UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Seth Charles Ben Haim, et al.		The Islamic Republic of Iran, et al.
Plaintiff(s)	vs	Defendant(s)
	CIVIL ACTION NO. ⁰²⁻¹⁸¹ WRIT OF ATTACHMENT ON J THAN WAGES, SALARY AN	UDGMENT
To Internet Corporation for Ass	igned Names and Numbe	rs
801 17th Street NW, Suite 400	, Washington, DC 20006	Garnishee:
the above named defendant(s), are set or surrender it to the defendant(s) or t The Judgement against the c	ized by the Writ of Attachment, o anyone else without an order lefendant was entered on March	in the amount of
sixteen million dollars	_{(\$} 16,0	00,000 and the costs amounting to \$
wit	h interest at an annual rate	of 4.76 % from
March 24, 2006	less credits of \$ 0	·
UNDER PENALTY OF PERJURY, and copy, by mail or other means, upon the entered against you for the entire amount of the entered against you for the entered against your forther entered against your	d to file in this Court the origina e plaintiff(s) and upon the defer ount of the plaintiff's claims with	are required to answer the interrogatories, all and one copy of the answers, and to serve a idant(s). If you fail to do so, judgment may be a interest and costs.
	Angel	a D. Caesar, Clerk
	Ву	Deputy Clerk
Robert J. Tolchin, The Berkman La	w Office, LLC	
Attorney for Plaintiff 111 Livingston Street, Suite 1928		
Brooklyn, New York 11201		
(718) 855-3627		
Address & Telephone Number		

INTERROGATORIES IN ATTACHMENT

NOTICE

As a garnishee, you are required by law to file answers to the following Interrogatories in Attachment1 within ten (10) days after service of the writ upon you [Title 16. Section 521 (a), D.C. Code 1981 ed.]. If you fail to answer the Interrogatories, judgment may be entered against you for the entire amount of the plaintiff's claim and costs [Title 16, Section 526(b), D.C. Code 1981 ed.].

The garnishee is required to file the original and one copy of the answers in this Court, and to serve a copy upon the plaintiff(s) and defendant(s).

If, within ten (10) days after service of the answers, the party at whose request the Attachment was issued does not contest the answers pursuant to <u>Title 15</u>, <u>Section 522</u>. <u>D.C. Code</u> (1981 ed.), the garnishee's obligations under the attachment shall be limited by the answers.

1. and the	Were you at the time of the service of the writ of attachment, or have you been between the time filing of your answers to this interrogatory indebted to the defendant(s), and, if so, how, and it ANSWER	
	Had you at the time of the service of the writ of attachment, or have you had between the time filing of your answer to this interrogatory, any goods, chattels, or credits of the defendant(s) in ge, and, if so, what? ANSWER	
knowled	I declare under the penalties of perjury that the answers to the above interrogatories are, to dge and belief, true and correct as to every material matter.	the best of my
Date: _	Ga	rnishee

UNITED STATES DISTRICT COURT

for the

	District of Colu	mbia	
	rles Ben Haim, et al. Plaintiff v. Republic of Iran, et al. Defendant)	Civil Action No.	02-1811(RCL)
OTI			M OD OD IECTS
	BPOENA TO PRODUCE DOCUMENTS OR TO PERMIT INSPECTION OF PR		
То:	Internet Corporation for Assign	ned Names and N	umbers
	(Name of person to whom th	is subpoena is directed	1)
documents, electronic material: See attached	YOU ARE COMMANDED to produce at tally stored information, or objects, and to page 5.	ermit inspection, c	opying, testing, or sampling of the
Place: Internet Corpo Washington, I (for courrier pi		Date and Time:	7/07/2014 10:00 am
other property possess	Premises: YOU ARE COMMANDED to sed or controlled by you at the time, date, as survey, photograph, test, or sample the pro-	nd location set fort	h below, so that the requesting party
Rule 45(d), relating to	provisions of Fed. R. Civ. P. 45 are attached your protection as a person subject to a submanand the potential consequences of not decrease.	opoena; and Rule 4	
	CLERK OF COURT		•
		OR	/s/ Robert J. Tolchin
	Signature of Clerk or Deputy Clerk		Attorney's signature
Seth Charles Ben Hair	mail address, and telephone number of the a m, et al. Livingston Street Suite 1928, Brooklyn, NY	, who issu	es or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 02-1811(RCL)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

(data)	ppoena for (name of individual and title, if a		
	•		
☐ I served the sul	bpoena by delivering a copy to the na	ned person as follows:	
		on (date) ;	or
	subpoena unexecuted because:		
		States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
\$	·		
fees are \$	for travel and \$	for services, for a total of \$	0.00
T 4	and the second s	- 4	
i deciare under pe	nalty of perjury that this information i	s true.	
e:	_	Server's signature	
		server's signature	
		Printed name and title	1. II. II
		Server's address	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an

order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
 (iii) requires disclosure of privileged or other protected matter, if no
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpocna.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

SCHEDULE A

DEFINITIONS

"ICANN" means the Internet Corporation for Assigned Names and Numbers, the Internet Assigned Numbers Authority (a/k/a/ IANA) and each of the five regional internet registries, as applicable – AfriNIC (serving Africa), APNIC (serving East Asia and the Pacific Region), ARIN (serving the United States and Canada), LACNIC (serving Latin America and much of the Caribbean), and RIPE NCC (serving Europe, the Middle East and much of the former Soviet Union).

"Iran" means the Islamic Republic of Iran and any person or entity acting on its behalf, including the Institute for Research in Fundamental Sciences (a/k/a/ IPM) and IRNIC.

"MOIS" means the Iranian Ministry of Information and Security and any person or entity acting on its behalf.

DOCUMENT REQUEST

- 1. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN allocates, licenses, assigns or transfers rights of any kind in any top level domain names to Iran and/or MOIS.
- 2. All documents and electronically stored information referencing, listing or describing: all top level domain names allocated, licensed, assigned or transferred by ICANN to Iran and/or MOIS.
- 3. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN

allocates, licenses, assigns or transfers rights of any kind in any internet protocol addresses to Iran and/or MOIS.

