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Attorneys for Defendant
INTERNET CORPORATION FOR ASSIGNED
NAMES AND NUMBERS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

VERISIGN, INC., a Delaware
corporation,

Plaintiff,

v.

INTERNET CORPORATION FOR
ASSIGNED NAMES AND NUMBERS, a
California corporation; DOES 1-50,

Defendants.

Case No. 04-CV1292 AHM (CTx)

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

[Central District Local Rule 83-1.3.1]

2004 MAR -5 PM 4:09
CLERK OF DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
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.

5 The instant action, filed by plaintiff VeriSign on February 26, 2004, involves
6 a series of disputes between VeriSign and defendant ICANN. One of those
7 disputes concerns a "Wait Listing Service" or "WLS." (See Complaint ¶ 40, et seq.)
8 VeriSign alleges that ICANN has breached an agreement between VeriSign and
9 ICANN by delaying approval of WLS.

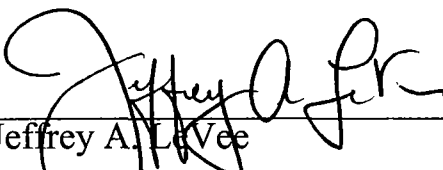
10 In *Dotster, Inc., et al. v. Internet Corporation for Assigned Names and*
11 *Numbers*, Case No. 03-CV5045 JFW (MANx) (hereinafter "*Dotster*"), the plaintiffs
12 alleged that ICANN should not approve WLS and had breached different contracts
13 by proposing to approve WLS. Judge Walters dismissed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

20 On March 1, 2004, a third lawsuit concerning the WLS was filed in this
21 District. This third suit, captioned *Registersite.com, et al. v. Internet Corporation*
22 *for Assigned Names and Numbers, et al.*, Case No. 04-CV1368 ABC (CWx)
23 (hereinafter "*Registersite.com*"), is essentially a repeat of the *Dotster* case. In
24 *Registersite.com*, just as in *Dotster*, plaintiffs allege that ICANN's conduct with
25 respect to VeriSign's WLS constitutes a breach of ICANN's Registrar Accreditation
26 Agreements with the plaintiffs in that case. VeriSign also is a defendant in the
27 *Registersite.com* case. And, as in *Dotster*, the plaintiffs in the *Registersite.com* case
28 seek a preliminary injunction to prevent the implementation of WLS.

1 In short, all three of these cases specifically involve VeriSign's proposal to
2 implement WLS. In VeriSign's lawsuit, ICANN is accused of delaying the
3 introduction of WLS; in the other two lawsuits, ICANN is accused of breaching
4 contracts by permitting WLS to proceed. In order to prevent the substantial
5 duplication of judicial resources, as well as the possibility of inconsistent
6 judgments, both the instant matter and the *RegisterSite.com* matter should be
7 transferred to Judge Walters.

8
9 Dated: March 5, 2004

JONES DAY

10
11 By: 
Jeffrey A. LeVe

12 Attorneys for Defendant
13 INTERNET CORPORATION FOR
14 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	 _____ Signature
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SERVICE LIST
VERISIGN, INC. v. ICANN

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