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12	UNITED STATES DISTRICT COURT				
13	CENTRAL DISTRICT OF CALIFORNIA				
14	A A A STRUME A A GENERAL GRAND OF THE PART A GENERAL GRAND	TIONIAL	CACI	ENO CV	11 0514 PGC
15	MANWIN LICENSING INTERNA S.A.R.L., a Luxembourg limited lia	bility	(JCG		11-9514-PSG
16	company (s.à.r.l.) and DIGITAL PI GROUND, INC., a California corpo	oration,	Hono	rable Phili	ip S. Gutierrez
17	Plaintiffs,		DEC	LARATIO	ON OF STUART
18		ζ. а	LAW	LEY IN S	SUPPORT OF AIMANT ICM
19	ICM REGISTRY, LLC, d/b/a .XXX Delaware limited liability corporation INTERNET CORPORATION FOR		REG OPP	ISTRY, L OSITION	LC'S TO
20	ASSIGNED NAMES AND NUMB California nonprofit public benefit corporation; and Does 1-10,	ERS, a	SPEC	CIAL MO	FENDANTS' TION TO STRIKE
21	Corporation; and Does 1-10, Defendan	te	CIV.	PROC. SI	O CAL. CODE ECTION 425.16
23	Defendan	is.	(AIV)	II-SEALL	,
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DECLARATION OF STUART LAWLEY

I, Stuart Lawley, hereby declare as follows:

- I am the Chief Executive Officer of Defendant and Counterclaimant ICM Registry, LLC ("ICM"), and have held that position since early 2004. I submit this declaration in support of ICM's Opposition to Counterdefendants Manwin Licensing International, S.A.R.L.("Manwin") and Digital Playground, Inc.'s Special Motion to Strike Pursuant to Cal. Code Civ. Proc. Section 425.16. All Exhibits to this Declaration are maintained in ICM's business records, in the ordinary course of business.
- 2. Attached hereto as Exhibit 1 is a true and correct copy of email correspondences between myself and Fabian Thylmann, Manwin's managing partner, regarding a joint business venture between ICM and Manwin. These correspondences were part of ongoing business development negotiations and discussions that began in September 2011, and were related to Manwin's interest in doing business with ICM, including a revenue sharing arrangement. ICM anticipated that any joint venture or arrangement reached between ICM and Manwin would be reduced to, and memorialized in, a written contract between the parties.
- Although Mr. Thylmann mentioned litigation in connection with Manwin's demands during the business development negotiations between ICM and Manwin, at no time did he or any other representative of Manwin make any reference to claims of antitrust violations by ICM in connection with the .XXX TLD.
- 4. The business development negotiations, including Manwin's demands, were not impliedly or expressly stated by Manwin as settlement discussions. In fact, when ICM requested confidentiality agreements for the business development discussions, Manwin indicated that confidentiality agreements were not needed because nothing being discussed was confidential.

America, that the foregoing is true and correct.

Executed on January 13, 2013 at Las Vegas, NV.

Stuart Lawley

ICM/1083510/14499020v.28