

ORAL ARGUMENT NOT YET SCHEDULED

*Appeal No. 14-7193*

IN THE

**United States Court of Appeals**

FOR THE DISTRICT OF COLUMBIA CIRCUIT

SUSAN WEINSTEIN, individually as Co-Administrator of the Estate of Ira William Weinstein, and as natural guardian of plaintiff DAVID WEINSTEIN (minor); JEFFREY A. MILLER, as Co-Administrator of the Estate of Ira William Weinstein; JOSEPH WEINSTEIN; JENNIFER WEINSTEIN HAZI; DAVID WEINSTEIN, minor, by his guardian and next friend SUSAN WEINSTEIN,

*Plaintiffs-Appellants.*

v.

ISLAMIC REPUBLIC OF IRAN; IRANIAN MINISTRY OF INFORMATION AND SECURITY; AYATOLLAH ALI HOSEINI KHAMENEI, Supreme Leader of the Islamic Republic of Iran; ALI AKBAR HASHEMI-RAFSANJANI, Former President of the Islamic Republic of Iran; ALI FALLAHIAN-KHUZESTANI, Former Minister of Information and Security,

*Defendants,*

*and*

INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER,

*Appellee.*

Consolidated with 14-7194, 14-7195, 14-7198,  
14-7202, 14-7203 and 14-7204

*On Appeal from the United States District Court  
for the District of Columbia*

**APPENDIX**

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APPEAL,TYPE-E

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:00-cv-02601-RCL**

WEINSTEIN, et al v. ISLAMIC REPUBLIC OF, et al  
Assigned to: Chief Judge Royce C. Lamberth  
Demand: \$330,000  
Case in other court: USCA, 04-05139  
14-07193  
Cause: 28:1602 Foreign Sovereign Immunities Act

Date Filed: 10/27/2000  
Date Terminated: 02/06/2002  
Jury Demand: None  
Nature of Suit: 890 Other Statutory  
Actions  
Jurisdiction: Federal Question

**Plaintiff**

**SUSAN WEINSTEIN**  
*individually as Co-Administrator of the  
Estate of Ira William Weinstein, and as  
natural guardian of plaintiff David  
Weinstein (minor)*

represented by **Erik Swen Syverson**  
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*TERMINATED: 03/05/2001*

**Plaintiff**

**JEFFREY A. MILLER**  
*as Co-Administrator of the Estate of Ira  
William Weinstein*

represented by **Erik Swen Syverson**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Jeffrey A. Miller**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**William A. Davis**  
(See above for address)  
*TERMINATED: 03/05/2001*

**Plaintiff**

**JOSEPH WEINSTEIN**

represented by **Erik Swen Syverson**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Jeffrey A. Miller**  
(See above for address)  
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**Robert Joseph Tolchin**  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**William A. Davis**  
(See above for address)  
*TERMINATED: 03/05/2001*

**Plaintiff**

**JENNIFER WEINSTEIN HAZI**

represented by **Erik Swen Syverson**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Jeffrey A. Miller**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**William A. Davis**  
(See above for address)  
*TERMINATED: 03/05/2001*

**Plaintiff**

**DAVID WEINSTEIN**  
*minor, by his guardian and next friend*  
*Susan Weinstein*

represented by **Erik Swen Syverson**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Jeffrey A. Miller**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**William A. Davis**  
(See above for address)  
*TERMINATED: 03/05/2001*

V.

**Defendant**

District of Columbia live database

Page 4 of 19

**ISLAMIC REPUBLIC OF IRAN**

**Defendant**

**IRANIAN MINISTRY OF  
INFORMATION AND SECURITY**

**Defendant**

**AYATOLLAH SAYYID ALI  
HOSSEINI KHAMENEI**  
*Supreme Leader of the Islamic Republic  
of Iran*

**Defendant**

**ALI AKBAR HASHEMI-  
RAFSANJANI**  
*Former President of the Islamic  
Republic of Iran*

**Defendant**

**ALI FALLAHIAN-KHUZESTANI**  
*Former Minister of Information and  
Security*

V.

**Garnishee**

**INTERNET CORPORATION FOR  
ASSIGNED NAMES AND NUMBER**

represented by **Eric Enson**  
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**Movant**

**UNITED STATES OF AMERICA**

represented by **Carol Federighi**  
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Civil Division, Federal Programs  
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**Rupa Bhattacharyya**  
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*ATTORNEY TO BE NOTICED*

**Movant**

**EDWENA R. HEGNA**  
*individually and as executrix of Charles  
Hegna, Steven A. Hegna, Craig M.  
Hegna, Lynn Marie Hegna Moore, and  
Paul B. Hegna*

represented by **Houston Putnam Lowry**  
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**Ralph P. Dupont**  
 THE DUPONT LAW FIRM  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

Date Filed	#	Docket Text
10/27/2000	1	COMPLAINT filed by plaintiff SUSAN WEINSTEIN, plaintiff JEFFREY A. MILLER, plaintiff JOSEPH WEINSTEIN, plaintiff JENNIFER WEINSTEIN HAZI, plaintiff DAVID WEINSTEIN (ab) (Entered: 11/03/2000)
10/27/2000		SUMMONS (5) issued for defendant ISLAMIC REPUBLIC OF, defendant IRANIAN MINISTRY, defendant AYATOLLAH ALI KHAMENEI, defendant ALI AKBAR HASHEMI-RAFSANJANI, defendant ALI FALLAHIAN-KHUZESTANI (ab) (Entered: 11/03/2000)
10/27/2000	2	NOTIFICATION OF RELATED CASE: Case related to Case No(s): 98-1945 (ab) (Entered: 11/03/2000)
03/05/2001	3	SUBSTITUTION OF COUNSEL for plaintiff, substituting Jeffrey A. Miller for attorney William A. Davis for DAVID WEINSTEIN, attorney William A. Davis for JENNIFER WEINSTEIN HAZI, attorney William A. Davis for JOSEPH WEINSTEIN, attorney William A. Davis for JEFFREY A. MILLER, attorney William A. Davis for SUSAN WEINSTEIN (tth) (Entered: 03/07/2001)
03/23/2001	4	REQUEST by plaintiffs for the Clerk to mail by DHL Worldwide Express, a copy of the summons and complaint to defendant The Islamic Republic of Iran pursuant to 28 U.S.C. 1608 (a)(3) and defendants The Iranian Ministry of Information and Security, Ayatollah Ali Hoseini Khamenei, Ali Akbar Hashemi-Rafsanjani, Ali Fallahian-Khuzestani pursuant to 28 U.S.C. 1608 (b)(3)(B) (tth) (Entered: 03/27/2001)
03/27/2001		SUMMONS (5) REISSUED for defendant ISLAMIC REPUBLIC OF, defendant IRANIAN MINISTRY, defendant AYATOLLAH ALI HOSEINI KHAMENEI, defendant ALI AKBAR HASHEMI-RAFSANJANI, defendant ALI FALLAHIAN-KHUZESTANI. (tth) (Entered: 03/27/2001)
04/04/2001	5	CERTIFICATE OF MAILING to ISLAMIC REPUBLIC OF, IRANIAN MINISTRY, AYATOLLAH ALI HOSEINI KHAMENEI, ALI AKBAR HASHEMI-RAFSANJANI, ALI FALLAHIAN-KHUZESTANI of summons, complaint by registered mail, return receipt requested pursuant to FRCP/TITLE/SECTION: 28 U.S.C 1608(b)(3)(B) and 28 U.S.C. 1608 (a)(3).

		(tth) (Entered: 04/04/2001)
07/11/2001	6	MOTION (EX PARTE) filed by plaintiff SUSAN WEINSTEIN, plaintiff JEFFREY A. MILLER, plaintiff JOSEPH WEINSTEIN, plaintiff JENNIFER WEINSTEIN HAZI, plaintiff DAVID WEINSTEIN for entry of default for the scheduling of an ex parte hearing and to adopt in this matter prior findings of the court ; exhibiit's (5) (cas) (Entered: 07/13/2001)
07/11/2001	7	RETURN OF SERVICE/AFFIDAVIT of summons and complaint executed on 4/3/01 upon defendant ISLAMIC REP/IRAN, defendant IRANIAN MINISTRY (cjp) (Entered: 07/16/2001)
07/11/2001	9	RETURN OF SERVICE/AFFIDAVIT of summons and complaint executed on 4/12/01 upon defendant ALI FALLAHIAN-KHUZESTANI (cjp) (Entered: 07/16/2001)
07/11/2001	10	AFFIDAVIT in support of default by plaintiff SUSAN WEINSTEIN, plaintiff JEFFREY A. MILLER, plaintiff JOSEPH WEINSTEIN, plaintiff JENNIFER WEINSTEIN HAZI, plaintiff DAVID WEINSTEIN; affidavit (1) (cjp) (Entered: 07/16/2001)
07/11/2001	14	MOTION filed by plaintiff SUSAN WEINSTEIN, plaintiff JEFFREY A. MILLER, plaintiff JOSEPH WEINSTEIN, plaintiff JENNIFER WEINSTEIN HAZI, plaintiff DAVID WEINSTEIN for issuance of letter of request for Judicial assistance pursuant to the Hague Convention of 18 March 1970 on the taking of the evidence abroad in civil or commercial matters ; attachment (cas) (Entered: 07/19/2001)
07/11/2001	15	LETTER OF REQUEST FOR JUDICIAL ASSISTANCE PURSUANT TO THE HAGUE CONVENTION OF 18 MARCH 1970 ON THE TAKING OF EVIDENCE ABROAD IN CIVIL OE COMMERCIAL MATTERS. (cas) (Entered: 07/19/2001)
07/14/2001	8	RETURN OF SERVICE/AFFIDAVIT of summons and complaint executed on 4/7/01 upon defendant AYATOLLAH ALI HOSEINI KHAMENEI, defendant ALI AKBAR HASHEMI-RAFSANJANI (cjp) (Entered: 07/16/2001)
07/16/2001	11	DEFAULT vs. defendant ISLAMIC REP/IRAN, defendant IRANIAN MINISTRY By Clerk (N) (cjp) (Entered: 07/16/2001)
07/16/2001	12	DEFAULT vs. defendant AYATOLLAH ALI HOSEINI KHAMENEI, defendant ALI AKBAR HASHEMI-RAFSANJANI By Clerk (N) (cjp) (Entered: 07/16/2001)
07/16/2001	13	DEFAULT vs. defendant ALI FALLAHIAN-KHUZESTANI By Clerk (N) (cjp) (Entered: 07/16/2001)
10/03/2001	<a href="#">16</a>	ORDER by Judge Royce C. Lamberth : directing plaintiffs to file within 15 days a memo of law addressing certain issues (N) (mon) (Entered: 10/05/2001)
10/17/2001	17	SUPPLEMENTAL MEMORANDUM by plaintiff in support of motion for

		issuance of letter of request for Judicial assistance pursuant to the Hague Convention of 18 March 1970 on the taking of the evidence abroad in civil or commercial matters [14-1] by DAVID WEINSTEIN, JENNIFER WEINSTEIN HAZI, JOSEPH WEINSTEIN, JEFFREY A. MILLER, SUSAN WEINSTEIN (tth) (Entered: 10/18/2001)
10/31/2001	<a href="#">18</a>	MEMORANDUM AND ORDER by Judge Royce C. Lamberth : granting in part and denying in part plaintiffs' exparte motion for adoption of prior findings using judicial notice, collateral estoppel, or other means. (N) (mon) (Entered: 10/31/2001)
11/30/2001	19	LETTER of Request for Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters (N) (bh) (Entered: 12/03/2001)
12/05/2001	<a href="#">20</a>	ORDER by Judge Royce C. Lamberth : granting motion for entry of default for the scheduling of an ex parte hearing and to adopt in this matter prior findings of the court [6-1] by plaintiffs evidentiary hearing set for 2:30 (N) (tb) (Entered: 12/05/2001)
12/06/2001		NON-JURY TRIAL(evidentiary hearing after default judgment) before Judge Royce C. Lamberth begun and continued to 10:30 12/7/01 . reporter: Susan Tyner (mon) Modified on 07/22/2003 (Entered: 12/07/2001)
12/06/2001		EVIDENTIARY HEARING before Judge Royce C. Lamberth on matter of damages after entry of default judgment; begun and continued to 12/7/01, 9:30am. reporter: Susan Tyner (mon) (Entered: 12/10/2001)
12/07/2001		EVIDENTIARY HEARING before Judge Royce C. Lamberth on matter of damages after entry of default judgment; resumed and concluded; taken under advisement; plaintiffs to file proposed findings and conclusions within 1 week reporter: Susan Tyner (mon) (Entered: 12/10/2001)
01/04/2002	21	SUPPLEMENTAL MEMORANDUM by plaintiff in support of pain and suffering damage requests. (cas) Modified on 01/30/2002 (Entered: 01/07/2002)
02/06/2002	<a href="#">22</a>	MEMORANDUM OPINION by Judge Royce C. Lamberth (N) (mon) (Entered: 02/06/2002)
02/06/2002	<a href="#">23</a>	ORDER AND JUDGMENT by Judge Royce C. Lamberth : entering judgment on behalf of plaintiffs, Susan Weinstein and Jeffrey A. Miller, as co-administrators of the Estate of Ira W. Weinstein against defendants, the Islamic Republic of Iran, the Iranian Ministry of Information and Security, Ayatollah ALi Hoseini Khamenei, Ali Akbar Hashemi-Rafsanjani, and Ali Fallahian-Khuzestani, jointly and severally for loss of accretions to the Estate of Ira W. Weinstein in the amount of \$248,164; for the conscious pain and suffering of Ira W. Weinstein, a judgment in the amount of \$10,000,000; judgment for solatium for the surviving spouse and children in the total amount of \$23,000,000; judgment on behalf of plaintiffs, Susan Weinstsein and Jeffrey A. Miller, as co-administrators of the Estate of Ira

