

**Reconsideration Request Form**

**1. Requestor Information**

**Name:** Rahul Goel, Representative of Zydus Lifesciences Ltd.

**Address:** Contact Information Redacted

**Email:** Contact Information Redacted

**Phone Number (optional):** Contact Information Redacted

**2. Request for Reconsideration of:**

**Board action/inaction**

**Staff action/inaction**

**3. Description of specific action you are seeking to have reconsidered.**

Administrative Panel Decision - Zydus Lifesciences Ltd. (formerly known as Cadila Healthcare Ltd.) v. Jewella Privacy LLC / DNS, Domain Privacy LTD  
**WIPO UDRP Case No. D2022-0880**

Biased Administrative Panel Decision granted by ICANN Staff Panelists **Nick J. Gardner, Pablo A. Palazzi** and **Alan L. Limbury**, based upon assumptions and false information submitted by the Respondent.

<https://www.wipo.int/amc/en/domains/decisions/pdf/2022/d2022-0880.pdf>

The said Administrative Panel Decision is not in adherence with the ICANN Rules and contradicts ICANN's Mission, Commitments, Core Values and established ICANN policies.

**4. Date of action/inaction:**

The Decision of the Administrative Panel was published on **24 June 2022**.

**5. On what date did you become aware of the action or that action would not be taken?**

The Decision of the Administrative Panel was conveyed to us and received by us on **1 July 2022**.

**6. Describe how you believe you are materially and adversely affected by the action or inaction:**

Extreme bias has been exhibited in the ICANN – UDRP Administrative proceedings conducted at the WIPO Arbitration Centre (ICANN-Accredited Dispute Resolution Service Provider).

The Panelists of the ICANN UDRP Forum have exhibited extreme bias in their reading and interpretation of Complainant's Complaint against the Respondent to the extent that independence and impartiality were completely non-existent in their decision as well as lacking ability to understand and comprehend the facts. The Panelists have erred while deciding on the issue by relying on misleading arguments made by the Respondent that are devoid of merits and are factually incorrect. The Respondent has attempted to deceive the proceedings by falsifying the facts which the Panelists have based their decision on and have held that the Complainant has brought the Complaint in bad faith and constitutes an abuse of the administrative proceedings.

The decision of the Panel is in violation of:

**ICANN Bylaws Article 2, Section 2.3. NON-DISCRIMINATORY TREATMENT**

ICANN shall not apply its standards, policies, procedures, or practices inequitably or single out any particular party for disparate treatment unless justified by substantial and reasonable cause, such as the promotion of effective competition.

### **ICANN Bylaws Article 3, Section 3.1. OPEN AND TRANSPARENT**

ICANN and its constituent bodies shall operate to the maximum extent feasible in an open and transparent manner and consistent with procedures designed to ensure fairness, including implementing procedures to (a) provide advance notice to facilitate stakeholder engagement in policy development decision-making and cross-community deliberations, (b) maintain responsive consultation procedures that provide detailed explanations of the basis for decisions (including how comments have influenced the development of policy considerations), and (c) encourage fact-based policy development work. ICANN shall also implement procedures for the documentation and public disclosure of the rationale for decisions made by the Board and ICANN's constituent bodies.

#### **7. Describe how others may be adversely affected by the action or inaction, if you believe that this is a concern.**

The Administrative Panel Proceedings have been in violation of the established ICANN Rules, Bylaws, Mechanisms and Policies by relying on assumptions, inaccurate, false and misleading information. The Panel has acted in a biased and discriminatory manner especially because the Complainant is from a developing nation and the Respondent is from a developed country

Complainant being a leading player in the pharmaceutical sector (globally) will not be able to prevent misuse of the disputed domain name <zydus.com> - which is identical to corporate identity of the Complainant from selling spurious, illegal,

unauthorised drugs – which general public may perceive to be manufactured, sourced and supplied by the Complainant itself – which is likely to cause irreparable harm not only to public at large (especially patients) but also the Complainant (apart from raising of concerns by regulators across the globe). Additionally, the Complainant will substantially lose financially in actual costs involved with business set up and marketing. Complainant will lose intrinsic value of its branding and reliance on international community recognition and its good name in its services that international community has come to know and rely on.

This amounts to bad legal practice, which if comes to become a precedent shall amount to grave violation of rights of members of developing nations and hence making it necessary for the decision to be reversed.

