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7  
8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

10  
11 THE INTERNET CORPORATION FOR  
ASSIGNED NAMES AND NUMBERS,

12 Plaintiff,

13 v.

14 REGISTERFLY.COM, INC., and  
15 UNIFIED NAMES, INC. ,

16 Defendants.

CASE NO. CV 07-2089 R (PLAx)

**DECLARATION OF KEVIN  
MEDINA RE: COMPLIANCE WITH  
COURT ORDER OF MAY 25, 2007;  
EXHIBITS IN SUPPORT THEREOF**

Date: June 1  
Place: Ctrm. 8 (Hon. Manuel L. Real)

17  
18  
19 I, Kevin Medina, declare:

20 1. I am the principal of RegisterFly.com, Inc. and UnifiedNames, Inc.,  
21 defendants in the above-referenced action. Unless otherwise stated, I have first hand  
22 personal knowledge of the facts set forth herein. I have personally supervised the  
23 efforts of RegisterFly to comply with the Orders issued by this Court and submit this  
24 declaration to show its compliance therewith.

25 **Compliance With May 25, 2007 Order**

26 2. RegisterFly has been providing the requested data to ICANN beginning  
27 on March 16, 2007, prior to the initiation of this lawsuit or entry of orders by this  
28 Court requiring that RegisterFly do so. Attached hereto as Exhibit "1" is a chart

1 which I prepared that details the date, content, and manner in which each data  
2 transfer has been made by RegisterFly to ICANN, in compliance with the Orders of  
3 this Court. The chart shows that RegisterFly began transferring data on March 16,  
4 2007 – even prior to the filing of this lawsuit – as requested by ICANN. Additional  
5 transfers were made at least once weekly from that time until May 31, 2007.

6 Attached hereto as Exhibit "2" is a mapping chart which specifies the files that were  
7 supplied by RegisterFly to ICANN – which include all data elements/fields and  
8 additional fields as specified by ICANN in the TRO. ICANN now has all of the  
9 data listed in paragraph 1 of the May 25, 2007 Order and the Preliminary Injunction.

10 3. RegisterFly has now, as of May 31, 2007, provided ICANN with an  
11 appropriate MD5 algorithm, as ordered in paragraph 2 of the May 25, 2007 Order.  
12 Attached hereto as Exhibit "3" is a true and correct copy of the hash key evidencing  
13 the transfer of the file with the MD5 algorithm. In addition, the privacy/proxy data  
14 has been uploaded to ICANN as of June 1, 2007, which contained 800000 rows or  
15 200000 records, and this upload was in the requested .csv format and has been  
16 encrypted via MD5 as required by the injunction. RegisterFly had not previously  
17 encrypted its data transfers to ICANN because on March 27, 2007, it received an e-  
18 mail from ICANN's Chief Security Officer, Steve Conte, who stated the following:  
19 "We've decided that because of the encryption of sftp, it is not necessary to pgp  
20 encrypt the file before transmission." In reliance on this instruction, RegisterFly did  
21 not provide the MD5 algorithm. Attached hereto as Exhibit "4" is a true and correct  
22 copy of the e-mail received from Steve Conte on March 27, 2007.

23 4. Following the May 25, 2007 hearing, RegisterFly immediately  
24 contacted its web master in order to post the notice required in paragraph 3 of the  
25 May 25, 2007 Order. Unfortunately, due to severe script errors, the webmaster was  
26 only able to post the notice on the bottom of certain pages of the website. This is  
27 because the navigational elements use a series of DHTML and javascript which  
28 require a certain page structure to function. The navigational design was based on

1 having no text above the navigation. The Court's order required that the text be  
2 above the javascript/dynamic menu elements and created severe scripting issues  
3 when the notice was posted. These errors rendered the site unusable, so the notice  
4 was removed from those locations. The notice remains on the Customer Service  
5 page of the website, where it could be placed without causing these scripting issues.  
6 Attached hereto as Exhibit "5" is a true and correct copy of the notice as it appears  
7 on the Customer Service page. RegisterFly's web master continues to work on this  
8 issue and anticipates it will take approximately ten (10) business days to make the  
9 changes and test the website.

