

**Date: 4 May 2011**  
**From: ICANN**  
**To: EuroDNS S.A.**

Dear Mr. Buck,

We received your letter dated 25 April 2011. Your letter includes numerous inaccurate and extraneous assertions that we won't go into here, except to say that we did reach out to you (on 31 March 2011) before we sent you a notice of breach of your Registrar Accreditation Agreement with ICANN and asked you why you had not implemented the UDRP decision as required by the policy.

You still have not provided an adequate explanation for EuroDNS' failure to comply with the policy.

To help clarify the situation, please answer the following questions:

1. Have you received a court order prohibiting you from implementing the UDRP decision ordering facebook.com to be transferred to Facebook, Inc.? If so, please provide us with a copy of that court order.
2. If not, what specific other legal requirement prohibits you from transferring the name to the prevailing complainant as required by the policy? Please attach the relevant order or law.
3. Even if you are legally prohibited from transferring the name facebook.com to the complainant, please identify the legal requirement that you believe compels you to continue to allow the name to remain active and in use by the respondent (who WIPO found to be a cybersquatter, and who the plaintiff in the third-party lawsuit has alleged to be a thief).

To further help us understand the facts of this matter, please promptly send us a copy of all the records that EuroDNS is required to maintain and share with ICANN relating to this domain under section 3.4 of the RAA, including all registration data, correspondence, and account records.

In response to your questions, ICANN will not indemnify you or provide you with any legal advice on this matter.

Thank you for your attention. We look forward to your response.

Best regards,  
Khalil Rasheed

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**Khalil Rasheed**

*Contractual Compliance Manager*

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