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8 Attorney for Plaintiffs FEGISTRY, LLC, RADIX DOMAIN
9 SOLUTIONS PTE. LTD., and DOMAIN VENTURE
10 PARTNERS PCC LIMITED

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

11 FEGISTRY, LLC, RADIX DOMAIN
12 SOLUTIONS PTE. LTD., and DOMAIN
13 VENTURE PARTNERS PCC LIMITED,

14 Plaintiffs,

15 vs.

16 INTERNET CORPORATION FOR
17 ASSIGNED NAMES AND NUMBERS, a
18 California public benefit corporation,

19 Defendant.

Case No. 20STCV42881

**REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANT'S DEMURRER**

Assigned to Hon. Craig D. Karlan

[Filed concurrently with Declaration of Michael Rodenbaugh in Support of Plaintiffs' Request for Judicial Notice]

Hearing Date: Dec. 9

Time: 8:30 a.m.

Place: Dept. N

Complaint Filed: November 9, 2020

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23 Plaintiffs Fegistry, LLC, Radix Domain Solutions PTE. LTD., and Doman Venture
24 Partners PCC Limited (together, "Plaintiffs") hereby request that the Court take judicial notice
25 of the following documents pursuant to California Evidence Code sections 452 and 453:

- 26 1. 1. Plaintiffs request that this Court take judicial notice of the December 8,
27 2011 ICANN Bylaws (the "ICANN's 2011 Bylaws"), March 16, 2012 ICANN
28 Bylaws (the "ICANN's 2012 Bylaws"), and the April 11, 2013 ICANN Bylaws

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(the “ICANN’s 2013 Bylaws”). The archived ICANN Bylaws should be judicially noticed because they are “not reasonably subject to dispute and are capable of immediate and accurate determination by resort to sources of reasonably indisputable accuracy.” Cal. Evid. Code § 452(h). The archived Bylaws are readily available on ICANN’s website, as Defendant is aware given that Defendant controls its own website.

2. Attached to the Declaration of Michael Rodenbaugh in Support of this Request, marked as Exhibit A is a true and copy of the 2011 ICANN Bylaws, copied from ICANN’s website; marked as Exhibit B is a true and copy of the 2012 ICANN Bylaws, copied from ICANN’s website; marked as Exhibit C is a true and copy of the 2013 ICANN Bylaws, copied from ICANN’s website.

Respectfully submitted,

Dated: November 23, 2021

By: /s/ Mike Rodenbaugh
Michael Rodenbaugh
RODENBAUGH LAW

Attorneys for Plaintiffs
Fegistry, LLC, Radix Domain Solutions
PTE. LTD., and Doman Venture Partners
PCC Limited