		Weinstein against defendant,Iranian Ministry of Information and Security, for punitive damages in the amount of \$150,000,000.(N) (mon) (Entered: 02/06/2002)
02/11/2002	24	TRANSCRIPT filed for date(s) of 12/7/01. Reporter: Susan Page Tyner (nmr) (Entered: 02/12/2002)
02/15/2002	25	MOTION filed by plaintiff for reconsideration of order [23-1] ; Attachments (2) (nmr) (Entered: 02/19/2002)
03/15/2002	26	MOTION filed by plaintiff to withdraw motion for reconsideration of order [23-1] [25-1] (nmr) (Entered: 03/18/2002)
03/18/2002	<a href="#">27</a>	ORDER by Judge Royce C. Lamberth : granting motion to withdraw motion for reconsideration of order [23-1] [25-1] [26-1] by DAVID WEINSTEIN, JENNIFER WEINSTEIN HAZI, JOSEPH WEINSTEIN, JEFFREY A. MILLER, SUSAN WEINSTEIN, withdrawing by DAVID WEINSTEIN, JENNIFER WEINSTEIN HAZI, JOSEPH WEINSTEIN, JEFFREY A. MILLER, SUSAN WEINSTEIN motion for reconsideration of order [23-1] [25-1] (N) (mon) (Entered: 03/18/2002)
04/18/2002	28	REQUEST by plaintiffs for the Clerk, pursuant to 28 U.S.C. 1608(a)(4), to mail two copies of the Memorandum Opinion, Order and Judgment, and Notice of Default Judgment, together with a translation of each into the official language of the foreign state, by certified mail, return receipt requested, to the Director of Special Consular Services at the U.S. Department of State (nmr) (Entered: 04/18/2002)
08/09/2002	29	RETURN OF SERVICE/AFFIDAVIT of default judgment executed on 7/15/02 upon defendant ISLAMIC REPUBLIC, defendant IRANIAN MINISTRY; returned the documents without comment. (mpt) (Entered: 08/12/2002)
10/21/2002		WRIT of Attachment on Judgment issued to Suntrust Bank, Garnishee pursuant to application by USA for writ of continuing Garnishment. (mpt) (Entered: 10/21/2002)
10/21/2002		WRIT of Attachment on Judgment issued to Bank of America, Garnishee pursuant to application by USA for writ of continuing Garnishment. (mpt) (Entered: 10/21/2002)
10/21/2002		WRIT of Attachment on Judgment issued to Citibank, Garnishee pursuant to application by USA for writ of continuing Garnishment. (mpt) (Entered: 10/21/2002)
10/21/2002		WRIT of Attachment on Judgment issued to BB&T, Garnishee pursuant to application by USA for writ of continuing Garnishment. (mpt) (Entered: 10/21/2002)
10/21/2002		WRIT of Attachment on Judgment issued to First Union National Bank, Garnishee pursuant to application by USA for writ of continuing Garnishment. (mpt) (Entered: 10/21/2002)

10/21/2002		WRIT of Attachment on Judgment issued to Chevy Chase Bank, Garnishee pursuant to application by USA for writ of continuing Garnishment. (mpt) (Entered: 10/21/2002)
10/21/2002		WRIT of Attachment on Judgment issued to Riggs Bank, Garnishee pursuant to application by USA for writ of continuing Garnishment. (mpt) (Entered: 10/21/2002)
10/28/2002	30	ANSWER to interrogatories on writ of attachment by Riggs Bank, Garnishee. (mpt) (Entered: 10/29/2002)
11/04/2002	32	ANSWER to interrogatories on writ of attachment by BB&T, Garnishee. (mpt) (Entered: 11/06/2002)
11/05/2002	31	ANSWER to interrogatories on writ of attachment by Chevy Chase, Garnishee. (mpt) (Entered: 11/06/2002)
11/08/2002	33	ANSWER to interrogatories on writ of attachment by Bank of America, Garnishee. (mpt) (Entered: 11/12/2002)
11/08/2002	34	ANSWER to interrogatories on writ of attachment by Suntrust Bank, Garnishee. (mpt) (Entered: 11/12/2002)
11/26/2002		WRIT of Attachment on Judgment issued on Bank of America (1) by Jeffrey A. Miller, Esq., counsel for the plaintiff (cp) Modified on 11/27/2002 (Entered: 11/27/2002)
11/26/2002		WRIT of Attachment on Judgment issued (1) on Paul O'Neill of the U.S. Department of Treasury by Jeffrey A. Miller, Esq., counsel for the plaintiff (cp) Modified on 11/27/2002 (Entered: 11/27/2002)
11/26/2002		WRIT of Attachment on Judgment issued (1) on Donald H. Rumsfeld, Secretary of Defense, by Jeffrey A. Miller, Esq., counsel for the plaintiff (cp) Modified on 11/27/2002 (Entered: 11/27/2002)
11/26/2002		WRIT of Attachment on Judgment issued (1) on Colin Powell, Secretary of State of the United States, by Jeffrey A. Miller, Esq., counsel for the plaintiff (cp) Modified on 11/27/2002 (Entered: 11/27/2002)
12/12/2002	35	ANSWER to interrogatories on writ of attachment by Bank of America, Garnishee. (mpt) (Entered: 12/17/2002)
12/17/2002		WRIT of Attachment on Judgment issued (6) other than wages, salary and commissions issued to (BB&T, First Union National Bank, Suntrust Bank, Chevy Chase Bank, Riggs Bank, Citibank); Garnishee (mpt) (Entered: 12/17/2002)
12/30/2002	36	ANSWER to interrogatories on writ of attachment by Riggs Bank N.A., Garnishee; exhibits (2). (mpt) (Entered: 12/31/2002)
01/02/2003	37	ANSWER to interrogatories on writ of attachment by BB&T. (mpt) (Entered: 01/06/2003)
01/13/2003	38	ANSWER to interrogatories on writ of attachment on Judgment by Chevy

		Chase Bank (mpt) (Entered: 01/14/2003)
01/31/2003	39	NOTICE by plaintiff SUSAN WEINSTEIN requesting Court to withdraw, without prejudice, the Writ of Attachment on Judgment issued against Riggs Bank as Garnishee, by the Court on 12/17/02; Affidavit (1). (ks) (Entered: 02/03/2003)
01/31/2003	40	MOTION filed by Non Party UNITED STATES to quash plaintiff's writs of attachment ; Exhibits (32) (Bulky) (ks) (Entered: 02/03/2003)
03/05/2003	41	MOTION filed by plaintiffs to extend time to 5/2/03 to file their opposition to USA's motion to quash plaintiff's writs of attachments. (ks) (Entered: 03/06/2003)
03/10/2003	<a href="#">42</a>	ORDER by Judge Royce C. Lamberth : granting motion to extend time to 5/2/03 to file their opposition to USA's motion to quash plaintiff's writs of attachments. [41-1] by SUSAN WEINSTEIN (N) (rew) (Entered: 03/11/2003)
05/09/2003	43	MEMORANDUM by plaintiffs in opposition to motion to quash plaintiff's writs of attachment [40-1] by UNITED STATES; exhibits (5) (mpt) (Entered: 05/12/2003)
05/14/2003		WRIT of Attachment (1) on Judgment issued to Bank of America, Garnishee pursuant to application by plaintiff for writ of continuing Garnishment. (mpt) (Entered: 05/14/2003)
05/15/2003	44	MOTION filed by Non Party UNITED STATES to extend time to 6/13/03 to file reply in further support of its motion to quash writs of attachment (mpt) (Entered: 05/16/2003)
05/16/2003	45	MOTION filed by plaintiffs for consolidation of proceedings , and expedited disposition ; exhibit (1) (mpt) (Entered: 05/19/2003)
05/29/2003	46	RESPONSE by Non Party UNITED STATES in opposition to motion for consolidation of proceedings [45-1] by SUSAN WEINSTEIN, motion expedited disposition [45-2] by SUSAN WEINSTEIN . (mpt) (Entered: 05/30/2003)
06/04/2003	47	REPLY by plaintiffs to response in opposition to motion for consolidation of proceedings [45-1] by SUSAN WEINSTEIN, motion expedited disposition [45-2] by SUSAN WEINSTEIN (mpt) (Entered: 06/05/2003)
06/13/2003	48	REPLY by Non Party UNITED STATES in support of motion to quash plaintiff's writs of attachment [40-1] by UNITED STATES (mpt) (Entered: 06/16/2003)
06/27/2003	49	MOTION filed by plaintiffs to extend time to 7/25/03 to file application for judgment of condemnation and order of turnover against garnishee (mpt) (Entered: 06/30/2003)
07/22/2003	<a href="#">50</a>	ORDER by Judge Royce C. Lamberth : granting nunc pro tunc motion to extend time to 6/13/03 to file reply in further support of its motion to quash writs of attachment [44-1] by UNITED STATES (N) (mon) (Entered: 07/22/2003)

		07/22/2003)
07/22/2003	<a href="#">51</a>	ORDER by Judge Royce C. Lamberth : directing Clerk to file various motions, responses, etc in this action in civil action 99cv2802 also. (N) (mon) (Entered: 07/22/2003)
07/22/2003	<a href="#">52</a>	MEMORANDUM AND ORDER by Judge Royce C. Lamberth : granting in part, denying in part motion to quash plaintiff's writs of attachment [40-1]; quashing writs of attachment as to the Iran Foreign Military Sales Program account within the Foreign Military Sales Fund, and the two Bank of America accounts entitled "Iranian Diplomatic and Consular Property Renovation Account" and "U.S. Dept of State, Office of Foreign Missions, Iranian Renovation Account"; denying motion as to the two Bank of America accounts entitled " Consulate General of the Islamic Republic in Chicago" and "Consulate General Iran". (N) (mon) (Entered: 07/22/2003)
07/22/2003	<a href="#">53</a>	ORDER by Judge Royce C. Lamberth : granting motion to extend time to 7/25/03 to file application for judgment of condemnation and order of turnover against garnishee [49-1] by SUSAN WEINSTEIN (N) (mon) (Entered: 07/22/2003)
07/22/2003	54	ORDER(copy) by Judge Royce C. Lamberth : denying plaintiff's motion in 99cv2802 to consolidate cases. (N) (mon) (Entered: 07/22/2003)
07/28/2003	55	MOTION filed by plaintiff to extend time to 8/8/03 to file application for judgment of condemnation and order of turnover against garnishee pursuant to court's order of 7/22/03 (mpt) (Entered: 07/31/2003)
07/30/2003	57	MOTION filed by movant EDWENA R. HEGNA for post- judgment intervention ; exhibit (1) (mpt) (Entered: 08/04/2003)
07/30/2003	58	ATTORNEY APPEARANCE for movant EDWENA R. HEGNA by Houston Lowry. (mpt) (Entered: 08/04/2003)
08/04/2003	<a href="#">56</a>	ORDER by Judge Royce C. Lamberth : directing that" Motion To Determine Interest"of Edwena R. Hegna, individually and as executrix of Charles Hegna, Steven Hegna, Craig Hegna, Lynn Hegna Moore and Paul Hegna be treated as a motion for post-judgment intervention; directing Clerk of Court to file said motion in this action. (N) (mon) (Entered: 08/04/2003)
08/04/2003	<a href="#">59</a>	ORDER by Judge Royce C. Lamberth : granting motion to extend time to 8/8/03 to file application for judgment of condemnation and order of turnover against garnishee pursuant to court's order of 7/22/03 [55-1] by SUSAN WEINSTEIN motion(s) due by 8/8/03 ; (N) (mon) (Entered: 08/04/2003)
08/11/2003	60	ERRATA by movant EDWENA R. HEGNA; Corrected Affidavit in Support of Motion to Determine Interest; exhibits (1) (mpt) (Entered: 08/12/2003)
08/11/2003	61	MOTION filed by plaintiff for a continuance until 8/29/03 to file application for judgment of condemnation and order of turnover against Garnishee (mpt) (Entered: 08/12/2003)
08/12/2003	<a href="#">62</a>	ORDER by Judge Royce C. Lamberth : granting motion for a continuance

