

10 September 2026

Marika Konings
Vice President, New gTLD Program, Lead
ICANN
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536, USA

Re: .EASY Prohibited Communications

Dear Marika,

I am writing on behalf of Link Freedom Group (“LFG”) regarding our above-referenced .EASY application and ongoing community discussions regarding perceived ambiguity arising from the prohibition of private contention resolution.¹

As you may be aware, LFG publicly announced its primary and replacement strings before Reveal Day. After that announcement, LFG received the attached correspondence, dated August 26, 2026, on behalf of easyGroup Ltd. The letter demands that LFG withdraw its .EASY application and states that, if LFG does not comply, easyGroup may initiate legal proceedings in jurisdictions where it claims relevant rights. Separately, easyGroup has publicly announced that it has submitted its own application to ICANN for the .EASY gTLD, a fact omitted from its correspondence to LFG.

Our concern that easyGroup has engaged in a prohibited communication designed to induce withdrawal of a competing application is reinforced by the fact that the ICANN Applicant Guidebook provides an explicit mechanism for evaluating precisely the sort of intellectual property claim which easyGroup is asserting in its correspondence to LFG. Specifically, Module 4 of the AGB provides the Legal Rights Objection (LRO) process for evaluation of whether a TLD string is unfairly premised on a claimed trademark. Given the existence of an orderly process for objective evaluation of these claims, LFG believes there is no justifiable reason for a competing TLD applicant to attempt to route around the process ICANN has prescribed to address such situations.

In view of the fact that easyGroup has engaged in the attached communication demanding withdrawal of LFG's application (a) without mentioning that it is a contending TLD string applicant, (b) asserting legally questionable claims, and (c) attempting to circumvent the contention and legal rights resolution mechanisms which were the result of arduous policy development by ICANN to govern the new gTLD application process, we must request that

¹ See, e.g., Trachtenberg, M., “ICANN Should Immediately Clarify if Applicants for the Same String Can Communicate Before Reveal Day”, CircleID, August 16, 2026, <<https://circleid.com/posts/icann-should-clarify-pre-reveal-communication-between-same-string-applicants>>

ICANN consider whether easyGroup should be disqualified from applying for .EASY in the ICANN 2026 new gTLD application round.

We would appreciate ICANN's guidance as to whether communications of this nature are consistent with the Applicant Guidebook. LFG remains committed to proceeding with its applications and fully complying with the processes established for the 2026 round, while simultaneously reserving all legal rights afforded it under the law.

Sincerely,



Vaughn Liley
Chief Executive Officer
Link Freedom Group

Enclosures: EasyGroup Communication to LFG

cc:
Theresa Swinehart, SVP, Global Domains & Strategy
John Jeffery, General Counsel and Secretariat
Andee Hill, Sr. Director, GDD Accounts
Aysegul Tekce, GDD Accounts Director
ICANN Correspondence

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26 August 2026

By courier and email (hello@lfg.link; Vaughn@nova.link; yoni@nova.link)

Dear Messrs Belousov and Liley,

Our client: easyGroup Ltd

Link Freedom Group's application for the .easy TLD

We act for easyGroup Ltd ("easyGroup") (a UK company with Registered No. 4060333) of 168 Fulham Road, London, United Kingdom, SW10 9PR. As we explain below, information about our client can be found at www.easy.com and www.easyHistory.info. easyGroup is the private investment vehicle of Sir Stelios Haji-Ioannou ("Sir Stelios") and is the owner of the easy family of brands. More information about our client can be found at www.stelios.org.