- 4. All documents and electronically stored information referencing, listing or describing: all internet protocol addresses allocated, licensed, assigned or transferred by ICANN to Iran and/or MOIS.
- All documents and electronically stored information referencing, listing or describing any payments from Iran and/or MOIS to ICANN.
- 6. All documents and electronically stored information referencing, listing or describing any amounts owed:
 - a. from Iran and/or MOIS to ICANN; and
 - b. from ICANN to Iran and/or MOIS.
- 7. All communications between ICANN, on the one hand and Iran and/or MOIS, on the other hand concerning any of the foregoing.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Seth Charles Ben Haim, et al.		The Islamic Republic of Iran, et al.
Plaintiff(s)	vs	Defendant(s)
OTHER TH	CIVIL ACTION NO. 08-5: T OF ATTACHMENT ON IAN WAGES, SALARY AN	JUDGMENT ND COMMISSIONS
To Internet Corporation for Assign	ed Names and Numb	ers
801 17th Street NW, Suite 400, W	Vashington, DC 20006	Garnishee:
the above named defendant(s), are seized or surrender it to the defendant(s) or to ar The Judgement against the defe three hundred million dollars	by the Writ of Attachmen nyone else without an orde ndant was entered on May	$\begin{array}{ccc} 19,2011 & & \text{in the amount of} \\ 0.000.000 & & & & \end{array}$
with in	terest at an annual rate	e of .18 % from
May 19, 2011 less	terest at an annual rates of \$\frac{3}{2} \rightarrow{3}{2} \right	
Within ten (10) days after this w UNDER PENALTY OF PERJURY, and to	rit is served upon you, you file in this Court the origin aintiff(s) and upon the defo of the plaintiff's claims wi	nare required to answer the interrogatories, and and one copy of the answers, and to serve a condant(s). If you fail to do so, judgment may be th interest and costs.
		ela D. Caesar, Clerk Regulation of the Company Clerk Deputy Clerk
Robert J. Tolchin, The Berkman Law (Office, LLC	
Attorney for Plaintiff 111 Livingston Street, Suite 1928		
Brooklyn, New York 11201		
(718) 855-3627		
Address & Telephone Number		

INTERROGATORIES IN ATTACHMENT

NOTICE

As a garnishee, you are required by law to file answers to the following Interrogatories in Attachment1 within ten (10) days after service of the writ upon you [Title 16. Section 521 (a), D.C. Code 1981 ed.]. If you fail to answer the Interrogatories, judgment may be entered against you for the entire amount of the plaintiff's claim and costs [Title 16, Section 526(b), D.C. Code 1981 ed.].

The garnishee is required to file the original and one copy of the answers in this Court, and to serve a copy upon the plaintiff(s) and defendant(s).

If, within ten (10) days after service of the answers, the party at whose request the Attachment was issued does not contest the answers pursuant to <u>Title 15</u>, <u>Section 522</u>. <u>D.C. Code</u> (1981 ed.), the garnishee's obligations under the attachment shall be limited by the answers.

1.	Were you at the time of the service of the writ of attachment, or have you been between the tim	e of such service
and the	e filing of your answers to this interrogatory indebted to the defendant(s), and, if so, how, and in ANSWER	n what amount?
	Had you at the time of the service of the writ of attachment, or have you had between the time of iling of your answer to this interrogatory, any goods, chattels, or credits of the defendant(s) in tree, and, if so, what? ANSWER	
	AND WEIS	
knowle	I declare under the penalties of perjury that the answers to the above interrogatories are, to edge and belief, true and correct as to every material matter.	the best of my
Date: _	G	nrnishee

UNITED STATES DISTRICT COURT

for the

District of Columbia

	District of Colum	ioia	
Seth Charles Ben Haim, et al. Plaintiff v. The Islamic Republic of Iran, et al. Defendant	,	Civil Action No.	08-520 (RCL)
SUBPOENA TO PRODU OR TO PERMIT INS			
To: Internet C	Corporation for Assign	ed Names and Nu	ımbers
(No	ame of person to whom this	subpoena is directed)
♣ Production: YOU ARE COMMAN documents, electronically stored information material: See attached Schedule A ■ Production: YOU ARE COMMAN documents, electronically stored information. ■ Production: YOU ARE COMMAN documents, electronically stored information. ■ Production: YOU ARE COMMAN documents, electronically stored information. ■ Production: YOU ARE COMMAN documents, electronically stored information. ■ Production: YOU ARE COMMAN documents, electronically stored information. ■ Production: YOU ARE COMMAN documents, electronically stored information. ■ Production: YOU ARE COMMAN documents. ■ Production: YOU ARE COMMAN documents.	NDED to produce at the notation, or objects, and to pe	e time, date, and print inspection, co	place set forth below the following opying, testing, or sampling of the
Place: Internet Corporation for Assigned Na Washington, D.C. (for courrier pick-up)	ames and Numbers,	Date and Time:	7/07/2014 10:00 am
☐ Inspection of Premises: YOU ARE other property possessed or controlled by yo may inspect, measure, survey, photograph, to	ou at the time, date, and	l location set forth	n below, so that the requesting party
Place:		Date and Time:	
The following provisions of Fed. R. Rule 45(d), relating to your protection as a p respond to this subpoena and the potential co	erson subject to a subj	ooena; and Rule 4	
Date: 06/23/2014 CLERK OF COUR	RT	OR	
Signature of C	Clerk or Deputy Clerk	— — — — — — — — — — — — — — — — — — —	/s/ Robert J. Tolchin Attorney's signature
The name, address, e-mail address, and telep	phone number of the at	torney representir	ng (name of party)
Seth Charles Ben Haim, et al.			es or requests this subpoena, are:
Robert J. Tolchin,111 Livingston Street Suite	e 1928, Brooklyn, NY 1	1201, rjt berkmar	n@gmail.com, (718) 855-3627