		until 8/29/03 to file application for judgment of condemnation and order of turnover against Garnishee [61-1] by SUSAN WEINSTEIN (N) (mon) (Entered: 08/12/2003)
08/12/2003	63	MEMORANDUM by plaintiff in opposition to motion for post- judgment intervention [57-1] by EDWENA R. HEGNA; exhibit (1) (mpt) (Entered: 08/13/2003)
08/15/2003	64	MOTION (RENEWED) filed by Non Party UNITED STATES to quash writs of attachment ; exhibits (4) (mpt) (Entered: 08/18/2003)
08/15/2003	65	SUBSTITUTION OF COUNSEL for Non Party UNITED STATES , substituting Rupa Bhattacharyya for attorney Carol Federighi for UNITED STATES (mpt) (Entered: 08/18/2003)
08/18/2003	66	MOTION filed by movant EDWENA R. HEGNA to extend time to 9/10/03 to reply to opposition to motion to determine interest (post judgment) (mpt) (Entered: 08/19/2003)
08/20/2003	<a href="#">67</a>	ORDER by Judge Royce C. Lamberth : granting motion to extend time to 9/10/03 to reply to opposition to motion to determine interest (post judgment) [66-1] by EDWENA R. HEGNA reply to motion(s) due by 9/10/03 ; (N) (mon) (Entered: 08/20/2003)
08/21/2003	68	NOTICE OF APPEAL by plaintiffs SUSAN WEINSTEIN, JEFFREY A. MILLER, JOSEPH WEINSTEIN, JENNIFER WEINSTEIN HAZI, DAVID WEINSTEIN; attachment (1); from order [52-1] , entered on: 7/22/03; 5.00 docketing fee; 100.00 filing fee to US Treasury; copies mailed to parties. (mpt) (Entered: 08/26/2003)
08/26/2003		TRANSMITTED PRELIMINARY RECORD on appeal [68-1] by DAVID WEINSTEIN, JENNIFER WEINSTEIN HAZI, JOSEPH WEINSTEIN, JEFFREY A. MILLER, SUSAN WEINSTEIN to U.S. Court of Appeals (mpt) (Entered: 08/26/2003)
08/29/2003		USCA # 03-5235 assigned for appeal [68-1] by DAVID WEINSTEIN, JENNIFER WEINSTEIN HAZI, JOSEPH WEINSTEIN, JEFFREY A. MILLER, SUSAN WEINSTEIN (mpt) (Entered: 09/02/2003)
09/10/2003	69	REPLY by movant EDWENA R. HEGNA to response in opposition to motion for post- judgment intervention [57-1] by EDWENA R. HEGNA (mpt) (Entered: 09/11/2003)
09/10/2003	70	MOTION filed by movant EDWENA R. HEGNA to stay post-judgment motion filed on 7/30/03 (mpt) (Entered: 09/11/2003)
09/26/2003	71	MEMORANDUM by plaintiffs in opposition to motion to stay post-judgment motion filed on 7/30/03 [70-1] by EDWENA R. HEGNA (mpt) (Entered: 09/29/2003)
10/03/2003	72	MOTION filed by plaintiffs for leave to file sur reply ; EXHIBIT (SUR-REPLY) (bjsp) Modified on 10/07/2003 (Entered: 10/07/2003)



12/16/2003	<a href="#">73</a>	NOTICE by UNITED STATES of <i>Supplemental Authority in Support of Renewed Motion to Quash 64</i> (Bhattacharyya, Rupa) (Entered: 12/16/2003)
01/09/2004	<a href="#">74</a>	CERTIFIED COPY of Order filed in USCA dated 1/9/2004, on appeal 68 , dismissing appeal. USCA # 03-5235 (lnw, ) (Entered: 01/13/2004)
02/09/2004	<a href="#">75</a>	ORDER granting 72 Motion for Leave to File Sur-Reply. Signed by Judge Royce C. Lamberth on 2/9/04. (lcrcl1) (Entered: 02/09/2004)
02/11/2004	<a href="#">76</a>	ORDER denying as moot 70 Motion to Stay. Signed by Judge Royce C. Lamberth on 2/4/04. (lcrcl1) (Entered: 02/11/2004)
02/17/2004	<a href="#">77</a>	SURREPLY to 57 HEGNA REPLY CONCERNING MOTION TO DETERMINE INTEREST (MOTION FOR POST-JUDGMENT INTERVENTION) by JENNIFER WEINSTEIN HAZI, JEFFREY A. MILLER, DAVID WEINSTEIN, JOSEPH WEINSTEIN, SUSAN WEINSTEIN. (Miller, Jeffrey) Modified on 2/17/2004 (rje, ). (Entered: 02/17/2004)
02/26/2004	<a href="#">78</a>	ORDER denying as moot 57 Motion to Determine Interest, granting 64 Motion to Quash. Signed by Judge Royce C. Lamberth on 02/26/04. (lcrcl1) (Entered: 02/26/2004)
03/04/2004	<a href="#">79</a>	MOTION to Amend/Correct <a href="#">78</a> Order on Motion for Judgment, Order on Motion to Quash by EDWENA R. HEGNA. (Attachments: # <a href="#">1</a> Text of Proposed Order)(Lowry, Houston) (Entered: 03/04/2004)
03/23/2004		MINUTE ORDER denying <a href="#">79</a> Motion to Amend/Correct . Signed by Judge Royce C. Lamberth on 3/23/04. (lcrcl1) (Entered: 03/23/2004)
04/13/2004	<a href="#">80</a>	NOTICE of Appearance by Ralph P. Dupont on behalf of EDWENA R. HEGNA (rje, ) (Entered: 04/14/2004)
04/13/2004	<a href="#">81</a>	NOTICE OF APPEAL as to <a href="#">78</a> Order on Motion for Judgment, Order on Motion to Quash, Order on Motion to Amend/Correct dated 3/23/04 by EDWENA R. HEGNA. Partial Filing fee \$ 250, receipt number 123030. (rje, ) (Entered: 04/14/2004)
04/14/2004		Transmission of Notice of Appeal and Docket Sheet to US Court of Appeals re <a href="#">81</a> Notice of Appeal (rje, ) (Entered: 04/14/2004)
04/16/2004		USCA Case Number 04-5139 for <a href="#">81</a> Notice of Appeal filed by EDWENA R. HEGNA. (rje, ) (Entered: 04/20/2004)
06/27/2005	<a href="#">82</a>	USCA JUDGMENT (certified copy) as to <a href="#">81</a> Notice of Appeal filed by EDWENA R. HEGNA; It is hereby ordered and adjudged that the judgment of the District Court be affirmed; USCA#04-5139 (jsc) (Entered: 07/01/2005)
07/07/2014	<a href="#">84</a>	Consent MOTION for Extension of Time to <i>RESPOND TO WRIT OF ATTACHMENT AND RELATED SUBPOENA</i> by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/07/2014)

07/28/2014	<a href="#">85</a>	ENTERED IN ERROR. . . . OBJECTIONS to Answer to Writ by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)(Zurawski, Tara Lynn) Modified on 7/29/2014 (td, ). (Entered: 07/28/2014)
07/28/2014	<a href="#">86</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Eric Enson, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792176. Fee Status: Fee Paid. by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">87</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Jeffrey LeVee, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792178. Fee Status: Fee Paid. by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">88</a>	OBJECTIONS to Answer to Writ by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014		NOTICE OF CORRECTED DOCKET ENTRY: re <a href="#">85</a> Objection to Answer to Writ was entered in error and counsel refiled said pleading as docket entry no. <a href="#">88</a> . (td, ) (Entered: 07/29/2014)
07/29/2014	<a href="#">89</a>	MOTION to Quash by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Memorandum in Support, # <a href="#">2</a> Declaration Jeffrey, # <a href="#">3</a> Declaration Enson, # <a href="#">4</a> Text of Proposed Order) (Zurawski, Tara Lynn) (Entered: 07/29/2014)
07/29/2014	<a href="#">90</a>	MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order) (Zurawski, Tara Lynn) (Entered: 07/29/2014)
08/04/2014	<a href="#">91</a>	MOTION for Order to Revive Judgment Pursuant to D.C. Code Section 15-101 by JENNIFER WEINSTEIN HAZI, JEFFREY A. MILLER, DAVID WEINSTEIN, JOSEPH WEINSTEIN, SUSAN WEINSTEIN (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/04/2014)
08/04/2014	<a href="#">92</a>	Consent MOTION for Extension of Time to <i>Superseding Previous Consent Motion for Extension of Time to Respond to Writ of Attachment and Related Subpoena</i> by JENNIFER WEINSTEIN HAZI, JEFFREY A. MILLER, DAVID WEINSTEIN, JOSEPH WEINSTEIN, SUSAN WEINSTEIN (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/04/2014)

08/11/2014	<a href="#">93</a>	WITHDRAWN PER ORDER FILED 9/9/2014.....MOTION to Compel <i>Production of Documents in Response to Subpoena</i> by JENNIFER WEINSTEIN HAZI, JEFFREY A. MILLER, DAVID WEINSTEIN, JOSEPH WEINSTEIN, SUSAN WEINSTEIN (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Text of Proposed Order)(Tolchin, Robert) Modified on 9/9/2014 (zmm, ). (Entered: 08/11/2014)
08/11/2014	<a href="#">94</a>	MOTION for Extension of Time to File Response/Reply as to <a href="#">89</a> MOTION to Quash by JENNIFER WEINSTEIN HAZI, JEFFREY A. MILLER, DAVID WEINSTEIN, JOSEPH WEINSTEIN, SUSAN WEINSTEIN (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/11/2014)
08/13/2014	<a href="#">96</a>	ORDER: Upon consideration of Internet Corporation for Assigned Names and Numbers("ICANN") and Plaintiffs' Consent Motion Superseding Previous Consent Motion for an Extension of Time to Respond to Writ of Attachment and Related Subpoena, and good cause appearing, it is hereby ORDERED that ICANN and Plaintiffs' Consent Motion is GRANTED. ICANN's response to the writ of attachment and subpoena was due and filed on July 28, 2014. Plaintiff's time period pursuant to D.C. Superior Court Civil Rule 69-I(d) and (e) shall not begin to run until the parties agree, or absent such agreement, until the Court has determined, that ICANN has fulfilled its obligation in response to the Subpoena and in no event shall such periods expire before September 8, 2014. Plaintiff's lien is correspondingly extended unless ICANN's to Quash, filed on July 29, 2014, is granted. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr). Modified on 8/14/2014 (ztc, ). (Entered: 08/13/2014)
08/13/2014	<a href="#">95</a>	ORDER granting (71) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:08-cv-00502-RCL; granting (45) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:08-cv-00520-RCL; granting (107) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:01-cv-01655-RMU; granting (8) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:14-mc-00648-UNA; granting (48) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:02-cv-01811-RCL; granting (90) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02601-RCL; granting (30) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02602-RCL; The Court will consolidate the consideration of, and hearing on, all seven of ICANN's Motion to Quash, including the motion filed in civil case number 01-1655(RMU) and miscellaneous case number 14-648

