

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

**AFILIAS DOMAINS NO. 3 LIMITED,**

*Claimant*

v.

**INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS,**

*Respondent*

**ICDR Case No. 01-18-0004-2702**

**EXHIBIT LIST FOR**

**WITNESS STATEMENT BY PAUL LIVESAY**

June 1, 2020

Exhibit No.	Description
A	Leaf Group- Demand Media to Participate in Historic Expansion of Generic Top Level Web Domain (11 June 2012)
B	Google- Agreement to Withdraw a .TLD Application (undated) <i>Highly Confidential- Attorneys' Eyes Only</i>
C	Dot Tech- Sale and Purchase Agreement (undated) <i>Highly Confidential- Attorneys' Eyes Only</i>
D	Domain Acquisition Agreement Between Verisign and NDC (25 August 2015) <i>Highly Confidential- Attorneys' Eyes Only</i>
E	Kevin Murphy, Domain Incite, WordPress Reveals IT Bought .blog for \$19 Million (13 May 2016)
F	Alan Dunn, NameCorp, Knock Knock WordPress Acquires Blog for 19 Million (15 May 2016)
G	.blog Registry Agreement ICANN- Primer Nivel (webpage)
H	Confirmation of Understanding Between Verisign and NDC (26 July 2016) <i>Highly Confidential- Attorneys' Eyes Only</i>

# **EXHIBIT A**

SANTA MONICA, Calif.--(BUSINESS WIRE)--Jun. 11, 2012-- [Demand Media®](#) (NYSE: DMD) today announced that it is pursuing new generic Top Level Domains (gTLDs) as part of ICANN's (Internet Corporation for Assigned Names and Numbers) expansion of the Internet domain name space.

"We believe the new gTLD program represents a significant milestone in the evolution of the Internet," said Richard Rosenblatt, chairman and CEO, Demand Media. "In addition to delivering more choice for consumers and business owners, we expect the domain name expansion to spur innovation and new business opportunities."

Demand Media is pursuing a diverse portfolio of gTLD names intended to help bring millions of digital destinations to life. Guided by a proprietary, data-driven methodology, the company selected gTLD names in categories connected to an extremely broad range of interests and capabilities including: ecommerce, personal & professional identity, education, entertainment, internet life, sports, small business and social media.

As part of this initiative, Demand Media has applied for 26 names on a stand-alone basis. In addition, Demand Media has entered into a strategic arrangement with Donuts Inc., an Internet domain name registry founded by industry veterans, through which it may acquire rights in certain gTLDs after they have been awarded to Donuts by ICANN. These rights are shared equally with Donuts and are associated with 107 gTLDs for which Donuts is the applicant. Further, as previously announced, a subsidiary of Demand Media has been selected as the technical registry operator for both Demand Media and Donuts.

"The gTLDs we seek naturally reflect and organize the world around us and will help consumers more seamlessly discover and connect with the people, information and organizations of importance to them," said Taryn Naidu, executive vice president, Demand Media. Donuts CEO, Paul Stahura, added, "As previously announced, Donuts has raised more than \$100 million in funding to pursue the new gTLD opportunity. Donuts' strategic arrangement with Demand Media takes us well beyond that \$100 million funding and enables both companies to utilize additional resources, expertise and talent to generate the most value and benefits for customers from this historic opportunity."

### **About Demand Media**

Demand Media, Inc. (NYSE: DMD) is a leading content and social media company that informs and entertains one of the internet's largest audiences, helps advertisers find innovative ways to engage with their customers and enables publishers to expand their online presence. Headquartered in Santa Monica, CA, Demand Media has offices in North America, South America and Europe. For more information about Demand Media, please visit [www.demandmedia.com](http://www.demandmedia.com).

Demand Media and its affiliates are neither investors in Donuts and its affiliates nor are they involved in any joint venture with Donuts and its affiliates.

### **Cautionary Information Regarding Forward-Looking Statements**

*This press release contains forward-looking statements within the meaning of the "safe*

