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7 COALITION FOR ICANN TRANSPARENCY INC.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11
12 COALITION FOR ICANN TRANSPARENCY
INC., a Delaware corporation,

13 Plaintiff,

14 v.

15 VERISIGN, INC., a Delaware corporation;
16 INTERNET CORPORATION FOR ASSIGNED
NAMES AND NUMBERS, a California
17 corporation,

18 Defendants.

Case No.

**COALITION FOR ICANN
TRANSPARENCY'S *EX PARTE*
APPLICATION FOR
TEMPORARY RESTRAINING
ORDER**

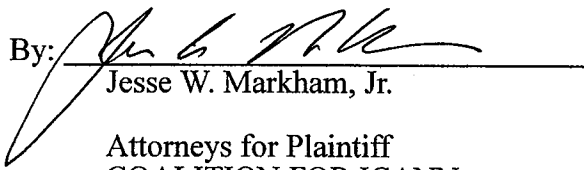
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20 Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Local Rule 65-1,
21 Plaintiff Coalition For ICANN Transparency Inc. ("CFIT"), hereby applies for a temporary
22 restraining order requiring that Defendants Internet Corporation for Assigned Names and
23 Numbers ("ICANN") and VeriSign, Inc. ("VeriSign") shall not enter into the proposed 2005 .com
24 Agreement, that ICANN and VeriSign shall abide by the terms of the current .com Agreement
25 until it expires on November 10, 2007, and that VeriSign shall not engage in any "Registry
26 Services" as defined in the 2005 .com Agreement, including without limitation the Central Listing
27 Service, and excluding services that are defined as "Registry Services" in the 2001 .com
28 Agreement, pending further order of this Court.

1 This Application is made on the ground that Defendants have violated and are threatening
2 to violate the antitrust laws and cause irreparable harm to CFIT's members, and others, and is
3 based upon this Application, CFIT's Complaint, CFIT's Memorandum In Support of Application
4 for Temporary Restraining Order, accompanying declarations and exhibits, and such further
5 evidence and arguments as may be presented.

6 Dated: November 28, 2005

7 Respectfully submitted,

8 MORRISON & FOERSTER LLP

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11 By:  _____
12 Jesse W. Markham, Jr.

13 Attorneys for Plaintiff
14 COALITION FOR ICANN
15 TRANSPARENCY INC.