10 **Compliance With April 26, 2007 Preliminary Injunction**

11 5. RegisterFly has been providing the data to ICANN since prior to the  
12 Court's entry of its Orders requiring RegisterFly to do so, as you can see from  
13 Exhibit A hereto. As of this time, ICANN has been provided with all of the data  
14 which was required to be transferred. The data is complete and up to date.

15 6. Paragraph 5 of the Preliminary Injunction requires that the data  
16 transfers be in SFTP format. Initially, RegisterFly's transmissions of data were not  
17 in SFTP format. However, as of April 16, 2007, all data submissions have been sent  
18 via SFTP.

19 7. Paragraph 6 of the Preliminary Injunction requires that RegisterFly  
20 perform a MD5 algorithm over each transmission. As discussed above, RegisterFly  
21 was informed on March 27, 2007 by ICANN's Chief Security Officer, Steve Conte,  
22 that it was not necessary for RegisterFly to provide the MD5 algorithm. However,  
23 as of May 31, 2007, the file has been encrypted via MD5. Attached hereto as  
24 Exhibit "6" is a true and correct copy of the hash key evidencing this is the case and  
25 that it has been uploaded to ICANN's file server.

26 8. Pursuant to Paragraph 7 of the Preliminary Injunction, RegisterFly has  
27 provided the data in a .csv file format. Attached hereto as Exhibit "7" is a document  
28 which explains the format in which RegisterFly has provided the data to ICANN,

1 and clearly indicates that the files are in a .csv format. ICANN continues to claim  
2 that this is somehow wrong, but it is not. Perhaps the reason for the confusion is the  
3 fact that, due to the enormous size of the files (3.2 GB), they had to first be  
4 compressed into "zip" format. Once the files are opened, it is clear that they are in  
5 the required .csv format required by the Preliminary Injunction.

6 9. Pursuant to Paragraph 8 of the Preliminary Injunction, RegisterFly has  
7 made available to ICANN its books and records (in electronic format) that include  
8 RegisterFly's registration data. That information has been made available for  
9 inspection and audit at the offices of RegisterFly's counsel, Ervin, Cohen & Jessup,  
10 LLP. Attached hereto as Exhibit "8" is a true and correct copy of an e-mail dated  
11 May 31, 2007 from Heather McCloskey to Samantha Eisner and Jeff LeVee,  
12 counsel for ICANN, inviting them to inspect the books.

13 10. Paragraph 11 of the Preliminary Injunction requires that RegisterFly  
14 post the notice described above in paragraph 4 of this declaration. The problems  
15 RegisterFly has encountered in posting this notice are detailed thereat.

16 11. It is my understanding that RegisterFly is otherwise fully in compliance  
17 with the terms of the Temporary Restraining Order, the Preliminary Injunction, and  
18 this Court's Order of May 25, 2007.

19 12. Since the entry of the permanent injunction, ICANN has acknowledged  
20 that all names formerly held under RegisterFly's ICANN accreditation as a registrar  
21 have been transferred to Godaddy.com. Attached hereto as Exhibit "9" is a true and  
22 correct copy of the press release made by ICANN on May 29, 2007. Thus, as of  
23 May 31, 2007, RegisterFly is no longer in possession of registrant data. RegisterFly  
24 is no longer in possession of current registrant data as of May 31, 2007 as  
25 RegisterFly.com is no longer the registrar of record for any names.

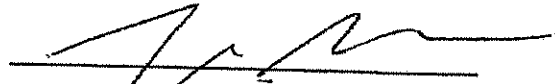
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this was executed on the 1<sup>st</sup> day of June, 2007, at Los Angeles, California.



---

Kevin Medina

**ICANN Data submissions**

Since The end of March , registerfy has consistently provided data uploads at MINIMUM once weekly. This spreadsheet shows a chronological history of data submissions to ICANN.