#### **8. Detail of Board or Staff Action/Inaction – Required Information**

It is submitted that; the Panelists have erred while giving their decision in WIPO UDRP Case No. D2022-0880. The Panelists, relying upon factually incorrect, inaccurate and misleading information put forth by the Respondent have held that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding.

The Administrative Panel in the Decision (**EXHIBIT – A**) at page no. 4 have found that the Complainant has legitimate rights in the ZYDUS mark and has held that “the Disputed Domain Name is identical to the Complainant’s trademark and hence the first condition of paragraph 4(a) of the Policy has been fulfilled.”

The Administrative Panel however, has given no weight and importance to this finding. The Panel has gone further in its bias relying on the false, factually incorrect and inaccurate information furnished by the Respondent throughout its response (**EXHIBIT – B**). Thereby, making biased conclusions inasmuch as the Respondent holds legitimate rights in the domain name and that the Respondent has not registered and used the Disputed Domain name in Bad Faith.

The same however, is incorrect as this decision has been given by the Panel owing to misleading and factually incorrect and information provided by the Respondent with the intention to mislead the proceedings. The Decision of the Administrative Panel is totally unsubstantiated without consideration of material facts and relying on false and inaccurate information submitted by the Respondent, and it contradicts the ICANN's Mission, Commitments, Core Values and/or established ICANN policies.

It is submitted that the Respondent has placed false, inaccurate and misleading information on record at multiple places throughout their response. These instances are further mentioned:

**a. That the Complainant has sent offers via domain name brokers.**

The Respondent in its Response (**EXHIBIT – B**) at page 3 has falsely claimed that they received correspondence from the Complainant's brokers a total of nineteen (19) times with offers to buy the disputed domain name for price ranging from \$750 to \$4000. These alleged offers have been annexed by the Respondent in its response as Exhibit D, the same is annexed herein as **EXHIBIT – C**, wherein there

are emails from domain brokers from GoDaddy LLC. It is pertinent to note here that not even a single reference has been made by any of the brokers which could show that the alleged correspondences were made on behalf of the Complainant.

The Administrative Panel in their Decision (**EXHIBIT – A**) at page 7 has accepted the Respondent's argument based upon false information and have held that these requests were made on behalf of the Complainant without any material evidence, but merely an assumption based upon misleading evidence filed by the Respondent. The Panel based upon this assumption has further assumed and decided that the Complainant has not disclosed these offers in the Complaint which appears to indicate that the Complainant knew it did not have prior rights that would allow it to recover the Disputed Domain Name. Further holding that the Complainant has brought the Complaint in bad faith and constitutes an abuse of the administrative proceeding.

**Administrative Panel's decision to base their decision on this inaccurate and false information submitted by the Respondent and rendering their presumption as a decision is biased and in contradiction with ICANN's Mission, Commitments, Core Values and established ICANN policies.**

**b. Regarding the Request for Settlement**

The Panel has completely overlooked the request for Settlement that has been sent by the Respondent's Counsel dated 18 April 2022.

It is pertinent to note here that, all the events that arise post the filing of any

Complaint are to be brought in information of the Panel. Including any correspondence received from either party.

The aforementioned e-mail has been relayed by the Respondent's Counsel to discuss Settlement, which signifies that the Respondent is aware of its wrongful actions and believes that they do not have a strong case and hence their attempt to settle the dispute outside of the Panel Proceedings.

This thread of e-mail is enclosed herein as **EXHIBIT – D**. It is also submitted that the thread of e-mails in which this settlement request was conveyed, included WIPO's Case Officer Mr. Patrick K. However, when the offer for settlement was sent by the Respondent in the same thread, they have very conveniently left out WIPO's Case Manager Mr. Patrick K (Originally a recipient in the thread) outside the loop.

This signifies malafide intentions on the part of the Respondent. As the request for settlement in itself signifies the unwillingness of the Respondent to participate in the Dispute Resolution process as they are aware that their domain name is identical to Complainant's trademark, they hold no legitimate rights and that they are in possession of this domain name in bad faith and for the purposes of domain name squatting.

The action of the Respondent to particularly leave out the Case Manager and not inform the WIPO or the case manager of the Settlement offer signifies that the same is a case of domain name squatting as the Respondent is only looking to gain monetary benefit via settlement for the domain name.



