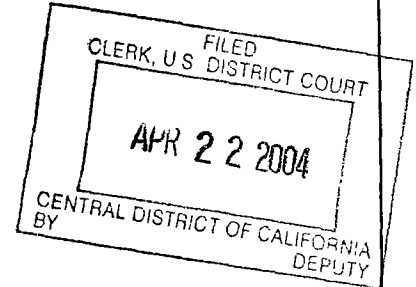


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VeriSign, Inc. and  
7 Network Solutions, Inc.

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA



10  
11 REGISTERSITE.COM, an Assumed  
Name of ABR PRODUCTS INC., a  
12 New York Corporation, et al.,

13 Plaintiffs,

14 v.

15 INTERNET CORPORATION FOR  
ASSIGNED NAMES AND  
16 NUMBERS, a California corporation;  
VERISIGN, INC., a Delaware  
17 Corporation; NETWORK  
SOLUTIONS, INC., a Washington  
18 Corporation; ENOM, INC., a  
Washington Corporation; ENOM  
19 FOREIGN HOLDINGS  
CORPORATION, a Washington  
20 Corporation; and DOES 1-10,  
inclusive;

21 Defendants.  
22

Case No. CV 04-1368 ABC (CWx)

STIPULATION EXTENDING TIME  
FOR CERTAIN DEFENDANTS TO  
RESPOND TO FIRST AMENDED  
COMPLAINT AND  
23 ~~PROPOSED~~ ORDER THEREON

24 Plaintiffs, on the one hand, and Defendants VeriSign, Inc. ("VeriSign"),  
25 Network Solutions, Inc. ("NSI"), and Internet Corporation for Assigned Names and  
26 Numbers ("ICANN"), on the other, enter into this Stipulation, through their  
27 respective counsel of record, based upon and with respect to the following  
28 circumstances:

1           A.    On March 1, 2004, Plaintiffs commenced this action with the filing of a  
2 Complaint against ICANN and VeriSign. Plaintiffs served the Complaint on ICANN  
3 and VeriSign on or about March 4, 2004. Pursuant to a Stipulation filed with the  
4 Court on March 16, 2004, the parties agreed that ICANN and VeriSign could have an  
5 extension of time, through and including April 8, 2004, within which to respond to  
6 the Complaint.

7           B.    Thereafter, following a "meet and confer" session between Plaintiffs and  
8 VeriSign on March 29, 2004, and a "meet and confer" session between Plaintiffs and  
9 ICANN on April 1, 2004, with respect to intended motions by VeriSign and ICANN  
10 to dismiss the Complaint, Plaintiffs filed the current First Amended Complaint, and  
11 served it by electronic means on ICANN and VeriSign on April 8, 2004. As a result,  
12 under Rules 15(a), 5(b)(2)(D), and 6(e) of the Federal Rules of Civil Procedure,  
13 ICANN and VeriSign have until April 21, 2004 to respond to the First Amended  
14 Complaint.

15           C.    The First Amended Complaint adds several additional causes of action,  
16 legal theories, and allegations. The Plaintiffs have therefore agreed that VeriSign and  
17 ICANN may have an extension of time, from April 21, 2004, through and including  
18 May 10, 2004, within which to respond to the First Amended Complaint, without  
19 prejudice to the rights of VeriSign and ICANN to request or to move the Court for,  
20 additional time, if needed, beyond that date to respond.

21           D.    The First Amended Complaint also adds three additional defendants.  
22 NSI was served with the First Amended Complaint on April 15, 2004. According to  
23 Rule 12(a)(1)(A) of the Federal Rules of Civil Procedure, the response of NSI to the  
24 First Amended Complaint must be filed by May 5, 2004. Plaintiffs have agreed to a  
25 five-day extension of time for NSI to respond to the First Amended Complaint, so  
26 that its response will be due concurrently with the responses of VeriSign and ICANN.  
27 The requirements of Local Rule 8.3 are met as to NSI since this is NSI's first request  
28

1 for an extension of time in which to respond in this action and the requested  
2 extension is for less than 30 days.

