

982(a)(6)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Robert A. Sacks (No. 150146) Sullivan & Cromwell LLP 1888 Century Park East, Suite 2100, Los Angeles, California 90067 TELEPHONE NO.: (310) 712-6600 FAX NO. (Optional): (310) 712-8800 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): C. Itoh Middle East (Bahrain)	FOR COURT USE ONLY CASE NUMBER: SC090220
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: Santa Monica Courthouse MAILING ADDRESS: 1725 Main Street CITY AND ZIP CODE: Santa Monica, California 90401 BRANCH NAME:	
PLAINTIFF/PETITIONER: C. Itoh Middle East (Bahrain) DEFENDANT/RESPONDENT: Internet Corp. for Assigned Names & Num. et al	
REQUEST FOR (Application) <input checked="" type="checkbox"/> Entry of Default <input type="checkbox"/> Clerk's Judgment <input type="checkbox"/> Court Judgment	

1. TO THE CLERK: On the complaint or cross-complaint filed
- a. on (date): **June 28, 2006**
 - b. by (name): **C. Itoh Middle East (Bahrain), through real party in interest National Union Fire Insurance Co.**
 - c. Enter default of defendant (names): **The People's Republic of the Congo; the Congolese Redemption Fund**
 - d. I request a court judgment under Code of Civil Procedure sections 585(b), 585(c), 989, etc., against defendant (names):

(Testimony required. Apply to the clerk for a hearing date, unless the court will enter a judgment on an affidavit under Code Civ. Proc., § 585(d).)

- e. Enter clerk's judgment
 - (1) for restitution of the premises only and issue a writ of execution on the judgment. Code of Civil Procedure section 1174(c) does not apply. (Code Civ. Proc., § 1169.)
 - Include in the judgment all tenants, subtenants, named claimants, and other occupants of the premises. The Prejudgment Claim of Right to Possession was served in compliance with Code of Civil Procedure section 415.46.
 - (2) under Code of Civil Procedure section 585(a). (Complete the declaration under Code Civ. Proc., § 585.5 on the reverse (item 5).)
 - (3) for default previously entered on (date):

2. Judgment to be entered.

	Amount	Credits acknowledged	Balance
a. Demand of complaint	\$	\$	\$
b. Statement of damages *			
(1) Special	\$	\$	\$
(2) General	\$	\$	\$
c. Interest	\$	\$	\$
d. Costs (see reverse)	\$	\$	\$
e. Attorney fees	\$	\$	\$
f. TOTALS	\$	\$	\$

g. Daily damages were demanded in complaint at the rate of: \$ _____ per day beginning (date): _____
 (* Personal injury or wrongful death actions; Code Civ. Proc., § 425.11.)

3. (Check if filed in an unlawful detainer case) Legal document assistant or unlawful detainer assistant information is on the reverse (complete item 4).
 Date: **November 13, 2006**

 Robert A. Sacks
 (TYPE OR PRINT NAME)

▶ Robert A. Sacks / EEW
 (SIGNATURE OF PLAINTIFF OR ATTORNEY FOR PLAINTIFF)

FOR COURT USE ONLY	(1) <input type="checkbox"/> Default entered as requested on (date):	
	(2) <input type="checkbox"/> Default NOT entered as requested (state reason):	
		Clerk, by _____, Deputy

PLAINTIFF/PETITIONER: C. Itoh Middle East (Bahrain)	CASE NUMBER:
DEFENDANT/RESPONDENT: Internet Corp. for Assigned Names & Num. et al	SC090220

4. Legal document assistant or unlawful detainer assistant (Bus. & Prof. Code, § 6400 et seq.). A legal document assistant or unlawful detainer assistant did did not for compensation give advice or assistance with this form. (If declarant has received any help or advice for pay from a legal document assistant or unlawful detainer assistant, state):

- a. Assistant's name:
- b. Street address, city, and zip code:

- c. Telephone no.:
- d. County of registration:
- e. Registration no.:
- f. Expires on (date):

5. Declaration under Code of Civil Procedure Section 585.5 (required for entry of default under Code Civ. Proc., § 585(a)). This action

- a. is is not on a contract or installment sale for goods or services subject to Civ. Code, § 1801 et seq. (Unruh Act).
- b. is is not on a conditional sales contract subject to Civ. Code, § 2981 et seq. (Rees-Levering Motor Vehicle Sales and Finance Act).
- c. is is not on an obligation for goods, services, loans, or extensions of credit subject to Code Civ. Proc., § 395(b).