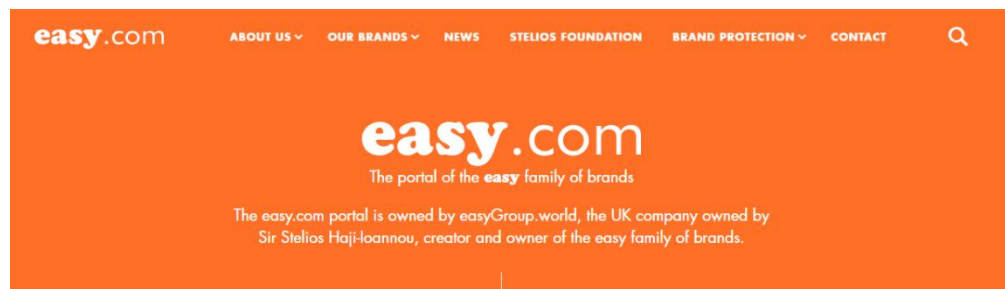
easyGroup and the "easy" family of brands

The easy family of brands has been established since 1994, when Sir Stelios was determined to build a strong brand around the word "easy". Each brand operates under the "easy" family of brands and is made up of the prefix "easy" followed by a second word, which typically denotes the goods or services offered under the brand. The first venture was in the travel sector in March 1995, when easyJet was incorporated at Companies House in the UK. Today, easyJet is one of the largest airlines in the world, operating in over 31 countries and carrying approximately 100 million passengers a year.

Since then, easyGroup (as the owner and licensor of the easy brand) and the wider family of easy brands have continued to grow to cover a wide range of different goods and services across a variety of sectors, including travel (easyJet.com), accommodation (easyHotel.com, easyStay.com, easyRoommate.com), telecoms and IT services (easyMobile.com, easySim.global, easyNetworks.co.uk), transport (easyCar.com, easyBus.com, easyFerry.com), leisure (easyGym.fr, easyCruise.com, easyMusic.com, easyCinema.gr), household cleaning products (easyCleaning.biz), food and drink (easyFood.com, easyPizza.com), retail (easyLife.co.uk), finance (easyMoney.com, easyPayments.com, easySure.dk and easyBitcoin.app), energy (easyEnergy.com), betting (easyBet.net), storage (easyStorage.com) and co-working office space (easyOffice.co.uk and easyHub.com) to name just a few.

In addition to individual brands promoting their own goods and services, the family is promoted at easyGroup's portal site at www.easy.com, which it has maintained since 1998. An extract appears as follows:

LONLIVE\121285849.2

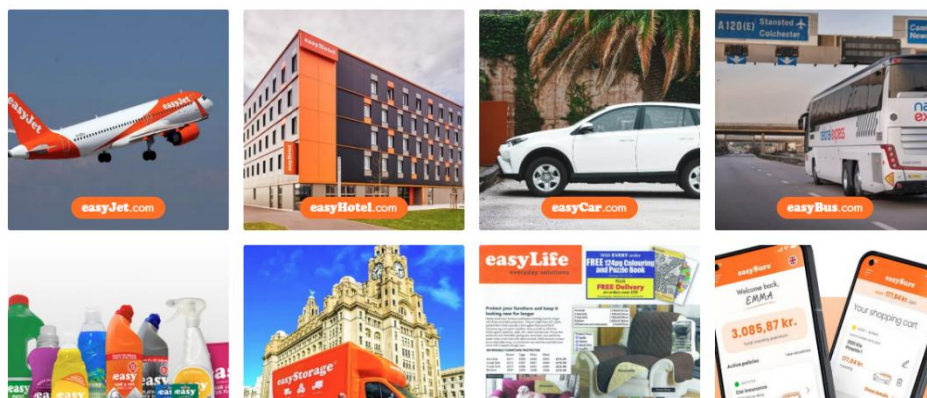


easyGroup Ltd donates at least 51% of its annual profits to the [Stelios Philanthropic Foundation](#), a charity registered with the Charity Commission for England and Wales under number 1141206. For the year ended 30 September 2025 we donated a total of £12.7m. The total cumulative giving by Sir Stelios Haji-Ioannou and easyGroup to the Stelios Philanthropic Foundation since 2010 amounts to 122 million euro.



Discover our brands

View our top 16 **easy** brands below



Additionally, each “easy” brand also promotes its membership of the family on its website, for example as follows:



A more detailed background and history to the easy family of brands is set out in the easyHistory booklet enclosed herewith (post copy only, but also accessible at www.easyHistory.info, where you can also access the easyHistory video). In addition, we have also provided a high-level summary of a number of the brands within the family at **Annex 1**.

