

1 Plaintiffs and Defendants, through their respective counsel of record herein,
2 enter into this Stipulation to extend the time for compliance with the requirements of
3 Fed. R. Civ. P. 26 with reference to the following circumstances:

4 A. Plaintiffs commenced this action against Defendants VeriSign, Inc.
5 (“VeriSign”) and Internet Corporation for Assigned Names and Numbers (“ICANN”)
6 through the filing of the Complaint on March 1, 2004.

7 B. Prior to VeriSign and ICANN filing responsive pleadings, but after they
8 had advised Plaintiffs of their intent to move to dismiss the Complaint, Plaintiffs filed
9 a First Amended Complaint on or about April 8, 2004. The First Amended
10 Complaint added various claims for relief and three additional defendants, Network
11 Solutions, Inc. (“NSI”), and eNOM, Inc. and eNOM Foreign Holdings Corporation
12 (collectively “eNOM”).

13 C. Pursuant to Stipulations and Orders filed on or about April 22, 2004 and
14 May 5, 2004: Defendants had until May 28, 2004, to plead to the First Amended
15 Complaint; a briefing schedule was established for any motions by Defendants to
16 dismiss; and a hearing on any such motions to dismiss was set for July 12, 2004. In
17 accordance with those Stipulations and Orders, on May 28, 2004, Defendants served
18 and filed their respective Motions to Dismiss the First Amended Complaint. Those
19 motions are presently pending and set for hearing before this Court on July 12, 2004.

20 D. Since the pleadings in this action have not yet been finalized, and since
21 no scheduling conference under Fed. R. Civ. P. 16(b) has been set by the Court,
22 Plaintiffs and Defendants mutually believe that any requirement that they engage now
23 in the meeting of counsel and mutual disclosures contemplated by Fed. R. Civ. P.
24 26(f) should be temporarily extended.

25
26 Accordingly, IT IS HEREBY STIPULATED AND AGREED by and between
27 Plaintiffs and Defendants as follows:
28

1 1. To the extent Fed. R. Civ. P. 26 and 16 could be construed as requiring
2 Plaintiffs and Defendants to engage in the meeting of counsel and disclosures
3 provided for therein at this juncture in the proceedings, the deadline for Plaintiffs and
4 Defendants to meet and confer as provided by Fed. R. Civ. P. 26(f) shall be extended
5 until 30 days after Defendants file answers to the First Amended Complaint (or any
6 then operative complaint).

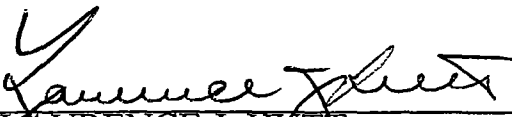
7 2. Plaintiffs and Defendants shall thereafter file their proposed discovery
8 plan and Rule 26(f) report, and shall make the initial disclosures, at the times
9 provided in Fed. R. Civ. P. 26(f) and 26(a) respectively.

10 3. Nothing in this Stipulation is intended, or shall be construed, as a waiver
11 of any of the respective claims, defenses, or motions of any of the parties.

12 4. This stipulation is without prejudice to any party's right to seek a further
13 continuance of the above deadlines.

14
15 DATED: June 10, 2004

ARNOLD & PORTER LLP

16
17 By: 
18 LAURENCE J. HUTT
19 Attorneys for Defendants
20 VeriSign, Inc. and Network
21 Solutions, Inc.

22 DATED: June __, 2004

JONES DAY

23
24 By: _____
25 JEFFREY A. LEVEE
26 Attorneys for Defendants
27 Internet Corporation for Assigned
28 Names and Numbers

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ARNOLD & PORTER LLP

16
 17 By: _____
 18 LAURENCE J. HUTT
 19 Attorneys for Defendants
 20 VeriSign, Inc. and Network
 21 Solutions, Inc.

22 DATED: June 10, 2004

JONES DAY


23
 24 By: *Jeffrey A. Levee*
 25 JEFFREY A. LEVEE
 26 Attorneys for Defendants *hek*
 27 Internet Corporation for Assigned
 28 Names and Numbers

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DATED: June 2nd, 2004

DAVIS WRIGHT TREMAINE LLP

By


FREDERICK F. MUMM
Attorneys for Defendants
eNOM, Inc. and eNOM Foreign
Holdings Corporation

erroneously also sued as

F.F.M.

DATED: June 10th, 2004

NEWMAN & NEWMAN LLP

By


DEREK A. NEWMAN
Attorneys for Plaintiffs

ORDER

Based upon the foregoing Stipulation of the parties, and good cause appearing therefor, IT IS HEREBY SO ORDERED that:

1. The deadline for Plaintiffs and Defendants to meet and confer as provided by Fed. R. Civ. P. 26(f) is extended until 30 days after Defendants file answers to the First Amended Complaint (or any then operative complaint).
2. Plaintiffs and Defendants shall thereafter file their proposed discovery plan and Rule 26(f) report, and shall make the initial disclosures, at the times provided in Fed. R. Civ. P. 26(f) and 26(a) respectively.
3. Nothing herein is intended, or shall be construed, as a waiver of any claims, defenses, or motions of any of the parties.
4. This Order is without prejudice to any party's right to seek a further continuance of the above deadlines based upon a proper showing of good cause.

DATED:

UNITED STATES DISTRICT JUDGE

1 DATED: June __, 2004

DAVIS WRIGHT TREMAINE LLP

2
3
4 By:

FREDERICK F. MUMM
Attorneys for Defendants
eNOM, Inc. and eNOM Foreign
Holdings Corporation

5
6
7
8 DATED: June __, 2004

NEWMAN & NEWMAN LLP

9
10 By:

DEREK A. NEWMAN
Attorneys for Plaintiffs

11
12
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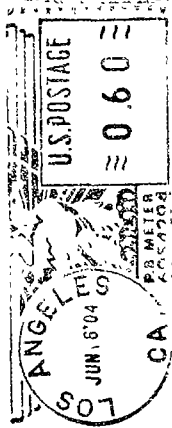
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27 DATED:

UNITED STATES DISTRICT JUDGE

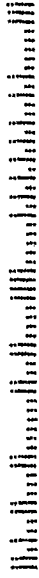
ARNOLD & PORTER LLP

44th Floor
777 South Figueroa Street
Los Angeles, CA 90077-5844



RECEIVED
JUN 18 2004
JONES DAY

Jeff LeVee
Emma Killick
Jones Day
555 West 5th Street
Suite 4600
Los Angeles, CA 90013



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