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9 Attorneys for Plaintiffs
10 DOTSTER, INC., a Washington
corporation, GO DADDY SOFTWARE,
11 INC., an Arizona corporation,
and eNOM, Incorporated, a
12 Nevada corporation

13
14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA
16

17 DOTSTER, INC., a Washington
corporation, GO DADDY SOFTWARE,
18 INC., an Arizona corporation,
19 and eNOM, Incorporated, a
Nevada corporation,

20 Plaintiffs,

21 v.

22 INTERNET CORPORATION FOR
ASSIGNED NAMES AND
23 NUMBERS, a California corporation,

24 Defendant.

Case No. CV03-5045 JFW (MANx)

DECLARATION OF SHARON K.
DUNHAM IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION

Date: October 6, 2003
Time: 1:30 p.m.
Ctmm: 16
Judge: John F. Walter

1 I, Sharon K. Dunham, declare and state as follows:

2 I am a legal secretary for Preston Gates & Ellis LLP. I make this declaration of
3 my own knowledge, and based on direct knowledge and personal experience after
4 "pre-ordering" a Wait List Service subscription from Network Solutions, Inc., a
5 VeriSign company. If called as a witness I could testify to each of the following facts:

6 1. On August 27, 2003, I "pre-ordered" a Wait List Service subscription
7 from Network Solutions, Inc. ("Network Solutions"), which is wholly owned by
8 VeriSign, Inc., the company that operates the .COM and .NET Registries. Copies of
9 the confirmation pages are attached hereto as Exhibit 1, and is incorporated herein by
10 reference.

11 2. I pre-ordered the Wait List Service subscription, which is marketed under
12 the name "Next Registration Rights", by accessing the Internet in my office, viewing
13 the web site located at www.nextregistrationrights.com and following the instructions
14 located therein. A copy of the first web site page is attached hereto as Exhibit 2, and
15 is incorporated herein by reference.

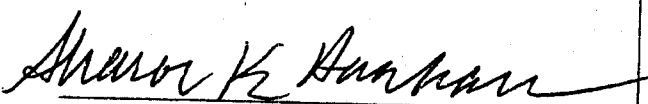
16 3. According to the Next Registration Rights web site, "Pre-Orders for Next
17 Registration Rights will be available until the service 'goes live' (currently scheduled
18 for October 27, 2003)." A copy of the web site page is attached hereto as Exhibit 3,
19 and is incorporated herein by reference.

20 4. Further, according to the Next Registration Rights web site, "[The] pre-
21 order is a commitment to purchase and cannot be cancelled." A copy of the web site
22 page is attached hereto as Exhibit 4, and is incorporated herein by reference.

23 5. Moreover, according to the Next Registration Rights web site, "This new
24 service is superior to traditional back-order services, which are not administered by
25 the .com/.net registry and frequently accept more than one name per backorder. With
26 Next Registration Rights, there's no competition or auction when the name deletes. If
27 the domain name becomes available during your subscription term, then it is
28

1 automatically registered in your name" (emphasis added). A copy of the web site
2 page is attached hereto as Exhibit 5, and is incorporated herein by reference.

3 I declare under penalty of perjury under the laws of the United States of
4 America that the foregoing is true and correct, and that this declaration was executed
5 on September 5th, 2003 at Portland, Oregon.

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9 Sharon K. Dunham

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