6. Declaration of mailing (Code Civ. Proc., § 587). A copy of this Request for Entry of Default was

- a. not mailed to the following defendants, whose addresses are unknown to plaintiff or plaintiff's attorney (names):
- b. mailed first-class, postage prepaid, in a sealed envelope addressed to each defendant's attorney of record or, if none, to each defendant's last known address as follows:

(1) Mailed on (date): October 2, 2006

(2) To (specify names and addresses shown on the envelopes):
 The People's Republic of the Congo, the Congolese Redemption Fund, Regie National Des Travaux Publics et de la Construction, B.P. 2073, Brazzaville, Republique Populaire du Congo

I declare under penalty of perjury under the laws of the State of California that the foregoing items 4, 5, and 6 are true and correct.
 Date:

Edward Johnson

(TYPE OR PRINT NAME)



(SIGNATURE OF DECLARANT)

7. Memorandum of costs (required if money judgment requested). Costs and disbursements are as follows (Code Civ. Proc., § 1033.5):

- a. Clerk's filing fees \$
- b. Process server's fees \$
- c. Other (specify): \$
- d. \$
- e. TOTAL \$
- f. Costs and disbursements are waived.

9. I am the attorney, agent, or party who claims these costs. To the best of my knowledge and belief this memorandum of costs is correct and these costs were necessarily incurred in this case.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
 Date:

(TYPE OR PRINT NAME)

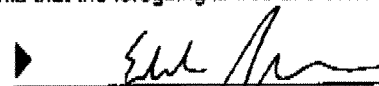
(SIGNATURE OF DECLARANT)

8. Declaration of nonmilitary status (required for a judgment). No defendant named in item 1c of the application is in the military service so as to be entitled to the benefits of the Servicemembers Civil Relief Act (50 U.S.C. App. § 501 et seq.).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
 Date:

Edward Johnson

(TYPE OR PRINT NAME)



(SIGNATURE OF DECLARANT)

Exhibit A

COPY
UNFORMED COPY
HE ORIGINAL FILED
Los Angeles Superior Court

AUG 03 2008
John A. Clark, Law Clerk
By B. Rodriguez, Deputy

1 Robert A. Sacks (Cal. Bar No. 150146)
2 Edward E. Johnson (Cal. Bar No. 241065)
3 SULLIVAN & CROMWELL LLP
4 1888 Century Park East
5 Los Angeles, California 90067-1725
6 (310) 712-6600
7 (310) 712-8800 facsimile

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12
13 Attorneys for Plaintiff C. ITOH MIDDLE
14 EAST E.C. (Bahrain), through the real
15 party in interest, NATIONAL UNION
16 FIRE INSURANCE COMPANY OF
17 PITTSBURGH, PA.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

WEST DISTRICT

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

15 Plaintiff,

17 v.

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

22 Defendants.

Case No. SC090220

**PROOF OF SERVICE OF SUMMONS
AND COMPLAINT**

1 TO ALL INTERESTED PARTIES AND THEIR COUNSEL OF RECORD:

2 Plaintiff C. Itoh Middle East E.C. (Bahrain), acting through the real party in
3 interest National Union Fire Insurance Company of Pittsburgh, PA. ("NUFI") has served a
4 Summons; Complaint; Civil Case Cover Sheet; Civil Case Cover Sheet Addendum; Alternative
5 Dispute Resolution (ADR) Information; and Notice of Case Assignment on Defendants the
6 People's Republic of the Congo and the Congolese Redemption Fund, as follows:

7 1. On June 28, 2006, in accordance with the special arrangement in the
8 contract giving rise to the Congo's obligation at issue in this case, NUFI served the Summons;
9 Complaint; Civil Case Cover Sheet; Civil Case Cover Sheet Addendum; Alternative Dispute
10 Resolution (ADR) Information; and Notice of Case Assignment, by U.S. Mail and Federal
11 Express, on the Congo at the following address:

12 Regie National Des Travaux Publics et de la Construction
13 B.P. 2073
14 Brazzaville
Republique Populaire du Congo.

15 The Federal Express package was delivered and signed for by N. Gami K on July 5, 2006. The
16 tracking results confirming that the package was delivered and signed for are attached hereto as
17 Exhibit A.