As a global licensor, easyGroup owns a very substantial number of trade mark registrations around the world. Indeed, over the last 30+ years, easyGroup has registered well over 1,200 trade marks in

respect of the easy family of brands, including for the word “easy”, easy.com, and a large number of “easy-” prefixed trade marks. The full list of easyGroup’s registrations and active applications is at **Annex 2** to this letter. easyGroup currently owns 1,228 such trade mark registrations or active applications.

Those trade marks have been registered or applied for globally. The full geographic split by country is shown at **Annex 3** to this letter, and can be summarised by region as follows:

Territory	Number
Americas	181
Asia	143
Europe	809
International	18
Middle East and Africa	51
Oceania	26
Grand Total	1,228

These registrations include the following:

Mark	Registration number	Country	Registration date	Classes
EASY	001699792	EUIPO	13-07-2006	39, 42
EASY	UK00004161371	United Kingdom	30-01-2026	39
EASY	UK00901699792	United Kingdom	13-07-2006	35, 39, 42
	UK00003407716	United Kingdom	20-09-2019	9, 36, 37, 41, 42
	4416807	USA	15-10-2013	39
EASY.COM	3434399	Argentina	28-08-2023	39
easy.com	56094	Cyprus	29-11-2013	39
EASY.COM	002835197	EUIPO	17-06-2005	36, 38, 41, 42, 43
easy.com	UK00002247942	United Kingdom	04-05-2007	16, 35, 36, 38, 39, 41, 42
easy.com	136668	Israel	03-06-2002	39
easy.com	612017	New Zealand	06-10-1999	16, 35, 39

Your application for the .easy gTLD

It has come to easyGroup's attention that you have submitted an application to ICANN for 316 TLDs in the 2026 top level domain release. One of those applications is for the .easy gTLD (the **".easy gTLD"**). It is unknown as to whether you have applied for the .easy gTLD as a primary or secondary application. Please confirm. Moreover, please confirm if you are planning to make any registration restrictions or voluntary commitments in relation to potential registrants of .easy.

We understand that you plan to offer domains for sale under the gTLDs for which you have applied (including under the .easy gTLD (the **".easy Domains"**)). For example, your website refers to your plan to sell domains as a "vertically integrated domain name authority" under which customers would have "digital sovereignty" over the domain names they purchase from you. We have assumed that your motivation for attempting to register the .easy gTLD is to operate a profitable business which will find enough customers to buy the .easy Domains so you can cover your fixed and variable costs and make a profit.

In light of our client's trade mark rights globally, as explained above, our client has significant concerns about your application for the .easy gTLD and your future registration, promotion and sale of the .easy Domains. In particular, the promotion and provision of those services – and subsequent acquisition and use by your customers – will inevitably lead to a likelihood of confusion with our client's family of easy brands and one or more associated registrations and/or the taking of unfair advantage and/or detriment to the distinctive character and/or repute of its registrations. This would constitute trade mark infringement and passing off in the UK and Europe and under similar laws of other jurisdictions worldwide.

Specifically, there are three ways in which that infringement will arise:

- 1 **Your registration, promotion and sale of .easy Domains:** Our client will consider all registration, promotion and sale by you to the public of .easy Domains to constitute trade mark infringement and passing off, including by reason of the infringement of our client's "easy" registrations. By way of example only (and without prejudice to our client's arguments based on the reputation of its trade marks), the following registrations owned by our client specifically cover internet-related services and your services will be deemed confusingly similar thereto:

Mark	Registration number	Country	Registration date	Relevant specification
EASY.COM	002835197	EUIPO	17-06-2005	Class 38 Email services Class 42 Provision of information relating to

Mark	Registration number	Country	Registration date	Relevant specification
				technical matters, legal matters, information technology, and intellectual property.
easy.com	UK00002247942	United Kingdom	04-05-2007	Class 38 Electronic mail services
	UK00003407716	United Kingdom	20-09-2019	Class 42 Website design consultancy; consultancy in the fields of computers.