Date	Transfer Type	Specifics
3/16/2007	CD-ROM	On or around 3-16-07 a data file was received from tuccows and sent to icann via fedx

3/24/2007	CD-ROM	another data cd was sent to icann via fedx
-----------	--------	--

4/2/2007	SENDAFILE	data was transmitted to steve conte from icann via send a file. it was confirmed by steve
----------	-----------	---

From: Steve Conte To: robert.oneill@registerfy.com  
Subject: Re: A file is Sent to you via Sendafile Cc:  
From:  
To:  
Cc:  
Date:  
Subject: Re: A file is Sent to you via Sendafile

4/4/2007 SENDAFILE

Download link provided to ICANN  
From: Steve Conte  
Sent: Wed April 04 2007 5:28 pm  
To: robert.oneill@registerfy.com  
Subject: Re: Your file has been sent using Sendafile.com (TM)

Hi Robert

I got this one.

Thanks

Steve

4/6/2007 SENDAFILE

From: Steve Conte  
Sent: Wed April 04, 2007 5:00 p.m.  
To: robert.oneill@registerfly.com  
Cc: mnovick@mitchellnovick.com Amy Stathos  
Subject: Re: File delivery success

Download link provided to ICANN  
4-6-07 data was sent via send a file    steve conte confirmed  
this via email

From: Steve Conte    To: robert.oneill@registerfly.com  
Subject: Re: A file is Sent to you via Sendafile Cc:  
steve.conte@icann.org mnovick@mitchellnovick.com  
From:  
To:  
Cc:  
Date:  
Subject: Re: A file is Sent to you via Sendafile

Attach:

Attach:

Reply/Reply All/Forward/Delete/SafeList/Blacklist/Resume  
Draft/Re-Send Email/Print

4/12/2007 SENDAFILE

Download link provided to ICANN  
between 4-6-07 and 4-12-07 it was determined that we will  
give data over only once a week and that it needs to be sent  
via the sftp site after trying to upload the file i spoke with  
kent crispin and then had kevin speak with kent we found  
out to do t we then uploaded the file

Exh. 1  
Page 7

4/16/2007 SFTP

File uploaded to FTP Site  
4-16-07 got conformation from steve  
From: Steve Conte To: robert.oneill@registerfly.com

Subject: Re: file upload Cc: mnovick@mitchellnovick.com

From:

To:

Cc:

Date:

Subject: Re: file upload

this starts the once per week uploads to the sftp site from  
icann we get no conformations back from them on the  
uploads after this

4/18/2007 SFTP

4/23/2007 SFTP

5/2/2007 SFTP

5/9/2007 SFTP

5/15/2007 SFTP

5/23/2007 SFTP

5/31/2007 SFTP

data uploaded to the sftp site

data uploaded to the sftp site

data uploaded to the sftp site

data uploaded to the sftp site

data uploaded to the sftp site

data uploaded to the sftp site



### Data Mapping of what was requested in TRO and what has been sent to ICANN since March

The data that has been sent since March contains ALL of the data elements that ICANN has specified in the TRO. In fact we have also provided extended information in addition such as Address2, Address3, nameservers 3 to 10 in the event they wished to include it.

Exh. 2  
Page 9

#### Fields Required in TRO

Domain Name  
Registrant Name  
Name Server1  
Name Server2

#### Fields being supplied in extract File sent weekly

Domain Name  
Owner First Name + Owner Last name  
Name Server1  
Name Server2  
Name Server3  
Name Server4  
Name Server5  
Name Server6  
Name Server7  
Name Server8  
Name Server9  
Name Server10

IMPLIED SINCE IT IS COMING FROM REGISTERFLY

Registrar  
Create Date  
Expire Date  
Registrant Name  
Registrant Address  
Registrant City  
Registrant State  
Registrant Zip  
Technical Name  
Technical Address  
Technical City  
Technical State  
Technical Zip  
Technical Email  
Technical Phone  
Technical Fax  
Admin Name