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 08-520 (RCL)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this sub	opoena for (name of individual and title, if ar	w)	
(date)	·		
☐ I served the su	bpoena by delivering a copy to the nan	ned person as follows:	
		on (date)	or
☐ I returned the s	subpoena unexecuted because:		
Unless the subpoetendered to the wi	ena was issued on behalf of the United itness the fees for one day's attendance	States, or one of its officers or agents, I and the mileage allowed by law, in the	have also amount of
\$	•		
/ fees are \$	for travel and \$	for services, for a total of \$	0.00
I dealans under no	enalty of perjury that this information is	a tura	
i deciate under pe	many of perjury mat this information is	s ii uc.	
te:			
		Server's signature	
		Printed name and title	
		Server's address	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(e);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

SCHEDULE A

DEFINITIONS

"ICANN" means the Internet Corporation for Assigned Names and Numbers, the Internet Assigned Numbers Authority (a/k/a/ IANA) and each of the five regional internet registries, as applicable – AfriNIC (serving Africa), APNIC (serving East Asia and the Pacific Region), ARIN (serving the United States and Canada), LACNIC (serving Latin America and much of the Caribbean), and RIPE NCC (serving Europe, the Middle East and much of the former Soviet Union).

"Iran" means the Islamic Republic of Iran and any person or entity acting on its behalf, including the Institute for Research in Fundamental Sciences (a/k/a/ IPM) and IRNIC.

"MOIS" means the Iranian Ministry of Information and Security and any person or entity acting on its behalf.

DOCUMENT REQUEST

- 1. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN allocates, licenses, assigns or transfers rights of any kind in any top level domain names to Iran and/or MOIS.
- All documents and electronically stored information referencing, listing or describing: all top level domain names allocated, licensed, assigned or transferred by ICANN to Iran and/or MOIS.
- 3. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN

1

allocates, licenses, assigns or transfers rights of any kind in any internet protocol addresses to Iran and/or MOIS.

- 4. All documents and electronically stored information referencing, listing or describing: all internet protocol addresses allocated, licensed, assigned or transferred by ICANN to Iran and/or MOIS.
- 5. All documents and electronically stored information referencing, listing or describing any payments from Iran and/or MOIS to ICANN.
- 6. All documents and electronically stored information referencing, listing or describing any amounts owed:
 - a. from Iran and/or MOIS to ICANN; and
 - b. from ICANN to Iran and/or MOIS.
- All communications between ICANN, on the one hand and Iran and/or
 MOIS, on the other hand concerning any of the foregoing.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Ruth Calderon-Cardona, et al.		Democ	ratic People's Republic of Korea, et al.
Plaintiff(s)	VS	-	Defendant(s)
	CIVIL ACTION I WRIT OF ATTACHME HER THAN WAGES, SALA	ENT ON JUDGME ARY AND COMM	
To Internet Corporation for A	Assigned Names and	Numbers	
801 17th Street NW, Suite 4	100, Washington, DC	20006	Garnishee:
the above named defendant(s), are or surrender it to the defendant(s) The Judgement against the	e seized by the Writ of Att or to anyone else without he defendant was entered	achment, and you an order from this on August 5, 2010	n wages, salary and commissions of are required to hold it and not to pay court. in the amount of) and the costs amounting to \$
	with interest at .30		% from
August 5, 2010	with interest at .30 less credits of \$ 0		
Within ten (10) days after UNDER PENALTY OF PERJURY copy, by mail or other means, upon entered against you for the entire a	r this writ is served upon y , and to file in this Court tl n the plaintiff(s) and upon	you, you are requing the original and on the defendant(s).	red to answer the interrogatories, e copy of the answers, and to serve a If you fail to do so, judgment may be and costs.
		Angela D. Caes By Deput	y Clerk
Robert J. Tolchin, The Berkman	n Law Office, LLC		
Attorney for Plaintiff 111 Livingston Street, Suite 1928			
Brooklyn, New York 11201	14.4600		
(718) 855-3627 Address & Telephone Number			

INTERROGATORIES IN ATTACHMENT

NOTICE

As a garnishee, you are required by law to file answers to the following Interrogatories in Attachment1 within ten (10) days after service of the writ upon you [Title 16, Section 521 (a), D.C. Code 1981 ed.]. If you fail to answer the Interrogatories, judgment may be entered against you for the entire amount of the plaintiff's claim and costs [Title 16, Section 526(b), D.C. Code 1981 ed.].

The garnishee is required to file the original and one copy of the answers in this Court, and to serve a copy upon the plaintiff(s) and defendant(s).

If, within ten (10) days after service of the answers, the party at whose request the Attachment was issued does not contest the answers pursuant to <u>Title 15, Section 522</u>. D.C. Code (1981 ed.), the garnishee's obligations under the attachment shall be limited by the answers.

1. and the	Were you at the time of the service of the writ of attachment, or have you been between the tim filing of your answers to this interrogatory indebted to the defendant(s), and, if so, how, and i ANSWER	
	Had you at the time of the service of the writ of attachment, or have you had between the time filing of your answer to this interrogatory, any goods, chattels, or credits of the defendant(s) in ge, and, if so, what? ANSWER	
	I declare under the penalties of perjury that the answers to the above interrogatories are, to dge and belief, true and correct as to every material matter.	the best of my
		arnishee