In addition to your registration, promotion and sale of .easy Domains, our client considers your application for the .easy gTLD and your promotion of that fact to be an indication to the public of your planned future use.

- 2 **Third party use of .easy Domains:** Our client will also consider any use of a .easy Domain to constitute trade mark infringement and/or passing off for the reasons explained above. Accordingly, and to the extent that this matter cannot be resolved and your application for the easy gTLD is successful, our client will monitor all of your sales of .easy Domains and reserves the right to take appropriate action against each and every one of your customers to the extent necessary, including through the bringing of legal proceedings against them. Our client will also make this policy publicly available so that your prospective customers are aware of its position and the risk of purchasing a domain name from you. By way of example and without limitation, you will appreciate that our client would be highly concerned if someone applied to register any of the following: jet.easy , hotel.easy, flights.easy, fly.easy, air.easy, stay.easy, or for that matter ryanair.easy or britishairways.easy.
- 3 **Your liability with purchasers of .easy Domains:** Along with your customers who purchase .easy Domains, our client will hold you jointly liable for trade mark infringement and passing off. You are now on notice of our client's intellectual property rights and your active involvement in the creation and management of .easy Domains will mean that our client will consider you to be jointly liable along with your customers. For the purposes of the EU's Digital Services Act and the Electronic Commerce (EC Directive) Regulations 2002, there is no applicable safe harbour provision for you as a registrar.

Our client will enforce any judgment it obtains against you, including if necessary in the courts in Malta and elsewhere.

For your information our client has a very substantial brand protection budget and it will not hesitate to use it to protect its intellectual property rights.

Next steps

Our client now invites you to withdraw your application for the .easy gTLD. Please confirm that you have done this by or before **9 September 2026**.

Should you not withdraw your application by that date, our client reserves the right to commence proceedings against you in the High Court in London and elsewhere in the world.

Yours sincerely

Stephenson Harwood LLP

Stephenson Harwood LLP

Annex 1

Selected members of the “easy” family of brands

1 easyJet – www.easyjet.com

easyJet is a low-cost pan-European scheduled airline which launched in 1995. It was the first airline in the world to cut out travel agents and sell directly to the public. The easyJet.com website, offering online booking, was launched in April/May 1998; at that time no other low-cost rival (including Ryanair) offered internet booking, and British Airways took under 1% of its bookings online. easyJet floated on the London Stock Exchange on 15 November 2000, valuing the group at £777 million after the float proceeds. In the financial year 2025, easyJet carried 93.4 million passengers on 356 Airbus aircraft and generated revenue of £10.1 billion.

2 easyHotel – www.easyhotel.com

easyHotel is a chain of budget hotels operated under licence from easyGroup. The easyHotel.com website launched in 2004 and the first easyHotel opened in Kensington, London in August 2005. By 2020, easyHotel was operating in the UK, Hungary, the Netherlands, Germany, Portugal, Bulgaria, Belgium, Spain and France. easyHotel was floated on London's AIM market in 2014, raising £38 million to fund expansion across London and Europe. Multi-language versions of the website have been available since at least 2006 in French, German, Spanish, Italian, Dutch, Portuguese, Bulgarian and Hungarian. Reported turnover grew from £5.69 million in 2009 to £44.1 million in 2019. By 2025 the portfolio comprised 46 owned/leased and franchised hotels across 11 countries, with total assets of €450 million, turnover of €110 million and 1.64 million room nights per year.

3 easyCar (previously easyRentacar) – www.easycar.com

easyCar is a low-cost vehicle rental business, originally operating its own fleet and now operating as an online broker for third-party rental providers. The easyRentacar website went live on 2 March 2000 taking bookings direct from the public at a launch price of £9 per day. By the end of September 2000, easyRentacar was operating in London, Manchester, Glasgow, Birmingham, Paris, Nice, Malaga, Barcelona and Amsterdam, with turnover of £3.34 million. By January 2003 (following rebranding to easyCar.com) there were 45 physical rental locations across the UK, France, the Netherlands and Spain, rising to 50 sites by April 2004, after which the business shifted to acting as an online broker for third-party rental companies. A peer-to-peer 'easyCar Club' service was launched in 2010. easyCar now allows customers to compare and book vehicle hire in 45,000 locations worldwide.