**c. The Respondent has provided false and incomplete information pertaining to prior knowledge of existence of Zydus**

The Respondent in its Response on multiple instances at page 3, 4, 5 and 6 has stated that they had never heard of the Complainant prior to the filing of this Complaint. The Respondent also states on page 3 that the Complainant entered US market in 2003.

The Respondent has attached as Exhibit F (enclosed herein as **EXHIBIT – E**), screenshots of Zyduscadila.com from Archive.org and have claimed that the Complainant did not get its US webpage up until August of 2003, making it highly improbable that someone not in the pharmaceutical industry know anything about Complainant.

The Administrative Panel in furtherance of their bias approach has further stated that “The website at “www.zyduscadila.com” contained, in 2003 the following statement: “we aim to be leading Asian player by 2010 and a global player by 2020”. That would seem to confirm the limited extent of the Complainant’s international reputation as at 2003 and 2004.”

However, the Panel has yet again erred in reading and interpreting the evidence on record as they failed to recognise the information provided within **EXHIBIT – E**, which clearly states that the sales of the Complainant was Rs. 8624.58 Million in 2002 which is approximately USD110 Million. Similarly, it is also mentioned that the exports of the Complainant increased by 33% in the Q1 of 2003.

Stating that the Complainant aims to become a **leading** Asian and Global player does not signify that the Complainant has a limited international reputation, this is yet another instance of the Panel giving their decision based upon assumptions. The Panel has relied on no material evidence to reach the conclusion that the Complainant has limited international reputation. Aspiring to be Global leaders does not signify that the Complainant has limited international reputation, it merely signifies that the Complainant aims to be a Global leader in this domain.

It is therefore pertinent to note that, such high amount of sales and increase in exports signify the Complainant's presence and international reputation.

Additionally, the Respondent has failed to bring to the Panel's notice the existence of <www.zyodususa.com> the Whois database results of which are enclosed herein as **EXHIBIT – F**. This particular website of Complainant's USA based company was first created in 2003. And as per the Whois database of the disputed domain name, (enclosed as **EXHIBIT – G**) it was registered in November 2004. This shows that there was a window of a year and a half between the registration of zyodususa.com and the disputed domain name. This signifies that; there was ample amount of time prior to the registration of disputed domain name for the Respondent to be aware of the presence of the Complainant and its marks owing to the fact that the Complainant's company is well reputed internationally in the pharmaceutical domain.

Respondent claims that it was unaware of the existence of the Complainant at the time of registration of the disputed domain name, further stating that they only

became aware of the Complainant's existence when the complaint was filed under UDRP.

This signifies that it is not the Complainant who lacks international reputation, it is in fact an attempt by the Respondent to misguide the Panel and assail the proceedings. As it has been clearly mentioned in the complaint filed by Complainant (enclosed herein as **EXHIBIT – H**) at page 7, 8 and 9 that the Complainant has been a leading innovator and market leader throughout its course of business including but not limited to: the world's first *adalimumab biosimilar* launched by Complainant under the brand name Exemptia at one-fifth the originator's price, the Complainant also launched its first research based drug molecule Saroglitazar in treatment of Diabetic Dyslipidemia under brand name "Lipaglyn". More importantly, the Complainant developed ZyCoV-D **world's first Plasmid DNA Vaccine** authorized for COVID- 19. In addition to, India's first indigenously developed plasma DNA vaccine. ZyCoV-D is a three-dose intradermal vaccine, which is applied using The PharmaJet needle-free system, Tropis, which can significantly reduce any side effects. Also, being a plasmid DNA vaccine, ZyCoV-D doesn't display vector-based immunity concerns. A painless, needle-free injector delivers the immunization in a narrow fluid stream into the skin.

Owing to the COVID-19 pandemic that has been going since early 2020, it is very hard to believe the Respondent's claims that it was unaware of the existence of the Complainant who has been the first to come up with a plasma based vaccine for COVID-19.