UNITED STATES DISTRICT COURT

for the

	District of Colu	mbia	,
Democratic People's Democratic People's SUBPOOR	n-Cardona, et al. laintiff	EMISES IN A CI	on, OR OBJECTS VIL ACTION
То:	internet Corporation for Assign	ica itamos ana ita	arriboro -
	(Name of person to whom th	is subpoena is directed	Ų.
documents, electronically material: See attached So	J ARE COMMANDED to produce at t stored information, or objects, and to p hedule A	he time, date, and ermit inspection, c	place set forth below the following opying, testing, or sampling of the
Place: Internet Corporati Washington, D.C	on for Assigned Names and Numbers,	Date and Time:	
(for courrier pick-		0	7/07/2014 10:00 am
other property possessed	mises: YOU ARE COMMANDED to controlled by you at the time, date, as evey, photograph, test, or sample the pro-	nd location set fort	h below, so that the requesting party
Rule 45(d), relating to you	ovisions of Fed. R. Civ. P. 45 are attached protection as a person subject to a sub	poena; and Rule 4	
	CLERK OF COURT		
		OR	/s/ Robert J. Tolchin
	Signature of Clerk or Deputy Clerk		Attorney's signature
The name, address, e-mai	address, and telephone number of the a	• •	
Ruth Calderon-Cardona, e	et al.	, who issu	es or requests this subpoena, are:
Robert J. Tolchin,111 Livi	ngston Street Suite 1928, Brooklyn, NY	11201, rjt.berkmar	n@gmail.com, (718) 855-3627

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 14-mc-648

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this sub	ppoena for (name of individual and title, if a	ny)	
1 (date)	·		
☐ I served the su	bpoena by delivering a copy to the na	ned person as follows:	
		on (date)	or
☐ I returned the s	subpoena unexecuted because:		
		States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
\$	•		
fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under pe	nalty of perjury that this information i	s true.	
·	, , ,		
e:		Server's signature	
		Printed name and title	
		Server's address	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

SCHEDULE A

DEFINITIONS

"ICANN" means the Internet Corporation for Assigned Names and Numbers, the Internet Assigned Numbers Authority (a/k/a/ IANA) and each of the five regional internet registries, as applicable – AfriNIC (serving Africa), APNIC (serving East Asia and the Pacific Region), ARIN (serving the United States and Canada), LACNIC (serving Latin America and much of the Caribbean), and RIPE NCC (serving Europe, the Middle East and much of the former Soviet Union).

"North Korea" means the Democratic People's Republic of Korea and any person or entity acting on its behalf, including Star Joint Venture Company and Naenara.

"North Korean Intelligence Service" means the Cabinet General Intelligence Bureau of North Korea and any person or entity acting on its behalf.

DOCUMENT REQUEST

- 1. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN allocates, licenses, assigns or transfers rights of any kind in any top level domain names to North Korea and/or the North Korean Intelligence Service.
- 2. All documents and electronically stored information referencing, listing or describing: all top level domain names allocated, licensed, assigned or transferred by ICANN to North Korea and/or the North Korean Intelligence Service.
- 3. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN

allocates, licenses, assigns or transfers rights of any kind in any internet protocol addresses to North Korea and/or the North Korean Intelligence Service.

- 4. All documents and electronically stored information referencing, listing or describing: all internet protocol addresses allocated, licensed, assigned or transferred by ICANN to North Korea and/or the North Korean Intelligence Service.
- 5. All documents and electronically stored information referencing, listing or describing any payments from North Korea and/or the North Korean Intelligence Service to ICANN.
- 6. All documents and electronically stored information referencing, listing or describing any amounts owed:
 - a. from North Korea and/or the North Korean Intelligence Service to ICANN; and
 - from ICANN to North Korea and/or the North Korean Intelligence
 Service.
- 7. All communications between ICANN, on the one hand and North Korea and/or the North Korean Intelligence Service, on the other hand concerning any of the foregoing.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Jenny Rubin, et al.		The Islamic Republic of Iran, et al.
Plaintiff(s)	vs	Defendant(s)
	CIVIL ACTION NO. O1-16 WRIT OF ATTACHMENT ON THAN WAGES, SALARY AN	JUDGMENT
To Internet Corporation for Ass	igned Names and Numb	ers
801 17th Street NW, Suite 400	, Washington, DC 20006	Garnishee:
the above named defendant(s), are sei or surrender it to the defendant(s) or to The Judgement against the defendant against you for the entire amount of the defendant against you for the entire amount against the defendant(s) or to the defendant against the defendant a	ized by the Writ of Attachmen o anyone else without an orde lefendant was entered on september of the control o	in the amount of 2,000,000 109 and the costs amounting to \$ of 1.33 % from are required to answer the interrogatories, and and one copy of the answers, and to serve a endant(s). If you fail to do so, judgment may be th interest and costs.
Robert J. Tolchin, The Berkman La	Ву	Per All Mark Doputy Clerk
Attorney for Plaintiff		
111 Livingston Street, Suite 1928		
Brooklyn, New York 11201		
(718) 855-3627		
Address & Telephone Number		

INTERROGATORIES IN ATTACHMENT

NOTICE

As a garnishee, you are required by law to file answers to the following Interrogatories in Attachment1 within ten (10) days after service of the writ upon you [Title 16. Section 521 (a), D.C. Code 1981 ed.]. If you fail to answer the Interrogatories, judgment may be entered against you for the entire amount of the plaintiff's claim and costs [Title 16, Section 526(b), D.C. Code 1981 ed.].

The garnishee is required to file the original and one copy of the answers in this Court, and to serve a copy upon the plaintiff(s) and defendant(s).

If, within ten (10) days after service of the answers, the party at whose request the Attachment was issued does not contest the answers pursuant to <u>Title 15</u>, <u>Section 522</u>, <u>D.C. Code</u> (1981 ed.), the garnishee's obligations under the attachment shall be limited by the answers.