4 easyBus – www.easybus.com

easyBus is a low-cost bus and coach booking service, principally covering airport transfers and inter-city routes. easyBus launched in 2004 with a service between Milton Keynes and London; routes to Gatwick, Stansted and Luton airports were added in 2007 and 2008. Between 2010 and 2020, routes were added in France (Paris and Chamonix in 2015; Les Gets, Morzine and Avoriaz in 2017), Switzerland

(Geneva in 2015) and Italy (Milan, Pisa and Florence in 2017). Local-language versions of the easyBus website were produced in German, Spanish, French, Polish and Italian. By the start of 2020, easyBus.com was selling more than one million bus seats per year across hundreds of routes in Europe and beyond.

5 easyCleaning – www.easycleaning.biz

easyCleaning is an established manufacturer and supplier of household cleaning products. The licensee operates a 35,000 sq m integrated cleaning-product factory in Thetford, Norfolk, and employs over 250 people. Turnover in 2024/2025 was £59.6 million, with 120 million units produced across all brands. easyCleaning products are stocked in Tesco, Asda, Aldi and Lidl in the UK, in Dunnes Stores in the Republic of Ireland, and elsewhere in mainland Europe. In 2025, easyCleaning was listed in Kantar Worldpanel's Top 20 most-chosen UK Homecare brands.

6 easyStorage – www.easystorage.com

easyStorage is a self-storage business offering both collect-and-store services and drive-up container storage, which was first conceived in 2017. Its Collect & Store service achieved coverage extending to 85% of the UK population within a short period, and its Drive-Up Self-Storage container model scaled such that easyStorage became the largest operator of container self-storage sites in the UK. The proposition is supported by sub-brands including easyPod.uk (modular pods), easyContainer (drive-up containers) and easyVan (transport of belongings), together with the bespoke VAULT technology platform for franchisees. In 2025, easyStorage entered the Netherlands, marking the first step in its European expansion. Industry recognition includes the Elite Franchise Top 100 (rank 24, 2026) and BFA British Franchise Award finalist status for Research & Development in 2025.

7 easyLife – www.easylife.co.uk

easyLife is a value-focused catalogue and online retailer of household, gardening and lifestyle products. The brand was launched in the summer of 2000 by entrepreneur Gregory Caplan with the easylifeonline.com catalogue. Catalogues were distributed principally through inserts in national and local newspapers and magazines, with orders taken via order forms, telephone or the easylifeonline.com website; easyLife developed own-branded catalogue relationships with major UK titles including the News of the World, The Sun, The Mirror, The Daily Telegraph, The Guardian and The Radio Times. Over its trading history to 2022, easyLife inserted more than one billion catalogues, mailed over 100 million catalogues, and served over 5 million customers with more than 10 million orders. easyLife joined the easy family and became an easyGroup licensee in July 2022 and now fulfils over one million orders per year from a 40,000+ sq ft warehouse opened in Sheerness, Kent in 2023.

8 easySure – www.easysure.dk

Launched in 2024, easySure is a low-cost insurance provider offering car, buildings and personal accident cover, sold direct via website and app, to customers in Denmark. Customers can obtain and accept insurance quotes in under three minutes. The service operates via www.easySure.dk (available in Danish and English) and through a customer app on iOS and Android. Further European market expansion is planned.

9 easyMoney – www.easymoney.com

easyMoney is a financial services brand. An easyMoney credit card was launched on 21 August 2001 in partnership with credit company Accucard, allowing customers to personalise credit conditions by adjusting cashback, interest rates and annual fees. The brand was subsequently licensed to Zurich Insurance for a period for the sale of motor insurance. easyMoney is now operated by Andrew de Candole and Jason Ferrando as an online fintech offering peer-to-peer property-backed lending and an Innovative Finance ISA, and has advertised on Sky TV. As at November 2025, the easyMoney loan book stood at over £270 million, with total deposits from inception of £610 million and more than 5,000 active investors.