Additionally, there have been multiple news reports that signify the activities of the Complainant in the market of USA and other major countries. These activities show how the Complainant has a good international reputation that dates years prior to the registration of the disputed domain name. These news reports are enclosed herein as **EXHIBIT – K**. These reports explain how the Complainant has good international reputation. A few instances reported in these news articles are:

- i. In September 1999, Zydus Cadila signed an agreement with Cherry Valley Farms Ltd., UK for supply of vaccine eggs.
- ii. In 1999, The Complainant has set up a joint venture company to manufacture the break-through molecule Pantoprazole. The Company is also undertaking discovery research projects with Byk Gulden as a part of the Joint Venture.
- iii. The Company has entered into a technical-cum-marketing tie-up with the Swiss Serum and Vaccine Institute, Berne, Institute to launch a range of vaccines
- iv. During the year under report the Company has launched several new products in the market : Vac Typh, HB Vac, Xylodac, Losartan, Losacar was the first to be launched
- v. The Complainant launched block-buster molecules Atorvastatin (Atorva), Lamivudine (Lamidac 100) and Celecoxib (Zycel), Meloxicam (Mel-OD) and Carvedilol (Carvil)
- vi. The Complainant was setting up wholly owned subsidiaries abroad and acquiring overseas companies to market products in year 2000.

- vii. The Complainant launched two drugs for the treatment of HIV (Human Immunodeficiency Virus) in 2000.
- viii. Complainant in 2000, also launched zidovudine, which is imported and marketed under the brand name Zydowin. Zidovudine, commonly called AZT, is an AIDS-retardant drug made by Glaxo Wellcome.
- ix. In 2003, Cadila Healthcare Ltd has acquired US base Alpharma Inc's French Subsidiary Alpharma, SAS France for a consideration of Euro 5.5 million.
- x. The complainant received approval from the USFDA to market the anti-hypertensive drug, Atenolol, and an anti-infective drug, Clindamycin.
- xi. The complainant tied up with Tyco unit to sell generic drugs in US.
- xii. Complainant launched Fludara Oral for Lymphocytic Leukaemia.
- xiii. Complainant received approval for Divalproex Sodium DR Tablets and Promethazine Tablets from USFDA.

This signifies that the Respondent has put false statements on record to assail and deceive the Panel proceedings. The panel has acted in a biased manner by not relying on material facts but merely the This signifies how the Respondent has acted in bad faith at the time of registration of the disputed domain name as well as throughout the course of Administrative Panel Proceedings.

**d. The Respondent has provided false and incomplete information pertaining to prior knowledge of existence of Complainant's Trademarks**

The Respondent in its Response has enclosed a result of search from USPTO as Exhibit G (enclosed herein as **EXHIBIT – I**) which is a search conducted on 7 May 2022, for the live marks of **ZYDUS**. The Respondent further states that there exists only one live mark which includes the word Zydus.

However, the Respondent has chosen to show a list of marks that are live on the date of the search. It is pertinent to note here that the Complainant held Marks in the USA prior to the registration of disputed domain name. A list and details of said marks are enclosed herein as **EXHIBIT – J**. This signifies that the Respondent was aware of the existence of the Complainant and its marks as well as the international reputation of the Complainant which can be verified from the news reports predating the registration of disputed domain name enclosed herein as **EXHIBIT – K**.

With existing knowledge of the reputation of the Complainant and the marks of the Complainant, the Respondent still chose to register the disputed domain name, which signifies that the Respondent has done so for purposes of domain name squatting resulting in monetary benefit.

It is also pertinent to note that the Respondent has attached screenshots of the disputed domain name that has been taken after the complaint has been filed. The Respondent conveniently misled this Administrative Panel by purposefully (and with absolute intent) not disclosing that the disputed domain name (website), prior to filing of the Complaint, categorically and undisputedly used the words “Zydus Pharma”, “India Pharma”, “Pharmaceutical Solutions”, “Pharmaceutical Services”,

“How to go ahead in Pharma”, “Industry News”, “we bring people into the limelight, showcasing the pharma industry’s success stories” among other text/ quotes; which is sufficient to prove and establish that the Respondent’s were not only aware about existence of the Complainant but also exploiting the tradename, brand name, goodwill and success story of the Complainant by illegal and unauthorised use of its name especially with respect to India. The webpage as was in existence prior to filing of the compliant also had text in “hindi”. The Respondent with a purpose to mislead the Administrative Panel changed the content of the disputed domain name to show different content.. The screenshots of the disputed domain name prior to filing of the Compliant are enclosed herein as **EXHIBIT – L** and the screenshots as provided by the Respondent are enclosed herein as **EXHIBIT – L1**

**e. Core ICANN values of Transparency and Consideration are being exploited**

Pursuant to Article 3 of the ICANN Bylaws, it is mandatory for the ICANN and its constituent bodies to operate to the maximum extent in an open and transparent manner. ICANN and its constituent bodies shall operate consistent with the procedures designed to ensure fairness.