Creation Date  
Expiry Date  
Owner First Name + Owner Last name  
Address1  
City  
State  
Postal Code  
Tech First Name + Tech Last Name  
Tech Address1  
Tech City  
Tech State  
Tech Postal Code  
Tech Email  
Tech Phone  
Tech Fax  
Admin First Name + Admin Last Name

Admin Address  
Admin City  
Admin State  
Admin ZIP  
Admin Email  
Admin Phone  
Admin Fax  
BillingName  
Billing Address  
Billing City  
Billing State  
Billing Zip  
Billing Email  
Billing Phone  
Billing Fax

Admin Address1  
Admin City  
Admin State  
Admin ZIP  
Admin Email  
Admin Phone  
Admin Fax  
Billing First Name + Billing Last Name  
Billing Address1  
Billing City  
Billing State  
Billing Postal Code  
Billing Email  
Billing Phone  
Billing Fax



upload327

-----Original Message-----

From: Steve Conte  
Sent: Tue, March 27, 2007 4:39 pm  
To: robert.oneill@registerfly.com,  
kevin@unifiednames-inc.com,  
kevin@unifiednames.com  
Cc: Kurt Pritz , John Jeffrey  
Subject: SFTP Site: ICANN

Robert,

I've set up a user for one of our machines for you to sftp the data up to our site. Details as follows:

server: dev28.icann.org  
user: rfly  
pass: 039Gma1X

We've decided that because of the encryption of sftp, it is not

Page 1

Ext. 4  
Page 12

upload327

necessary to pgp encrypt the file  
before transmission.

Please let me know if there's any  
issues. If you are unable to reach

me, then please call Kent Crispin  
@ +1 310 301 5802

Thanks,

Steve

-----

Steve Conte  
Chief Security Officer

ICANN

+1 310 823 9358

Direct: +1 310 301 5829

Mobile: +1 310 279 2655

steve.conte@icann.org

PGP Key ID: 0xE72D5F30



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Includes over 20 tools »



**Transfer**  
**\$6.99**  
Includes 1 fre

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Ext. 5  
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> [home](#) > [customer service](#) > [overview](#)



### Customer Service Center

**SUPPORT TICKET AVAILABLE**  
**E-MAIL SUPPORT AVAILABLE**

03:22:18 EST

## Customer Service Center

**TITLE:** RegisterFly.com Arranges for bulk transfer of names under its accreditation

### NOTICE TO CONSUMERS.

**THE INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS - THE NON FOR PROFIT ENTITY THAT ADMINISTERS THE INTERNET'S DOMAIN NAME SYSTEM, HAS ISSUED A NOTICE OF TERMINATION OF THIS COMPANY'S ACCREDITATION TO SERVE AS AN INTERNET DOMAIN NAME REGISTRAR. PLEASE SEE [WWW.ICANN.ORG](http://WWW.ICANN.ORG) FOR FURTHER INFORMATION.**

#### Ticket Support

The ticket system is available 24/7

#### Support Ticket System

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**Heather McCloskey**

---

**Subject: FW: Notice posting**

File Name                    HMAC-[ALL HASHers]  
(Base16)

HMAC-MD5 -> Copy of regfly\_escrow\_may30.zip

ae9282ce1a8ffa46c1cbeb1b41834c9a

HMAC-RMD-128 -> Copy of regfly\_escrow\_may30.zip 7a64a5bc7f0822ed6ce2cbf849313f78

&nb

p;

HMAC-RMD-160 -> Copy of regfly\_escrow\_may30.zip

8501b8662a4900b80afdac2dfa6fe290463dcb2a

&nb sp;

HMAC-TIGER -> Copy of regfly\_escrow\_may30.zip

5e251bfcaee372ffdb24738c03adab9532a1bbc9a35d2ba3

HMAC-HAVAL5 -> Copy of regfly\_escrow\_may30.zip

902c74497ca0d23c13997b315f0a5af6437f61c14bb731b0c5480342608726e6

&nb

sp;