3 E. The parties have further agreed that it is in their respective best interests,  
4 as well as in the interests of judicial efficiency and economy, if possible, to have a  
5 single response date for all existing defendants and a single briefing schedule and  
6 hearing date for any motions to dismiss that defendants, or some of them, may file  
7 with respect to the First Amended Complaint. Therefore, once the remaining  
8 defendants have been served, the parties may, subject to further order of the Court,  
9 agree upon some further extension of time to achieve such coordination.

10 Based upon the foregoing, IT IS HEREBY STIPULATED AND AGREED  
11 that ICANN, VeriSign, and NSI will file and serve their respective responses to the  
12 First Amended Complaint on or before May 10, 2004.

13  
14 DATED: April 21, 2004

ARNOLD & PORTER LLP

15  
16 By: Laurence J. Hutt  
17 Laurence J. Hutt  
18 Attorneys for Defendants  
VeriSign, Inc. and Network  
Solutions, Inc.

19 DATED: April \_\_, 2004

JONES DAY

20  
21 By: Jeffrey A. LeVee  
22 Jeffrey A. LeVee  
23 Attorneys for Defendant  
Internet Corporation for Assigned  
Names and Numbers

24 DATED: April \_\_, 2004

NEWMAN & NEWMAN LLP

25  
26 By: Derek A. Newman  
27 Derek A. Newman  
28 Attorneys for Plaintiffs

1 for an extension of time in which to respond in this action and the requested  
2 extension is for less than 30 days.

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7 with respect to the First Amended Complaint. Therefore, once the remaining  
8 defendants have been served, the parties may, subject to further order of the Court,  
9 agree upon some further extension of time to achieve such coordination.

10 Based upon the foregoing, IT IS HEREBY STIPULATED AND AGREED  
11 that ICANN, VeriSign, and NSI will file and serve their respective responses to the  
12 First Amended Complaint on or before May 10, 2004.

13  
14 DATED: April \_\_, 2004

ARNOLD & PORTER LLP

15  
16 By: \_\_\_\_\_  
17 Laurence J. Hutt  
18 Attorneys for Defendants  
VeriSign, Inc. and Network  
Solutions, Inc.

19 DATED: April 21, 2004

JONES DAY

20  
21 By: Jeffrey A. LeVee / etc  
22 Jeffrey A. LeVee  
23 Attorneys for Defendant  
Internet Corporation for Assigned  
Names and Numbers

24 DATED: April \_\_, 2004

NEWMAN & NEWMAN LLP

25  
26 By: \_\_\_\_\_  
27 Derek A. Newman  
28 Attorneys for Plaintiffs

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2 extension is for less than 30 days.

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4 as well as in the interests of judicial efficiency and economy, if possible, to have a  
5 single response date for all existing defendants and a single briefing schedule and  
6 hearing date for any motions to dismiss that defendants, or some of them, may file  
7 with respect to the First Amended Complaint. Therefore, once the remaining  
8 defendants have been served, the parties may, subject to further order of the Court,  
9 agree upon some further extension of time to achieve such coordination.

10 Based upon the foregoing, IT IS HEREBY STIPULATED AND AGREED  
11 that ICANN, VeriSign, and NSI will file and serve their respective responses to the  
12 First Amended Complaint on or before May 10, 2004.

13  
14 DATED: April \_\_, 2004

ARNOLD & PORTER LLP

15  
16 By: \_\_\_\_\_  
17 Laurence J. Hutt  
18 Attorneys for Defendants  
VeriSign, Inc. and Network  
Solutions, Inc.