*harbor" provisions of the Private Securities Litigation Reform Act of 1995, as amended. These forward-looking statements involve risks and uncertainties regarding the Company's future financial performance, and are based on current expectations, estimates and projections about our industry, financial condition, operating performance and results of operations, including certain assumptions related thereto. Statements containing words such as "guidance," "may," "believe," "anticipate," "expect," "intend," "plan," "project," "projections," "business outlook," and "estimate" or similar expressions constitute forward-looking statements. Actual results may differ materially from the results predicted, and reported results should not be considered an indication of future performance. Potential risks and uncertainties include, among others: changes in the methodologies of Internet search engines, including ongoing algorithmic changes made by Google to its search results as well as possible future changes, and the impact such changes may have on page view growth and driving search related traffic to our owned and operated websites and the websites of our network customers; changes in our content creation and distribution platform, including the possible repurposing of content to alternate distribution channels, or the sale or removal of content; our ability to successfully launch, produce and monetize new content formats; the inherent challenges of estimating the overall impact on page views and search driven traffic to our owned and operated websites based on the data available to us as Google continues to make adjustments to its search algorithms; our ability to compete with new or existing competitors; our ability to maintain or increase our advertising revenue; our ability to continue to drive and grow traffic to our owned and operated websites and the websites of our network customers; our ability to effectively monetize our portfolio of content; our dependence on material agreements with a specific business partner for a significant portion of our revenue; future internal rates of return on content investment and our decision to invest in different types of content in the future, including video and other formats of text content; our ability to attract and retain freelance creative professionals; changes in our level of investment in media content intangibles; the effects of changes in marketing expenditures or shifts in marketing expenditures; the effects of seasonality on traffic to our owned and operated websites and the websites of our network customers; our ability to continue to add partners to our registrar platform on competitive terms; our ability to successfully pursue and implement our gTLD initiative; changes in stock-based compensation; changes in amortization or depreciation expense due to a variety of factors; potential write downs, reserves against or impairment of assets including receivables, goodwill, intangibles, and media content or other assets; changes in tax laws, our business or other factors that would impact anticipated tax benefits or expenses; our ability to successfully identify, consummate and integrate acquisitions, including integrating our recent acquisitions; our ability to retain key customers and key personnel; risks associated with litigation; the impact of governmental regulation; and the effects of discontinuing or discontinued business operations. From time to time, we may consider acquisitions or divestitures that, if consummated, could be material. Any forward-looking statements regarding financial metrics are based upon the assumption that no such acquisition or divestiture is consummated during the relevant periods. If an acquisition or divestiture were consummated, actual results could differ materially from any forward-looking statements. More information about potential risk factors that could affect our operating and financial results are contained in our annual report on Form 10-K for the fiscal year ending December 31, 2011 filed with the Securities and Exchange Commission (<http://www.sec.gov>) on February 24, 2012, and as such risk factors may be updated in our quarterly reports on Form 10-Q filed with the Securities and Exchange Commission, including, without limitation, information under the captions "Risk Factors" and "Management's Discussion and Analysis of Financial Condition and Results of Operations."*

*Furthermore, as discussed above, the Company does not intend to revise or update the information set forth in this press release, except as required by law, and may not provide this type of information in the future.*

Source: Demand Media, Inc.

Demand Media

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**EXHIBIT B-**

**HIGHLY CONFIDENTIAL-  
ATTORNEYS' EYES ONLY**

Redacted – Third Party Designated Confidential Information



**EXHIBIT C-**

**HIGHLY CONFIDENTIAL-  
ATTORNEYS' EYES ONLY**

Redacted – Third Party Designated Confidential Information

**EXHIBIT D-**

**HIGHLY CONFIDENTIAL-  
ATTORNEYS' EYES ONLY**

Redacted – Third Party Designated Confidential Information

# **EXHIBIT E**



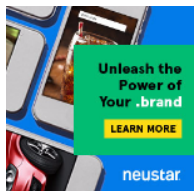
Seven reasons in favor of ironDNS®



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Enter Search Query



RECENT POSTS

- World's youngest country launches its Nazi-risk TLD next week
- Is ICANN chickening out of Whois access role?
- Irony alert! Data protection agency complains it can't get access to private Whois data
- ICANN dissenter explains why she wanted .org sale approved
- CSC removes reference to "retiring" new gTLD domain after retiring new gTLD domain
- Google launches .meet gTLD after Meet service goes free during lockdown
- Aussie ccTLD surges under coronavirus lockdown
- Spring Break redux! ICANN picks Cancun for 2023 meeting

### WordPress reveals IT bought .blog for \$19 million

Kevin Murphy, May 13, 2016, 09:09:41 (UTC), Domain Registries

**WordPress.com owner Automattic has outed itself as the bankroll behind the winner of the .blog auction and the new owner of the forthcoming new gTLD.**

Founder Matt Mullenweg also revealed that the company paid around \$19 million for the domain at private auction in February 2015, about \$1 million more than [the amount DI estimated](#) at the time.

Until now, the winning .blog applicant, which fought off competition from eight competitors including Google, M+M, Radix and Donuts, was only known as Primer Nivel.

Primer Nivel is a Panamanian company previously described to DI as an investment vehicle with links to Colombian registrar My.co.

To the best of my knowledge, Automattic's involvement with the bid has never even been hinted at, but Automattic founder Matt Mullenweg [said in a blog post](#) last night that it has been involved since well before the auction took place.

