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 14 Manwin Licensing International S.à.r.l.
 15 and Digital Playground, Inc.

16 UNITED STATES DISTRICT COURT
 17 CENTRAL DISTRICT OF CALIFORNIA

18 MANWIN LICENSING
 19 INTERNATIONAL S.A.R.L., a
 20 Luxemburg limited liability company
 21 (s.à.r.l.), and DIGITAL
 22 PLAYGROUND, INC., a California
 23 corporation,

24 Plaintiffs,

25 v.

26 ICM REGISTRY, LLC, d/b/a .XXX, a
 27 Delaware limited liability corporation;
 28 INTERNET CORPORATION FOR
 ASSIGNED NAMES AND NUMBERS,
 a California nonprofit public benefit
 corporation; and Does 1-10,

Defendants.

Case No. CV11- 9514 PSG (JCGx)

The Honorable Philip S. Gutierrez

**STIPULATION ON BRIEFING
 SCHEDULE FOR MOTIONS IN
 RESPONSE TO FIRST AMENDED
 COMPLAINT**

Courtroom: 880 Roybal Federal Building

1 **TO THE DISTRICT COURT AND ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD:**

3 Plaintiffs Manwin Licensing International S.à.r.l. and Digital Playground,
4 Inc. (collectively, "Plaintiffs"), Defendant Internet Corporation for Assigned
5 Names and Numbers ("ICANN"), and Defendant ICM Registry, LLC ("ICM"),
6 stipulate as follows through their undersigned counsel of record:

7 1. By Order dated February 15, 2012, the Court approved the parties'
8 stipulation granting Defendants 60 days (or until April 17, 2012) to respond to
9 Plaintiffs' First Amended Complaint, filed on February 17, 2012. The parties
10 stipulated so that they could have time to explore settlement.

11 2. The parties' settlement discussions have not yet finished. In order to
12 complete those discussions, the parties stipulate to extend, by an additional about
13 three weeks until May 8, 2012, the deadline for Defendants to respond to
14 Plaintiffs' First Amended Complaint.

15 3. ICANN and ICM currently intend to file motions in response to the
16 First Amended Complaint on the May 8, 2012 deadline, if no settlement occurs
17 before then.

18 4. Given the complexity of the issues involved in the First Amended
19 Complaint, the parties believe having additional time to prepare briefing on the
20 motions would be beneficial to the parties and the Court.

21 5. The parties therefore agree on the following briefing schedule for the
22 motions:

23 (a) Defendants shall respond to the First Amended Complaint by
24 May 8, 2012.

25 (b) Plaintiffs shall have 30 days up to and including June 8, 2012 to
26 file opposition to the motions to be filed in response to the First Amended
27 Complaint.

1 (c) ICM and ICANN shall have until June 29, 2012 to file replies
2 in support of the motions.

3 6. The parties request that motions be heard on or about July 30, 2012.

4 7. No prior extensions of time have been requested or granted
5 concerning the First Amended Complaint and the response to it, other than as
6 described above.

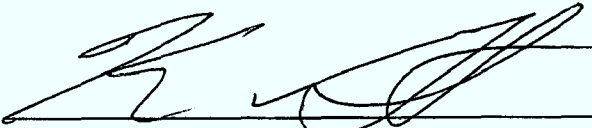
7 8. Neither the parties nor the Court will be prejudiced by an extension,
8 because there are no pending pre-trial or other deadlines in this action.

9 **SO STIPULATED.**

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DATED: April 2, 2012

THOMAS P. LAMBERT
JEAN PIERRE NOGUES
KEVIN E. GAUT
MITCHELL SILBERBERG & KNUPP LLP

By: 
Kevin E. Gaut
Attorneys for Defendant

DATED: April 3, 2012

JEFFREY A. LEVEE
JONES DAY

By: 
Jeffrey A. LeVe
Attorneys for Defendant Internet
Corporation for Assigned Names and
Numbers

1 DATED: April 3, 2012

2 ANDREA WEISS JEFFRIES
3 WILMER, CUTLER, PICKERING, HALE
4 & DORR LLP

5 By: Andrea Weiss Jeffries / BMS
6 Andrea Weiss Jeffries
7 Attorneys for Defendant ICM Registry,
8 LLC
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