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Attorneys for Defendant  
INTERNET CORPORATION FOR  
ASSIGNED NAMES AND NUMBERS

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

REGISTERSITE.COM, et al.,

Plaintiff,

v.

INTERNET CORPORATION FOR  
ASSIGNED NAMES AND NUMBERS, a  
California Corporation; VERISIGN, INC.,  
a Delaware Corporation; and DOES 1-  
150, inclusive,

Defendants.

Case No. 04CV1368 ABC (CWx)

**DEFENDANT INTERNET  
CORPORATION FOR  
ASSIGNED NAMES AND  
NUMBERS' NOTICE OF  
RELATED CASES**

[Central District Local Rule 83-1.3.1]

2004 MAR -5 PM 3:55  
CENTRAL DISTRICT COURT  
LOS ANGELES

FILED

1 Defendant Internet Corporation for Assigned Names and Numbers  
2 ("ICANN") hereby gives notice, pursuant to United States District Court Central  
3 District of California Local Rule 83-1.3.1, that this matter is substantially related to  
4 two (2) other matters previously filed or currently pending in this Court. ICANN  
5 refers the Court to the Notice of Related Case that ICANN has filed on this date in  
6 Case No. 04CV1292 AHM (CTx).

7 The instant action was filed on March 1, 2004 and is based solely on a  
8 dispute over a "Wait Listing Service" or "WLS" proposed by VeriSign, Inc.  
9 ("VeriSign") with respect to the Internet. VeriSign is also named as a defendant in  
10 the action. The plaintiffs essentially allege that ICANN should not permit VeriSign  
11 to implement WLS.

12 In *Dotster, Inc., et al. v. Internet Corporation for Assigned Names and*  
13 *Numbers*, Case No. 03-CV5045 JFW (MANx) (hereinafter "*Dotster*"), the plaintiffs  
14 also alleged that ICANN should not approve WLS. Judge Walters dismissed the  
15 *Dotster* case only three months ago. Judge Walters invested considerable time with  
16 respect to the *Dotster* case (which involved both a request for temporary restraining  
17 order and a motion for preliminary injunction); substantial duplication of labor  
18 would occur if the two cases were heard by different judges.

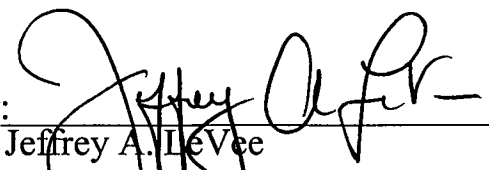
19 On February 27, 2004, another lawsuit that concerns the WLS was filed in  
20 this District. This suit, captioned *Verisign, Inc. v. Internet Corporation for*  
21 *Assigned Names and Numbers, et al.*, Case No. 04-CV1292 AHM (CTx)  
22 (hereinafter "*VeriSign*"), involves a series of disputes between VeriSign and  
23 defendant ICANN. One of those disputes concerns VeriSign's claim that ICANN  
24 has breached an agreement between VeriSign and ICANN by delaying approval of  
25 WLS.

26 In short, all three of these cases specifically involve VeriSign's proposal to  
27 implement WLS. In VeriSign's lawsuit, ICANN is accused of delaying the  
28 introduction of WLS; in the other two lawsuits, ICANN is accused of breaching

1 contracts by permitting WLS to proceed. In order to prevent the substantial  
2 duplication of judicial resources, as well as the possibility of inconsistent  
3 judgments, both the instant matter and the *VeriSign* matter should be transferred to  
4 Judge Walters.

5  
6 Dated: March 5, 2004

JONES DAY

7  
8 By:   
Jeffrey A. LeVee

9 Attorneys for Defendant  
10 INTERNET CORPORATION FOR  
11 ASSIGNED NAMES AND NUMBERS  
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**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 555 West Fifth Street, Suite 4600, Los Angeles, California 90013.

On March 5, 2004, I caused to be served the document described as:

**DEFENDANT INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS' NOTICE OF RELATED CASES**

on the interested parties in this action.

X BY (U.S. MAIL) I placed \_\_\_\_\_ the original X a true copy thereof enclosed in sealed envelope(s) to the addressee(s) as follows:

**SEE ATTACHED SERVICE LIST**

\_\_\_\_\_ BY PERSONAL SERVICE I placed \_\_\_ the original \_\_\_ true copies thereof enclosed in sealed envelope(s) and caused such envelope to be hand delivered via messenger to the offices of the addressee(s) as follows:

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

\_\_\_\_\_(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

X (FEDERAL) I declare that I am employed in the office of a member of the bar of this Court at whose direction this service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 5, 2004, at Los Angeles, California.

\_\_\_\_\_  
Elba Alonso de Ortega  
Type or Print Name

\_\_\_\_\_  
*Elba Alonso de Ortega*  
Signature

**SERVICE LIST**  
**REGISTERSITE.COM v. ICANN**

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