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7 Attorneys for Plaintiffs
Manwin Licensing International S.à.r.l.
8 and Digital Playground, Inc.

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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

Plaintiffs,

v.

ICM REGISTRY, LLC, d/b/a .XXX, a
Delaware limited liability corporation;
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 ACCEPT
SERVICE OF COMPLAINT,
EXTEND TIME TO RESPOND TO
COMPLAINT, AND SET BRIEFING
SCHEDULE**

Courtroom: 880 Roybal Federal Building

Mitchell
Silberberg &
Knupp LLP

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. ICANN and ICM hereby agree to accept service of the Complaint.

9 3. ICANN and ICM shall have until January 20, 2012 to respond to the
10 Complaint.

11 4. ICANN and ICM currently intend to file motions in response to the
12 Complaint.

13 5. Given the complexity of the issues involved in the Complaint, the
14 parties believe additional time to meet and confer and prepare briefing on the
15 motions would be beneficial to the parties and the Court.

16 6. The parties therefore agree on the following briefing schedule for the
17 motions:

18 (a) The parties shall meet and confer concerning the motions,
19 pursuant to Local Rule 7.3, not later than during the week of January 2, 2012.

20 (b) Plaintiffs shall have until February 17, 2012 to file opposition
21 to the motions.

22 (c) ICM and ICANN shall have until March 16, 2012 to file replies
23 in support of the motions.

24 7. The parties request that motions be heard on or about April 2, 2012.
25 Defendants anticipate that the motions may be complex and, thus, that the Court
26 and the parties would benefit from the setting of a hearing on a date and time other
27 than during the Court's regular law and motion calendar so that the parties can be

1 afforded more time than would be permissible on the law and motion calendar.
2 Plaintiffs do not yet know the content of the motions and so reserve their position
3 on that issue. Once the motions are fully briefed and submitted, the parties will
4 contact the Court further with a time estimate for the requested oral argument.

5 8. No prior extensions of time have been requested or granted.

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

8 **SO STIPULATED.**

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10 DATED: December 17, 2011

THOMAS P. LAMBERT
JEAN PIERRE NOGUES
KEVIN E. GAUT
MITCHELL SILBERBERG & KNUPP LLP

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By: 
Kevin E. Gaut
Attorneys for Defendant

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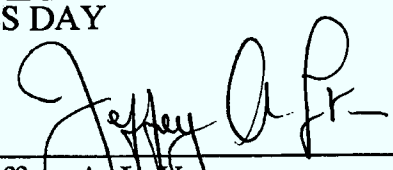
16

17 DATED: December 19, 2011

JEFFREY A. LEVEE
JONES DAY

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

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23 DATED: December __, 2011

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

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By: _____
Andrea Weiss Jeffries
Attorneys for Defendant ICM Registry,
LLC

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2 Plaintiffs do not yet know the content of the motions and so reserve their position
3 on that issue. Once the motions are fully briefed and submitted, the parties will
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7 because there are no pending pre-trial or other deadlines in this action.

8 **SO STIPULATED.**

9
10 DATED: December __, 2011

THOMAS P. LAMBERT
JEAN PIERRE NOGUES
KEVIN E. GAUT
MITCHELL SILBERBERG & KNUPP LLP

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14 By: _____
Kevin E. Gaut
Attorneys for Defendant


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16
17 DATED: December __, 2011

JEFFREY A. LEVEE
JONES DAY

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

20
21
22 DATED: December 19, 2011

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

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24
25 By:  _____
Andrea Weiss Jeffries
Attorneys for Defendant ICM Registry,
26 LLC
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Mitchell
Silberberg &
Knupp LLP
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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 Mitchell Silberberg & Knupp LLP, 11377 West Olympic Boulevard, Los Angeles, California 90064-1683.

On December 20, 2011, I served a copy of the foregoing document(s) described as **STIPULATION TO ACCEPT SERVICE OF COMPLAINT, EXTEND TIME TO RESPOND TO COMPLAINT, AND SET BRIEFING SCHEDULE** on the interested parties in this action at their last known address as set forth below by taking the action described below:

Counsel for Internet Corporation for Assigned Names and Numbers *Counsel for ICM Registry, LLC*

Jeffrey A. LeVee
Jones Day
555 South Flower Street
Fiftieth Floor
Los Angeles, CA 90071-2300
Tel 213 243 2572
Fax 213 243 2539
E-mail: jlevec@jonesday.com

Andrea Weiss Jeffries
WilmerHale
350 South Grand Avenue, Suite 2100
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E-mail: andrea.jeffries@wilmerhale.com

BY MAIL: I placed the above-mentioned document(s) in sealed envelope(s) addressed as set forth above, and deposited each envelope in the mail at Los Angeles, California. Each envelope was mailed with postage thereon fully prepaid.

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

Executed on December 20, 2011, at Los Angeles, California.


Jennifer Gaines