It's now public that Automattic is the company behind Knock Knock Whois There LLC, the registry for the new .blog TLD. (And a great pun.) We wanted to stay stealth while in the bidding process and afterward in order not to draw too much attention, but nonetheless the cost of the .blog auction got up there (people are estimating around \$20M).

An earlier version of the blog post put the price at "about \$19m", as captured by Google.

[Matt Mullenweg | Unlucky in Cards](#)

[ma.tt/](#) ... while in the bidding process and afterward in order not to draw too much attention, but nonetheless the cost of the .blog auction got up there (about \$19M).

ICANN approved the reassignment of the .blog contract from Primer Nivel to Knock Knock WHOIS There on April 29.

In the original Primer Nivel application, only My.co CEO Gerardo Aristizabal and VP of business development Carlos Neira were listed as shareholders of 15% or more of the company in its answer to question 11 of the application form.

ICANN processed a change request to the question 11 answer in March 2014, but did not publish the result of the change. It may merely have been a change of personal contact information.

site

1 MILLION DOMAINS

Become an online rockstar

fm Now Available at CentralNic

REGISTRYOFFICE

Abuse Monitor

with automation and case management  
ICANN Reporting

FIND OUT MORE

Auto DNS

CREATED BY InterNetX

DOMAINING FOR EXPERTS  
INTELLIGENT DOMAIN SEARCH

RECENT COMMENTS

- Shaun: [whata.me.ss... read more](#)
- [lifesavings.online:](#) [Ain't that Some Shit?... read more](#)

ICANN's .org decision was NOT unanimous, and it was made in secret

Donuts kicks down .place fences after attempt at innovation

.org sale officially dead

Afilias promotes .vote domains amid US vote-by-mail controversies

After Zoom trolling, ICANN 68 will be password-protected

Despite Brexit, .eu actually returned to growth in Q1

ICANN whistleblower expects to be fired after alleging budget irregularities, bugged meetings

Portugal ccTLD says growth better than expected during pandemic

The .org deal may be dead and buried, but calls remain for PIR to lose its contract

"Dangerous precedent" as ICANN rejects \$1.13 billion .org buyout

ICANN may scrap its \$0.18 reg tax in coronavirus "solidarity"

Domain industry likely to suffer from coronavirus as ICANN slashes budget by 8%

Decision on .org deal may come sooner than you think

ICANN meeting got "Zoombombing" with offensive material

CentralNic does not expect big coronavirus impact as it posts almost-doubled revenue for 2019

Verisign expects to sell fewer domains because of coronavirus

Coronavirus lockdown is working out great for at least one registry

Coronavirus could cause "high risk of widespread outages", ICANN says

Free domains registrar gets FOURTH breach notice

Four more dot-brands join the gTLD deadpool

As ICANN meets to decide .org's fate, California AG says billion-dollar deal must be rejected

Whois privacy talks in Bizarro World as governments and trademark owners urge coronavirus delay

GoDaddy signs up 30 partners to lockdown-era marketing scheme

Kuala Lumpur meeting cancelled and ICANN 68 could be even trickier online

Five SAFE ways to buy and sell domains during the coronavirus pandemic

One has to wonder whether, had WordPress' involvement in Primer Nivel been public, the .blog auction could have fetched even more.

One might imagine that Google, which competes with WordPress with its Blogger service, would have viewed .blog as more threatening in a rival's hands.

But Primer Nivel and now Automattic/KKWT appear to have no intention to make .blog a WordPress-exclusive gTLD. The original application stated that it would be open to all, and ICANN has since banned so-called "closed generics".

The registry has already opened a [web site at kkwt.domains](#), which is currently pitching the product to accredited registrars.

It says it plans to go to general availability and "activate" 250,000 .blog domains before the end of the year.

Automattic [obtained an ICANN registrar accreditation](#) back in October 2010 but to date has not sold a single domain via that accreditation.

It offers WordPress.com hosting customers domain registrations, but I believe it does so as a GoDaddy reseller.

.blog is currently in "transition to delegation" and it's probably only a matter of days before it is delegated to the internet.

Mullenweg blogged that the sunrise period is expected to start in August, with and October landrush.

Pricing is expected to be in line with current industry standards, including premium tiers.

The gTLD has always been one of my favorites, and having WordPress backing it will almost certainly make it more successful than if the registry were an independent third party, possibly raising the profile of new gTLDs as a whole.

Related posts (automatically generated):

[Nominet to run .blog's back-end](#)

["Dave" becomes first .blog blogger](#)

[.blog launch date and pricing revealed](#)

Tweet

Tagged: [.blog](#), [auction](#), [automattic](#), [ICANN](#), [kkwt](#), [knock knock whois there](#), [new gTLDs](#), [primer nivel](#), [reassignment](#)

#### COMMENTS (7)

**M. Menius**

May 13, 2016 at 11:36 am

Very interesting. I did not know this:

"...and ICANN has since banned so-called "closed generics."

