

As set forth more fully in the accompanying Memorandum and the Declaration of Akram Atallah, the Complaint against ICANN should be dismissed under Fed. R. Civ. P. 12(b)(2) for lack of personal jurisdiction over ICANN. In addition, the Complaint against ICANN should be dismissed under Fed. R. Civ. P. 12(b)(3) for lack of venue. Finally, the Complaint against ICANN should be dismissed under Fed. R. Civ. P. 12(b)(6) for failure to state a claim upon which relief may be granted.

Pursuant to Local Rule 7(E), counsel for ICANN hereby certifies that a good faith effort has been made with Plaintiff Schreiber to resolve the matters stated herein, but the parties were unable to reach an agreeable solution.

Dated: September 10, 2012

Respectfully submitted,

/s/ Walter D. Kelley, Jr.

Walter D. Kelley, Jr. (VA Bar. No. 21622)
Tara Lynn R. Zurawski (VA Bar No. 73602)
JONES DAY
51 Louisiana Avenue, NW
Washington, DC 20001-2113
Email: wdkelley@jonesday.com
Email: tzurawski@jonesday.com
Telephone: (202) 879-2113
Facsimile: (202) 626-1700

Eric P. Enson (*pro hac vice* pending)
JONES DAY
555 South Flower Street, 50th Floor
Los Angeles, CA 90071
Email: epenson@jonesday.com
Telephone: (213) 243-2304
Facsimile: (213) 243-2539

*Attorneys for Defendant INTERNET
CORPORATION FOR ASSIGNED NAMES
AND NUMBERS*

CERTIFICATE OF SERVICE

As Plaintiff Graham Schreiber is proceeding pro se in the above entitled action, he is not registered with the ECF system and cannot be served electronically. I certify that on September 10, 2012, a copy of the foregoing was filed electronically with the Clerk of Court using the ECF system, which will send notifications to any ECF participants, and was served via First Class Mail on the following:

Lorraine Lesley Dunabin *DEFENDANT*
1 Chalder Farm Cottages, Chalder Lane
Sidlesham, Chichester, West Sussex
United Kingdom
PO20 7RN

CentralNic Ltd. *DEFENDANT*
35-39 Moorgate
London
United Kingdom
EC2R 6AR

Network Solutions LLC. *DEFENDANT*
13861 Sunrise Valley Dr., Suite 300
Herndon, VA
USA
20171

Verisign Inc. *DEFENDANT*
12061 Bluemont Way
Reston, VA
USA
20190

eNom Inc. *DEFENDANT*
5808 Lake Washington Blvd, Ste. 300
Kirkland, WA
98033
USA.

Graham Schreiber *PLAINTIFF*
5303 Spruce Ave.
Burlington, Ontario
Canada
L7L-1N4

Dated: September 10, 2012

/s/ Walter D. Kelley, Jr.

Walter D. Kelley, Jr. (VA Bar. No. 21622)
JONES DAY
51 Louisiana Avenue, NW
Washington, DC 20001-2113
Email: wdkelley@jonesday.com
Telephone: (202) 879-2113
Facsimile: (202) 626-1700

*Attorney for Defendant INTERNET
CORPORATION FOR ASSIGNED
NAMES AND NUMBERS*