HMAC-SHA1 -> Copy of regfly\_escrow\_may30.zip

51b69326bc7afdbb32a53d8a813df15058dee443

HMAC-SHA256 -> Copy of regfly\_escrow\_may30.zip

40d39fe0fc94fe70d9f2317492f32edfce81c08cf8d167f2b6beca8ba4048669

HMAC-SHA384 -> Copy of regfly\_escrow\_may30.zip

ce95ef32517e662fc06b8b5e07c1ebe195c8d733340715cc8e5e5168bbad71bf4bb037ab7d02b0bc35efe479b55952d3

HMAC-SHA512 -> Copy of regfly\_escrow\_may30.zip 836

af233833515640c7c0207ea42b65c236fbd02d700676055316d94db2aacca2f5b

Exh. 6  
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## ICANN FILE SUBMISSION

Since March RegisterFly.com has provided ICANN with a file at LEAST ONCE WEEKLY. The file that is being sent is in the form of a ZIP file. As an example the most recent file uploaded has the naming convention

Regfly\_escrow\_may30.zip

The prior file was Regfly\_escrow\_may23.zip

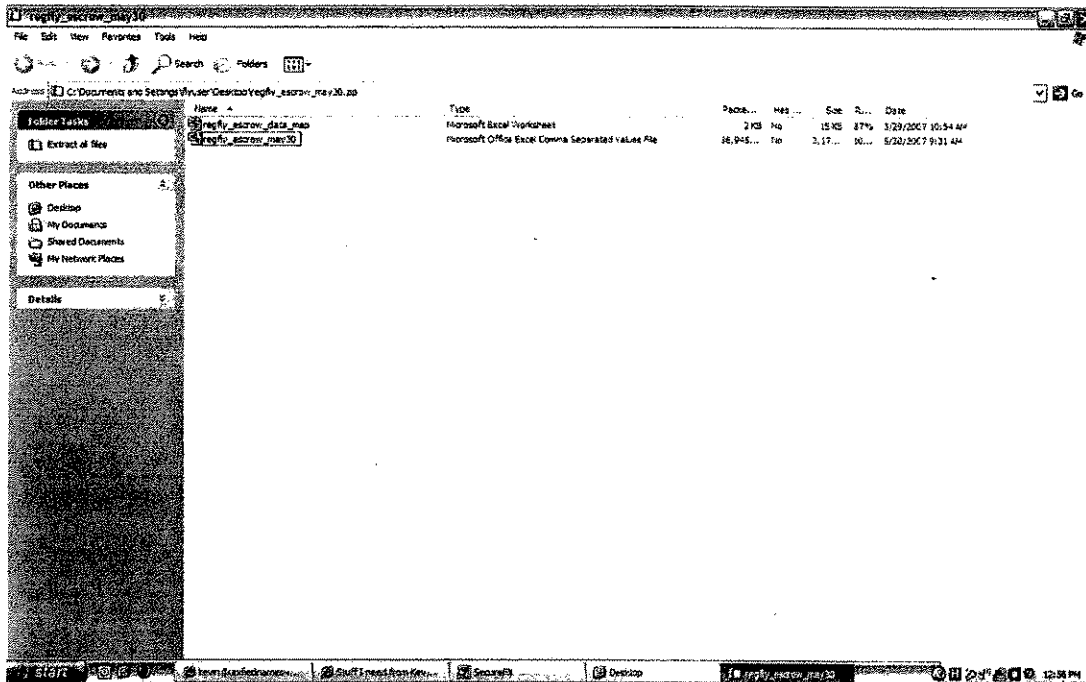
And each file prior has the date of submission as part of the file name.

Included in the contents of the zip file are TWO files.

### The file(s)

**Regfly\_escrow\_data\_map**, this file is included in EVERY file submission and provides and EXTENSIVE mapping of the data fields included in the primary extract file.

**Regfly\_escrow\_mon/day.CSV** (the most recent file was regfly\_escrow\_may30.CSV)  
The file is ALWAYS in a .CSV file which is what is included in the TRO



The file had to be zipped/compressed to to the extremely large size of the file. The compressed file is around 80MB, however the actual UNCOMPRESSED FILE is 3.2 GB which would be nearly impossible to upload due to its size.