1. and the	Were you at the time of the service of the writ of attachment, or have you been between the time filing of your answers to this interrogatory indebted to the defendant(s), and, if so, how, and i ANSWER	
	Had you at the time of the service of the writ of attachment, or have you had between the time filing of your answer to this interrogatory, any goods, chattels, or credits of the defendant(s) in ge, and, if so, what? ANSWER	
knowlec	I declare under the penalties of perjury that the answers to the above interrogatories are, to fige and belief, true and correct as to every material matter.	the best of my
Date:	Ga	rnishee

UNITED STATES DISTRICT COURT

for the

	District of Colur	mbia		
The Islamic Re	Rubin, et al. Plaintiff V. epublic of Iran, et al.	Civil Action No. 01-1655 (RMU)		
D	efendant)			
	OENA TO PRODUCE DOCUMENTS R TO PERMIT INSPECTION OF PRI			
To:	To: Internet Corporation for Assigned Names and Numbers			
	(Name of person to whom the	is subpoena is directed)		
documents, electronicall material: See attached S	y stored information, or objects, and to po	he time, date, and place set forth below the following ermit inspection, copying, testing, or sampling of the		
Place: Internet Corpora	tion for Assigned Names and Numbers,	Date and Time:		
Washington, D.C. (for courrier pick-up)		07/07/2014 10:00 am		
☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it. Place: Date and Time:				
The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.				
Date: 06/23/2014	-			
	CLERK OF COURT	OR		
		/s/ Robert J. Tolchin		
	Signature of Clerk or Deputy Clerk	Attorney's signature		
The name, address, e-ma	il address, and telephone number of the a	attorney representing (name of party)		
Jenny Rubin, et al.		, who issues or requests this subpoena, are:		
Robert J. Tolchin,111 Liv	ringston Street Suite 1928, Brooklyn, NY	11201, rjt.berkman@gmail.com, (718) 855-3627		

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 01-1655 (RMU)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

1 (date)	oena for (name of individual and title, if an	w	
☐ I served the sub	ooena by delivering a copy to the nar	ned person as follows:	
		on (date) ;	or
☐ I returned the su	bpoena unexecuted because:		
	ness the fees for one day's attendance	States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
/ fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under pen	alty of perjury that this information is	s true.	
te:		Server's signature	
	<u> </u>	Printed name and title	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

SCHEDULE A

DEFINITIONS

"ICANN" means the Internet Corporation for Assigned Names and Numbers, the Internet Assigned Numbers Authority (a/k/a/ IANA) and each of the five regional internet registries, as applicable – AfriNIC (serving Africa), APNIC (serving East Asia and the Pacific Region), ARIN (serving the United States and Canada), LACNIC (serving Latin America and much of the Caribbean), and RIPE NCC (serving Europe, the Middle East and much of the former Soviet Union).

"Iran" means the Islamic Republic of Iran and any person or entity acting on its behalf, including the Institute for Research in Fundamental Sciences (a/k/a/ IPM) and IRNIC.

"MOIS" means the Iranian Ministry of Information and Security and any person or entity acting on its behalf.

DOCUMENT REQUEST

- 1. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN allocates, licenses, assigns or transfers rights of any kind in any top level domain names to Iran and/or MOIS.
- All documents and electronically stored information referencing, listing or describing: all top level domain names allocated, licensed, assigned or transferred by ICANN to Iran and/or MOIS.
- 3. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN

allocates, licenses, assigns or transfers rights of any kind in any internet protocol addresses to Iran and/or MOIS.

- 4. All documents and electronically stored information referencing, listing or describing: all internet protocol addresses allocated, licensed, assigned or transferred by ICANN to Iran and/or MOIS.
- 5. All documents and electronically stored information referencing, listing or describing any payments from Iran and/or MOIS to ICANN.
- 6. All documents and electronically stored information referencing, listing or describing any amounts owed:
 - a. from Iran and/or MOIS to ICANN; and
 - b. from ICANN to Iran and/or MOIS.
- 7. All communications between ICANN, on the one hand and Iran and/or MOIS, on the other hand concerning any of the foregoing.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Shaul Stern, et al.			The Islan	nic Republic of Iran, et al.
Plaintiff(s)	vs			Defendant(s)
O	CIVIL ACTIO WRIT OF ATTACHI THER THAN WAGES, SA	MENT ON JU	IDGMENT	BIONS
To Internet Corporation for	r Assigned Names ar	nd Number	S	
801 17th Street NW, Suit	e 400, Washington, D	C 20006		Garnishee:
the above named defendant(s), or surrender it to the defendant The Judgement agains	are seized by the Writ of a (s) or to anyone else without the defendant was enter	Attachment, a out an order f red on July 17.	and you are rom this co 2003	in the amount of
three hundred and thirtee			000,000	
	with interest at an ar	nnual rate o	of 1.08%	% from
July 17, 2003	less credits of \$ 0			<u> </u>
UNDER PENALTY OF PERJUIC copy, by mail or other means, u entered against you for the enti	RY, and to file in this Coupon the plaintiff(s) and up	rt the origina oon the defend s claims with	I and one co dant(s). If y interest and	to answer the interrogatories, opp of the answers, and to serve a ou fail to do so, judgment may be 1 costs. day of,
		_	D. Caesar, Deputy C	
Robert J. Tolchin, The Berkn	nan Law Office, LLC			
Attorney for Plaintiff 111 Livingston Street, Suite 1928	,			
Brooklyn, New York 1120)1			
(718) 855-3627				
Address & Telephone Number				

INTERROGATORIES IN ATTACHMENT

NOTICE

As a garnishee, you are required by law to file answers to the following Interrogatories in Attachment1 within ten (10) days after service of the writ upon you [Title 16. Section 521 (a), D.C. Code 1981 ed.]. If you fail to answer the Interrogatories, judgment may be entered against you for the entire amount of the plaintiff's claim and costs [Title 16, Section 526(b), D.C. Code 1981 ed.].

The garnishee is required to file the original and one copy of the answers in this Court, and to serve a copy upon the plaintiff(s) and defendant(s).

If, within ten (10) days after service of the answers, the party at whose request the Attachment was issued does not contest the answers pursuant to <u>Title 15</u>, <u>Section 522</u>, <u>D.C. Code</u> (1981 ed.), the garnishee's obligations under the attachment shall be limited by the answers.