As per Section 4.3 (a) (vii) The ICANN should secure the accessible, transparent, efficient, consistent, coherent, and just resolution of Disputes. In the present case, the Complainant has gravely suffered pursuant to the violation of ICANN’s core values pertaining to transparency , consistency and fairness. The decision of the

Administrative Panel in this case is in grave violations of these core values of ICANN.

The Panel has erred by relying on inaccurate, misleading and false information brought on record by the Respondent in this case. The Panel giving its decision based upon misleading and false information signifies how the Panel has not conducted the proceedings in a fair manner that is not consistent with the ICANN mechanisms, rules, bylaws and policies.

Similar position can be witnessed in *Corn Lake, LLC v. ICANN (.CHARITY) (ICDR CASE NO. 01-15-0002-9938)* wherein the core values of the ICANN were violated.

The same clearly does not amount to efficient, coherent and just resolution of disputes. This would in turn make the decision fall under the reconsideration process as well as the Individual Review Process.

Owing to the aforementioned issues, it is evident that the Respondent has deceived and assailed the Panel Proceedings and committed fraud by putting inaccurate, false, misleading and incomplete information on record.

It is also evident that the Panelists have been biased, relied upon false, inaccurate and incomplete information. For these reasons, the decision of the Administrative Panel contradicts ICANN's Mission, Commitments, Core Values and/or established ICANN policy and shall be vacated.



Additionally, this manner of functioning of the Administrative Panel signifies that they have been biased towards the Complainant and have given their decision merely based upon factually incorrect, incomplete and misleading information submitted by the Respondent with the intention to mislead and assail the proceedings.

It is prima facie visible by the actions and inactions of the Panelists that they have shown this bias towards the Complainant merely because the Complainant is a company that originates from a developing country like India and the respondent belongs to the USA which is a developed country. The panelists which are all from developed nations, have given their decision merely based upon assumptions and factually incorrect, misleading and false information submitted by the Respondent, without giving due consideration to the Complainant's case which has merit.

The Panel has just refused to cooperate and proceed fairly in this Panel Proceedings. This Panel Proceeding is a classic case of Discrimination by the ICANN staff that has been the case in certain earlier proceedings as well. For instance, *See Corn Lake, LLC v. ICANN (.CHARITY) (ICDR CASE NO. 01-15-0002-9938)* wherein -The Board Did Not Act "in the Best Interests of the Internet Community," or in Accordance with the Non-Discrimination Provision of the Bylaws, When It Omitted the .CHARITY Ruling from the Review Procedure Established by the October 2014 Resolution and was biased against the .Africa gTLD.

Similarly, in the *Statement of the ICANN African Community on the Low African*

*Participation in the Applications of new gTLD*, it was regrettably noted that; the ICANN African community is not able to participate significantly in the new gTLD program due to a deficiency of outreach and communication activities in the region, to almost nonexistence of the domain names industry and negligible number of ICANN accredited Registrars in Africa. Which signifies the biased approach taken by ICANN towards the underdeveloped/developing countries.

This adds on to portray that the Administrative Panel Proceeding that is the subject of this Reconsideration request did not adhere to the ICANN Rules, Bylaws, Mechanisms and policies and was contradictory of the same due to a discriminatory and biased approach taken by the Panel merely because the Complainant is a company from a developing nation and not a developed nation. This is a classic example of Racial-discrimination in practice.

**9. What are you asking ICANN to do now?**

The Panel perpetrated extreme bias on the Complainant in this decision. Complainant respectfully requests that this Panel decision be reversed and the Panelists be forever barred. Additionally, Respondent's Response which was presented with unclean hands solely to fraud this Complainant and Panel shall also amount to this Panel Decision being reversed.

**10. Please state specifically the grounds under which you have the standing and the right to assert this Reconsideration Request, and the grounds or justifications that support your request.**

As Complainant in **WIPO UDRP Case No. D2022-0880**, the Complainant has standing.

The Complainant has been grievously harmed and is adversely impacted by the Administrative Panel's biased Decision finding that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding.

Complainant being a leading player in the pharmaceutical sector (globally) will not be able to prevent misuse of the disputed domain name <zydus.com> - which is identical to corporate identity of the Complainant from selling spurious, illegal, unauthorised drugs – which general public may perceive to be manufactured, sourced and supplied by the Complainant itself – which is likely to cause irreparable harm not only to public at large (especially patients) but also the Complainant (apart from raising of concerns by regulators across the globe). Additionally, the Complainant will substantially lose financially in actual costs involved with business set up and marketing. Complainant will lose intrinsic value of its branding and reliance on international community recognition and its good name in its services that international community has come to know and rely on.