If ICANN opened the file they would of quickly determined that it was a .CSV file inside of the zip.

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**Heather McCloskey**

---

**From:** Heather McCloskey  
**Sent:** Thursday, May 31, 2007 12:38 PM  
**To:** 'Samantha Eisner'; jlevee@JonesDay.com  
**Cc:** Kelly Scott  
**Subject:** ICANN Audit of RegisterFly Books

Ms. Eisner and Mr. LeVee,

I am now in possession of RegisterFly's registration data which is available for ICANN to review and/or audit at any time. Please inform me when you would like to review the data and I will make it available at my office.

Thank you,

Heather McCloskey

**Ervin, Cohen & Jessup LLP**  
9401 Wilshire Blvd, 9th Floor  
Beverly Hills, CA 90212-2974  
Phone: 310-281-6349  
Direct Fax: 310-887-6853  
Email: [hmccloskey@ecjlaw.com](mailto:hmccloskey@ecjlaw.com)



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5/31/2007

## ICANN Welcomes GoDaddy.com Takeover of RegisterFly Data

Direct, automatic transfer of domain names imminent under business deal

29 May 2007

**MARINA DEL REY, Calif.:** ICANN has welcomed today's GoDaddy.com® announcement that it will take over the entire portfolio of more than 850,000 generic top-level domain (gTLD) names held by RegisterFly.

"The RegisterFly situation has been extremely difficult – first and foremost for registrants, as well as for the entire registry and registrar community," said Dr Paul Twomey, ICANN's President and CEO.

ICANN's understanding is that GoDaddy.com and the gTLD registries holding RegisterFly names have worked out the mechanics for restoring, renewing, and redeeming names intending that no names will be inadvertently dropped. According to the terms of the transfer agreement, RegisterFly domain names and the data underlying the available proxy service will also be transferred. People with domain names registered with RegisterFly can contact GoDaddy.com at 480-366-3500 with any questions about the transfer. GoDaddy.com also has a question and answer sheet available at <http://www.godaddy.com/welcomeregisterfly>

"ICANN had been actively seeking participants to act as a transfer provider to bulk transfer RegisterFly records to another accredited registrar," Dr Twomey said. "We have ended that process because the GoDaddy.com agreement is a better solution for RegisterFly customers since it's a direct and automatic transfer to a competent and experienced customer service oriented organization."

Afilias and VeriSign, the two registries with the most RegisterFly names, have forgone considerable fees for transfers. The gTLD registries GNR, NeuStar and PIR also acted to prevent deletion of names. As well, Tucows took uncompensated effort to provide data and pursue a solution that would protect registrants. In each step of this situation, ICANN and these organizations worked to serve and protect the interests of registrants.

"I want to commend the organizations that have come to the table to ensure people's domain names were protected to the extent possible," Dr Twomey added. "Especially, I also want to thank the registrars that came forward to express an interest in acting as the transfer program ICANN was developing, but which now will not be required. The work contributed by their participation will lead to the creation of a standard process that will better protect registrants."

"After the passionate comments in response to my blog posting about this ordeal, we decided to step up," said Bob Parsons, CEO and Founder of GoDaddy.com. "It's what many RegisterFly customers asked us to do."

### About ICANN:

ICANN is responsible for the global coordination of the Internet's system of unique identifiers like domain names (like .org, .museum and country codes like .uk) and the addresses used in a variety of Internet protocols that help computers reach each other over the Internet. Careful management of these resources is vital to the Internet's operation, so ICANN's global stakeholders meet regularly to develop policies that ensure the Internet's ongoing security and stability. ICANN is an internationally organized, public benefit non-profit company. For more information please visit: [www.icann.org](http://www.icann.org).

### Media Contacts:

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Public Relations Specialist, Go Daddy.com  
Ph.: 480-505-8800 x4451  
E: [press@GoDaddy.com](mailto:press@GoDaddy.com)

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