18 2. On July 12, 2006, pursuant to 28 U.S.C. § 1608(a)(3), NUFI also served,
19 by U.S. Mail and Federal Express, the Summons, with French translation; Complaint, with
20 French translation; Notice of Suit, with French Translation, pursuant to 22 C.F.R. § 93.2; Civil
21 Case Cover Sheet; Civil Case Cover Sheet Addendum; Alternative Dispute Resolution (ADR)
22 Information; and Notice of Case Assignment on:

23 Roldphe Adade
24 Minister of Foreign Affairs
25 International Cooperation & Relations with Francophone Countries
B.P. 2070, Brazzaville
Congo.

26 The Federal Express package was delivered and signed for by M. Abela K on July 17, 2006. The
27 tracking results confirming that the package was delivered and signed for are attached hereto as
28 Exhibit B.

1 3. On July 17, 2006, to ensure that the Congo received notice of this action,
 2 NUFI also sent the summons and complaint to the Congo's U.S. counsel, Boaz Morag Esq. of
 3 Cleary, Gottlieb, Steen & Hamilton, by email. A copy of the email is attached hereto as
 4 Exhibit C. Mr. Morag represents the Congo in other judgment enforcement litigation
 5 commenced by judgment creditors of the Congo, including Texas litigation in which NUFI is a
 6 plaintiff.

7
 8 Dated: August 3, 2006

Respectfully submitted,



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 11 Of Counsel:
 12 Mark F. Rosenberg
 13 Jacob F.M. Oslick
 14 SULLIVAN & CROMWELL LLP
 15 125 Broad Street
 16 New York, New York 10004-2498
 17 (212) 558-4000
 18 (212) 558-3588 facsimile

Robert A. Sacks (Cal. Bar No. 150146)
 Edward E. Johnson (Cal. Bar No. 241065)
 SULLIVAN & CROMWELL LLP
 1888 Century Park East
 Los Angeles, California 90067-1725
 (310) 712-6600
 (310) 712-8800 facsimile

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

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Exhibit A

Tracking summary



Close Window

Track Shipments
Detailed Results

Print

Tracking number	791983758577	Reference	009228014301253
Signed for by	N.GAMI K		5
Ship date	Jun 28, 2008		
Delivery date	Jul 5, 2008 2:44 PM	Destination	Brazzaville CG
		Delivered to	Receptionist/Front Desk
		Service type	Priority Pak
		Weight	4.0 lbs.

Status Delivered

Date/Time	Activity	Location	Details
Jul 5, 2008	2:44 PM Delivered	Brazzaville CG	
Jun 30, 2008	8:54 AM In transit	PARIS FR	
	5:16 AM In transit	PARIS FR	
	5:15 AM In transit	PARIS FR	
	1:24 AM Departed FedEx location	PARIS FR	
Jun 29, 2008	8:32 PM Arrived at FedEx location	PARIS FR	
	3:18 AM Departed FedEx location	MEMPHIS, TN	
	1:25 AM Arrived at FedEx location	MEMPHIS, TN	
Jun 28, 2008	8:08 PM Departed FedEx location	LOS ANGELES, CA	
	7:07 PM Arrived at FedEx location	LOS ANGELES, CA	
	6:21 PM Left origin	MARINA DEL REY, CA	
	6:18 PM Package data transmitted to FedEx		
	5:28 PM Picked up	MARINA DEL REY, CA	

Small Results Track more shipments

Subscribe to tracking updates (optional)

Your Name:

Your Email Address:

Email address	Language	Exception updates	Delivery updates
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>

Select format: HTML Text Wireless

Add personal message:

Not available for Wireless or non-English characters.