10 easyBet – www.easybet.net

easyBet is an online sports betting service. easyBet.net was launched on 25 October 2024 in partnership with Matchbook, a peer-to-peer betting exchange. easyBet is the first easy-branded venture in the sports betting industry. Prior to launch, in December 2019, easyGroup obtained a court order against Swiss hosting provider Exoscale (Akenes SA), which had been hosting an unauthorised online betting portal at easybet.com.

11 easyCruise – www.easycruise.com

easyCruise, a value-focused cruise line launched from Nice on its maiden voyage in 2005 around the Italian and French Rivas. Between 2005 and 2009, the line expanded across the Mediterranean, Caribbean, French and Italian Rivas, Greece, the Ionian, Turkey, the Aegean Islands and Crete. Multi-language website versions were produced in English, German, French and Greek. A three-part Sky TV documentary "Cruise with Stelios" was broadcast in the UK from 2005 and on the Travel Channel in the United States. easyCruise.com now operates in partnership with licensee Supercruises, providing access to over 18,000 cruises.

12 easyGym – www.easygym.fr

easyGym is a low-cost gym chain offering fitness memberships without long-term contracts. The brand launched in 2011 with two UK gyms. The estate grew to 15 UK gyms by 2016 and remained at 15 in 2017. From 2019, easyGym extended into France, with 7 UK and 6 French gyms in 2019, and 5 UK and 11 French gyms by 2020. Membership rose from 48,055 in 2014 to 65,823 in 2018. Revenue grew from £2.67 million (nine months to 30 June 2013) to £13.94 million in 2018. As at January 2026, there

were seven easyGym locations open in France, including two in Paris, together with a site in the French territory of Réunion. In April 2025, easyGym also expanded into India with a site in Delhi.

13 easyBitcoin – www.easybitcoin.app

easyBitcoin is a cryptocurrency app allowing customers to buy, sell and hold bitcoin. The service was launched in the United States in September 2025. Bitcoin rewards are paid on US dollar balances. The app is powered by Uphold, a global trading platform with over 10 million users, which provides the underlying infrastructure. The service is scheduled to launch in the UK in 2026.

14 easyEnergy – www.easyenergy.com

easyEnergy is a real-time consumer energy supply service, linking household prices directly to the wholesale market. The service was launched in the Netherlands by the Dutch energy company NieuweStroom under the easyEnergy.com brand. Under the model, a customer's energy price is directly linked to the current market price, which varies by hour for electricity and daily for gas. As at March 2024, easyEnergy.com had nearly 10,000 customers and over 16,000 gas and electricity connections across the Netherlands.

15 easySim – www.easysim.global

easySim is a travel eSIM service. The service was launched in 2023 by Richard Gwilliam, the founder and licensee of easyNetworks, at easySim.global. The service is available to anyone in the world, travelling to anywhere else in the world; the eSIM works in tandem with a customer's existing SIM card, so the customer's mobile number is retained. The eSIM works in over 200 countries and offers savings of up to 95% on home-network roaming charges.

16 easyFerry – www.easyferry.com

easyFerry is an online platform for booking ferry tickets. The brand was developed following the award of Stelios's Young Greek Entrepreneur Award in 2017 to Ferryhopper, an Athens-based start-up. The platform operates at easyferry.com. easyFerry.com currently offers ferry tickets on more than 3,000 routes across 33 countries.

17 easyNetworks – www.easynetworks.co.uk

easyNetworks is a business-to-business installer of data networks and telephone systems. The underlying business was established in Portsmouth in November 1995 by entrepreneur Richard Gwilliam as Easy Networks, offering internet, network and telecom services to businesses in Portsmouth and the surrounding area. In 2019, all brand rights (including those for prior use since 1995) were purchased by easyGroup, and the company is now a member of the easy family of brands using the easyNetworks mark under licence from easyGroup. easyNetworks has continued to grow its range of services and geographic coverage since joining the easy family and installs data networks and telephone systems across the UK.

Annex 2

Full list of easyGroup trade marks