1. and the	Were you at the time of the service of the writ of attachment, or have you been between the tim filing of your answers to this interrogatory indebted to the defendant(s), and, if so, how, and ANSWER	
		-
	Had you at the time of the service of the writ of attachment, or have you had between the tim filing of your answer to this interrogatory, any goods, chattels, or credits of the defendant(s) is and, if so, what? ANSWER	
		-
knowlec	I declare under the penalties of perjury that the answers to the above interrogatories are, to dge and belief, true and correct as to every material matter.	the best of my
Date: _		arnishee

United States District Court

for the

District of Colu	ımbia	
Shaul Stern, et al.		
Plaintiff)		
v.)	Civil Action No. 00-2602 (RCL)	
The Islamic Republic of Iran, et al.		
)		
Defendant)		
SUBPOENA TO PRODUCE DOCUMENT OR TO PERMIT INSPECTION OF PR		
To: Internet Corporation for Assig	ned Names and Numbers	
(Name of person to whom ti	his subpoena is directed)	
documents, electronically stored information, or objects, and to praterial: See attached Schedule A	permit inspection, copying, testing, or sampling of the	
Place: Internet Corporation for Assigned Names and Numbers,	Date and Time:	
Washington, D.C.	07/07/2014 10:00 am	
(for courrier pick-up)		
☐ Inspection of Premises: YOU ARE COMMANDED to other property possessed or controlled by you at the time, date, a may inspect, measure, survey, photograph, test, or sample the pro-	nd location set forth below, so that the requesting party	
Place:	Date and Time:	
The following provisions of Fed. R. Civ. P. 45 are attach Rule 45(d), relating to your protection as a person subject to a su		
respond to this subpoena and the potential consequences of not d		
Date:06/23/2014		
CLERK OF COURT		
Camilla Coom	OR	
	/s/ Robert J. Tolchin	
Signature of Clerk or Deputy Clerk	Attorney's signature	
The name, address, e-mail address, and telephone number of the	attorney representing (name of party)	
Shaul Stern, et al.	, who issues or requests this subpoena, are:	
Robert J. Tolchin,111 Livingston Street Suite 1928, Brooklyn, NY	′ 11201, rjt.berkman@gmail.com, (718) 855-3627	

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 00-2602 (RCL)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this sub	ppoena for (name of individual and title, if a	ny)	
(date)	·		
☐ I served the su	bpoena by delivering a copy to the nar	ned person as follows:	
		on (date)	or
☐ I returned the	subpoena unexecuted because:		
		States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
\$	•		
fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under pe	enalty of perjury that this information is	s true.	
2:		Server's signature	·······
		Printed name and title	
		Server's address	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense,

(2) For Other Discovery. A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

SCHEDULE A

DEFINITIONS

"ICANN" means the Internet Corporation for Assigned Names and Numbers, the Internet Assigned Numbers Authority (a/k/a/ IANA) and each of the five regional internet registries, as applicable – AfriNIC (serving Africa), APNIC (serving East Asia and the Pacific Region), ARIN (serving the United States and Canada), LACNIC (serving Latin America and much of the Caribbean), and RIPE NCC (serving Europe, the Middle East and much of the former Soviet Union).

"Iran" means the Islamic Republic of Iran and any person or entity acting on its behalf, including the Institute for Research in Fundamental Sciences (a/k/a/ IPM) and IRNIC.

"MOIS" means the Iranian Ministry of Information and Security and any person or entity acting on its behalf.

DOCUMENT REQUEST

- 1. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN allocates, licenses, assigns or transfers rights of any kind in any top level domain names to Iran and/or MOIS.
- 2. All documents and electronically stored information referencing, listing or describing: all top level domain names allocated, licensed, assigned or transferred by ICANN to Iran and/or MOIS.
- 3. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN

allocates, licenses, assigns or transfers rights of any kind in any internet protocol addresses to Iran and/or MOIS.

- 4. All documents and electronically stored information referencing, listing or describing: all internet protocol addresses allocated, licensed, assigned or transferred by ICANN to Iran and/or MOIS.
- 5. All documents and electronically stored information referencing, listing or describing any payments from Iran and/or MOIS to ICANN.
- 6. All documents and electronically stored information referencing, listing or describing any amounts owed:
 - a. from Iran and/or MOIS to ICANN; and
 - b. from ICANN to Iran and/or MOIS.
- All communications between ICANN, on the one hand and Iran and/or
 MOIS, on the other hand concerning any of the foregoing.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Susan Weinstein, et al.		The Islamic Republic of Iran, et al.
Plaintiff(s)	vs	Defendant(s)
	CIVIL ACTION NO. ⁰⁰⁻²⁶ VRIT OF ATTACHMENT ON . THAN WAGES, SALARY AN	JUDGMENT
To Internet Corporation for Ass	igned Names and Numbe	ers
801 17th Street NW, Suite 400	, Washington, DC 20006	Garnishee:
the above named defendant(s), are set or surrender it to the defendant(s) or t The Judgement against the	zed by the Writ of Attachment o anyone else without an order lefendant was entered on Febru	
	h interest at an annual rate	
February 6, 2002	less credits of \$ Approxima	ately \$5,000,000
UNDER PENALTY OF PERJURY, and copy, by mail or other means, upon the entered against you for the entire amount of the entered against you for the entire amount of the entered against you for the entered against your for the enter	d to file in this Court the origing e plaintiff(s) and upon the defe	are required to answer the interrogatories, nal and one copy of the answers, and to serve a endant(s). If you fail to do so, judgment may be the interest and costs. 1412 day of,
	Ange	la D. Caesar, Clerk
	Ву_	Re NA HA Beputy Clerk
Robert J. Tolchin, The Berkman La	aw Office, LLC	
Attorney for Plaintiff 111 Livingston Street, Suite 1928		
Brooklyn, New York 11201		
(718) 855-3627		
Address & Telephone Number		

INTERROGATORIES IN ATTACHMENT

NOTICE

As a garnishee, you are required by law to file answers to the following Interrogatories in Attachment1 within ten (10) days after service of the writ upon you [Title 16. Section 521 (a), D.C. Code 1981 ed.]. If you fail to answer the Interrogatories, judgment may be entered against you for the entire amount of the plaintiff's claim and costs [Title 16, Section 526(b). D.C. Code 1981 ed.].

