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 13 Attorneys for Plaintiffs
 14 Manwin Licensing International S.à.r.l.
 15 and Digital Playground, Inc.

16 UNITED STATES DISTRICT COURT
 17 CENTRAL DISTRICT OF CALIFORNIA

18 MANWIN LICENSING
 19 INTERNATIONAL S.A.R.L., a
 20 Luxemburg limited liability company
 21 (s.à.r.l.), and DIGITAL
 22 PLAYGROUND, INC., a California
 23 corporation,

24 Plaintiffs,

25 v.

26 ICM REGISTRY, LLC, d/b/a .XXX, a
 27 Delaware limited liability corporation;
 28 INTERNET CORPORATION FOR
 ASSIGNED NAMES AND NUMBERS,
 a California nonprofit public benefit
 corporation; and Does 1-10,

Defendants.

Case No. CV11- 9514 PSG (JCGx)

The Honorable Philip S. Gutierrez

**STIPULATION TO TAKE
 MOTIONS OFF CALENDAR AND
 SETTING DATES FOR
 AMENDMENT AND RESPONSE**

Courtroom: 880 Roybal Federal Building

1 **TO THE DISTRICT COURT AND ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD:**

3 Plaintiffs Manwin Licensing International S.à.r.l. and Digital Playground,
4 Inc. (collectively, "Plaintiffs"), Defendant Internet Corporation for Assigned
5 Names and Numbers ("ICANN"), and Defendant ICM Registry, LLC ("ICM"),
6 stipulate as follows through their undersigned counsel of record:

7 1. On November 16, 2011, Plaintiffs filed the Complaint in this Action.

8 2. On December 20, 2011, the parties filed a Stipulation and [Proposed]
9 Order, whereby ICANN and ICM agreed to accept service of the Complaint, and
10 the parties agreed to a briefing schedule for ICANN and ICM to file responsive
11 motions.

12 3. On December 27, 2011, the Court entered an Order agreeing to the
13 stipulated schedule (the "December Order").

14 4. Pursuant to the December Order, on January 20, 2012, ICANN and
15 ICM each filed a motion to dismiss pursuant to Rule of Federal Procedure
16 12(b)(6). In addition ICM filed a motion to strike pursuant to California Code of
17 Civil Procedure Section 425.16 (collectively, the "Motions").

18 5. Plaintiffs have advised that they intend to amend their Complaint in
19 response to the Motions. The parties have agreed in writing pursuant to Federal
20 Rule of Civil Procedure Rule 15(a)(2) that Plaintiffs may have until February 17,
21 2012 to file an amendment to their Complaint.

22 6. In light of the upcoming amendment of the Complaint, the parties
23 agree and hereby stipulate that the pending Motions should be taken off calendar.

24 7. In addition, in recent days, Plaintiffs and ICM have engaged in
25 discussions aimed at resolving the disputes that are the subject of this litigation.

26 8. The parties believe that additional time would potentially allow the
27 parties to resolve all or some portion of their disputes. Accordingly, the parties

28

1 hereby stipulate that Defendants shall have 60 days from the filing of the amended
2 Complaint to file an answer, motion or other response thereto. By continuing the
3 response date for the amended Complaint for 60 days, the parties will be able to
4 focus their energies on these efforts, and avoid unnecessarily expending the
5 parties' and the Court's resources.


6 9. The parties therefore agree that Defendants shall have until April 17,
7 2012 to file a motion, answer or other response to the amended Complaint to be
8 filed on or before February 17, 2012.

9 10. Neither the parties nor the Court will be prejudiced by an extension,
10 because there are no pending pre-trial or other deadlines in this action.

11
12 **SO STIPULATED.**

13
14 DATED: February 14, 2012

15 THOMAS P. LAMBERT
16 JEAN PIERRE NOGUES
17 KEVIN E. GAUT
18 MITCHELL SILBERBERG & KNUPP LLP

19 By: 
20 Kevin E. Gaut
21 Attorneys for Defendant

22
23 DATED: February __, 2012

24 JEFFREY A. LEVEE
25 JONES DAY

26 By: _____
27 Jeffrey A. LeVee
28 Attorneys for Defendant Internet
Corporation for Assigned Names and
Numbers

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KEVIN E. GAUT
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By: _____
Kevin E. Gaut
Attorneys for Defendant

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21 DATED: February 14, 2012

JEFFREY A. LEVEE
JONES DAY

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By: Jeffrey A. Levee *KL*
Jeffrey A. Levee
Attorneys for Defendant Internet
Corporation for Assigned Names and
Numbers

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1 DATED: February __, 2012

ANDREA WEISS JEFFRIES
WILMER, CUTLER, PICKERING, HALE
& DORR LLP

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3
4 By: 

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6 Andrea Weiss Jeffries
Attorneys for Defendant ICM Registry,
7 LLC

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