If ICANN receives a fee for every new tld registration, then that decision alone insured a steady stream of income for them.

Dan:

This seems like a SSAD state of affairs (had to be done..) Is there any precedence for ICANNs roll being expanded via... [read more](#)

Theo Geurts:

Reminds me somewhat of the case of Microsoft Ireland vs the US DOJ [https://en.wikipedia.org/wiki/Microsoft\\_Corp.\\_v.\\_Uni...](https://en.wikipedia.org/wiki/Microsoft_Corp._v._Uni...) [read more](#)

Volker:

The new domain honestly looks like alphabet soup. Who is going to remember that string. The earlier one was better, alth... [read more](#)

Konstantinos Zournas:

LOL! Nice one... They tried to "fix" it and brought more attention to it.... [read more](#)

gpmgroup:

The problem is the very flawed agreement between ICANN and its contracted new gTLD registries being foisted on legacy gT... [read more](#)

Jean Guillon:

FairWinds Partners, which offers the same kind of Corporate domain name management services (including new gTLDs) operat... [read more](#)

Bob Banker:

It was a bank error. They agreed to not go public with the "error" after further investigation.... [read more](#)

convergence:

leading edge... [read more](#)

Voice Acting:

If you are sitting around all day at home, "Hey, I want to start a business! Let me buy a domain name."... [read more](#)

Kyle-K:

Makes you wonder how much this was helped along by the promotional giveaway done by one of the largest registrars in Aus... [read more](#)

parse:

Moroccan Dirham... [read more](#)

Dan:

Have any examples of supposed "innovation" in the new gTLD space actually panned out?... [read more](#)

John:

Excluding all forms of competition is a violation of US competition laws. ICANN's agreement with the registry operators... [read more](#)

gpmgroup:

Every one in ICANN knows (or should know) that domains are not substitutable the cost to move i.e. design, stationery, s... [read more](#)

Mark Thorpe:

ICANN never walks a straight line and tells the whole truth, so them saying the entire Board stands by this decision, bu... [read more](#)

John:

Where are the statements from the other ICANN board members? Who attended these secret meetings? Jones Day and JJ li... [read more](#)

Avri Doria:

I have not worked for either PIR or Donuts, or any other contracted party, since before I joined the Board. This was a p... [read more](#)

DomainBoss:

Hundreds of thousands a year in huge salaries and fun at public expense. Then these guys have the nerve to call ICANN... [read more](#)

DomainBoss:

I am just glad that this Anti-Public deal was finally rejected. ICANN has done first good thing in their entire exis... [read more](#)

DomainBoss:

There is hardly any place for .place TLD in domaining as new GTDs like these are failing more and more.... [read more](#)

DomainBoss:

It is ICANN's moral and ethical duty to transfer the control of .ORG registry away from disgraced ISOC/PIR combo to anot... [read more](#)

To show new focus on registry, Uniregistry dumps "registry" from its brand. Um...

No ICANN tax relief for Chinese registrars

ICANN declares coronavirus a "natural disaster" to protect expired domains

Ethos clarifies .org price rises, promises to reveal number of censored domains

End of the road for Neustar as GoDaddy U-turns again and buys out its registry biz

ICANN to consider cancelling ICANN 68 tomorrow

Coronavirus: more delay and free domains for .gay

CentralNic seeing no impact from coronavirus

ICANN expects "significant" budget impact from coronavirus

ICANN's number two Cyrus Namazi quits. Probably due to sexual discrimination claims.

ICANN grants Verisign its price increases, of course

ALL .za domains have to link to government coronavirus web site

Namecheap and others banning coronavirus domains

Go here to help fight against coronavirus abuse

As it releases free download, DomainTools says 68,000 dangerous coronavirus domains have been registered

No .com price increases this year. Thanks, coronavirus!

US officials gunning for coronavirus domains

Nominet to intercept dangerous coronavirus domains

An open question to the domain name industry about coronavirus

US senators tell ICANN to reject .org deal

More ICANN events cancelled for May

More domain industry response to coronavirus

.org decision delayed another month

Delay .org deal because of... coronavirus? Gimme a break

Not every coronavirus domain registrant is a douchebag

Roundup: domain industry starts to respond to coronavirus pandemic

At ICANN 67, nobody knew you're a dog

Reply

### Kevin Murphy

May 13, 2016 at 11:44 am

The ban was based on GAC advice, primarily. So blame governments.

Reply

### @PotentialNames

May 14, 2016 at 7:21 pm

Why blame government, when banning "closed generics" is good for the public?

