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3 Los Angeles, California 90067-1725  
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5 Attorneys for Plaintiff C. ITOH MIDDLE  
EAST E.C. (Bahrain), through the real  
6 party in interest, NATIONAL UNION  
FIRE INSURANCE COMPANY OF  
7 PITTSBURGH, PA.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES  
WEST DISTRICT

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

Plaintiff,

v.

INTERNET CORPORATION FOR  
ASSIGNED NAMES AND NUMBERS,  
INTERNET ASSIGNED NUMBERS  
AUTHORITY, the PEOPLE'S  
REPUBLIC OF THE CONGO, and THE  
CONGOLESE REDEMPTION FUND,

Defendants.

) Case No. SC090220

) The Hon. John L. Segal

) NOTICE OF ENTRY OF ORDER  
) ENLARGING THE BRIEFING AND  
) HEARING SCHEDULE ON  
) DEFENDANTS' DEMURRER

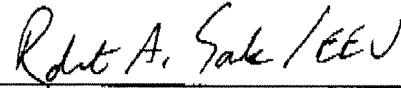
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TO ALL INTERESTED PARTIES:

PLEASE TAKE NOTICE THAT on September 7, 2006 the Court entered an Order Enlarging the Briefing and Hearing Schedule on Defendants' Demurrer, a copy of which is attached hereto as Exhibit A.

Dated: September 7, 2006

Respectfully submitted,



Robert A. Sacks (Cal. Bar No. 150146)  
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Of Counsel:  
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Jacob F.M. Oslick  
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Attorneys for Plaintiff C. ITOH MIDDLE EAST E.C. (Bahrain), through the real party in interest, NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.

# **Exhibit A**

ORIGINAL

1 Robert A. Sacks (Cal. Bar No. 150146)  
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SEP 06 2006

SUPERIOR COURT  
WEST DISTRICT  
SANTA MONICA

FILED  
LOS ANGELES SUPERIOR COURT

SEP 07 2006  
JOHN L. CLARKE, CLERK  
BY [Signature], DEPUTY

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

13 Jeffrey A. LeVee (Cal. Bar No. 125863)  
14 Sean W. Jaquez (Cal. Bar No. 223132)  
15 Samantha S. Eisner (Cal. Bar No. 230344)  
16 JONES DAY  
17 555 South Flower Street  
18 Fiftieth Floor  
19 Los Angeles, California 90071-2300  
20 (213) 489-3939  
21 (213) 243-2539 facsimile

22 Attorneys for Defendants INTERNET  
23 CORPORATION FOR ASSIGNED NAMES  
24 AND NUMBERS and erroneously named  
25 INTERNET ASSIGNED  
26 NUMBERS AUTHORITY

27 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
28 COUNTY OF LOS ANGELES  
WEST DISTRICT

29 C. ITOH MIDDLE EAST E.C. (Bahrain)  
30 through the real party in interest, NATIONAL  
31 UNION FIRE INSURANCE COMPANY  
32 OF PITTSBURGH, PA.

33 Plaintiff,

34 v.

35 INTERNET CORPORATION FOR  
36 ASSIGNED NAMES AND NUMBERS,  
37 INTERNET ASSIGNED NUMBERS  
38 AUTHORITY, the PEOPLE'S  
39 REPUBLIC OF THE CONGO, and THE  
40 CONGOLESE REDEMPTION FUND,

41 Defendants.

Case No. SC090220

The Hon. John L. Segal

STIPULATION TO ENLARGE  
THE BRIEFING AND HEARING  
SCHEDULE ON DEFENDANTS'  
DEMURRER; ~~PROPOSED~~  
ORDER

Date: September 20, 2006

Time: 8:30 a.m.

Dept: M

Action Filed: June 28, 2006

1 WHEREAS, the Complaint in this action was filed on June 28, 2006;

2 WHEREAS, on July 19, 2006 the Court entered an Order extending Defendants  
3 Internet Corporation for Assigned Names and Numbers' ("ICANN") and Internet Assigned  
4 Numbers Authority's ("IANA") time to respond to the Complaint until August 28, 2006;

5 WHEREAS, on August 28, 2006 Defendants ICANN and IANA filed a Notice of  
6 Demurrer and Demurrer to the Complaint, and an accompanying Request for Judicial Notice,  
7 which are set for hearing on September 20, 2006;

8 WHEREAS, Plaintiff's Opposition to the Demurrer and Request for Judicial  
9 Notice are currently due on September 7, 2006, and Defendants' Reply to both Oppositions are  
10 currently due on September 13, 2006;

11 WHEREAS, Plaintiff served its First Set of Requests for the Production of  
12 Documents ("Requests for Production") on Defendants ICANN and IANA on July 14, 2006 and  
13 Defendants responded to the Requests for Production on August 14, 2006;

