

EXHIBIT 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 11-14052-CV-MARTINEZ/LYNCH

JOHN ZUCCARINI,)
)
 Plaintiff,)
)
 v.)
)
 NETWORK SOLUTIONS, LLC,)
 a Delaware Limited Liability Company;)
 NAMEJET, LLC,)
 a Delaware Limited Liability Company;)
 INTERNET CORPORATION)
 FOR ASSIGNED NAMES)
 AND NUMBERS, INC.)
 a California non-profit Corporation;)
)
 Defendants.)
 _____)

**FIRST SET OF RULE 26.1(g) INTERROGATORIES TO THE
INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS, INC.**

Plaintiff John Zuccarini propounds the following interrogatories upon the Internet Corporation for Assigned Names and Numbers, Inc. (“ICANN”) and requests that they be answered separately, fully and under oath within thirty (30) days of service pursuant to Federal Rule of Civil Procedure 33 and Local Rule 26.1(g).

Definitions:

(a) The words “you,” “yours” and/or “yourselves” means the Internet Corporation for Assigned Names and Numbers, Inc. and any directors, officers, employees, agents, representatives or other persons acting, or purporting to act, on behalf of the Internet Corporation for Assigned Names and Numbers, Inc.

(b) The singular shall include the plural and vice versa; the terms “and” or “or” shall be both conjunctive and disjunctive; and the term “including” mean “including without limitation”.

(c) “Date” shall mean the exact date, month and year, if ascertainable or, if not, the best approximation of the date (based upon relationship with other events).

(d) The word “document” shall mean any writing, recording, electronically stored information or photograph in your actual or constructive possession, custody, care or control, which pertain directly or indirectly, in whole or in part, either to any of the subjects listed below or to any other matter relevant to the issues in this action, or which are themselves listed below as specific documents, including, but not limited to: correspondence, memoranda, notes, messages, diaries, minutes, books, reports, charts, ledgers, invoices, computer printouts, microfilms, video tapes or tape recordings.

(e) “Agent” shall mean: any agent, employee, officer, director, attorney, independent contractor or any other person acting at the direction of or on behalf of another.

(f) “Person” shall mean any individual, corporation, proprietorship, partnership, trust, association or any other entity.

(g) The words “pertain to” or “pertaining to” mean: relates to, refers to, contains, concerns, describes, embodies, mentions, constitutes, constituting, supports, corroborates, demonstrates, proves, evidences, shows, refutes, disputes, rebuts, controverts or contradicts.

(h) The term “third party” or “third parties” refers to individuals or entities that are not a party to this action.

(i) The term “action” shall mean the case entitled Zuccarini v. Network Solutions, et al Case No. 11-14052 pending in the United States District Court for the Southern District of Florida.

(j) The word “identify”, when used in reference to a document (including electronically stored information), means and includes the name and address of the custodian of the document, the location of the document, and a general description of the document, including (1) the type of document (e.g., letter or memorandum) and, if electronically stored information, the software application used to create it (e.g., MS Word or MS Excel Spreadsheet); (2) the general subject matter of the document or electronically stored information; (3) the date of the document or electronically stored information; (4) the author of the document or electronically stored information; (5) the addressee of the document or electronically stored information; and (6) the relationship of the author and addressee to each other.

Instructions:

If you object to fully identifying a document, electronically stored information or oral communication because of a privilege, you must nevertheless provide the following information pursuant to Local Rule 26.1.G. 6.(b), unless divulging the information would disclose the privileged information:

(1) the nature of the privilege claimed (including work product);

(2) if the privilege is being asserted in connection with a claim or defense governed by state law, the state privilege rule being invoked;

(3) the date of the document, electronically stored information or oral communication;

(4) if a document: its type (e.g., letter or memorandum) and, if electronically stored information, the software application used to create it (e.g., MS Word or MS Excel Spreadsheet), and the custodian, location, and such other information sufficient to identify the material for a subpoena duces tecum or a production request, including where appropriate the author, the addressee, and, if not apparent, the relationship between the author and addressee;

(5) if an oral communication: the place where it was made, the names of the persons present while it was made, and, if not apparent, the relationship of the persons present to the declarant; and

(6) the general subject matter of the document, electronically stored information or oral communication.

You are under a continuous obligation to supplement your answers to these interrogatories under the circumstances specified in Federal Rule of Civil Procedure 26(e).