		(UNA); and it is further ORDERED that the Clerk of the Court shall transfer civil case number 01-1655 (RMU) and miscellaneous case number 14-648 (UNA) to this Court for further proceedings. Signed by Judge Royce C. Lamberth on 8/12/2014. (tr) . Modified on 8/14/2014 (ztr, ). (Entered: 08/13/2014)
08/13/2014	<a href="#">97</a>	ORDER re: <a href="#">87</a> Motion for Leave to Appear Pro Hac Vice Attorney Name-Jeffrey LeVee; ORDERED that the Motion for Admission pro hac vice is GRANTED, and that Jeffrey A. LeVee be, and that the same hereby is, admitted pro hac vice to appear and participate fully in the above-captioned case. Signed by Judge Royce C. Lamberth on 8/12/2014. (tr) (Entered: 08/14/2014)
08/13/2014	<a href="#">98</a>	ORDER re: <a href="#">86</a> MOTION for Leave to Appear Pro Hac Vice :Attorney Name-Eric Enson; ORDERED that the Motion for Admission pro hac vice is GRANTED, and that Eric P. Enson be, and that the same hereby is, admitted pro hac vice to appear and participate fully in the above-captioned case. Signed by Judge Royce C. Lamberth on 8/12/2014. (tr) (Entered: 08/14/2014)
08/18/2014	<a href="#">99</a>	Memorandum in opposition to re <a href="#">94</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">89</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Proposed Order, # <a href="#">2</a> Declaration of Eric Enson)(Francisco, Noel) (Entered: 08/18/2014)
08/28/2014	<a href="#">100</a>	REPLY to opposition to motion re <a href="#">94</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">89</a> MOTION to Quash filed by JENNIFER WEINSTEIN HAZI, JEFFREY A. MILLER, DAVID WEINSTEIN, JOSEPH WEINSTEIN, SUSAN WEINSTEIN. (Attachments: # <a href="#">1</a> Exhibit A)(Tolchin, Robert) (Entered: 08/28/2014)
08/28/2014	<a href="#">101</a>	Memorandum in opposition to re <a href="#">93</a> MOTION to Compel <i>Production of Documents in Response to Subpoena</i> filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order)(Francisco, Noel) (Entered: 08/28/2014)
08/29/2014	<a href="#">102</a>	ORDER Granting <a href="#">94</a> Motion for Extension of Time to File Response/Reply re <a href="#">89</a> MOTION to Quash Wrtis of Attachment for Assigned Names and Numbers shall be due on 9/30/2014. Signed by Judge Royce C. Lamberth on 8/28/14. (mpt, ) (Entered: 08/29/2014)
09/08/2014	<a href="#">103</a>	Consent MOTION Regarding Plaintiffs' Motion to Compel by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Francisco, Noel) (Entered: 09/08/2014)
09/09/2014	<a href="#">104</a>	ORDER granting (57) Motion Regarding Plaintiffs' Motion to Compel in case 1:08-cv-00520-RCL; granting (119) Motion Regarding Plaintiffs' Motion to Compel in case 1:01-cv-01655-RCL; granting (60) Motion Regarding Plaintiffs' Motion to Compel in case 1:02-cv-01811-RCL; granting (103)

		Motion Regarding Plaintiffs' Motion to Compel in case 1:00-cv-02601-RCL; granting (42) Motion Regarding Plaintiffs' Motion to Compel in case 1:00-cv-02602-RCL. Plaintiffs' Motion to Compel is ordered withdrawn. Signed by Judge Royce C. Lamberth on 9/9/2014. (zmm, ) (Entered: 09/09/2014)
09/16/2014	<a href="#">105</a>	STIPULATION [PROPOSED] PROTECTIVE ORDER by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Francisco, Noel) (Entered: 09/16/2014)
09/19/2014	<a href="#">106</a>	STIPULATED PROTECTIVE ORDER setting forth procedures for handling confidential material; signed by Judge Royce C. Lamberth on 9/18/14. (Attachment: Exhibit A) (kk) (Entered: 09/19/2014)
09/28/2014	<a href="#">107</a>	MOTION for Discovery , MOTION for Extension of Time to File Response/Reply as to <a href="#">89</a> MOTION to Quash by JENNIFER WEINSTEIN HAZI, JEFFREY A. MILLER, DAVID WEINSTEIN, JOSEPH WEINSTEIN, SUSAN WEINSTEIN (Attachments: # <a href="#">1</a> Declaration Erik S. Syverson, # <a href="#">2</a> Declaration Steven T. Gebelin)(Tolchin, Robert) (Entered: 09/28/2014)
09/30/2014	<a href="#">108</a>	RESPONSE re <a href="#">89</a> MOTION to Quash <i>Writ of Attachment</i> filed by JENNIFER WEINSTEIN HAZI, JEFFREY A. MILLER, DAVID WEINSTEIN, JOSEPH WEINSTEIN, SUSAN WEINSTEIN. (Syverson, Erik) (Entered: 09/30/2014)
10/10/2014	<a href="#">109</a>	REPLY to opposition to motion re <a href="#">89</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Francisco, Noel) (Entered: 10/10/2014)
10/14/2014	<a href="#">110</a>	Memorandum in opposition to re <a href="#">107</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply as to <a href="#">89</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order)(Francisco, Noel) (Entered: 10/14/2014)
10/24/2014	<a href="#">111</a>	REPLY to opposition to motion re <a href="#">107</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply as to <a href="#">89</a> MOTION to Quash filed by JENNIFER WEINSTEIN HAZI, JEFFREY A. MILLER, DAVID WEINSTEIN, JOSEPH WEINSTEIN, SUSAN WEINSTEIN. (Syverson, Erik) (Entered: 10/24/2014)
11/10/2014	<a href="#">112</a>	ORDER Granting <a href="#">89</a> Motion to Quash and writs of attachment as to ICANN are quashed; Denied as Moot <a href="#">107</a> Motion for Discovery. Signed by Judge Royce C. Lamberth on 11/10/14. (mpt) (Entered: 11/12/2014)
11/10/2014	<a href="#">113</a>	MEMORANDUM AND OPINION (See Image for Details). Signed by Judge Royce C. Lamberth on 11/10/14. (mpt, ) (Entered: 11/12/2014)
11/25/2014	<a href="#">114</a>	MEMORANDUM AND ORDER granting <a href="#">91</a> Motion for Order to Revive Judgment. Plaintiffs' Judgment is hereby revived as of this date. Signed by Judge Royce C. Lamberth on November 25, 2014. (lcrcl1) (Entered: 11/25/2014)

12/12/2014	<a href="#">115</a>	NOTICE OF APPEAL TO DC CIRCUIT COURT as to <a href="#">112</a> Order on Motion to Quash, Order on Motion for Discovery, Order on Motion for Extension of Time to File Response/Reply by JENNIFER WEINSTEIN HAZI, JEFFREY A. MILLER, DAVID WEINSTEIN, JOSEPH WEINSTEIN, SUSAN WEINSTEIN. Filing fee \$ 505, receipt number 0090-3934532. Fee Status: Fee Paid. Parties have been notified. (Syverson, Erik) (Entered: 12/12/2014)
12/15/2014	<a href="#">116</a>	Transmission of the Notice of Appeal, Order Appealed, and Docket Sheet to US Court of Appeals. The Court of Appeals fee was paid this date re <a href="#">115</a> Notice of Appeal to DC Circuit Court. (rdj) (Entered: 12/15/2014)
12/17/2014		USCA Case Number 14-7193 for <a href="#">115</a> Notice of Appeal to DC Circuit Court, filed by SUSAN WEINSTEIN, DAVID WEINSTEIN, JOSEPH WEINSTEIN, JENNIFER WEINSTEIN HAZI, JEFFREY A. MILLER. (erd) (Entered: 12/18/2014)

<b>PACER Service Center</b>			
<b>Transaction Receipt</b>			
06/01/2015 14:44:59			
<b>PACER Login:</b>	php10east0660:2616006:0	<b>Client Code:</b>	
<b>Description:</b>	Docket Report	<b>Search Criteria:</b>	1:00-cv-02601-RCL
<b>Billable Pages:</b>	13	<b>Cost:</b>	1.30

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

SUSAN WEINSTEIN, et al., )  
 )  
 **Plaintiffs,** )  
 )  
 v. )  
 )  
 **THE ISLAMIC REPUBLIC OF IRAN,** )  
 **et al.,** )  
 )  
 **Defendants.** )  
 \_\_\_\_\_ )

Civil Action Number 00-2601 (RCL)

**FILED**

**FEB 6 2002**

**NANCY MAYER WHITTINGTON, CLERK  
U.S. DISTRICT COURT**

**ORDER and JUDGMENT**

In accordance with the Memorandum Opinion issued this date, it is hereby

ORDERED that judgment be and it is entered on behalf of Plaintiffs, Susan Weinstein and Jeffrey A. Miller, as co-administrators of the Estate of Ira William Weinstein against Defendants, the Islamic Republic of Iran, the Iranian Ministry of Information and Security, Ayatollah Ali Hoseini Khamenei, Ali Akbar Hashemi-Rafsanjani, and Ali Fallahian-Khuzestani, jointly and severally, for loss of accretions to the Estate of Ira William Weinstein in the amount of \$248,164, said amount to be apportioned in accordance with the intestate laws of the State of New York; further, it is

ORDERED that judgment be and it is entered on behalf of Plaintiffs Susan Weinstein and Jeffrey A. Miller, as co-administrators of the Estate of Ira William Weinstein against Defendants, the Islamic Republic of Iran, the Iranian Ministry of Information and Security, Ayatollah Ali Hoseini Khamenei, Ali Akbar Hashemi-Rafsanjani, and Ali Fallahian-Khuzestani, jointly and severally, for the conscious pain and suffering of Ira William Weinstein in the amount of TEN MILLION DOLLARS (\$10,000,000), said amount to be apportioned in accordance with the

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intestate laws of the State of New York; further, it is

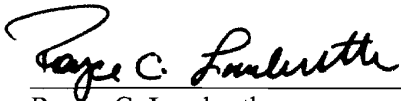
ORDERED that judgment be and it is entered on behalf of Ira William Weinstein's surviving spouse and surviving children, Plaintiffs Susan Weinstein, Joseph Weinstein, Jennifer Weinstein Hazi, and David Weinstein against Defendants, the Islamic Republic of Iran, the Iranian Ministry of Information and Security, Ayatollah Ali Hoseini Khamenei, Ali Akbar Hashemi-Rafsanjani, and Ali Fallahian-Khuzestani, jointly and severally, for solatium, in the total amount of TWENTY-THREE MILLION DOLLARS (\$23,000,000), allocated as follows: to Decedent's wife, Susan Weinstein, EIGHT MILLION DOLLARS (\$8,000,000); to Decedent's son, Joseph Weinstein, FIVE MILLION DOLLARS (\$5,000,000); to Decedent's daughter Jennifer Weinstein Hazi, FIVE MILLION DOLLARS (\$5,000,000); to Decedent's son David Weinstein, FIVE MILLION DOLLARS (\$5,000,000); further, it is

ORDERED that judgment be and it is entered on behalf of Plaintiffs, Susan Weinstein and Jeffrey A. Miller, as co-administrators of the Estate of Ira William Weinstein against Defendant, the Iranian Ministry of Information and Security, for punitive damages in the amount of ONE HUNDRED FIFTY MILLION DOLLARS (\$150,000,000); further, it is

ORDERED that the Clerk of the Court shall cause a copy of this Order and Judgment and the accompanying Memorandum Opinion to be translated into Farsi and transmitted to the United States Department of State for diplomatic service upon the Defendants in accordance with the provisions of 28 U.S.C. § 1608(a)(4), with the costs of translation to be paid by the Plaintiffs.

SO ORDERED.

Date: 2-6-02

  
\_\_\_\_\_  
Royce C. Lamberth  
United States District Judge



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____ Susan Weinstein, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 00-2601-RCL
	)	
The Islamic Republic of Iran, et al.,	)	<b>HEARING REQUEST</b>
	)	
Defendants.	)	
	)	
	)	
_____	)	

**INTERNET CORPORATION FOR ASSIGNED NAME AND NUMBERS’  
MOTION TO QUASH WRIT OF ATTACHMENT**

The Internet Corporation for Assigned Names and Numbers (“ICANN”), a non-party, by counsel, respectfully moves this Court to quash the Writ of Attachment on Judgment Other Than Wages, Salary And Commissions (“Writ of Attachment”) issued by Plaintiffs in the above-entitled action, for the reasons set forth in ICANN’s accompanying Memorandum.<sup>1</sup>

Furthermore, ICANN, in accordance with Local Civil Rule 78.1, requests that an oral hearing be scheduled to inform the Court’s ruling on the Motion.

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<sup>1</sup> Plaintiffs issued to ICANN, and ICANN is moving to quash, writs of attachment in seven actions: (1) *Rubin, et al. v. Islamic Republic of Iran, et al.*, Case No. 01-1655-RMU; (2) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 02-1811-RCL; (3) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 08-520-RCL; (4) *Stern, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2602-RCL; (5) *Weinstein, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2601-RCL; (6) *Wyatt, et al. v. Syrian Arab Republic, et al.*, Case No. 08-502-RCL; and (7) *Calderon-Cardona, et al. v. Democratic People’s Republic of North Korea, et al.*, Case No. 14-mc-648-RCL. All of these actions were assigned to this Court, with the exception of the *Rubin* matter, which was assigned to now-retired Judge Ricardo M. Urbina and has not been re-assigned to another Judge. Accordingly, ICANN has filed a Motion to Consolidate Consideration of, and Hearing on, ICANN’s Motions to Quash requesting that this Court consider and rule upon all of ICANN’s Motions to Quash, including the motion filed in the *Rubin* case.