The garnishee is required to file the original and one copy of the answers in this Court, and to serve a copy upon the plaintiff(s) and defendant(s).

If, within ten (10) days after service of the answers, the party at whose request the Attachment was issued does not contest the answers pursuant to <u>Title 15</u>, <u>Section 522</u>. <u>D.C. Code</u> (1981 ed.), the garnishee's obligations under the attachment shall be limited by the answers.

1. and the	Were you at the time of the service of the writ of attachment, or have you been between the time filing of your answers to this interrogatory indebted to the defendant(s), and, if so, how, and i ANSWER	
	Had you at the time of the service of the writ of attachment, or have you had between the time filing of your answer to this interrogatory, any goods, chattels, or credits of the defendant(s) in ge, and, if so, what? ANSWER	
	I declare under the penalties of perjury that the answers to the above interrogatories are, to	the best of my
knowle	dge and belief, true and correct as to every material matter.	·
Date: _	Ge	rnishee

UNITED STATES DISTRICT COURT

for the

	District of Co	olumbia	
Susan W	einstein, et al.		
P	laintiff)	~	00-2601 (RCL)
The Johnnia De	V.)	Civil Action No.	00-2001 (RCL)
The Islamic Re	public of Iran, et al.		
De	fendant)		
	DENA TO PRODUCE DOCUMENT TO PERMIT INSPECTION OF 1		
То:	Internet Corporation for As	signed Names and N	umbers
	(Name of person to who	m this subpoena is directe	d)
₱ Production: YOU documents, electronically material: See attached Sc	J ARE COMMANDED to produce stored information, or objects, and the shedule A	at the time, date, and o permit inspection, c	place set forth below the following copying, testing, or sampling of the
Place: Internet Corporat	ion for Assigned Names and Number	Date and Time:	
Washington, D.C (for courrier pick-		l l	07/07/2014 10:00 am
other property possessed	mises: YOU ARE COMMANDED or controlled by you at the time, date evey, photograph, test, or sample the	, and location set fort	h below, so that the requesting party
Rule 45(d), relating to yo	ovisions of Fed. R. Civ. P. 45 are atta ur protection as a person subject to a and the potential consequences of no	subpoena; and Rule 4	lating to the place of compliance; 45(e) and (g), relating to your duty to
Date.			
	CLERK OF COURT	o.p.	
		OR	/s/ Robert J. Tolchin
	Signature of Clerk or Deputy Clerk	WHAT ARE ALL AND A MARKET WHAT ARE ALL AND A MARKET WHAT ARE A MARKET WHAT A MARKET WHAT ARE A MARKET WHAT ARE A MARKET WHAT ARE A MARKET WHAT ARE A MARKET WHAT A MARKET	Attorney's signature
	Signature of Stern or Deputy Clerk		221107.1107.0.2181101100
The name, address, e-mai	address, and telephone number of the	ne attorney representi	ng (name of party)
Susan Weinstein, et al.		, who issu	es or requests this subpoena, are:
Robert J. Tolchin,111 Livi	ngston Street Suite 1928, Brooklyn, I	NY 11201, rjt.berkma	n@gmail.com, (718) 855-3627

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 00-2601 (RCL)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this su	ibpoena for (name of individual and title, if a	ny)	
n (date)	,		
☐ I served the s	ubpoena by delivering a copy to the nar	ned person as follows:	
		on (date)	or
☐ I returned the	subpoena unexecuted because:		
Unless the subpotendered to the v	pena was issued on behalf of the United vitness the fees for one day's attendance.	States, or one of its officers or agents, I e, and the mileage allowed by law, in the	have also
-	for travel and \$	for services, for a total of \$	0.00
I declare under p	enalty of perjury that this information i	s true.	
nte:			
		Server's signature	
		Printed name and title	
		Server's address	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(e);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

SCHEDULE A

DEFINITIONS

"ICANN" means the Internet Corporation for Assigned Names and Numbers, the Internet Assigned Numbers Authority (a/k/a/ IANA) and each of the five regional internet registries, as applicable – AfriNIC (serving Africa), APNIC (serving East Asia and the Pacific Region), ARIN (serving the United States and Canada), LACNIC (serving Latin America and much of the Caribbean), and RIPE NCC (serving Europe, the Middle East and much of the former Soviet Union).

"Iran" means the Islamic Republic of Iran and any person or entity acting on its behalf, including the Institute for Research in Fundamental Sciences (a/k/a/ IPM) and IRNIC.

"MOIS" means the Iranian Ministry of Information and Security and any person or entity acting on its behalf.

DOCUMENT REQUEST

- 1. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN allocates, licenses, assigns or transfers rights of any kind in any top level domain names to Iran and/or MOIS.
- 2. All documents and electronically stored information referencing, listing or describing: all top level domain names allocated, licensed, assigned or transferred by ICANN to Iran and/or MOIS.
- 3. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN

allocates, licenses, assigns or transfers rights of any kind in any internet protocol addresses to Iran and/or MOIS.

- 4. All documents and electronically stored information referencing, listing or describing: all internet protocol addresses allocated, licensed, assigned or transferred by ICANN to Iran and/or MOIS.
- 5. All documents and electronically stored information referencing, listing or describing any payments from Iran and/or MOIS to ICANN.
- 6. All documents and electronically stored information referencing, listing or describing any amounts owed:
 - a. from Iran and/or MOIS to ICANN; and
 - b. from ICANN to Iran and/or MOIS.
- 7. All communications between ICANN, on the one hand and Iran and/or MOIS, on the other hand concerning any of the foregoing.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Mary Nell Wyatt, et al.		The Syr	an Arab Republic, et al.
Plaintiff(s)	vs		Defendant(s)
	CIVIL ACTION NO WRIT OF ATTACHMEN THAN WAGES, SALAF	TON JUDGMENT	BIONS
To Internet Corporation for Ass	signed Names and N	umbers	<u>.</u>
801 17th Street NW, Suite 400	D, Washington, DC 20	0006	Garnishee:
You are hereby notified that the above named defendant(s), are se or surrender it to the defendant(s) or The Judgement against the three hundred and thirty eight	ized by the Writ of Attac to anyone else without an defendant was entered or	hment, and you are order from this co	
	th interest at an annua		% from
	less credits of \$ 0		
Within ten (10) days after th UNDER PENALTY OF PERJURY, an copy, by mail or other means, upon the entered against you for the entire and Witness the Honorable Chief	nd to file in this Court the ne plaintiff(s) and upon th ount of the plaintiff's clain	original and one cone defendant(s). If your suith interest an	ou fail to do so, judgment may be
		Angela D. Caesar, By Deputy C	
Robert J. Tolchin, The Berkman L	aw Office, LLC		
Attorney for Plaintiff 111 Livingston Street, Suite 1928			
Brooklyn, New York 11201			
(718) 855-3627			
Address & Telephone Number			

