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CENTRAL DISTRICT OF CALIFORNIA
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14 VERISIGN, INC.

15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA

LOGGED

17 VERISIGN, INC., a Delaware
Corporation,

18 Plaintiff,


19 v.

20 INTERNET CORPORATION FOR
21 ASSIGNED NAMES AND
22 NUMBERS, a California corporation;
DOES 1-50,

23 Defendants.

Case No. CV 04-1292 AHM (CTx)

STIPULATION EXTENDING TIME:
(1) FOR PLAINTIFF TO FILE FIRST
AMENDED COMPLAINT AND
(2) FOR PLAINTIFF AND
DEFENDANT TO ENGAGE IN RULE
26 DISCLOSURES; AND
[PROPOSED] ORDER THEREON

DOCKETED ON CM
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BY  007

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1 Plaintiff VeriSign, Inc. ("VeriSign") and defendant Internet Corporation for
2 Assigned Names and Numbers ("ICANN"), through their respective counsel of
3 record herein, enter into this Stipulation with reference to the following
4 circumstances:

5 A. In its Order entered on May 19, 2004, the Court, *inter alia*, granted
6 VeriSign until June 7, 2004, within which to file a First Amended Complaint in this
7 action.

8 B. For scheduling reasons, and to facilitate VeriSign's preparation and filing
9 of its amended pleading, VeriSign has requested, and ICANN has agreed (subject to
10 the approval of the Court) that VeriSign may have, an additional week within which
11 to serve and file the First Amended Complaint. ICANN has also requested, and
12 VeriSign has agreed that ICANN may have, 20 days within which to respond to the
13 First Amended Complaint.

14 C. Since the pleadings have not yet been finalized and no scheduling
15 conference has been set by the Court, VeriSign and ICANN mutually believe that any
16 requirement that they engage now in the meeting of counsel and mutual disclosures
17 contemplated by Rule 26 of the Federal Rules of Civil Procedure should be
18 temporarily extended.

19
20 Accordingly, IT IS HEREBY STIPULATED AND AGREED by and between
21 VeriSign and ICANN as follows:

22 1. VeriSign may have through and including June 14, 2004, within which to
23 serve and file a First Amended Complaint.

24 2. ICANN may have 20 days after service of a First Amended Complaint
25 within which to respond thereto.

26 3. To the extent Rules 26 and 16 of the Federal Rules of Civil Procedure could
27 be construed as requiring VeriSign and ICANN to engage in the meeting of counsel

1 and disclosures provided for therein at this juncture in the proceedings, the deadline
 2 for such meeting and disclosures will be extended until the earlier of (i) 21 days prior
 3 to any scheduling conference set by the Court pursuant to Rule 16(b) or (ii) 20 days
 4 after the Court rules on a Rule 12(b)(6) motion by ICANN to dismiss and on a special
 5 motion by ICANN to strike, the First Amended Complaint, if such motions are made
 6 and denied.

7 4. Nothing in this Stipulation is intended, or shall be construed, as waiver of
 8 any of the respective claims or defenses of the parties on the merits or as a waiver of
 9 VeriSign's request for certain discovery set forth in VeriSign's previously filed
 10 opposition to ICANN's special motion to strike.

11 DATED: June 2, 2004

ARNOLD & PORTER LLP

13 By:

14 LAURENCE J. HUTT
 Attorneys for Plaintiff
 VeriSign, Inc.

16 DATED: June 2, 2004

JONES DAY

18 By:

19 JEFFREY A. DEVEE
 Attorneys for Defendant
 Internet Corporation for Assigned
 Names and Numbers

21 **ORDER**

22 Based upon the foregoing Stipulation of the parties, and good cause appearing
 23 therefor, IT IS HEREBY SO ORDERED.

26 DATED:

UNITED STATES DISTRICT JUDGE