

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

GCCIX, W.L.L.,	)	
	)	
Claimant,	)	
	)	
vs.	)	
	)	
INTERNET CORPORATION for	)	
ASSIGNED NAMES AND NUMBERS,	)	
	)	
Respondent.	)	
	)	
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**DECLARATION OF ABDULLAH  
SAYYAR IN SUPPORT OF  
CLAIMANT’S SUR-REPLY IN  
OPPOSITION TO ICANN’S MOTION  
TO DISMISS SECOND AMENDED  
REQUEST FOR INDEPENDENT  
REVIEW**

I, Abdullah Sayyar, declare as follows:

1. I am an experienced Bahraini corporate attorney, having been duly licensed and practicing corporate law in Bahrain since 2011. I have considered the Reply Declaration of Ms. Fatima Al Ali, and continue to disagree with her opinion, as I reiterate here.

2. GCCIX maintains full and unfettered rights to litigate against any party, on any claims and in any court or before any tribunal anywhere in the world. Moreover, GCCIX maintains full and unfettered rights to commercially operate in Bahrain or anywhere in the world. GCCIX is not limited to actions to recover debts in Bahrain, as suggested by ICANN counsel as mentioned in exhibit A GCCIX can recover all its rights. This is because, as I have stated previously, GCCIX is a limited liability company and the Bahraini limited liability company acquires the legal personality that gives it the full right to litigate under the law after its registration in the commercial registry at the Ministry of Industry, Commerce and Tourism – unless and until it is fully liquidated and dissolved. This is in accordance with Article 8 and Article 268 quoted in my prior Declaration.

3. The “three-year rule” cited by Ms. Al Ali is not a legitimate “implementing regulation” because it is inconsistent with the Law which supersedes decisions by the ministry. Bahraini law (Article 13).

4. I personally have represented an entity (other than GCCIX) that was in “deleted by law” status and have obtained MOICT restoration’ “active” status, even though they had been “deleted by law” more than three years prior. Again, the Court of Cassation has made it clear that a limited liability company does not lose its legal personality and right to litigate unless and until it is liquidated and dissolved.

5. I continue to diligently pursue GCCIX efforts in Bahrain to restore its corporate status to ‘Active’ at the MOIT. I previously thought this would have been accomplished by now, but there have been complications which we are working through, and the relevant official entities in Bahrain tend to move slowly. Regardless, nothing currently prevents GCCIX from operating a TLD under contract from ICANN, except for ICANN’s refusal to grant such contract to GCCIX.

And in any event, if and when ICANN ever does award a Registry Agreement to GCCIX, this corporate issue likely will have been resolved long before.

6. This opinion is based on my analysis of the laws and judicial decisions currently in force in Bahrain, and on my lengthy experience representing clients in Bahraini corporate matters.

I swear that the foregoing is true and correct. Executed this 26th day of April 2024 in Bahrain.



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Abdullah Sayyar  
Sayyar Attorneys & Legal Consultants