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5 Attorneys for Plaintiff C. ITOH MIDDLE
6 EAST E.C. (Bahrain), through the real
party in interest, NATIONAL UNION
7 FIRE INSURANCE COMPANY OF
PITTSBURGH, PA.

8 Jeffrey A. LeVee (Cal. Bar No. 125863)
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13 Attorneys for Defendants INTERNET
CORPORATION FOR ASSIGNED NAMES
14 AND NUMBERS and erroneously named INTERNET
ASSIGNED NUMBERS AUTHORITY

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 COUNTY OF LOS ANGELES

17 WEST DISTRICT

18
19 C. ITOH MIDDLE EAST E.C. (Bahrain))
through the real party in interest, NATIONAL)
20 UNION FIRE INSURANCE COMPANY)
OF PITTSBURGH, PA,)

21 Plaintiff,)

22 v.)

23)
24 INTERNET CORPORATION FOR)
ASSIGNED NAMES AND NUMBERS,)
25 INTERNET ASSIGNED NUMBERS)
AUTHORITY, the PEOPLE'S)
26 REPUBLIC OF THE CONGO, and THE)
CONGOLESE REDEMPTION FUND,)

27 Defendants.)
28)

Case No. SC090220

The Hon. John L. Segal

**STIPULATION TO CONTINUE
THE HEARING ON DEFENDANTS'
DEMURRER; [PROPOSED]
ORDER**

Prior Date: November 9, 2006
New Date: November 20, 2006
Time: 8:30 a.m.
Dept: M

Action Filed: June 28, 2006

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WHEREAS, the Complaint in this action was filed on June 28, 2006;

WHEREAS, on July 19, 2006 the Court entered an Order extending Defendants' time to respond to the Complaint until August 28, 2006;

WHEREAS, on August 28, 2006 Defendants filed a Notice of Demurrer and Demurrer to the Complaint, setting the matter for hearing on September 20, 2006;

WHEREAS, on September 7, 2006, at the request of the parties, the Court entered an Order continuing the hearing on Defendants' Demurrer until November 3, 2006;

WHEREAS, on September 20, 2006, at the Hearing on the Order to Show Cause for Failure to File a Proof of Service, the Court continued the Initial Case Management Conference until November 3, 2006, at the same time as the hearing on Defendants' Demurrer;

WHEREAS, on October 10, 2006, Plaintiff filed an unopposed Application for Mark F. Rosenberg to Appear as Counsel Pro Hac Vice, with the hearing noticed for November 3, 2006, at the same time as the hearing on Defendants' Demurrer;

WHEREAS, on November 2, 2006, the Court notified the parties that the hearing on all matters set for November 3, 2006 was continued until November 9, 2006;

WHEREAS, the attorney who will appear on behalf of Plaintiff at the hearing on Defendants' Demurrer and the Initial Case Management Conference, Adam S. Paris, suffered a back injury and will be unable to appear on November 9, 2006;

WHEREAS, counsel for all parties have agreed for good cause to move the hearing on the Demurrer, the Initial Case Management Conference, and the hearing on Plaintiff's Application for Mark F. Rosenberg to Appear as Counsel Pro Hac Vice to November 20, 2006, at 8:30 a.m.;


1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by counsel
2 for all parties that the hearing on Defendants' Demurrer, the Initial Case Management
3 Conference, and the hearing on Plaintiff's Application for Mark F. Rosenberg to Appear as
4 Counsel Pro Hac Vice will be set for November 20, 2006 at 8:30 a.m.

5 IT IS SO STIPULATED.

6 Dated: November 7, 2006

Respectfully submitted,

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10 Of Counsel:
11 Mark F. Rosenberg
12 Jacob F.M. Oslick
13 SULLIVAN & CROMWELL LLP
14 125 Broad Street
15 New York, New York 10004-2498
16 (212) 558-4000
17 (212) 558-3588 facsimile

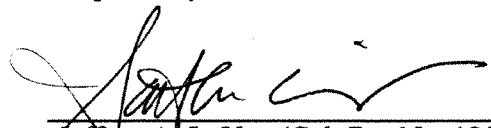

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Attorneys for Plaintiff C. ITOH MIDDLE
EAST E.C. (Bahrain), through the real party
in interest, NATIONAL UNION FIRE
INSURANCE COMPANY OF
PITTSBURGH, PA.

18 Dated: November 7, 2006

Respectfully submitted,

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Samantha S. Eisner (Cal. Bar No. 230344)
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Attorneys for Defendants INTERNET
CORPORATION FOR ASSIGNED NAMES
AND NUMBERS and erroneously named
INTERNET ASSIGNED NUMBERS
AUTHORITY

[Proposed] Order

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Pursuant to Stipulation, good cause having been shown,

IT IS HEREBY ORDERED THAT:

The hearing on Defendants' Demurrer, the Initial Case Management Conference, and the hearing on Plaintiff's Application for Mark F. Rosenberg to Appear as Counsel Pro Hac Vice will be set for November 20, 2006 at 8:30 a.m.

Dated: _____, 2006

The Honorable John L. Segal
Judge of the Superior Court

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the
3 age of eighteen years and am not a party to this action. My business address is Sullivan &
4 Cromwell LLP, 1888 Century Park East, Suite 2100, Los Angeles, California 90067-1725.

5 I served the below listed document(s) described as:

6 **STIPULATION TO CONTINUE THE HEARING ON**
7 **DEFENDANTS' DEMURRER; [PROPOSED] ORDER**

8 on November 8, 2006, on all other parties in this action by placing a true copy of the above
9 document(s) enclosed in sealed envelopes addressed as follows:

10 **Via Facsimile & U.S. Mail**

11 Jeffrey A. LeVee
12 Samantha S. Eisner
13 JONES DAY
14 555 South Flower Street, Fiftieth Floor
15 Los Angeles, California 90071-2300

16 **Via Mail**

17 The People's Republic of the Congo
18 Regie National Des Travaux Publics et de la Construction
19 B.P. 2073
20 Brazzaville
21 Republique Populaire du Congo

22 The Congolese Redemption Fund
23 Regie National Des Travaux Publics et de la Construction
24 B.P. 2073
25 Brazzaville
26 Republique Populaire du Congo

27 For copies sent by Facsimile, I delivered a true copy of the above documents to
28 the Sullivan & Cromwell LLP personnel responsible for facsimile service, to the persons listed at
the facsimile numbers listed above. I am familiar with the office practice of Sullivan &
Cromwell LLP, which practice is that when documents are deposited with the Sullivan &

1 Cromwell LLP personnel responsible for facsimile service, such documents are transmitted via
2 facsimile that same day in the course of business.

3 For copies served by United States Mail, I placed each such envelope with
4 postage thereon fully prepared for the deposit in the United States mail in accordance with the
5 office practice of Sullivan & Cromwell LLP, which practice is that when correspondence is
6 deposited with the Sullivan & Cromwell LLP personnel responsible for delivering
7 correspondence to the United States Postal Service, such correspondence is delivered to the
8 United States Postal Service that same day in the course of business.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct.

11 Executed on November 8, 2006 at Los Angeles, California.

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13 _____
14 Roberta Striplin
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