Reply

### Answers King

May 13, 2016 at 3:22 pm

Pretty interesting move from Matt, seeing over 70% of the blogs online use WordPress, I do expect the WP monopoly to continue for another decade at least 😊

Reply

### Joseph Peterson

May 14, 2016 at 5:54 am

I'd be shocked if Google didn't already know they were bidding against WordPress. All they'd need to do is scan gmail inboxes and Chrome browser histories to pick up some telltale sign.

Reply

### @PotentialNames

May 14, 2016 at 7:34 pm

I see it two ways.

Google probably thought bidding against a "nobody" masked or anonymous bidder (so to speak), was a bad move, and can be costly to them if probably a shill bidder. (i.e., just Google and Primer Nivel bidding at the end, with all others backed out)

Or, they realized bidder on the other end, wants it more badly than they do.

Reply

### answerskey

January 6, 2017 at 1:23 pm

over 70% of the bloggers use WordPress and they are comfortable with it, I do expect the WP monopoly to continue for another.

Reply

### ADD YOUR COMMENT

Name (required)

Mail (will not be published)

(required)

Web site (optional)

Submit Comment

Mogreen:

Hmmm - wonder why Avri Doria voted in favor of the sale Avri Doria is a research consultant. Her professional activit... [read more](#)

John:

So Jon Nevett is telling everyone "PIR is no longer for sale to any other party" If that was the case – why did Jon N... [read more](#)

Jack:

.org now needs a new steward. PIR doesn't care at all about .org registrants and was willing to throw all non profits... [read more](#)

Rob:

If I were PIR, I would raise prices for a .org to \$ 19.99 immediately. ISOC lost out on a huge endowment fund. The... [read more](#)

Chris Bell:

Surely at an internet convention the name given to us at birth is our fake name, while the name we made up ourselves is ... [read more](#)

Theo Geurts:

Since ICANN participation is open to everyone and their dog, anyone can apply to a WG or a public session or IRT. Settin... [read more](#)

Steve GOBIN:

LOL... [read more](#)

Owen:

The earliest reference re: government ID I could find was ICANN61: "All attendees will be required to present valid gove... [read more](#)

John:

Given the nature of these allegations, I find it concerning ICANN does not show this particular request on their website... [read more](#)

John:

Why was this particular request not published on ICANN's DIDP Requests and Responses" page? How many other requests t... [read more](#)

lifesavings.online:

Vaguely related: President Trump is using http://share.djt.app to promote campaign. It forwards to his .com but that ... [read more](#)

Owen:

ICANN started requiring government IDs to obtain name badges several years ago- perhaps it was ICANN57 in Hyderabad?... [read more](#)

Alfonso Bedoya:

"The only reason the DIDP (pdf) is in the public domain at all is that Sudowski copied it to the mailing list of the Emp... [read more](#)

David:

Do it with any other termination but not .Com .Net .Org They shouldn't be a privatization for them.... [read more](#)

Rubens Kuhl:

I was sure it was a rick-roll, but I was wrong.... [read more](#)

Antony Van Couvering:

Oh, the ironies... Some may recall that ICANN was set up in response to another Internet governance effort, the gTLD... [read more](#)

Brad Mugford:

No, the "dangerous precedent" was handing over a legacy extension to a brand new private equity company with no track re... [read more](#)

John Berryhill:

Here: <https://www.youtube.com/watch?v=UO1T9dkWCL8...> [read more](#)

Rubens Kuhl:

Where can I find the Ethos statement in full?... [read more](#)

Domenclature.com:

Ouch!... [read more](#)

John Berryhill:

The full Ethos statement is much better than the excerpt above, especially the part about "wicked thieving Hobbitses ste... [read more](#)

Chris Bell:

Both ICANN and the Attorney General did the right thing, by defending the interests of the registrants eventually. I...



GoDaddy cancels in-person investor day over coronavirus fears

WE'RE ALL GONNA DIE! In other news, ICANN 67 was... "muted"

Facebook WILL sue more registrars for cybersquatting

ICANN chair: "all options open" on .org deal

Could .org debate bring back the glory days of ICANN public forums?

The latest industry C-suite musical chairs

Poblete to replace Disspain on ICANN board

Chinese registrars ask ICANN to waive fees due to Coronavirus

Most languages won't be available at ICANN 67

Domain Incite turns 10 today. What the fuck have I done with my life?

Ethos volunteers for .org pricing handcuffs

Yup. ICANN cancelled Cancun

The Queen has beef with Prince Harry's domain name

ICANN wants to take your temperature before letting you into ICANN 67

ICANN might cancel Spring Break over Covid-19 fears

Verisign shifts on domainers, again

9,000 people tell ICANN they don't want .com price increases. Here's what some of them said

Covid-19: It's official, domainers are faster than journalists

ICA will help you support .com price increases (but doesn't want you to)

.gay hires pop star equality campaigner as spokesperson

Watch: climate change denier on why she trusts .org more than .com

Ethos' .org pricing promise may be misleading

Hacking claims resurface as .hotel losers force ICANN to lawyer up again

ICANN refuses to release more info on .org deal

Possibly the strangest new gTLD acquisition yet

California .org probe — existential crisis or blessed relief for ICANN?