INTERROGATORIES:

1. Do you have a policy that requires you conduct mandatory periodic reviews of the performance of the domain name registrars that you accredit?

2. If your answer to interrogatory number 1 was yes, please state how often you conduct those reviews.

3. If your answer to interrogatory number 1 was no, please state why you do not have a policy that requires you conduct mandatory periodic reviews of the performance of the domain name registrars that you accredit.

4. If you do not have a policy that requires you conduct mandatory periodic reviews

of the performance of the domain name registrars that you accredit, do you ever conduct a review of the performance of any domain name registrar that you accredit for any reason?

5. If your answer to interrogatory number 4 was yes, please state each and every reason why you would conduct a review of a domain name registrar that you accredit.

6. Have you ever conducted a review of the performance of Network Solutions, LLC, either through a mandatory review or a review for any other reason?

7. If your answer to interrogatory number 6 was yes, please state all of the dates and circumstances that prompted you to conduct a review of the performance of Network Solutions, LLC.

8. With reference to your answer to interrogatory number 7, please state the outcome of all the reviews of the performance of Network Solutions, LLC.

9. With reference to your answer to interrogatory number 7, please identify all the documents associated with any review of the performance of Network Solutions, LLC.

10. With reference to each affirmative defense you alleged in your answer to plaintiff's complaint, please set forth all facts which support that defense.

11. With reference to each affirmative defense you allege in your answer to plaintiff's complaint, please identify each person who has knowledge relating to any fact supporting that defense.

12. With reference to each affirmative defense you allege in your answer to plaintiff's complaint, please identify each document relating to that defense.

13. With reference to each denial set forth in your answer to plaintiff's complaint, please set forth each fact upon which you base that denial.

14. With reference to each denial set forth in your answer to plaintiff's complaint,

please identify each person who has knowledge of any fact relating to that denial.

15. With reference to each denial set forth in your answer to plaintiff's complaint, please identify each document relating to that denial.

16. Do you have a policy or procedure in effect that would require any domain name registrar that you accredit to place on hold or locked status any domain name that they are aware of which is the subject of ongoing legal proceedings or court orders?

17. If your answer to interrogatory number 16 was yes, please describe that policy or procedure.

18. If your answer to interrogatory number 16 was no, please state why you do not have any policy or procedure in effect that would require a domain name registrar to place a domain name on hold or locked status that is the subject of ongoing legal proceedings or court orders.

19. If you do not have policy or procedure in effect that would require a domain name registrar to place any domain name that is the subject of a legal proceeding or court order on a hold or locked status, did you consider the risk to someone who is a party to that legal proceeding or court order of losing their interest in that particular domain name if it is lost through non-renewal or lost through fraud or theft.

20. If your answer to interrogatory number 19 was yes, please set forth each factor you considered in determining the likelihood that the risk would occur.

21. If your answer to interrogatory number 19 was yes, please set forth each reason you do not have a policy or procedure in effect that would require a domain name registrar to place a domain name on hold or locked status that is the subject of a legal proceeding or court order, notwithstanding your awareness of the risk.

22. Please state if you considered not requiring any domain name registrar you accredit to place any domain name that is the subject of ongoing legal proceedings or court orders on a hold or locked status would impose hardship upon any party to that legal proceeding or court order if the subject domain name were lost through non-renewal, or lost through fraud or theft..

23. If your answer to interrogatory number 22 was yes, please set forth each factor you considered in your determination that your conduct posed a risk of hardship to any party.

24. If your answer to interrogatory number 22 was yes, please set forth each reason you proceeded to not require domain name registrars you accredit to place on hold or locked status any domain name that is the subject of ongoing legal proceedings or court orders, notwithstanding the risk of hardship to any party.

25. If your answer to interrogatory number 22 was no, please state each and every reason why you did not believe hardship would be imposed upon any party if you did not require any domain name registrar to place on hold or locked status a domain name that is the subject of ongoing legal proceedings or court orders.

Dated: August 27, 2011

By: _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Plaintiff John Zuccarini's Interrogatories to the Internet Corporation for Assigned Names and Numbers, Inc. was served by first class mail, postage prepaid, on August 27, 2011, on all counsel or parties of record on the service list and by email to their respective addresses.

John Zuccarini

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