

Ref: ORG-CIL1/202109/MS-1

Friday, 10 September 2021

Cloud Innovation Ltd
c/o Abacus (Seychelles) Limited
Mont Fleuri, Mahe
Seychelles

By email to: Mr. Heng Lu, Registered Contact and Director of Cloud Innovation Ltd
tech@cloudinnovation.org

Dear Sir,

Re: Cloud Innovation Ltd's Request for additional information

1. We refer to: -
 - (a) your letter dated 11 August 2021 under the hand of your attorney-at-law, and
 - (b) our reply dated 18 August 2021 under the hand of our Senior Attorney,
 - (c) our letter dated 27 August 2021, and
 - (d) the matter of **Cloud Innovation Ltd vs African Network Information Centre (AfrINIC) Ltd** [S.N. 1382/2021] which was called before The Honourable R. D. Dabee sitting in Chambers yesterday, 09 September 2021.
2. We record that, once more, you have not answered our queries.
3. Yesterday your Legal Representatives requested before Court that, following our letter dated 27 August 2021, any additional information we may have, be sent to you.
4. We wish to inform you that, save and except
 - (a) for the affidavit sworn by Mr. Neil Roland Hare-Brown on 09 August 2021, a copy of which has already been communicated to you as part of the matter of **African Network Information Centre (AfrINIC) Ltd vs Cloud Innovation Ltd** [SC/COM/JICA/000471/2021] and the information contained therein, and
 - (b) that we stand informed that Mr. Hare-Brown has already passed on the evidence of his testimony of fact to the law enforcement authorities which has led to an investigation being carried out by both the Mauritian Police Force and the Interpol,we are not in possession of any other actionable information at this stage.

5. In view of Mr. Hare-Brown's substantial expertise in digital investigations, incident coordination, security audit, and risk management, we have acted on the statements made by him in his affidavit dated 09 August 2021. That is specifically why you have been asked to answer our queries, which are aimed at ascertaining the background as well as your views on those facts.
6. Further, instead of insisting that AFRINIC provides you with actionable information, you ought to know that there is a range of readily available technologies available for the automatic detection of Child Sexual Abuse Material (CSAM)/ Indecent Images of Children (IloC) which may be resident on an ISP's system and which responsible ISPs utilise in-order to monitor for such material.
7. We accordingly require you to abide by your contractual undertaking to provide us with such information and assistance for the purpose of our investigation, including regarding the utilisation of the IP addresses assigned to you.
8. All our rights (including as set out in our previous letters) are reserved.

Yours faithfully,

Kayihura N. Eddy
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Eddy Kayihura
Chief Executive Officer

- c.c. (a) Mrs Y Hurnaurn-Calcutteea (yhurnaurn-calcutteea@applebyglobal.com)
(b) Mr M Mardemootoo SA (manon.mardemootoo@dentons.com)