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Dated: July 29, 2014

Respectfully submitted,

*/s/ Tara Lynn R. Zurawski*

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Jeffrey A. Levee (*pro hac vice* to be filed)  
Eric P. Enson (*pro hac vice* to be filed)  
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*Counsel for Non-Party INTERNET  
CORPORATION FOR ASSIGNED NAMES  
AND NUMBERS*

Case 1:00-cv-02601-RCL Document 89 Filed 07/29/14 Page 3 of 3

**CERTIFICATE OF SERVICE**

I certify that on July 29, 2014, I filed the foregoing Motion To Quash Writ of Attachment, and a [Proposed] Order thereon, with the Clerk of the Court for the U.S. District Court for the District of Columbia using its CM/ECF System, and I caused to be served one copy of the foregoing Motion by First Class Mail, postage prepaid, on the following:

Robert J. Tolchin  
Berkman Law Office, LLC  
111 Livingston Street, Suite 1928  
Brooklyn, NY 11201

*Counsel for Plaintiffs*

/s/ Tara Lynn R. Zurawski

Tara Lynn R. Zurawski (DC Bar No. 980960)

**IN UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
Susan Weinstein, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 00-2601-RCL
	)	
The Islamic Republic of Iran, et al.,	)	
	)	
Defendants.	)	
_____	)	

**DECLARATION OF JOHN O. JEFFREY IN SUPPORT OF NON-PARTY ICANN’S  
MOTION TO QUASH PLAINTIFFS’ WRITS OF ATTACHMENT**

I, John O. Jeffrey, declare and affirm as follows:

1. I am the General Counsel and Secretary for the Internet Corporation for Assigned Names and Numbers (“ICANN”). I have personal knowledge of the matters set forth herein and am competent to testify as to those matters. I make this declaration in support of ICANN’s Motion to Quash Plaintiffs’ Writs of Attachment.
2. ICANN is a California public benefit nonprofit corporation, which, among other things, administers, at the top level, the unique identifiers that allow computers and other devices on the Internet to communicate with one another.
3. Computers find one another over the Internet by using Internet Protocol (“IP”) addresses, which are strings of numbers separated by periods, such as “192.0.34.163.” An IP address is a numerical identifier of a particular source of data on the Internet, such as a website. The Internet’s domain name system (“DNS”) provides a human interface to the IP system by converting these numeric IP addresses into more easily-remembered sets of characters and numbers referred to as “domain names.”

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4. A domain name can be viewed as being made up of at least two elements – what is before and after the last “dot.” The part to the right of the last dot, such as “COM,” “GOV” or “US” is known as a “top-level domain” or “TLD.” The part of a domain name before the last dot, such as the “USCOURTS” in USCOURTS.GOV, is the word or phrase that individuals and entities register as second-level domain names in those TLDs, which are then used to identify online websites and email addresses.

5. Prior to ICANN’s formation in 1998, the United States Government, via contractual arrangements with third parties, administered the DNS. ICANN was formed in 1998 as part of the U.S. Government’s commitment to, among other things, privatize the Internet. ICANN’s mission is to protect the stability, integrity, interoperability and utility of the DNS on behalf of the global Internet community.

6. ICANN has an international Board of Directors, approximately 300 staff members, and an Ombudsman. The ICANN community is made up of thousands of stakeholders and approximately 140 governments involved in setting and advising on policy, and providing technical coordination functions of the Internet. The community is organized through three Supporting Organizations, four Advisory Committees, a group of technical expert advisors, a Nominating Committee, and a large, globally distributed group of community members who participate in ICANN’s processes.

7. One of the ways that ICANN fulfills its administrative role is by approving qualified entities for the responsibility of operating the Internet’s TLDs. These entities, which are often referred to as “Registry Operators,” are tasked with managing the definitive list of domain names registered within the TLD they manage. There are a number of long-standing “generic” TLDs, such as .COM, .NET and .ORG.

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8. Another way that ICANN fulfills its administrative role is by performing what are known as the Internet Assigned Numbers Authority (“IANA”) functions. Since 2000, the IANA functions have been performed by ICANN pursuant to contracts with the U.S. Department of Commerce (“IANA Functions Contract”). The most recent IANA Functions Contract was entered into in 2012, and remains in effect today.

9. One of the functions ICANN performs is maintaining the technical and administrative details of the DNS’s “Root Zone Database” used to compile the Root Zone of the Internet, which is the authoritative place to look up the network location of the more than 650 generic TLD in operation today. When a computer or device is establishing the location of a service on the Internet using its domain name, it may consult the Root Zone to determine that domain name’s location. The Root Zone provides a referral to a list of servers that are dedicated to hosting the TLD that contains the requested domain names.

10. ICANN is currently in the process of evaluating hundreds of applications for new generic TLDs, several hundred of which have already been delegated and in various stages of operation. ICANN enters into comprehensive contracts with the generic TLD Registry Operators; these contracts set forth the parties’ obligations and duties.

11. In addition to the generic TLDs, mentioned above, there are more than 280 country code TLDs (“ccTLDs”) in operation (including the non-ASCII ccTLDs), such as .US for the United States, .JP for Japan and three at issue in this matter, .IR for Iran, .SY for Syria and .KP for North Korea. ccTLDs are generally used for websites and communications specific to a country or region. Before ICANN came into existence, ccTLDs were created for countries appearing on a list of nations prepared by the International Organization for Standardization in its ISO 3166-1 publication, using ASCII characters, and some ccTLDs have been created since then. More

recently, internationalized domain name (“IDN”) ccTLDs have been created, using non-ASCII characters, such as Arabic script or Chinese characters.

12. ccTLDs are administered by entities generally referred to as ccTLD managers. Each recognized ccTLD manager is recorded in the Root Zone Database along with an administrative contact and a technical contact. Rules for evaluating and certifying ccTLD managers have been established by processes, standards and principles developed by the Internet community and documented in several publications like, “RFC 1591,” publicly available at <http://www.ietf.org/rfc/rfc1591.txt>, “ICP-1,” publicly available at <https://www.icann.org/resources/pages/delegation-2012-02-25-en>, the Governmental Advisory Committee Principles for Delegation and Administration of ccTLDs, publicly available at <http://archive.icann.org/en/committees/gac/gac-cctldprinciples-23feb00.htm>, and others. These standards and principles set out the criteria against which requests to establish and/or change ccTLD managers are to be assessed. The criteria include demonstrating technical and administrative competency, providing information that shows the domain will be managed in the relevant country, providing consent to the change by directly involved parties (such as from an incumbent ccTLD manager if a change to another manager is requested), demonstrating that the request serves the country’s local Internet community’s interests, demonstrating government review and consideration, and demonstrating a stable transfer plan. The major concern in selecting a manager for a country-code domain is that it be able to carry out the necessary responsibilities, and have the ability to do an equitable, just, honest and competent job.

13. Shortly after ICANN was created, it sought to formalize its expectations of many ccTLD managers. To this end, ICANN has entered into simple letter exchanges or memoranda of understanding with some ccTLD managers that document their technical responsibilities. Some

ccTLD managers make contributions to ICANN to defray ICANN's costs of operations, but these contributions are on a voluntary, non-mandatory basis. There are, however, a number of ccTLD managers with which ICANN: (1) has no agreement; and (2) from which ICANN receives no contributions. The managers of the .IR, .SY and .KP ccTLDs and their related IDN ccTLDs (collectively these ccTLDs are referred to the ".IR, .SY and .KP ccTLDs") have no agreement with ICANN, and pay no licensing or other fees to ICANN of any kind.

14. There are approximately 530,000 second-level domain names currently registered in the .IR ccTLDs, according to the NIC.IR website, <http://www.nic.ir/Statistics>. As set forth above, the domain names before the last dot are the names that help locate individuals, businesses, charitable and other organizations and serve as their connection to a single, global interoperable Internet.

15. Since at least 2005, when ICANN began electronically tracking communications with ccTLD managers pertaining to the IANA functions, ICANN has had sporadic interaction with the managers of the .IR, .SY and .KP ccTLDs. These communications have been technical in nature, usually relating to a change in contact information for a technical or administrative contract, or relating to the activation or de-activation of servers hosting the ccTLDs.

16. ICANN has never entered into any form of agreement with the managers of the .IR, .SY or .KP ccTLDs. ICANN has never obtained any funds or contributions relating to the operation or delegation of the .IR, .SY or .KP ccTLDs. ICANN is not now, nor ever has been, indebted to the managers of the .IR, .SY or .KP ccTLDs. ICANN is not now, and never has been, indebted to the governments of Iran, Syria or North Korea.



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

This declaration was signed on July 29, 2014 at Los Angeles, California.

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right, positioned above a thin horizontal line.

John O. Jeffrey

**CERTIFICATE OF SERVICE**

I certify that on July 29, 2014, I served one copy of the foregoing: **Declaration of John O. Jeffrey In Support of Non-Party ICANN's Motion to Quash Plaintiffs' Writs of Attachment** with the Clerk of the Court for the U.S. District Court for the District of Columbia using its CM/ECF System.

I further certify that I caused to be served one copy by First Class Mail, postage prepaid, on the following:

Robert J. Tolchin  
Berkman Law Office, LLC  
111 Livingston Street, Suite 1928  
Brooklyn, NY 11201

*Counsel for Plaintiffs*

Dated: July 29, 2014

/s/ Tara Lynn R. Zurawski

Tara Lynn R. Zurawski (DC Bar No. 980960)

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Susan Weinstein, et al.,

Plaintiffs,

v.

The Islamic Republic of Iran, et al.,

Defendants.

CIVIL ACTION NO. 00-2601-RCL

DECLARATION OF ERIC P. ENSON IN SUPPORT OF NON-PARTY ICANN'S MOTION TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT

I, Eric P. Enson, declare and affirm as follows:

1. I am a partner with the law firm of Jones Day, and am a member of the California Bar. Jones Day is counsel of record to the Internet Corporation for Assigned Names and Numbers ("ICANN") in this action. I have personal knowledge of the matters set forth herein and am competent to testify to those matters. I make this declaration in support of ICANN's Motion to Quash Plaintiffs' Writs of Attachment.

2. Attached hereto as Exhibit A is a true and correct copy of ICANN's Bylaws, which is also publicly available at https://www.icann.org/resources/pages/bylaws-2012-02-25-en.

3. Attached hereto as Exhibit B is a true and correct copy of the IANA Functions Contract, which is also publicly available at http://www.ntia.doc.gov/files/ntia/publications/sf\_26\_pg\_1-2-final\_award\_and\_sacs.pdf.

4. Attached hereto as Exhibit C is a true and correct copy of RFC 1591, which is also publicly available at http://www.ietf.org/rfc/rfc1591.txt.

5. Attached hereto as Exhibit D is a true and correct copy of ICANN's Delegating and Redelegating a Country-Code Top-level Domain (ccTLD) publication, which is also publicly available at <http://www.iana.org/help/cctld-delegation>.
6. Attached hereto as Exhibit E is a true and correct copy of ICANN's Common Questions on Delegating and Redelegating Country-Code Top-level Domain (ccTLDs) publication, which is also publicly available at <http://www.iana.org/help/cctld-delegation-answers>.
7. Attached hereto as Exhibit F is a true and correct copy of the ICP-1 publication, which is also publicly available at <https://www.icann.org/resources/pages/delegation-2012-02-25-en>.
8. Attached hereto as Exhibit G is a true and correct copy of ICANN's Report on the Delegation of the .("Iran") domain representing the Islamic Republic of Iran in Arabic, which is also publicly available at <http://www.iana.org/reports/2013/iran-report-20130913.html>.
9. Attached hereto as Exhibit H is a true and correct copy of the Delegation Record for .IR, which is also publicly available at <http://www.iana.org/domains/root/db/ir.html>.
10. Attached hereto as Exhibit I is a true and correct copy of the IDN ccTLD Fast Track String Evaluation Completion, which is also publicly available at <https://www.icann.org/resources/pages/string-evaluation-completion-2014-02-19-en>.
11. Attached hereto as Exhibit J is a true and correct copy of the Delegation Record for .SY, which is also publicly available at <http://www.iana.org/domains/root/db/sy.html>.
12. Attached hereto as Exhibit K is a true and correct copy of the Delegation Record for .KP, which is also publicly available at <http://www.iana.org/domains/root/db/kp.html>.
13. Attached hereto as Exhibit L is a true and correct copy of the Governmental Advisory Committee's Principles for Delegation and Administration of ccTLDs, which is also publicly available at <http://archive.icann.org/en/committees/gac/gac-cctldprinciples-23feb00.htm>.

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14. Attached hereto as Exhibit M is a true and correct copy of the Governmental Advisory Committee's Principles and Guidelines for the Delegation and Administration of Country Code Top Level Domains, which is also publicly available at <https://archive.icann.org/en/committees/gac/gac-cctld-principles.htm>.

15. Attached hereto as Exhibit N is a true and correct copy of a Letter from Drafting Committee, Alternate ccTLD Best Practices Draft, which is also publicly available at <https://archive.icann.org/en/meetings/cairo2000/altbestpracdraft-letter-03mar00.htm>.

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

This declaration was signed on July 29, 2014 at Los Angeles, California.