14 WHEREAS, counsel for all parties to this Stipulation have agreed for good cause  
15 to move the hearing on the Demurrer and Request for Judicial Notice to November 3, 2006, with  
16 Plaintiff's Oppositions due on October 10 and Defendants' Reply to both Oppositions due on  
17 October 27;

18 WHEREAS, counsel for all parties to this Stipulation have separately agreed that  
19 the deadline for Plaintiff to file a motion to compel further response to its Requests for  
20 Production under Cal. Civ. Proc. Code § 2031.310 will be extended until 45 days after the entry  
21 of an Order on Defendants' Demurrer and Request for Judicial Notice and that Plaintiff will not  
22 file any motion to compel or seek any further discovery from ICANN or IANA until entry of that  
23 Order;

24 WHEREAS, the Court has set an Initial Status Conference for October 16, 2006  
25 and the parties to this Stipulation believe, in the interest of judicial economy, that the Initial  
26 Status Conference should be continued to November 3, 2006 to account for the enlarged briefing  
27 schedule on Defendants' Demurrer and Request for Judicial Notice.

28

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by counsel  
 2 for all parties to this Stipulation that the hearing on Defendants' Demurrer and Request for  
 3 Judicial Notice will be set for November 3, 2006. Plaintiff's Opposition to the Demurrer and  
 4 Request for Judicial Notice must be filed and served by October 10, 2006. Defendants' Reply to  
 5 both Oppositions must be filed and served by October 27, 2006.

6 The deadline for Plaintiff to file a motion to compel further response to its  
 7 Requests for Production will be extended until 45 days after the entry of an Order on  
 8 Defendants' Demurrer and Request for Judicial Notice and that Plaintiff will not file any motion  
 9 to compel or seek any further discovery from ICANN or IANA until entry of that Order.

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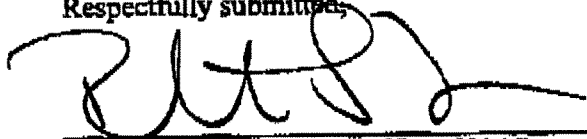
The Initial Status Conference currently set for October 16, 2006 should be continued to November 3, 2006.

IT IS SO STIPULATED.

Dated: September 5, 2006

Of Counsel:  
Mark F. Rosenberg  
Jacob F.M. Oslick  
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New York, New York 10004-2498  
(212) 558-4000  
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Respectfully submitted,

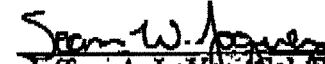


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Attorneys for Plaintiff C. ITOH MIDDLE EAST E.C. (Bahrain), through the real party in interest, NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.

Dated: September 5, 2006

Respectfully submitted,



Jeffrey A. LeVes (Cal. Bar No. 125863)  
Sean W. Jaquez (Cal. Bar No. 223132)  
Samantha S. Eisner (Cal. Bar No. 230344)  
JONES DAY  
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Attorneys for Defendants INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS and erroneously named INTERNET ASSIGNED NUMBERS AUTHORITY

Proposed Order

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Pursuant to Stipulation, good cause having been shown, IT IS SO ORDERED.

The new briefing and hearing schedule on Defendants' Demurrer and Request for

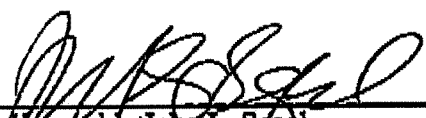
Judicial Notice is as follows:

- Hearing: November 3, 2006
- Plaintiff's Opposition due: October 10, 2006
- Defendants' Reply due: October 27, 2006

The deadline for Plaintiff to file a motion to compel further response to its Requests for Production will be extended until 45 days after the entry of an Order on Defendants' Demurrer and Request for Judicial Notice and Plaintiff will not file any motion to compel or seek any further discovery from ICANN or IANA until entry of that Order.

*Cox Management will remain on Department M.*  
The Initial Status Conference currently set for October 16, 2006 *8:30 a.m.* will be continued to November 3, 2006.

Dated: September 7, 2006

  
The Honorable John L. Segal  
Judge of the Los Angeles Superior Court  
**JOHN L. SEGAL**



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**PROOF OF SERVICE**

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

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

**NOTICE OF ENTRY OF ORDER ENLARGING THE BRIEFING AND HEARING SCHEDULE ON DEFENDANTS' DEMURRER**

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

**SEE ATTACHED SERVICE LIST**

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

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

Executed on September 7, 2006 at Los Angeles, California.

\_\_\_\_\_  
Roberta Striplin

SERVICE LIST

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**Via Facsimile and United States Mail:**

Jeffrey A. LeVec  
Sean W. Jaquez  
Samantha S. Eisner  
JONES DAY  
555 South Flower Street, Fiftieth Floor  
Los Angeles, California 90071-2300  
  
Counsel for Internet Corporation for Assigned  
Names and Numbers and Internet Assigned Names  
Authority

**Via United States Mail:**

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