As Cancun looms, ICANN bans China travel because of Coronavirus

XYZ expands gTLD stable as L'Oreal exits the domain game

Is the .co rebid biased toward Afiliis? Yeah, kinda

[read more](#)

**Mark Thorpe:**

"Ethos responded angrily almost immediately" No one feels bad for you.... [read more](#)

**Konstantinos Zournas:**

Yeah, I forgot to include Michele Neylon to my list of useful idiots... Sorry about this. <https://onlinedomain.com/2...> [read more](#)

**Ciera Hutson:**

Wow. This article. It's just wrong- let me count the ways..... [read more](#)

**Andrew:**

Which one company in the world will benefit the most from this rebate ? Yes the same company asking for it (Godaddy... [read more](#)

**Richard Funden:**

By Gabthars hammer, what a savings!... [read more](#)

**Jack:**

The .ORG deal is DEAD. Otherwise ICANN will be smashed by the California Attorney General and it's the last (bad) dec... [read more](#)

**Mark Thorpe:**

The .ORG deal should already be rejected by now!... [read more](#)

**Samit:**

I'll be extremely surprised if the sale doesn't go through. Public comment and objections are being ignored for every... [read more](#)

**Bub:**

Not sure domain investors are opposed to Ethos. But a slew of major nonprofits, some senior and respected politicians, t... [read more](#)

**Brad Mugford:**

A better show of "solidarity" would be for ICANN to side with the vast majority of stakeholders and quit making decision... [read more](#)

**Konstantinos Zournas:**

Yes, let's look at the \$30-40 million and leave the \$2-3 billion untouched.... [read more](#)

**Brad Mugford:**

Looks like ICANN might need more shady kickbacks, like in the Verisign .COM extension... Brad... [read more](#)

**Michiel Henneke:**

As the author of the original piece I'd like to add: most entrepreneurs going online now are working local, regional or ... [read more](#)

**Ron Andruff:**

My personal view, from experience and observation: This action (resign before your fired) was LOOOOONNNNGGG over due. Th... [read more](#)

**Chris:**

A lot of existing businesses have also been unable to make money from their stores, while there has been a large increas... [read more](#)

**James Gannon:**

Went off without a hitch for the record... [read more](#)

**Voice Acting:**

People got ideas, they got time, and they are home. A great combination for domain registrations.... [read more](#)

**John:**

But the key issue is that there is no "balanced consensus" in the ICANN multi-stakeholder model anymore. ICANN is no lo... [read more](#)

**Acro:**

What an elite group of privileged bureaucrats!... [read more](#)

**John Berryhill:**

Once again, it is time to shift gears from.... "If ICANN doesn't do (insert demand here), then government authorities... [read more](#)

**Rubens Kuhl:**

Most EU ccTLD models have all the features BC, IPC and GAC don't like, including treating legal and natural persons the ... [read more](#)

**Konstantinos Zournas:**

There is now a new deadline: May 4. This is also a very important point: "My office is also concerned that the .ORG ... [read more](#)

[Amazon governments vow revenge for "illegal and unjust" ICANN decision on .amazon](#)

[SaveDotOrg to protest outside ICANN HQ. #lol](#)

[Ten years ago I predicted Oscar winners wanted a .movie gTLD. Was I right?](#)

[ICANN gets a new European chief](#)

[New CEO to step into the lion's den at auDA](#)

[Secrets of the .org deal revealed, but much info remains private](#)

[Registrar terminated after what looks like domain hijacking](#)

[NamesCon publishes full agenda for debut Austin conference](#)

[.gay prices and availability revealed as registry promises to give 20% of revenue to charity](#)

[Now .org critics actually want to take over the registry, blocking billion-dollar sale](#)

[Verisign pays ICANN \\$20 million and gets to raise .com prices again](#)

[ICANN predicts shrinkage in new gTLD sector](#)

[ASO uses super powers to demand ICANN turn over .org buyout docs](#)

[Now PIR rubbishes .org "downtime" claims](#)

[DI Leaders Roundtable #4 — Big predictions for 2020](#)

[Afilias denies .org will go down post-acquisition](#)

[Palestine to release all one-character .ps domains, at a price](#)

[PIR thinks 20-year domain regs are a good idea](#)

[Amazon beats South America! Dot-brand contracts now signed](#)

[Q3 industry growth driven by .tk, .com and .icu](#)

[ICANN throws out second .org appeal, so URS stays](#)

[Warning \(or threat?\) prices must go up or .org will suffer DAYS of downtime](#)

[Russian company approved as gTLD escrow provider](#)

[Guy gets 14 years for trying to steal a domain with a gun](#)

[GoDaddy girls often make more money than the men](#)

[Non-coms want .org's future carved in stone](#)

[Kamel's deputy gets promoted at ICANN](#)

[ICANN delays approval of .org acquisition](#)

[AlpNames died months ago. Why is it still the "most-abused" registrar?](#)

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A lot of it is about a loan. I wrote so during the very earliest days on one of these blogs. Somone's back is against...