Eric P. Enson

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**CERTIFICATE OF SERVICE**

I certify that on July 29, 2014, I served one copy of the foregoing: **Declaration of Eric P. Enson In Support of Non-Party ICANN's Motion to Quash Plaintiffs' Writs of Attachment** with the Clerk of the Court for the U.S. District Court for the District of Columbia using its CM/ECF System.

I further certify that I caused to be served one copy by First Class Mail, postage prepaid, on the following:

Robert J. Tolchin  
Berkman Law Office, LLC  
111 Livingston Street, Suite 1928  
Brooklyn, NY 11201

*Counsel for Plaintiffs*

Dated: July 29, 2014

/s/ Tara Lynn R. Zurawski

Tara Lynn R. Zurawski (DC Bar No. 980960)

&gt;

Network Working Group  
Request for Comments: 1591  
Category: Informational

J. Postel  
ISI  
March 1994

## Domain Name System Structure and Delegation

### Status of this Memo

This memo provides information for the Internet community. This memo does not specify an Internet standard of any kind. Distribution of this memo is unlimited.

### 1. Introduction

This memo provides some information on the structure of the names in the Domain Name System (DNS), specifically the top-level domain names; and on the administration of domains. The Internet Assigned Numbers Authority (IANA) is the overall authority for the IP Addresses, the Domain Names, and many other parameters, used in the Internet. The day-to-day responsibility for the assignment of IP Addresses, Autonomous System Numbers, and most top and second level Domain Names are handled by the Internet Registry (IR) and regional registries.

### 2. The Top Level Structure of the Domain Names

In the Domain Name System (DNS) naming of computers there is a hierarchy of names. The root of system is unnamed. There are a set of what are called "top-level domain names" (TLDs). These are the generic TLDs (EDU, COM, NET, ORG, GOV, MIL, and INT), and the two letter country codes from ISO-3166. It is extremely unlikely that any other TLDs will be created.

Under each TLD may be created a hierarchy of names. Generally, under the generic TLDs the structure is very flat. That is, many organizations are registered directly under the TLD, and any further structure is up to the individual organizations.

In the country TLDs, there is a wide variation in the structure, in some countries the structure is very flat, in others there is substantial structural organization. In some country domains the second levels are generic categories (such as, AC, CO, GO, and RE), in others they are based on political geography, and in still others, organization names are listed directly under the country code. The organization for the US country domain is described in RFC 1480 [1].

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Each of the generic TLDs was created for a general category of organizations. The country code domains (for example, FR, NL, KR, US) are each organized by an administrator for that country. These administrators may further delegate the management of portions of the naming tree. These administrators are performing a public service on behalf of the Internet community. Descriptions of the generic domains and the US country domain follow.

Of these generic domains, five are international in nature, and two are restricted to use by entities in the United States.

World Wide Generic Domains:

COM - This domain is intended for commercial entities, that is companies. This domain has grown very large and there is concern about the administrative load and system performance if the current growth pattern is continued. Consideration is being taken to subdivide the COM domain and only allow future commercial registrations in the subdomains.

EDU - This domain was originally intended for all educational institutions. Many Universities, colleges, schools, educational service organizations, and educational consortia have registered here. More recently a decision has been taken to limit further registrations to 4 year colleges and universities. Schools and 2-year colleges will be registered in the country domains (see US Domain, especially K12 and CC, below).

NET - This domain is intended to hold only the computers of network providers, that is the NIC and NOC computers, the administrative computers, and the network node computers. The customers of the network provider would have domain names of their own (not in the NET TLD).

ORG - This domain is intended as the miscellaneous TLD for organizations that didn't fit anywhere else. Some non-government organizations may fit here.

INT - This domain is for organizations established by international treaties, or international databases.

United States Only Generic Domains:

GOV - This domain was originally intended for any kind of government office or agency. More recently a decision was taken to register only agencies of the US Federal government in this domain. State and local agencies are registered in the country

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domains (see US Domain, below).



MIL - This domain is used by the US military.

Example country code Domain:

US - As an example of a country domain, the US domain provides for the registration of all kinds of entities in the United States on the basis of political geography, that is, a hierarchy of <entity-name>.<locality>.<state-code>.US. For example, "IBM.Armonk.NY.US". In addition, branches of the US domain are provided within each state for schools (K12), community colleges (CC), technical schools (TEC), state government agencies (STATE), councils of governments (COG), libraries (LIB), museums (MUS), and several other generic types of entities (see RFC 1480 for details [1]).

To find a contact for a TLD use the "whois" program to access the database on the host rs.internic.net. Append "-dom" to the name of TLD you are interested in. For example:

```
whois -h rs.internic.net us-dom  
or  
whois -h rs.internic.net edu-dom
```

### 3. The Administration of Delegated Domains

The Internet Assigned Numbers Authority (IANA) is responsible for the overall coordination and management of the Domain Name System (DNS), and especially the delegation of portions of the name space called top-level domains. Most of these top-level domains are two-letter country codes taken from the ISO standard 3166.

A central Internet Registry (IR) has been selected and designated to handle the bulk of the day-to-day administration of the Domain Name System. Applications for new top-level domains (for example, country code domains) are handled by the IR with consultation with the IANA. The central IR is INTERNIC.NET. Second level domains in COM, EDU, ORG, NET, and GOV are registered by the Internet Registry at the InterNIC. The second level domains in the MIL are registered by the DDN registry at NIC.DDN.MIL. Second level names in INT are registered by the PVM at ISI.EDU.

While all requests for new top-level domains must be sent to the Internic (at hostmaster@internic.net), the regional registries are often enlisted to assist in the administration of the DNS, especially in solving problems with a country administration. Currently, the RIPE NCC is the regional registry for Europe and the APNIC is the

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regional registry for the Asia-Pacific region, while the INTERNIC administers the North America region, and all the as yet undelegated regions.

The contact mailboxes for these regional registries are:

INTERNIC            hostmaster@internic.net  
APNIC                hostmaster@apnic.net  
RIPE NCC            ncc@ripe.net

The policy concerns involved when a new top-level domain is established are described in the following. Also mentioned are concerns raised when it is necessary to change the delegation of an established domain from one party to another.

A new top-level domain is usually created and its management delegated to a "designated manager" all at once.

Most of these same concerns are relevant when a sub-domain is delegated and in general the principles described here apply recursively to all delegations of the Internet DNS name space.

The major concern in selecting a designated manager for a domain is that it be able to carry out the necessary responsibilities, and have the ability to do a equitable, just, honest, and competent job.

- 1) The key requirement is that for each domain there be a designated manager for supervising that domain's name space. In the case of top-level domains that are country codes this means that there is a manager that supervises the domain names and operates the domain name system in that country.

The manager must, of course, be on the Internet. There must be Internet Protocol (IP) connectivity to the nameservers and email connectivity to the management and staff of the manager.

There must be an administrative contact and a technical contact for each domain. For top-level domains that are country codes at least the administrative contact must reside in the country involved.

- 2) These designated authorities are trustees for the delegated domain, and have a duty to serve the community.

The designated manager is the trustee of the top-level domain for both the nation, in the case of a country code, and the global Internet community.

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Concerns about "rights" and "ownership" of domains are inappropriate. It is appropriate to be concerned about "responsibilities" and "service" to the community.

- 3) The designated manager must be equitable to all groups in the domain that request domain names.

This means that the same rules are applied to all requests, all requests must be processed in a non-discriminatory fashion, and

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academic and commercial (and other) users are treated on an equal basis. No bias shall be shown regarding requests that may come from customers of some other business related to the manager -- e.g., no preferential service for customers of a particular data network provider. There can be no requirement that a particular mail system (or other application), protocol, or product be used.

There are no requirements on subdomains of top-level domains beyond the requirements on higher-level domains themselves. That is, the requirements in this memo are applied recursively. In particular, all subdomains shall be allowed to operate their own domain name servers, providing in them whatever information the subdomain manager sees fit (as long as it is true and correct).

- 4) Significantly interested parties in the domain should agree that the designated manager is the appropriate party.

The IANA tries to have any contending parties reach agreement among themselves, and generally takes no action to change things unless all the contending parties agree; only in cases where the designated manager has substantially mis-behaved would the IANA step in.

However, it is also appropriate for interested parties to have some voice in selecting the designated manager.

There are two cases where the IANA and the central IR may establish a new top-level domain and delegate only a portion of it: (1) there are contending parties that cannot agree, or (2) the applying party may not be able to represent or serve the whole country. The later case sometimes arises when a party outside a country is trying to be helpful in getting networking started in a country -- this is sometimes called a "proxy" DNS service.

The Internet DNS Names Review Board (IDNB), a committee established by the IANA, will act as a review panel for cases in which the parties can not reach agreement among themselves. The IDNB's decisions will be binding.

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- 5) The designated manager must do a satisfactory job of operating the DNS service for the domain.

That is, the actual management of the assigning of domain names, delegating subdomains and operating nameservers must be done with technical competence. This includes keeping the central IR (in the case of top-level domains) or other higher-level domain manager advised of the status of the domain, responding to requests in a timely manner, and operating the database with accuracy, robustness, and resilience.

There must be a primary and a secondary nameserver that have IP connectivity to the Internet and can be easily checked for

operational status and database accuracy by the IR and the IANA.

In cases when there are persistent problems with the proper operation of a domain, the delegation may be revoked, and possibly delegated to another designated manager.

- 6) For any transfer of the designated manager trusteeship from one organization to another, the higher-level domain manager (the IANA in the case of top-level domains) must receive communications from both the old organization and the new organization that assure the IANA that the transfer is mutually agreed, and that the new organization understands its responsibilities.

It is also very helpful for the IANA to receive communications from other parties that may be concerned or affected by the transfer.

#### 4. Rights to Names

##### 1) Names and Trademarks

In case of a dispute between domain name registrants as to the rights to a particular name, the registration authority shall have no role or responsibility other than to provide the contact information to both parties.

The registration of a domain name does not have any Trademark status. It is up to the requestor to be sure he is not violating anyone else's Trademark.

##### 2) Country Codes

The IANA is not in the business of deciding what is and what is not a country.

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The selection of the ISO 3166 list as a basis for country code top-level domain names was made with the knowledge that ISO has a procedure for determining which entities should be and should not be on that list.

#### 5. Security Considerations

Security issues are not discussed in this memo.

#### 6. Acknowledgements

Many people have made comments on draft version of these descriptions and procedures. Steve Goldstein and John Klensin have been particularly helpful.

#### 7. Author's Address

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#### 7. References

- [1] Cooper, A., and J. Postel, "The US Domain", RFC 1480, USC/Information Sciences Institute, June 1993.
- [2] Reynolds, J., and J. Postel, "Assigned Numbers", STD 2, RFC 1340, USC/Information Sciences Institute, July 1992.
- [3] Mockapetris, P., "Domain Names - Concepts and Facilities", STD 13, RFC 1034, USC/Information Sciences Institute, November 1987.
- [4] Mockapetris, P., "Domain Names - Implementation and Specification", STD 13, RFC 1035, USC/Information Sciences Institute, November 1987.
- [6] Partridge, C., "Mail Routing and the Domain System", STD 14, RFC 974, CSNET CIC BBN, January 1986.
- [7] Braden, R., Editor, "Requirements for Internet Hosts -- Application and Support", STD 3, RFC 1123, Internet Engineering Task Force, October 1989.

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Internet Assigned Numbers Authority

## Delegating or redelegating a country-code top-level domain (ccTLD)

This document provides an overall guide to the country-code top-level domain (ccTLD) delegation and redelegation process, and is designed to assist requestors in determining their eligibility, and in preparing formal requests.

### Background on the process

The delegation and redelegation process is designed to assign or re-assign a ccTLD to a manager, taking into account a number of technical and public interest criteria. These criteria relate to the basic principles that the manager be a responsible and technically competent trustee of the domain on behalf of the national and global Internet communities.

The process is initiated when a formal request is submitted to the IANA Root Zone Management staff at ICANN. The request and all required documentation is then reviewed and verified by these ICANN staff members. After the review and authorisations are completed, the request is implemented as a change to the Root Zone and Root Zone Database.

Upon successful completion of the process, the new country-code domain is established, or a transfer takes place in the case of redelegation of an existing ccTLD.

