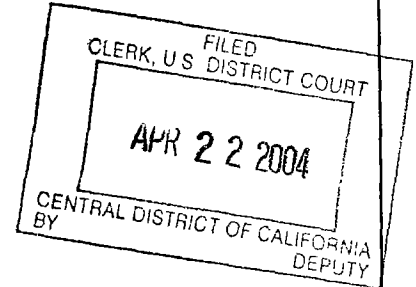


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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA



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