

## Formal Notice of Intent to Initiate Legal Proceedings – Domain Name “KIZILAYAVM.COM”

Dear Legal Department,

I, **Selim Erman Duranay**, an individual customer of Network Solutions, LLC, provide this formal notice of my intent to initiate legal proceedings on or after **November 1 2025** concerning the domain name **KIZILAYAVM.COM**.

This notice is issued because Network Solutions has failed to allocate the backordered domain in accordance with ICANN policies and its own contractual obligations.

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### I. Factual Background

1. **Backorder Placement** – On **June 16 2025**, I placed and paid for a valid backorder for *KIZILAYAVM.COM* before the domain entered its “pending-delete” period.
  2. **Internal Registration** – WHOIS and RDAP records show that the domain was subsequently re-registered under **Network Solutions** infrastructure (or its reseller NamePal.com #8009 LLC) on **June 21 2025**, long before the public release window closed.
  3. **Customer Service History** – Between July and August 2025 I contacted your support department numerous times.
    - Case **E-367818** (Aug 2 2025): confirmation email regarding transfer.
    - Case **I-21900318** (Aug 6 2025): agent confirmed “domain registered under Network Solutions backorder team.”
    - Case **I-22004831** (Aug 13 2025): agent reconfirmed “domain managed by our backorder team.”
  4. **Lack of Auction or Transfer** – No auction was held, and no transfer was processed once the 60-day ICANN lock expired.
  5. **Current State** – The domain still resolves to a **Network Solutions Under-Construction** page, indicating that the company retains possession.
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### II. Legal Grounds

Network Solutions’ conduct appears to violate:

- **ICANN Registrar Accreditation Agreement §3.7.7.9** – failure to act in good faith and consistent with ICANN consensus policies;
  - **ICANN Transfer Policy (Section I.A)** – failure to complete a lawful transfer request; and
  - Network Solutions’ own Backorder Terms of Service.
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### III. Damages and Demand

I hereby demand:

1. Immediate release and transfer of *KIZILAYAVM.COM* to my account; and

2. Payment of **USD 100,000 (One Hundred Thousand U.S. Dollars)** as compensatory and consequential damages for losses caused by this breach and unauthorized retention.

If no satisfactory resolution or written response is received within **10 business days after November 1 2025**, I intend to file suit in the **U.S. District Court, Middle District of Florida**, and simultaneously submit a complaint to **ICANN Contractual Compliance**.

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#### **IV. Evidence Repository**

All supporting documents—including order receipts, email transcripts, screenshots, and WHOIS records—are archived at:

👉 <https://case.seed.tr>

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#### **V. Contact Information**

Selim Erman Duranay  
Meksika Cad. 37/51  
Çankaya, Ankara, Türkiye  
Tel: +90 534 231 80 56  
Email: [selimerman@gmail.com](mailto:selimerman@gmail.com)

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#### **VI. Reservation of Rights**

All rights are expressly reserved. Nothing in this correspondence shall be construed as a waiver of any legal or equitable remedy available to me.

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**Sincerely,**  
**Selim Erman Duranay**  
*Individual Claimant*  
Ankara, Türkiye