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[Green Jobs:](#)

This is hilarious... thanks for sharing!... [read more](#)

[Adam:](#)

Late for April Fool's but love it.... [read more](#)

[Ethos promises to keep .org for many many many many years](#)

[Amid .org controversy, Cerf predicts the death of all domains](#)

[#SaveDotOrg to hold public web conference tomorrow with Ethos execs](#)

[As pricey .new launches, Google reveals first set of big-name users including rapper Drake](#)

[Three more dot-brands fizzle out. Total now 69, dudes](#)

[Are ISOC's claims about .org's history bogus?](#)

[Criminal .uk suspensions down this year](#)

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# **EXHIBIT F**

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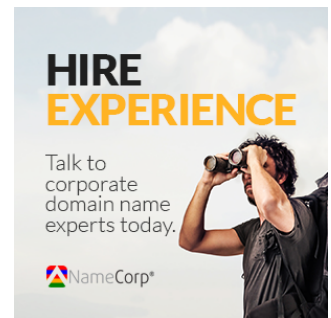
# Knock Knock WordPress Acquires Blog for 19 million

May 15th, 2016 | [Brand Stories](#), [Featured](#)



Automattic, the company behind WordPress, announced on May 12 they were the successful winner of the auction for the new top-level domain name extension .blog.

The winning bidder was a company called Knock Knock Whois There LLC, but it



## Recent Posts

[> What is a Category Killer Domain Name?](#)

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wasn't until now that the true owners of this LLC were announced.

Matt Mullenweg, founding developer of WordPress, [published a post](#) explaining the need for privacy. *"We wanted to stay stealth while in the bidding process and afterward in order not to draw too much attention, but nonetheless the cost of the .blog auction got up there."*

Automattic has now joined the list of brands who have invested millions of dollars into owning new domain name extensions. Google paid \$25 million for the .app extension last year, and Amazon acquired .buy for \$5 million.

According to [ntldstats.com](#), total new top-level domain (NTLD) registrations have now surpassed 17 million. While this number sounds impressive, it's the adoption of these new domain names by companies and publishers that really matter. WordPress has the X factor here. It's massive, relevant customer base is almost second to none. [VentureBeat](#) has reported that **WordPress now powers 25% of the web**, which may just be the perfect match for seeing adoption of new domain name extensions scale.

## Personal Branding

> [18 Government Agencies And Their Dot Coms](#)

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> [100 Companies Who Understand Domain Names](#)

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> [Why Hire a Domain Name Broker](#)

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It's well known that most all the best dot-coms are taken. So, **for personal brands**, the cost of acquiring the perfect dot-com is often far greater than the typical person can afford. However, it's not just a dot-com-world anymore.

Take, for example, Ryan Anderson Bell, founder of streaming conference site Summit.live, and a nominee for Periscoper of the Year. Ryan has collected almost 4 million likes on Periscope and is followed by over 17,000 people. We asked Ryan why he chose Ryan.live.

“Dot-com simply doesn't mean anything,” said Ryan. “And, who wants to say Twitter dot com slash Ryan underscore A underscore Bell?” – (Ryan's actual Twitter handle).

Ryan may be on to something. New domain name extensions like .live or .blog intuitively tell people what to expect before they arrive.

And it's not just tech founders like Ryan seeing the advantages of these personalized domains. Gene Marks, president of the Marks Group, published an article on how **professional athletes** are adopting the new domains, including D.J. Fluker of the San Diego Chargers, pro

golfer Lee Westwood, DeMarre Carroll of the Toronto Raptors, and more.

Even large celebrities like Joe Rogan (of Fear Factor / UFC / NewsRadio fame), who has 650,000 YouTube subscribers and 1.8 million Twitter followers, have embraced the new domains. Joe adopted JoeRogan.live, and is promoting his asset every day, not the vanity URL owned by YouTube. Sure, he still has the community at YouTube, but since he's telling everybody HE is JoeRogan.live, then he controls much more of the brand messaging.

### **Will .blog change the world?**

No. But it is another opportunity to acquire a premium piece of the Internet for your personal brand, instead of saying follow me at "Twitter dot com slash Ryan underscore A underscore Bell".

