

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 11-14052-CIV-MARTINEZ/LYNCH

JOHN ZUCCARINI,  
Plaintiff,

v.

NETWORK SOLUTIONS, LLC, et al.  
Defendants.

---

**JOINT MOTION FOR EXTENSION OF TIME TO SERVE  
INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)(A)**

Plaintiff, John Zuccarini, and Defendants, Network Solutions, LLC (“Network Solutions”), NameJet, LLC (“NameJet”), and Internet Corporation for Assigned Names and Numbers (“ICANN”) (collectively, the “parties”), jointly move for an extension of time to serve initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1)(A), and state as follows.

Network Solutions, NameJet, and ICANN each filed a Motion to Dismiss Plaintiff’s Amended Complaint, which motions will be fully briefed by April 18, 2011.<sup>1</sup> In the event Defendants’ respective Motions to Dismiss are granted, the initial disclosures and the related expense of preparing such disclosures will be rendered unnecessary. As such, at the parties’ April 11, 2011 in-person Scheduling Conference, held pursuant to this Court’s March 2, 2011 Scheduling Order, the parties agreed to seek joint relief from the Court from their respective initial disclosure obligations. The parties therefore hereby respectfully request an extension of time to serve initial disclosures until (and if) the Court determines that Plaintiff has stated a valid cause of action. If a Defendant’s motion to dismiss is denied, that Defendant and Plaintiff will

---

<sup>1</sup> Defendant ICANN moved to dismiss for (1) lack of personal jurisdiction, (2) improper venue, and (3) failure to state a claim upon which relief can be granted (*See* Dkt. # 19); Defendants NameJet and Network Solutions moved to dismiss on the basis of improper venue and for failure to state a claim upon which relief can be granted. *See* Dkt. #s 13, 14.

produce their initial disclosures within fourteen (14) days of service of an order denying that Defendant's motion to dismiss. If a Defendant's motion to dismiss is granted with leave to amend, that Defendant and Plaintiff will produce their initial disclosures within fourteen (14) days of service of an order stating that Plaintiff has stated a valid cause of action.

Respectfully submitted;

/s/ John Zuccarini

John Zuccarini (*pro se*)  
raveclub@comcast.net  
190 SW Kanner Highway  
Stuart, FL 34997  
Telephone: 772-631-3887  
(Mr. Zuccarini does not have a facsimile number)  
*Plaintiff*

/s/ Jamie Michelle Roos

Jamie Michelle Roos  
jhertz@steinsperling.com  
Florida Bar No. 694231  
Timothy B. Hyland  
thyland@steinsperling.com  
(*Pro Hac Vice admission pending*)  
Stein Sperling Bennett De Jong Driscoll & Greefeig, PC  
25 West Middle Lane  
Rockville, MD 20851  
301-838-3326  
Fax: 301-354-8326  
*Attorneys for Defendants Network Solutions, LLC and NameJet, LLC*

/s/ Maria H. Ruiz

Maria H. Ruiz  
Florida Bar No. 182923  
MRuiz@kasowitz.com  
KASOWITZ BENSON TORRES & FRIEDMAN LLP  
1441 Brickell Avenue, Suite 1420  
Miami, FL 33131  
Telephone: (786) 587-1044  
Facsimile: (305) 675-2601

Kathleen P. Wallace

*(Admitted Pro Hac Vice)*

Jones Day

555 S. Flower Street, 50th Floor

Los Angeles, CA 90071

213-489-3939

Fax: 213-243-2539

Email: [kwallace@jonesday.com](mailto:kwallace@jonesday.com)

*Attorneys for Defendant Internet Corporation for Assigned Names and Numbers*

[Electronically filed by Maria H. Ruiz with consent of the parties.]

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail and regular mail on Plaintiff and via the Court's CM/ECF system on all remaining persons on the Service List below on April 18, 2011.

John Zuccarini (Plaintiff, pro se)  
190 SW Kanner Highway  
Stuart, FL 34997

Jamie Michelle Roos  
jhertz@steinsperling.com  
Florida Bar No. 694231  
Timothy B. Hyland  
thyland@steinsperling.com  
*(Pro Hac Vice admission pending)*  
Stein Sperling Bennett De Jong Driscoll & Greefeig, PC  
25 West Middle Lane  
Rockville, MD 20851  
301-838-3326  
Fax: 301-354-8326  
*Attorneys for Defendants Network Solutions, LLC and NameJet, LLC*

Kathleen P. Wallace  
*(Admitted Pro Hac Vice)*  
Jones Day  
555 S. Flower Street, 50th Floor  
Los Angeles, CA 90071  
213-489-3939  
Fax: 213-243-2539  
Email: kwallace@jonesday.com  
*Attorneys for Defendant Internet Corporation for Assigned Names and Numbers*

/s/ Maria H. Ruiz  
\_\_\_\_\_  
Maria H. Ruiz

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 11-14052-CIV-MARTINEZ/LYNCH

JOHN ZUCCARINI,  
Plaintiff,

v.

NETWORK SOLUTIONS, LLC, et al.  
Defendants.

**[PROPOSED] ORDER ON JOINT MOTION FOR EXTENSION OF TIME TO SERVE  
INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)(A)**

THIS CAUSE came before the court on the parties' Joint Motion for Extension of Time to Serve Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)(A), and having reviewed motion and for good cause shown, it is hereby:

**ORDERED AND ADJUDGED** that the Joint Motion for Extension of Time to Serve Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)(A) is **GRANTED**.

The Court hereby **GRANTS** an extension of time to the parties to serve initial disclosures. If a Defendant's motion to dismiss is denied, that Defendant and Plaintiff will produce their initial disclosures within fourteen (14) days of service of an order denying that Defendant's motion to dismiss. If a Defendant's motion to dismiss is granted with leave to amend, that Defendant and Plaintiff will produce their initial disclosures within fourteen (14) days of service of an order stating that Plaintiff has stated a valid cause of action.

**DONE AND ORDERED** in Chambers at Miami, Florida, this \_\_\_ day of \_\_\_\_\_  
2011.

\_\_\_\_\_  
District Judge

cc:

John Zuccarini (*pro se*)  
raveclub@comcast.net  
190 SW Kanner Highway  
Stuart, FL 34997  
Telephone: 772-631-3887  
(Mr. Zuccarini does not have a facsimile number)  
*Plaintiff*

Jamie Michelle Roos  
jhertz@steinsperling.com  
Florida Bar No. 694231  
Timothy B. Hyland  
thyland@steinsperling.com  
(*Pro Hac Vice admission pending*)  
Stein Sperling Bennett De Jong Driscoll & Greefeig, PC  
25 West Middle Lane  
Rockville, MD 20851  
301-838-3326  
Fax: 301-354-8326  
*Attorneys for Defendants Network Solutions, LLC and NameJet, LLC*

Maria H. Ruiz  
Florida Bar No. 182923  
MRuiz@kasowitz.com  
KASOWITZ BENSON TORRES & FRIEDMAN LLP  
1441 Brickell Avenue, Suite 1420  
Miami, FL 33131  
Telephone: (786) 587-1044  
Facsimile: (305) 675-2601

Kathleen P. Wallace  
(*Admitted Pro Hac Vice*)  
Jones Day  
555 S. Flower Street, 50th Floor  
Los Angeles, CA 90071  
213-489-3939  
Fax: 213-243-2539  
Email: kwallace@jonesday.com  
*Attorneys for Defendant Internet Corporation for Assigned Names and Numbers*