues and persons authorising violation of moratorium are punishable under Sec 74 of IBC, 2016.

Whie on the subject, I'm seized of the issues of the outstanding dues of PIR and the same was also taken up with Hon'ble NCLT. The Hon'ble NCLT has also taken due cognizance of the same and issued directions to Mr. Jasji Sawhney to clear the dues. Pursuant to such directions, I understand an amount of USD 6000 was paid to PIR. I have further taken note of the dues position stated in your notice and shall pursue for payment of the same.

I would further like to advise that Hon'ble NCLT has taken cognizance of the peculiar issues involved in the case which lead to delays in payments and has reserved orders on a vital avoidance application. I'm hopeful that the issues shall be effectively addressed upon pronouncement of orders on the avoidance application. Further I would like to apprise that the committee of creditors of Net 4 India Ltd. has approved a resolution plan, which is now sub-judice before Hon'ble NCLT and pursuant to approval of resolution plan by Hon'ble NCLT, Net 4 India Ltd. shall undergo change of management and continue as a going concern.

I'm appending orders dated 25-9-2020 and 18-11-2020 of Hon'ble NCLT for your reference and record. The next date of hearing is on 5-1-2021.

I request you to extend co-operation and assistance as the CIRP process is at a fairly advanced stage and ensure timely renewal of domains so that public interest is not affected. I shall be constrained to reach out to Hon'ble NCLT for necessary directions if the notice under reference is not withdrawn and requisite co-operation is not extended. Let me assure you I'm parallely working to resolve the issues related to your dues.

Look forward to your cooperation, assistance and restraint.

Sincerely

Vikram Bajaj Resolution Professional Net 4 India Ltd.

On Wed, Dec 16, 2020 at 4:33 AM Anand Vora Contact Information Redacted wrote:

Hello Jasjit and Vikram,

Attached please find notice of termination of your Registry-Registrar Agreement with Public Interest Registry.

Please review the attached notice for further details. Feel free to reach out to us if you have questions.

Best:

https://mail.google.com/mail/u/0?ik=c3f89173d1&view=pt&search=all&permmsgid=msg-a%3Ar-3459700715055777202&dsqt=1&simpl=msg-a%3Ar-3... 1/2



12/21/2020

ΑV



### Anand Vora | Vice President, Business Affairs

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#### 2 attachments

18th Nov 2020 101Edelweiss Asset Reconstruction Co. Ltd Vs. Net 4 India Limited.pdf 725K

25-9-2020 Net 4 Order to Resolve Issues.pdf 2707K



ANNEXURE-8

From: Leticia Castillo < leticia.castillo@icann.org>

Date: Thu, Dec 24, 2020 at 7:15 PM

Subject: ICANN Notice of Breach: Net 4 India Limited (1007) [

ref: 00D616tJk. 5004McwsBd:ref]

To: ICANN Contractual Compliance < compliance-cases@icann.org>,

Contact Information Redacted

Cc: GDD Accounts Compliance < GDDAccounts-Compliance@icann.org >, Jamie

Hedlund < jamie.hedlund@icann.org >, Jonathan Denison < jonathan.denison@icann.org >,

Contact Information Redacted Leticia Castillo

<leticia.castillo@icann.org>

Dear Vikram,

As explained in my email of 23 December 2020, at 5:13 PM PST, I am sending you another communication through the 10 December 2020 Notice of Breach email thread. Please submit any communications related to the Notice of Breach issued against Net 4 India Limited on 10 December 2020 in response to this email thread.

Please confirm receipt of this email.

Sincerely,

Leticia Castillo

ICANN Contractual Compliance

From: ICANN Contractual Compliance < compliance-cases@icann.org>

Date: Friday, December 18, 2020 at 3:58 PM

To: Contact Information Redacted

Cc: GDD Accounts Compliance < GDDAccounts-Compliance@icann.org>, Leticia Castillo < leticia.castillo@icann.org>, Jamie Hedlund < jamie.hedlund@icann.org>, Jonathan Denison < jonathan.denison@icann.org>, Contact Information Redacted

Contact Information Redacted

Subject: [Ext] ICANN Notice of Breach: Net 4 India Limited (1007) [

ref:\_00D616tJk.\_5004McwsBd:ref]

Dear Vikram,

As explained in my email of 18 December 2020, please submit any communications related to the Notice of Breach issued against Net 4 India Limited on 10 December 2020 in response to this email thread.

Please refer to the Notice of Breach for the actions that must be taken by Net 4 India Limited (items #1 through #6 on pages 3 and 4 of the Notice of Breach). If you have any questions regarding the requests contained in the Notice of Breach, you may submit them via response email before 31 December 2020, so that there is sufficient time to act on any clarifications



Net 4 India Limited deposited gTLD registration data on 17 December 2020 (US time), after not making the required deposits on 26 November 2020, 3 December 2020 and 10 December 2020. However, please note that to cure this item in the Notice of Breach, Net 4 India Limited must continue depositing on a weekly basis in the terms prescribed by Section 3.6 of the Registrar Accreditation Agreement (RAA), including all deposits that are due on the remaining weeks prior to the 31 December 2020 deadline.

Please note that all violations included in the Notice of Breach must be fully cured by 31 December 2020. The amount of complaints ICANN is receiving from registrants who are unable to manage their domain name registrations with your registrar continues to increase. As of 17 December 2020, 10AM PST, more than 140 compliance cases remained in process with Net 4 India Limited while more than 150 new complaints are under reviewed to be sent to your registrar. Further, we continue to receive new complaints daily. Net 4 India Limited remains noncompliant with the RAA and Consensus Policies with respect to numerous compliance cases addressing these complaints and other violations. To that extent, please note that additional breach notices may be issued as other unresolved compliance cases continue to escalate. All cases have been, and will continue to be, sent to you.

Net 4 India Limited is not fully and timely operating as a registrar who fulfills its obligations pertaining to the provision of Registrar Services and failure to become complaint, by 31 December 2020, may result in ICANN initiating the RAA termination process.

Sincerely, Leticia Castillo ICANN Contractual Compliance



#### VAKALATNAM

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

CA NO. OF 2019

IN

CP (IB)-409 (PB)/2017

IN THE MATTER OF:

Edelweiss Asset Reconstruction Company Limited

Applicant/Financial Creditor

Net 4 India Limited

...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

> Chandhlok & Mahajan C-524 Defence Colony, New Delhi - 110024

alled the advocate/s) to be my/our Advocate in the above noted case auth and plead in the above-noted case in this Court or in any other Court in wi rd and also in the appellate Court including High Court subject to payment : by me/ us.

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

te back documents to admit and/or deny the documents of opposite party. r compromise the said case or submit to arbitration any differences or disput

touching or in any manner relating to the said case.

To take execution proceedings.

The deposit, 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

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. (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 Jour hand to these presents the contents of which have day of June 2019. been understood by me/us on this

Accepted subject to the terms of fees.

DVOCATE I identify the signature of the client

0430583