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- *Follow Alan Dunn [on Twitter](#)*

Share This Story, Choose  
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# **EXHIBIT G**

# .blog Registry Agreement

14 May 2015

On 14 May 2015, ICANN (Internet Corporation for Assigned Names and Numbers) and PRIMER NIVEL S.A., entered into a Registry Agreement under which PRIMER NIVEL S.A., operated the .blog top-level domain. Effective 29 April 2016, the Registry Agreement was assigned by PRIMER NIVEL S.A. to Knock Knock WHOIS (WHOIS (pronounced "who is"; not an acronym)) There, LLC which now operates the .blog top-level domain. The agreement may be viewed by following the links below:

## Registry Agreement

- [DOCX \(/sites/default/files/tlds/blog/blog-agmt-docx-14may15-en.docx\)](/sites/default/files/tlds/blog/blog-agmt-docx-14may15-en.docx) | [Redline \(/sites/default/files/tlds/blog/blog-agmt-docx-redline-14may15-en.docx\)](/sites/default/files/tlds/blog/blog-agmt-docx-redline-14may15-en.docx)
- [PDF \(/sites/default/files/tlds/blog/blog-agmt-pdf-14may15-en.pdf\)](/sites/default/files/tlds/blog/blog-agmt-pdf-14may15-en.pdf) | [Redline \(/sites/default/files/tlds/blog/blog-agmt-pdf-redline-14may15-en.pdf\)](/sites/default/files/tlds/blog/blog-agmt-pdf-redline-14may15-en.pdf)
- [HTML \(/sites/default/files/tlds/blog/blog-agmt-html-14may15-en.htm\)](/sites/default/files/tlds/blog/blog-agmt-html-14may15-en.htm) | [Redline \(/sites/default/files/tlds/blog/blog-agmt-html-redline-14may15-en.htm\)](/sites/default/files/tlds/blog/blog-agmt-html-redline-14may15-en.htm)

## 2017 Global Amendment to the base Registry Agreement

The 2017 Global Amendment to the base New gTLD (generic Top Level Domain) Registry Agreement is effective as of 31 July 2017. For additional information, please visit the [Global Amendment webpage \(/resources/pages/global-amendment-base-new-gtld-registry-agreement-2017-01-23-en\)](/resources/pages/global-amendment-base-new-gtld-registry-agreement-2017-01-23-en).

- [DOCX \(https://newgtlds.icann.org/sites/default/files/agreements/agreement-approved-global-amendment-31jul17-en.docx\)](https://newgtlds.icann.org/sites/default/files/agreements/agreement-approved-global-amendment-31jul17-en.docx) | [PDF \(https://newgtlds.icann.org/sites/default/files/agreements/agreement-approved-global-amendment-31jul17-en.pdf\)](https://newgtlds.icann.org/sites/default/files/agreements/agreement-approved-global-amendment-31jul17-en.pdf) | [HTML](#)

[\(<https://newgtlds.icann.org/sites/default/files/agreements/agreement-approved-global-amendment-31jul17-en.html>\)](https://newgtlds.icann.org/sites/default/files/agreements/agreement-approved-global-amendment-31jul17-en.html)

## Assignment and Assumption Agreement(s)

[PRIMER NIVEL S.A. to Knock Knock WHOIS \(WHOIS \(pronounced "who is"; not an acronym\)\) There, LLC \(29 April 2016\)](#)

- [PDF \(</sites/default/files/tlds/blog/blog-assign-pdf-29apr16-en.pdf>\)](#)

## Authorization(s) for Release of Reserved Names

- [All Digit/Digit, Letter/Digit, and Digit/Letter Two-Character ASCII Labels at the Second Level \(</en/system/files/files/spec5-amend-two-char-01dec14-en.pdf>\)](#) (01 December 2014)
- [Letter/Letter Two-Character ASCII Labels \(</sites/default/files/tlds/blog/blog-auth-ltr-ltr-18aug16-en.pdf>\)](#) (18 August 2016)
- [Authorization for Release of Letter/Letter Two-Character ASCII Labels at the Second Level \(</sites/default/files/tlds/second-level-auth-ltr-ltr-13dec16-en.pdf>\)](#) (13 December 2016)

Note: If multiple versions are provided above, the official document is the Word version. The HTML version is machine-generated and may not display correctly.

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## Name Collision Occurrence Management Documents

- [Name Collision Occurrence Assessment \(</resources/pages/registries-2012-02-25-en#name-collision-assessment>\)](#)

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## TLD (Top Level Domain) Startup Information

- [TLD \(Top Level Domain\) Startup Information Page \(<http://newgtlds.icann.org/en/program-status/sunrise-claims-periods/blog>\)](#)



**EXHIBIT H-**

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