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8 INTERNET CORPORATION FOR ASSIGNED  
NAMES AND NUMBERS and erroneously named  
9 INTERNET ASSIGNED NUMBERS AUTHORITY

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **COUNTY OF LOS ANGELES**

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

16 Plaintiff,

17 v.

18 INTERNET CORPORATION FOR  
19 ASSIGNED NAMES AND NUMBERS,  
INTERNET ASSIGNED NUMBERS  
20 AUTHORITY, the PEOPLE'S REPUBLIC  
OF THE CONGO, and THE CONGOLESE  
21 REDEMPTION FUND,

22 Defendants.

**CASE NO. SC090220**

Assigned for all purposes to  
Honorable John L. Segal

**COMPENDIUM OF NON-  
CALIFORNIA AUTHORITIES IN  
SUPPORT OF REPLY IN SUPPORT  
OF DEMURRER TO COMPLAINT  
BY DEFENDANT INTERNET  
CORPORATION FOR ASSIGNED  
NAMES AND NUMBERS AND  
ERRONEOUSLY-NAMED  
DEFENDANT INTERNET  
ASSIGNED NUMBERS AUTHORITY**

[Reply In Support of Demurrer; Reply In  
Support of Request for Judicial Notice  
and Declaration of Sean W. Jaquez; and  
Supplemental Request for Judicial Notice  
and Declaration of Samantha Eisner filed  
concurrently herewith; [Proposed] Order  
in Support of Supplemental Request  
lodged concurrently herewith]  
DATE: September 20, 2006  
TIME: 8:30 a.m.  
DEPT: M

Complaint Filed: June 28, 2006

Pursuant to California Rule of Court 313(h), defendant Internet Corporation For Assigned Names And Numbers And Erroneously-Named Defendant Internet Assigned Numbers Authority submits copies of the following non-California authorities, in support of its Reply Memorandum filed concurrently herewith:

**AUTHORITIES**

**Tab**

**Cases**

8	<i>FG Hemisphere Assocs. v. Republique du Congo</i> , 455 F.3d 575 (5th Cir. 2006).....	1
10	<i>Flatow v. Islamic Republic of Iran</i> , 308 F.3d 1065 (9th Cir. 2003).....	2
11	<i>In re Barnes</i> , 276 F.3d 927 (7th Cir. 2002).....	3
13	<i>In re Petruzzelli</i> , 139 B.R. 241 (Bnkr., E.D. Cal. 1992).....	4
14	<i>Lloyd's Underwriters v. AO Gazsnabtranzit</i> , No. CIVAI:00-MI-0242-CAP, 2000 WL 1719493 (N.D. Ga. Nov. 2, 2002).....	5
16	<i>Ministry of Defense &amp; Support for the Armed Forces for the Islamic Republic of Iran v. Cubic Defense Sys.</i> , 385 F.3d 1206 (9th Cir. 2004) vac'd on other grounds 126 S.Ct. 1143 (2006).....	6
18	<i>National Union Fire Ins. Co. v. People's Republic of Congo</i> , No. 91 C 3172, Doc. No. 84 (N.D. Ill. December 5, 1991).....	7
20	<i>Republic of Austria v. Altmann</i> , 541 U.S. 677 (2004).....	8
21	<i>Rubin v. Islamic Republic of Iran</i> , No. 06-11053, 2006 U.S. Dist. LEXIS 73383 (D. Mass. Sept. 30, 2006).....	9
23	<i>Tenen v. Winter</i> , 94-cv-7934-CJS, Doc. No. 295 (W.D.N.Y. Apr. 12, 2002).....	10
24	<i>Verlinden B.V. v. Central Bank of Nigeria</i> , 461 U.S. 480 (1983).....	11
26	<i>Zurakov v. Register.com, Inc.</i> , 304 A.D.2d 176 (N.Y. App. Div. 2003).....	12

**Statutes**

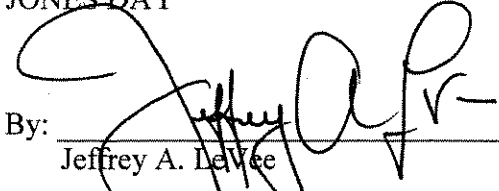
28	28 U.S.C. §§ 1604-05.....	13
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**Other Authorities**

*Black's Law Dictionary*,  
Eight Edition (2004)..... 14

JONES DAY



By: \_\_\_\_\_  
Jeffrey A. LeVee

Attorneys for Defendants  
INTERNET CORPORATION FOR  
ASSIGNED NAMES AND NUMBERS  
AND ERRONEOUSLY NAMED  
INTERNET ASSIGNED NUMBERS  
AUTHORITY

1 **PROOF OF SERVICE**

2 I, Grace M. Salter, declare:

3 I am a citizen of the United States and employed in Los Angeles County, California. I am  
4 over the age of eighteen years and not a party to the within-entitled action. My business address  
5 is 555 South Flower Street, Fiftieth Floor, Los Angeles, California 90071-2300. On October 27,  
6 2006, I caused to be served a copy of the within document(s):

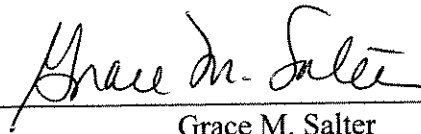
7 **COMPENDIUM OF NON-CALIFORNIA AUTHORITIES IN SUPPORT  
8 OF REPLY IN SUPPORT OF DEMURRER TO COMPLAINT BY  
9 DEFENDANT INTERNET CORPORATION FOR ASSIGNED NAMES AND  
10 NUMBERS AND ERRONEOUSLY-NAMED DEFENDANT INTERNET  
11 ASSIGNED NUMBERS AUTHORITY**

- 12  by transmitting via facsimile the document(s) listed above to the fax number(s) set  
13 forth below on this date before 5:00 p.m.
- 14  by placing the document(s) listed above in a sealed envelope with postage thereon  
15 fully prepaid, in the United States mail at Los Angeles, California addressed as set  
16 forth in the attached Service List.
- 17  by placing the document(s) listed above in a sealed Federal Express envelope and  
18 affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal  
19 Express agent for delivery.
- 20  by personally delivering the document(s) listed above to the person(s) at the  
21 address(es) set forth below.

22 I am readily familiar with the firm's practice of collection and processing correspondence  
23 for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same  
24 day with postage thereon fully prepaid in the ordinary course of business. I am aware that on  
25 motion of the party served, service is presumed invalid if postal cancellation date or postage  
26 meter date is more than one day after date of deposit for mailing in affidavit.

27 I declare that I am employed in the office of a member of the bar of this court at whose  
28 direction the service was made.

Executed on October 27, 2006, at Los Angeles, California.

  
Grace M. Salter

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**SERVICE LIST**  
***C. ITOH MIDDLE EAST E.C. (Bahrain) v. INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS, et al.***  
**LOS ANGELES SUPERIOR COURT, CASE NO. SC090220**

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The People's Republic of the Congo Via U.S. Mail  
Regie National Des Travaux Publics et de la Construction  
B.P. 2073  
Brazzaville  
Republique Populaire du Congo

The Congolese Redemption Fund Via U.S. Mail  
Regis National Des Travaux Publics et de la Construction  
B.P. 2073  
Brazzaville  
Republique Populaire du Congo