As a result of Panel's decision, the Respondent will now unfairly be the recipient of all of Complainant's hard work, laid out money and efforts to establish its good business practice and name. Respondent will be unjustly enriched at Complainant's true and accurate efforts and expense.

This request for Reconsideration is valid and is based upon concrete grounds. It is in accordance with the Section 4.2(c) (i), 4.2(c) (ii) and 4.2(c) (iii) of the ICANN

Bylaws, which permits filing of a Reconsideration request for actions and inactions of the Board and Staff of the ICANN. The WIPO Centre and the WIPO Domain Name Panelists are both ICANN accredited and approved. This information about WIPO's accreditation with ICANN is mentioned in multiple WIPO and ICANN documents that are mentioned herein:

**WIPO Website** – WIPO Domain Name Panelists – “... some of these panellists also appear on the list of other ICANN-accredited dispute resolution service providers.”

**ICANN Website** – List of Approved Dispute Resolution Service Providers – “...Complaints under the Uniform Dispute Resolution Policy (UDRP) may be submitted to any approved dispute-resolution service provider listed below – WIPO (World Intellectual Property Organisation).”

**Rules for Uniform Domain Name (Domain Name) Dispute Resolution Policy** – Rule 6(d) – “... These candidates may be drawn from any ICANN (Internet Corporation for Assigned Names and Numbers) approved Provider's list of panellists.”

**WIPO Guide to the Uniform Domain Name Dispute Resolution Policy (UDRP)** - to *which dispute resolution service provider do I submit my Complaint?* – “... the WIPO Center was the first provider to be accredited by ICANN and the first to receive cases under the UDRP Policy.”

**WIPO – Frequently Asked Questions: Internet Domain Names – *how did***

**WIPO get involved in the resolution of disputes?** – “... “... under the UDRP, WIPO is the leading ICANN- accredited domain dispute resolution service provider.”

Further, the definition of **Staff** as per Section 4.2 (a) of the ICANN Bylaws states that “Staff includes employees and individual long-term paid contractors serving in locations where ICANN does not have the mechanisms to employ such contractors directly.”

Since ICANN Rules, Bylaws and Policies contain no mechanism for employing Panelists and hold Administrative Panel Proceedings, ICANN approves and accredits Panelists and dispute resolution service provider to carry this task. Therefore, pursuant to Section 4.2(a) of ICANN Bylaws, these ICANN accredited and approved dispute resolution service providers and Panelists will fall under the purview of Staff as they function as per the guidelines of ICANN which does not have a mechanism to employ such personnel directly.

Additionally, since the Panel is in violation of core values of ICANN provided under Article 3 like resolving disputes in open, just and transparent manner and consistent with procedures designed to ensure fairness. Section 4.3 (a) and (b) allow for reconsideration requests to be filed based upon the grounds that the core values of ICANN have been violated and there has been no just, fair and transparent resolution of dispute.

This signifies that the present reconsideration request has standing not merely because of the Non-Discriminatory principle of ICANN Bylaws, but also because

the core values of ICANN have been contradicted amounting to an unfair resolution of dispute.

**11. Are you bringing this Reconsideration Request on behalf of multiple persons or entities? (Check one)**

Yes

X No

**11a. If yes, is the causal connection between the circumstances of the Reconsideration Request and the harm substantially the same for all of the Requestors? Explain.**

**12. Are you bringing this Reconsideration Request on an urgent basis pursuant to Article 4, Section 4.2(s) of the Bylaws?**

Yes

X No

**12a. If yes, please explain why the matter is urgent for reconsideration.**

**13. Do you have any documents you want to provide to ICANN?**

The Complainant understands that ICANN has complete access to all pertinent documents in **WIPO UDRP Case No. D2022-0880**, the Complainant is further enclosing other necessary documents in the form of **Exhibits** for the reference of the Board.

By Submitting my personal data, I agree that my personal data will be processed In accordance with the ICANN Privacy Policy, and agree to abide by the website Terms of Service.



10 July 2022

Signature

Date

**Rahul Goel**

**Representative of Zydus Lifesciences Ltd.**

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Print Name