Shipment Details

Page 1 of 1

FedEx

Track/History

Add to Favorites

Print

Feedback

Help

Logout

Home

My Account

<< Log out Home

Your Shipment Details:

Ship to:	Regie National Des Travaux Publics et de la Construction B.P. 2073 Brazzaville, CG 310 712-8604	Package Type: Pickup/Drop Off: Weight: Dimensions: Declared Value: Shipper Account Number:	FedEx Pak Drop Off 4 LBS 0 x 0 x 0 in 0 USD 158829384
From:	Edward Johnson Sullivan & Cromwell LLP 1888 Century Park East, Suite 2100 Los Angeles, CA 90067 US 310 712-6600	Bill transportation to: Bill duty/taxes to: Courtesy Rate Quote Special Services: Purpose: Shipment Type:	158829384 0 *127 Express
Tracking no:	791983756577		
Your reference:	0092260143012535		
Ship date:	Jun 28 2006		
Service Type:	International Priority		

Please Note

*The courtesy rate shown here may be different than the actual charges for your shipment. Differences may occur based on actual weight, dimensions, and other factors. Consult the applicable [FedEx Service Guide](#) or the [FedEx Rate Sheets](#) for details on how shipping charges are calculated.

FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdirected information, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current [FedEx Service Guide](#) apply. Your right to recover from FedEx for any loss, including intrinsic value of the goods, sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to a maximum of \$100 or the authorized declared value, whichever is less. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value, e.g., jewelry, precious metals, negotiable instruments and other items listed in our [Service Guide](#). Written claims must be filed within strict time limits. Consult the applicable [FedEx Service Guide](#) for details.

Exhibit B

Tracking summary



Close Window

Track Shipments
Detailed Results

Print

Tracking number	792150344130	Reference	009226014301253
Signed for by	M.ABELA K		5
Ship date	Jul 12, 2006	Destination	Brazzaville CG
Delivery date	Jul 17, 2006 2:00 PM	Delivered to	Receptionist/Front Desk
		Service type	Priority Pak
		Weight	5.0 lbs.

Status Delivered

Date/Time	Activity	Location	Details
Jul 17, 2006	2:00 PM Delivered	Brazzaville CG	
Jul 14, 2006	8:43 AM In transit	PARIS FR	
	5:18 AM In transit	PARIS FR	
	5:15 AM In transit	PARIS FR	
	3:10 AM Departed FedEx location	PARIS FR	
Jul 13, 2006	10:03 PM Departed FedEx location	PARIS FR	
	8:41 PM Arrived at FedEx location	PARIS FR	
	2:38 AM Departed FedEx location	MEMPHIS, TN	
	1:35 AM Arrived at FedEx location	MEMPHIS, TN	
Jul 12, 2006	7:50 PM Departed FedEx location	LOS ANGELES, CA	
	7:18 PM Arrived at FedEx location	LOS ANGELES, CA	
	6:22 PM Left origin	MARINA DEL REY, CA	
	5:24 PM Picked up	MARINA DEL REY, CA	
	4:24 PM Package data transmitted to FedEx		



Subscribe to tracking updates (optional)

Your Name: _____

Your Email Address: _____

Email address	Language	Exception updates	Delivery updates
_____	English	<input type="checkbox"/>	<input type="checkbox"/>
_____	English	<input type="checkbox"/>	<input type="checkbox"/>
_____	English	<input type="checkbox"/>	<input type="checkbox"/>
_____	English	<input type="checkbox"/>	<input type="checkbox"/>

Select format: HTML Text Wireless

Add personal message: _____

Not available for Wireless or non-English characters.

Shipment Details


[Track/History](#)
[Home](#)

Your Shipment Details:

Ship to:	Roldphe Adada Ministry of Foreign Affairs B.P. 2070 Brazzaville, CG 310 712-8804	Package Type:	FedEx Pak
From:	Edward Johnson Sullivan & Cromwell LLP 1888 Century Park East, Suite 2100 Los Angeles, CA 90087 US 310 712-8800	Pickup/Drop Off:	Drop Off
Tracking no:	782150344130	Weight:	3 LBS
Your reference:	000280143012536	Dimensions:	0 x 0 x 0 in
Ship date:	Jul 12 2006	Declared Value:	1 USD
Service Type:	International Priority	Shipper Account Number:	158929384
		Bill transportation to:	158929384
		Bill duty/taxes to:	158929384
		Courtesy Rate Quote	*115
		Discounted variable %	0.00
		Special Services:	
		Purpose:	
		Shipment Type:	Express

Please Note

The courtesy rate shown here may be different than the actual charges for your shipment. Differences may occur based on actual weight, dimensions, and other factors. Consult the applicable [FedEx Service Guide](#) or the [FedEx Rate Sheets](#) for details on how shipping charges are calculated.

FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misadvice, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current [FedEx Service Guide](#) apply. Your right to recover from FedEx for any loss, including intrinsic value of the contents, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to a maximum of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value, e.g., jewelry, precious metals, negotiable instruments and other items listed in our [Service Guide](#). Written claims must be filed within strict time limits. Consult the applicable [FedEx Service Guide](#) for details.

Exhibit C

Johnson, Edward E.

Subject:

FW: Congo



ICANN



ICANN

Complaint.pdf (8 MB) Immons.pdf (113 K)

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

From: Rosenberg, Mark F.

Sent: Monday, July 17, 2006 3:08 PM

To: bmorag@cgsh.com

Subject: Congo

Boaz,

Enclosed please find a copy of the creditors suit complaint filed by NUPI in California. Feel free to call me at 212-558-3647 if would like to discuss it.

Regards,

Mark

PROOF OF SERVICE

1
2 I am employed in the County of Los Angeles, State of California. I am over the
3 age of eighteen years and am not a party to this action. My business address is Sullivan &
4 Cromwell LLP, 1888 Century Park East, Suite 2100, Los Angeles, California 90067-1725.

5 I served the below listed document(s) described as:

6 **PROOF OF SERVICE OF SUMMONS AND COMPLAINT**

7 on August 3, 2006, on all other parties in this action by placing a true copy of the above
8 document(s) enclosed in sealed envelopes addressed as follows:

9 **SEE ATTACHED SERVICE LIST**

10
11 For copies served by United States Mail, I placed each such envelope with
12 postage thereon fully prepared for the deposit in the United States mail in accordance with the
13 office practice of Sullivan & Cromwell LLP, which practice is that when correspondence is
14 deposited with the Sullivan & Cromwell LLP personnel responsible for delivering
15 correspondence to the United States Postal Service, such correspondence is delivered to the
16 United States Postal Service that same day in the course of business.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct.

19 Executed on August 3, 2006 at Los Angeles, California.

20 
21 Roberta Striplin
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SERVICE LIST

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Via United States Mail:

**Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina Del Rey, California 90401**

**Internet Assigned Names Authority
4676 Admiralty Way, Suite 330
Marina Del Rey, California 90401**

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

**The Congolese Redemption Fund
Regie National Des Travaux Publics et de la Construction
B.P. 2073
Brazzaville
Republique Populaire du Congo**

PROOF OF SERVICE

1
2 I am employed in the County of Los Angeles, State of California. I am over the
3 age of eighteen years and am not a party to this action. My business address is Sullivan &
4 Cromwell LLP, 1888 Century Park East, Suite 2100, Los Angeles, California 90067-1725.

5 I served the below listed document(s) described as:

REQUEST FOR ENTRY OF DEFAULT

6
7 on November 13, 2006, on all other parties in this action by placing a true copy of the above
8 document(s) enclosed in sealed envelopes addressed as follows:

Via Facsimile & U.S. Mail

9
10 Jeffrey A. LeVee
11 Samantha S. Eisner
12 JONES DAY
13 555 South Flower Street, Fiftieth Floor
14 Los Angeles, California 90071-2300

Via Mail

15 The People's Republic of the Congo
16 Regie National Des Travaux Publics et de la Construction
17 B.P. 2073
18 Brazzaville
19 Republique Populaire du Congo

20 The Congolese Redemption Fund
21 Regie National Des Travaux Publics et de la Construction
22 B.P. 2073
23 Brazzaville
24 Republique Populaire du Congo

25 For copies sent by Facsimile, I delivered a true copy of the above documents to
26 the Sullivan & Cromwell LLP personnel responsible for facsimile service, to the persons listed at
27 the facsimile numbers listed above. I am familiar with the office practice of Sullivan &
28 Cromwell LLP, which practice is that when documents are deposited with the Sullivan &
Cromwell LLP personnel responsible for facsimile service, such documents are transmitted via
facsimile that same day in the course of business.

1 For copies served by United States Mail, I placed each such envelope with
2 postage thereon fully prepared for the deposit in the United States mail in accordance with the
3 office practice of Sullivan & Cromwell LLP, which practice is that when correspondence is
4 deposited with the Sullivan & Cromwell LLP personnel responsible for delivering
5 correspondence to the United States Postal Service, such correspondence is delivered to the
6 United States Postal Service that same day in the course of business.

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct.

9 Executed on November 13, 2006 at Los Angeles, California.

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Roberta Striplin