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VIA E-MAIL

December 19, 2011

Giovanna Micheli, LL.M. International Centre for Dispute Resolution 1633 Broadway, Tenth Floor New York, New York 10019

Re: Manwin Licensing International S.A.R.L. v. Internet Corporation For Assigned
Names and Numbers; Case No. 50 117 T 00812 11

Dear Ms. Micheli:

As requested during the telephonic hearing held on December 2, 2011, the parties have met and conferred and agreed as follows:

- 1. ICANN will file its responsive statement on before January 31, 2012.
- 2. The parties will nominate their arbitrator candidates on or before February 15, 2012. The parties are still discussing whether they will nominate their arbitrators simultaneously or in a particular order, and whether they will agree in advance that the nominated arbitrators must satisfy certain criteria. The parties will advise you of their further agreements, or need for additional guidance from the Centre, on such issues.
- 3. The parties have agreed that mediation would not be fruitful at this time.

Sincerely,

Kevin E. Gaut

of

MITCHELL SILBERBERG & KNUPP LLP

Jeffrey A. LeVee

JONES DAY