### Who is involved?

The delegation and redelegation process involves a number of different organisations and individuals. For example:

- The **requestor**, usually the proposed manager, initiates the process by submitting a formal delegation or redelegation request. The requestor is the main party ICANN interacts with throughout the request, and is responsible for collecting much of the materials required to process the request.
- The **proposed manager** is an organisation to which delegated responsibility for the ccTLD is sought. This organisation must demonstrate it understands and can meet its obligations as a trustee for the domain on behalf of the national and global Internet communities. The term manager is synonymous with other terms, such as Sponsoring Organization and operator, which have been used in other documentation. In this document, we have standardized on manager.
- **Significant stakeholders** are those parties that benefit from the operation of the ccTLD, and their opinions are important in assessing the public interest aspects of a request.
- The **respective government** is consulted to indicate either support or non-objection for the delegation or redelegation request. As a country-code represents the name of either a country or territory, the government is an important stakeholder in how the domain should be managed.
- **ICANN**, as the IANA Functions Operator, is responsible for the receipt, verification and processing of the request. IANA Root Zone Management staff performs these activities.
- The **U.S. Department of Commerce**, as the Root Zone Administrator, is responsible for verifying that processing procedures have been followed, and authorising any related changes to the DNS root zone and root zone database.
- **Verisign**, as the Root Zone Maintainer, is responsible for receiving requests that have been processed by ICANN and authorised by the US Department of Commerce, implementing those changes in the root zone, and distributing the revised root zone to the root name servers.

While many parties are involved in processing a delegation or redelegation, the Root Zone Management staff at ICANN are the primary interface for those requesting a delegation or a redelegation of a ccTLD.

### Preparing a request

A delegation or redelegation request involves the development and submission of documentation that describes the nature of the request, and how the proposed new manager satisfies the criteria used to assess the request.

#### Completing a delegation request form

The [delegation request form](#) which describes the basic details of the request, must be completed. The details include the identity of the proposed manager, the contact persons to be listed in the Root Zone Database, the technical delegation details for the domain, and a checklist relating to the assessment criteria for the delegation or redelegation request.

Please see [Technical requirements for authoritative name servers](#) for more information about the technical delegation details for the domain.

#### Demonstrating string eligibility

To delegate or redelegate a ccTLD, it must be shown that the string is eligible to be delegated.

The primary method of eligibility for country-code top-level domains is its listing as an "alpha-2" (two-letter ASCII) code listed in the ISO 3166-1 standard. Another method of eligibility is the string may have been deemed eligible as a country-code through the IDN Fast Track process.

Complete details on which country-codes are considered eligible are available in [Qualifying top-level domain strings](#).

#### Demonstrating technical and administrative competency

The delegation request must include documentation that demonstrates the technical and administrative ability of the proposed manager to operate the domain competently and that they will not jeopardize nor compromise the stability and security of the DNS.

The proposed manager decides whom to list as the administrative and technical contacts. Both the administrative contact and the technical contact must cross-verify all root zone changes and be responsive to communications about root zone changes.

For more information on preparing documentation to demonstrate technical and administrative ability, please go to [Preparing an Operational and Technical Plan](#).

#### **Providing information on the Proposed Manager**

It is a requirement that the requestor provides the legal name of the organisation (as officially registered in its principal place of business), along with its physical address, telephone and fax numbers. In support of this, the requestor must provide a certified copy or extract of the business registration, certification, or law that demonstrates the organisation's legal status.

#### **Providing geographical location**

As country-codes represent specific countries or territories, the proposed manager will be resident or incorporated in, the territory and/or jurisdiction of the relevant government or public authority of the country associated with the ccTLD, unless formally decided otherwise by the relevant government or public authority.

It is a requirement that the requestor indicate the geographic locations of the proposed manager, the administrative contact person for the domain, and the location(s) where the principal operations will be conducted.

#### **Demonstrating consent**

It is a requirement that the requestor provides documentation that shows that directly involved parties consent to the request to delegate or redelegate. For a new delegation, this includes the proposed new organisation and contact persons. For an existing delegation, this also includes documented consent from the existing management of the domain.

#### **Demonstrating that the request serves the local Internet community's interest**

The delegation or redelegation request must demonstrate that the proposed manager recognises its responsibility to fairly and equitably serve the local Internet community's interests with respect to management of the domain. In support of this, it is a requirement that the requestor document the mechanisms that will be utilised to inform and seek input from the local community on ccTLD management issues.

It is a requirement that the requestor provide documentation indicating local Internet community support for the proposed manager in operating the ccTLD, such as letters of support from interested and/or impacted parties, and the results of public consultations that led to the request.

#### **Demonstrating government review and consideration**

It is a requirement that the requestor provide documentation indicating the relevant governments have been informed about the request. It is a requirement that the documentation includes a statement of support or non-objection from an authorised representative of the government.

#### **Demonstrating a stable transfer plan**

For the redelegation of an existing operational ccTLD, it is a requirement that the requestor provide information on how existing operations will be transferred to the proposed new manager in a safe manner. It must explain how the stability of the domain will be preserved and how existing registrants will be impacted by the change. If the request is in relation to a transfer from a retired ccTLD to another ccTLD, it must also describe the decommissioning process for the retired domain.

### **Submitting the request**

Once the request has been prepared, submit it to ICANN's Root Zone Management staff to commence processing.

#### **Initial email submission**

To start the request, send an email with the delegation/redelegation form attached to [root-mgmt@iana.org](mailto:root-mgmt@iana.org).

Supporting documentation must be provided with the Delegation Request Form. Files should be in PDF format where possible.

Once the email is sent to [root-mgmt@iana.org](mailto:root-mgmt@iana.org), ICANN's ticketing system will reply automatically with a confirmation of receipt and a unique reference number within 1 day. This number will be used to track progress and correspondence relating to the request. Please ensure the number, just as it appears in the confirmation receipt, is included in the subject of all future communications related to the request.

#### **Original documentation**

In addition to the electronic submissions, it is a requirement that the requestor submit originals, or certified copies, of all official documents and testimony used in the request for which its authenticity is material to the evaluation. This includes the following:

- Registration certifications
- Letters of support or consent
- Legal documents that are a basis of the application

The documents should be couriered or posted to ICANN's Root Zone Management staff at the following address. It is important that the documents cite the reference number that appeared in the email confirmation receipt.

Root Zone Management  
ICANN  
12025 Waterfront Drive #300  
Los Angeles CA 90094  
USA

Please submit all requests, templates, and documentation in English. Where accuracy is essential, English documentation and/or English translations of key documents (such as governmental decrees relating to the request) must be notarised or certified official translations.

### **After the request is received**

Once we receive the request and issue a confirmation receipt, a process of analysis and verification begins. The amount of time this process takes varies depending upon the information provided in the supporting documentation, and the complexity of the individual case.

In the event that further documentation or clarification is needed, we will contact the requestor. The delegation or redelegation request will not proceed until we have received satisfactory documentation and information.

If we are unable to process the request due to significant lack of detail, the inability to confirm information, and/or unresponsiveness by the requestor, we will administratively close the request. In such cases, the requestor is welcome to resubmit the request at a later date to restart the review process once the additional material is available.

### **Requesting confirmation from contacts**

In addition to verification and analysis of the material supplied in the request, for redelegation requests, we will ask the current administrative and technical contacts, and the current ccTLD manager, whether they agree to the request.

In the case of a delegation, ICANN confirms with the proposed contacts as listed in the request, to ensure they consent to the responsibilities of being listed as a contact for the domain.

In those cases where confirmation is not received from one or more parties, further consultation will be necessary. This may delay processing of the request. Please see [Obtaining consent for a root zone change](#).

### **Posting the status of the pending request**

ICANN will publicly post requests for delegations and redelegations. This public disclosure will at a minimum include the domain name being requested, the party that will manage the domain, and the current status of the request.

If there are specific stability or security reasons why information should not be disclosed, the requestor should explain that in the Delegation Request Form.

### **Analysing the request**

After all materials are received, and the positions of the contacts have been ascertained, ICANN staff performs an analysis of the request.

The result of this analysis is a report that describes how the application meets the various criteria. This report will be reviewed by the ICANN Board of Directors to confirm proper procedures were followed.

### **Implementing the request**

After the review by the ICANN Board, ICANN, as the IANA Functions Operator will forward the completed request to the Root Zone Administrator. The Root Zone Administrator will then authorize changes to the DNS root zone and root zone database. Upon authorization, the Root Zone Maintainer will implement the changes to the DNS root zone. The IANA Functions Operator will implement the data changes in the WHOIS database.

After the request has been implemented, we will notify the requestor, and the requestor will verify that the changes were made correctly. In the event any problems arise, immediately notify us at [root-mgmt@iana.org](mailto:root-mgmt@iana.org) and include the reference number of the change request.





# Principles for Delegation and Administration of ccTLDs Presented by Governmental Advisory Committee

(23 February 2000)

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## PRINCIPLES FOR THE DELEGATION AND ADMINISTRATION OF COUNTRY CODE TOP LEVEL DOMAINS

### 1. PREAMBLE

In the five years since the issuance of [RFC 1591](#), the Internet has evolved from a tool reserved for computer and networking research, to a global medium for commerce, education, and communication. The new realities of the Internet, including its increased importance as a vehicle for national economic growth, and the expanding and more diverse nature of the Internet community necessitated evolution in the traditional means of managing and administering Internet technical functions.

As a result, DNS functions, including the administration of the DNS root server system, the development of policies for the registration and allocation of domain names, the coordination of Internet Protocols, and the delegation of Internet Protocol numbers are becoming more clearly delineated and formalised through the ICANN process. Similarly, the procedures and framework of accountability for delegation and administration of ccTLDs need to evolve into a more robust, certain, and reliable system as well.

While evolution is needed, the principle of RFC 1591 remains sound: the manager of a ccTLD performs a public service on behalf of the relevant local community and as such the designated manager has a duty to serve this community. The designated manager also has a responsibility to the global Internet community. By 'global Internet community' we do not mean any specific legal or international entity, but rather we interpret the term to refer to all of those who are affected by, now or in the future, the operation of the relevant TLD, because such operation may impinge on more than one jurisdiction and affect the interests of individuals and entities from both within the relevant country or territory and elsewhere. This is our interpretation of the meaning of 'global Internet community' as it is used in RFC 1591.

### 2. OBJECTIVE OF THIS DOCUMENT

The objective of this document is to suggest principles that will assist in the development of best practice for the delegation and administration of ccTLDs. These principles are intended to contribute to the development of models of:

- a communication between the relevant government or public authority and ICANN;
- a communication between ICANN and the delegee; and
- a communication between the relevant government or public authority and the delegee.

### 3. DEFINITIONS

For the purposes of this document, the following definitions apply:

3.1 'Alternative Dispute Resolution' (or 'ADR') means any system of resolving a dispute other than by court litigation, and includes arbitration, mediation, conciliation and processes of administrative dispute resolution.

3.2 'Communication' should include a law, regulation, agreement, document, contract, memorandum of understanding, or any other written instrument, as appropriate.

3.3 'Country code top level domain' or 'ccTLD' means a domain in the top level of the global domain name system assigned according to the two-letter codes in the [ISO 3166-1 standard](#), 'Codes for the Representation of Names of Countries and Their Subdivisions.'

3.4 'Delegation' means delegation by ICANN/IANA of responsibility for administration of a TLD in the DNS root.

3.5 'Delegee' means the organisation, enterprise or individual designated by the relevant government or public authority to exercise the public trust function of a ccTLD and consequently recognised through a communication between ICANN and the designated entity for that purpose. The delegee for a ccTLD may be the relevant government or public authority itself or an oversight body designated by the relevant government or public authority, inasmuch as the administrative and management functions for a ccTLD may be contracted out by the delegee to another party and hence not performed by the delegee itself.

3.6 'Designation' means designation by the relevant government or public authority of the delegee.

3.7 'DNS' means domain name system.

3.8 'ICANN' means the Internet Corporation for Assigned Names and Numbers.

3.9 'Relevant government or public authority' means relevant national government or public authority of a distinct economy as recognised in international fora as those terms are used in the ICANN Bylaws and GAC Operating Principles.

3.10 'Relevant local community' means the local community in the context of the ISO 3166-1 code. This definition is specific to the purposes identified in this document and not broader.

3.11 'Top Level Domain' or 'TLD' means a domain in the top level of the global domain name system.

#### **4. ROLE OF DELEGEE**

4.1 The delegee of a ccTLD is a trustee for the delegated domain, and has a duty to serve the residents of the relevant country or territory in the context of ISO 3166-1, as well as the global Internet community (as that term is interpreted in the Preamble to this document). Its policy role should be distinguished from the management, administration and marketing of the ccTLD. These functions may be performed by the same or different entities. However the delegation itself cannot be sub-contracted, sub-licensed or otherwise traded without the agreement of the relevant government or public authority and ICANN.

4.2 No private intellectual or other property rights should inhere in the ccTLD itself, nor accrue to the delegee as the result of delegation or to any entity as a result of the management, administration or marketing of the ccTLD.

4.3 Tradable goods and services may arise in the performance of other management and administrative functions attached to the ccTLD.

4.4 The delegee should recognise that ultimate public policy authority over the relevant ccTLD rests with the relevant government or public authority.

4.5 The delegee should work cooperatively with the relevant government or public authority of the country or territory for which the ccTLD has been established, within the framework and public policy objectives of such relevant government or public authority.