INTERROGATORIES IN ATTACHMENT

NOTICE

As a garnishee, you are required by law to file answers to the following Interrogatories in Attachment1 within ten (10) days after service of the writ upon you [Title 16. Section 521 (a), D.C. Code 1981 ed.]. If you fail to answer the Interrogatories, judgment may be entered against you for the entire amount of the plaintiff's claim and costs [Title 16, Section 526(b), D.C. Code 1981 ed.].

The garnishee is required to file the original and one copy of the answers in this Court, and to serve a copy upon the plaintiff(s) and defendant(s).

If, within ten (10) days after service of the answers, the party at whose request the Attachment was issued does not contest the answers pursuant to <u>Title 15</u>, <u>Section 522</u>, <u>D.C. Code</u> (1981 ed.), the garnishee's obligations under the attachment shall be limited by the answers.

1. and the	Were you at the time of the service of the writ of attachment, or have you been between the time filing of your answers to this interrogatory indebted to the defendant(s), and, if so, how, and in ANSWER	
	Had you at the time of the service of the writ of attachment, or have you had between the time filing of your answer to this interrogatory, any goods, chattels, or credits of the defendant(s) in ge, and, if so, what? ANSWER	
knowled	I declare under the penalties of perjury that the answers to the above interrogatories are, to dge and belief, true and correct as to every material matter.	the best of my
Date: _	Ga	rnishee

UNITED STATES DISTRICT COURT

for the

	District of Colu	nbia
The Syrian Ara	Wyatt, et al. aintiff	Civil Action No. 08-502 (RCL)
·	·	
	DENA TO PRODUCE DOCUMENTS TO PERMIT INSPECTION OF PRI	
То:	Internet Corporation for Assign	ned Names and Numbers
	(Name of person to whom th	is subpoena is directed)
	stored information, or objects, and to pe	he time, date, and place set forth below the following ermit inspection, copying, testing, or sampling of the
Place: Internet Corporat Washington, D.C (for courrier pick-		Date and Time: 07/07/2014 10:00 am
☐ Inspection of Pre	mises: YOU ARE COMMANDED to por controlled by you at the time, date, ar	permit entry onto the designated premises, land, or ad location set forth below, so that the requesting party perty or any designated object or operation on it.
Place:		Date and Time:
Rule 45(d), relating to yo respond to this subpoena		ed – Rule 45(c), relating to the place of compliance; opoena; and Rule 45(e) and (g), relating to your duty to bing so.
Date: 06/23/2014		
	CLERK OF COURT	OR /s/ Robert J. Tolchin
	Signature of Clerk or Deputy Clerk	Attorney's signature
Th	I adduces and taloubarra armitan a Cd	ttomor nonneganting (
The name, address, e-mai Mary Nell Wyatt, et al.	l address, and telephone number of the a	ttorney representing (name of party) , who issues or requests this subpoena, are:
· · · · · · · · · · · · · · · · · · ·	ngston Street Suite 1928, Brooklyn, NY	11201, rjt.berkman@gmail.com, (718) 855-3627

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 08-502 (RCL)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this sub	ppoena for (name of individual and title, if a	ny)	
(date)	•		
☐ I served the sul	bpoena by delivering a copy to the nat	ned person as follows:	
		on (date)	or
	subpoena unexecuted because:		
tendered to the wi		States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under pe	nalty of perjury that this information i	s true.	
:		Server's signature	
		derver s signature	
		Printed name and title	
		Server's address	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

- (ii) is commanded to attend a trial and would not incur substantial
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an

order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

 (2) Claiming Privilege or Protection.
 (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court-may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

SCHEDULE A

DEFINITIONS

"ICANN" means the Internet Corporation for Assigned Names and Numbers, the Internet Assigned Numbers Authority (a/k/a/ IANA) and each of the five regional internet registries, as applicable – AfriNIC (serving Africa), APNIC (serving East Asia and the Pacific Region), ARIN (serving the United States and Canada), LACNIC (serving Latin America and much of the Caribbean), and RIPE NCC (serving Europe, the Middle East and much of the former Soviet Union).

"Syria" means the Syrian Arab Republic and any person or entity acting on its behalf, including the National Agency for Network Services (a/k/a NANS).

DOCUMENT REQUEST

- 1. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN allocates, licenses, assigns or transfers rights of any kind in any top level domain names to Syria.
- 2. All documents and electronically stored information referencing, listing or describing: all top level domain names allocated, licensed, assigned or transferred by ICANN to Syria.
- 3. All documents and electronically stored information referencing, listing or describing: any contracts, agreements or understandings pursuant to which ICANN allocates, licenses, assigns or transfers rights of any kind in any internet protocol addresses to Syria.

- 4. All documents and electronically stored information referencing, listing or describing: all internet protocol addresses allocated, licensed, assigned or transferred by ICANN to Syria.
- All documents and electronically stored information referencing, listing or describing any payments from Syria to ICANN.
- 6. All documents and electronically stored information referencing, listing or describing any amounts owed:
 - a. from Syria to ICANN; and
 - b. from ICANN to Syria.
- 7. All communications between ICANN and Syria concerning any of the foregoing.