19 DATED: April \_\_, 2004

JONES DAY

20  
21 By: \_\_\_\_\_  
22 Jeffrey A. LeVee  
23 Attorneys for Defendant  
Internet Corporation for Assigned  
Names and Numbers

24 DATED: April 21, 2004

NEWMAN & NEWMAN LLP

25  
26 By:  \_\_\_\_\_  
27 Derek A. Newman  
28 Attorneys for Plaintiffs

ORDER

Based upon the foregoing Stipulation of the parties and good cause appearing therefor,

IT IS HEREBY ORDERED that Defendants ICANN, VeriSign, and NSI will have through and including May 10, 2004, within which to file and serve their respective responses to the First Amended Complaint.

DATED: *April 22, 2004*

AUDREY COLLINS

UNITED STATES DISTRICT JUDGE

**PROOF OF SERVICE**

STATE OF CALIFORNIA            )  
  )  
COUNTY OF LOS ANGELES        )            ss

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 777 South Figueroa Street, 44th Floor, Los Angeles, California 90017-5844.

On April 27, 2004, I served the foregoing document described as: ORDER BY THE COURT FOR THE STIPULATION EXTENDING TIME FOR CERTAIN DEFENDANTS TO RESPOND TO FIRST AMENDED COMPLAINT

by placing true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list.

by placing  the original and  a true copy thereof enclosed in sealed envelope(s) addressed as follows: Type Address Here or DELETE

**BY MAIL** I placed such envelope with postage thereon prepaid in the United States Mail at 777 South Figueroa Street, 44th Floor, Los Angeles, California 90017-5844. Executed on April 27, 2004 at Los Angeles, California.

**BY PERSONAL SERVICE** I caused such envelope to be delivered by hand to the office of the addressee. Executed on \_\_\_\_\_ at Los Angeles, California.

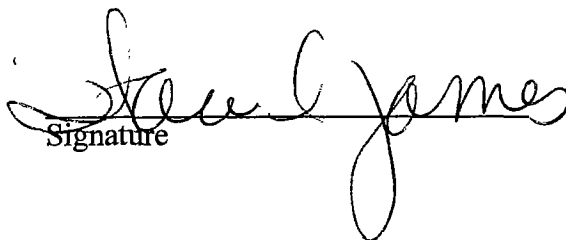
**BY FACSIMILE** The above-referenced document (together with all exhibits and attachments thereto) was transmitted via facsimile transmission to the addressee(s) as indicated on the attached mailing list on the date thereof. The transmission was reported as completed and without error. Executed on \_\_\_\_\_ at Los Angeles, California.

**BY FEDERAL EXPRESS** I am readily familiar with Arnold & Porter LLP's business practices of collecting and processing items for pickup and next business day delivery by Federal Express. Under said practices, items to be delivered the next business day are either picked up by Federal Express or deposited in a box or other facility regularly maintained by Federal Express in the ordinary course of business on that same day with the cost thereof billed to Arnold & Porter LLP's account. I placed such sealed envelope for delivery by Federal Express to the offices of the addressee(s) as indicated on the attached mailing list on the date hereof following ordinary business practices. Executed on \_\_\_\_\_ at Los Angeles, California.

**STATE** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

**FEDERAL** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

\_\_\_\_\_  
Stacie L. James

  
Signature

1 Derek A. Newman, Esq.  
2 Newman & Newman  
3 505 Fifth Avenue South  
4 Suite 610  
5 Seattle, Washington 98104

6 Jeffrey A. LeVee  
7 Jones Day  
8 555 West Fifth Street  
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10 Los Angeles, CA 90013  
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# ARNOLD & PORTER LLP

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213.243.4199 Fax

44<sup>th</sup> Floor  
777 South Figueroa Street  
Los Angeles, CA 90017-5844

| Fax Transmittal  |                           |  |
|--|---------------------------|--|
| April 29, 2004   |                           |  |
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| Emma Killick   | 213-243-2539              |  |
| SENDER   | SENDER'S TELEPHONE NUMBER |  |
| Laurence Hutt  | 213-243-4000              |  |
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