4.6 The delegee, and the delegee's administrative contact, should be resident or incorporated in the territory and/or jurisdiction of the relevant government or public authority. Where the delegee, administrative contact or technical contact are not resident or incorporated in the territory and/or jurisdiction of the relevant government or public authority, it should nevertheless operate in a way that is consistent with the laws and public policy of that relevant government or public authority.

## **5. ROLE OF GOVERNMENT OR PUBLIC AUTHORITY**

5.1 The relevant government or public authority ultimately represents the interests of the people of the country or territory for which the ccTLD has been delegated. Accordingly, the role of the relevant government or public authority is to ensure that the ccTLD is being administered in the public interest, whilst taking into consideration issues of public policy and relevant law and regulation.

5.2 Governments or public authorities have responsibility for public policy objectives such as: transparency and non-discriminatory practices; greater choice, lower prices and better services for all categories of users; respect for personal privacy; and consumer protection issues. Considering their responsibility to protect these interests, governments or public authorities maintain ultimate policy authority over their respective ccTLDs and should ensure that they are operated in conformity with domestic public policy objectives, laws and regulations, and international law and applicable international conventions.

5.3 It is recalled that the Governmental Advisory Committee (GAC) to ICANN has previously adopted the general principle that the Internet naming system is a public resource in the sense that its functions must be administered in the public or common interest.

5.4 The relevant government or public authority should ensure that DNS registration in the ccTLD benefits from effective and fair condition of competition, at appropriate levels and scale of activity.

5.5 To give effect to governments' or public authorities' public policy interests, governments or public authorities should ensure that the terms outlined in Clause 9 are included in their communications with delegees.

5.6 In making a designation for a delegee, the government or public authority should take into consideration the importance of long term stability in the administration and management of the ccTLD and in the DNS. In most cases, such stability may be best served through the designation of an organisation or an enterprise rather than a specific individual.

## **6. ROLE OF ICANN**

6.1 A primary function of ICANN is to establish, disseminate, and oversee implementation of the technical standards and practices that relate to the operation of the global DNS. In this capacity, ICANN administers a range of technical Internet management functions, including:

- establishment of policy for IP number block allocation;
- administration of the authoritative root server system;

- creation of policy for determining the circumstances under which new TLDs would be added to the root system;
- coordination of the assignment of other Internet technical parameters as needed to maintain universal connectivity on the Internet; and
- other activities necessary to coordinate specified DNS administration functions.

6.2 Specifically in relation to the administration and operation of ccTLDs, ICANN's role is to develop and implement policies that fulfil the provisions of Clause 10 below.

## **7. PRINCIPLES RELATING TO DELEGATIONS**

7.1 Where a communication between the relevant government or public authority and the delegee is in place, when ICANN is notified by the relevant government or public authority that the delegee has contravened the terms of the communication, or the term of the designation has expired, ICANN should act with the utmost promptness to reassign the delegation in coordination with the relevant government or public authority.

7.2 Notwithstanding the urgent need for a communication-based regime for ccTLD designation, delegation and administration, in the absence of such communication between the relevant government or public authority and the administrator of the ccTLD, ICANN should, upon the tendering of evidence by such government or public authority that the administrator does not have the support of the relevant local community and of the relevant government or public authority, or has breached and failed to remedy other material provisions of RFC 1591, act with the utmost promptness to reassign the delegation in coordination with the relevant government or public authority.

7.3 When ICANN notifies the relevant government or public authority that the ccTLD is being operated in a manner that threatens the stability of the DNS or of the Internet, or has otherwise breached and failed to remedy other material provisions of the communication between ICANN and the delegee, as outlined in Clause 10, the relevant government or public authority should cooperate with ICANN to remedy this situation or effect the reassignment of the delegation for the ccTLD.

7.4 With respect to future delegations or reassignment of delegations, ICANN should delegate the administration of a ccTLD only to an organisation, enterprise or individual that has been designated by the relevant government or public authority.

7.5 Delegees should enjoy, in the execution of their responsibilities, the appropriate rights under applicable law, and should not be subject to discriminatory or arbitrary practices, policies or procedures from ICANN or the relevant government or public authority. In the event of a reassignment of delegation, registrants in the ccTLD should be afforded continued name resolution, or a reasonable period in which to transfer to another TLD.

## **8. PRINCIPLES CONCERNING THE COMMUNICATION BETWEEN THE RELEVANT GOVERNMENT OR PUBLIC AUTHORITY AND ICANN**

8.1 The communication between the relevant government or public authority and ICANN, as outlined in Clause 2, should include a designated point of contact within the relevant government or public authority, as well as the name and contact details of the recognised delegee and duration of this recognition. Either as part of this communication, or through a subsequent communication, the relevant government or public authority should copy to ICANN any communication established between it and the delegee, setting forth the terms and conditions of the designation and/or concerning the execution of the delegee's role and the management of the delegation.

8.2 The relevant government or public authority should communicate to ICANN how it will require the delegee to abide by the terms and conditions outlined in Clause 9 below.

8.3 Recognising ICANN's responsibilities to achieve consensus in the creation of any new generic TLDs, ICANN should avoid, in the creation of new generic TLDs, well known and famous country, territory or place names; well known and famous country, territory or regional language or people descriptions; or ISO 639 Codes for representation of languages unless in agreement with the relevant governments or public authorities.

## **9. PRINCIPLES CONCERNING THE COMMUNICATION BETWEEN THE RELEVANT GOVERNMENT OR PUBLIC AUTHORITY AND THE DELEE**

9.1 The communication between the relevant government or public authority and the delegee should include the following provisions, a copy or summary of which should be forwarded to ICANN:

9.1.1 Term, performance clauses, opportunity for review and process for revocation.

9.1.2 A commitment by the delegee to operate the ccTLD in the interest of the relevant local community and the global Internet community.

9.1.3 A recognition by the delegee that the management and administration of the ccTLD are subject to the ultimate authority of the relevant government or public authority, and must conform with relevant domestic laws and regulations, and international law and international conventions.

9.1.4 Confirmation that the ccTLD is operated in trust in the public interest and that the delegee does not acquire property rights to the ccTLD itself.

9.1.5 Conditions to ensure the transfer of all relevant DNS data to a nominated replacement, if, for any reason, a reassignment to a new delegee is necessary.

9.1.6 Conditions for the efficient and effective resolution of disputes arising from domain name registration. In so far as ccTLD registration policies allow or encourage registrations from entities or individuals resident outside the relevant territory, then the delegee concerned should implement dispute resolution policies that ensure that the interests of all registrants, and of third parties, including those outside their territory and in other jurisdictions, are taken into account. Dispute resolution policies should, to the greatest extent possible, follow common principles, including due regard for internationally recognised intellectual property, consumer protection and other relevant law, and be implemented by all delegees. The delegee should, so far as possible, implement alternative dispute resolution procedures conducted online, without precluding access to court litigation.

9.1.7 The delegee's commitment to abide by ICANN developed policies as set forth in Clause 10.

9.1.8 Where ccTLD registration policies allow or encourage registrations from entities or individuals resident outside the relevant territory, the delegee commits to observe all ICANN policies applicable to such ccTLDs, not otherwise provided for in Clause 10, except where the delegee is prohibited by law from, or instructed in writing by the relevant government or public authority to refrain from, implementing such other ICANN policies.

9.1.9 The above terms and conditions shall apply to delegees, including delegees who are

resident and/or incorporated outside the territory of the relevant local community.

9.2 A delegee should not sub-contract part or all of the technical operations of the ccTLD registry without ensuring that the sub-contractor has the technical qualifications required by ICANN, and informing ICANN.

9.3 In any sub-contracting of the technical operations of the ccTLD registry or administrative and management functions of the ccTLD, the sub-contract must state that the delegation itself is an exercise of a public right, not an item of property, and cannot be reassigned to a new delegee except in accordance with the provisions of Clause 7.

## **10. PRINCIPLES CONCERNING THE COMMUNICATION BETWEEN ICANN AND THE DELEE**

10.1 The communication between ICANN and the delegee should contain ICANN's commitment to:

10.1.1 maintain, or cause to be maintained, a stable, secure, authoritative and publicly available database of relevant information for each ccTLD (see below);

10.1.2 ensure that authoritative and accurate root zone information is generated from such database and ensure that the root servers are operated in stable and secure manner;

10.1.3 maintain, or cause to be maintained, authoritative records and an audit trail regarding ccTLD delegations and records related to these delegations; and

10.1.4 inform the delegee in a timely manner of any changes to ICANN's contact information.

10.2 The communication between ICANN and the delegee should contain the delegee's commitment to:

10.2.1 cause to be operated and maintained in a stable and secure manner the authoritative primary and secondary nameservers for the ccTLD, adequate to resolve names within the ccTLD for users throughout the Internet, and any sub-domains over which they retain administrative authority, and ensure that the zone file and accurate and up-to-date registration data is continuously available to ICANN for purposes of verifying and ensuring the operational stability of the ccTLD only;

10.2.2 inform ICANN in a timely manner of any changes to the ccTLD's contact information held by ICANN;

10.2.3 ensure the safety and integrity of the registry database, including the establishment of a data escrow or mirror site policy for the registry data managed by the delegate. The escrow agent or mirror site should be mutually approved by the relevant government or public authority and the delegee and should not be under the control of the delegee;

10.2.4 ensure the transfer of all relevant DNS data to a nominated replacement, if, for any reason, a reassignment to a new delegee is necessary;

10.2.5 abide by ICANN developed policies concerning: interoperability of the ccTLD with other parts of the DNS and Internet; operational capabilities and performance of the ccTLD operator; and the obtaining and maintenance of, and public access to, accurate and up-to-date contact information for domain name registrants; and

ICANN | Principles for Delegation and Administration of ccTLDs Presented by Governmental Advisory Committee

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10.2.6 ensure the payment of its contribution to ICANN's cost of operation in accordance with an equitable scale, based on ICANN's total funding requirements (including reserves), developed by ICANN on the basis of consensus.

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Comments concerning the layout, construction and functionality of this site should be sent to [webmaster@icann.org](mailto:webmaster@icann.org).

Page Updated 23-February-00

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

\_\_\_\_\_  
Shaul Stern, *et al.*,  
  
Plaintiffs,  
  
v.  
  
The Islamic Republic of Iran, *et al.*,  
  
Defendants.  
\_\_\_\_\_

Civil No. 00-2602 (RCL)

**FILED**

AUG 13 2014

Clerk, U.S. District and  
Bankruptcy Courts

\_\_\_\_\_  
Susan Weinstein, *et al.*,  
  
Plaintiffs,  
  
v.  
  
The Islamic Republic of Iran, *et al.*,  
  
Defendants.  
\_\_\_\_\_

Civil No. 00-2601 (RCL)

\_\_\_\_\_  
Jenny Rubin, *et al.*,  
  
Plaintiffs,  
  
v.  
  
The Islamic Republic of Iran, *et al.*,  
  
Defendants.  
\_\_\_\_\_

Civil No. 01-1655 (RMU)

\_\_\_\_\_  
Seth Charles Ben Haim, *et al.*,  
  
Plaintiffs,  
  
v.  
  
The Islamic Republic of Iran, *et al.*,  
  
Defendants.  
\_\_\_\_\_

Civil No. 02-1811 (RCL)



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**Seth Charles Ben Haim, et al.,** )  
 )  
 **Plaintiffs,** )  
 )  
 v. )  
 **The Islamic Republic of Iran, et al.,** )  
 )  
 **Defendants.** )

**Civil No. 08-520 (RCL)**

\_\_\_\_\_) )  
\_\_\_\_\_ )  
**Ruth Calderon-Cardona, et al.,** )  
 )  
 **Plaintiffs,** )  
 )  
 v. )  
 **Democratic People’s Republic of Korea,** )  
**et al.,** )  
 )  
 **Defendants.** )

**Misc. No. 14-648 (UNA)**

\_\_\_\_\_) )  
\_\_\_\_\_ )  
**Mary Nell Wyatt, et al.,** )  
 )  
 **Plaintiffs,** )  
 )  
 v. )  
 **Syrian Arab Republic, et al.,** )  
 )  
 **Defendants.** )

**Civil No. 08-502 (RCL)**

**ORDER**

Upon consideration of non-party Internet Corporation for Assigned Names and Numbers’  
Motion to Consolidate Consideration Of, And Hearing On, ICANN’s Motions to Quash  
Plaintiffs’ Writs of Attachment, it is hereby

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**ORDERED** that the motion is **GRANTED**. The Court will consolidate the consideration of, and hearing on, all seven of ICANN's Motions to Quash, including the motion filed in civil case number 01-1655 (RMU) and miscellaneous case number 14-648 (UNA); and it is further

**ORDERED** that the Clerk of the Court shall transfer civil case number 01-1655 (RMU) and miscellaneous case number 14-648 (UNA) to this Court for further proceedings.

It is **SO ORDERED**.

Signed by Royce C. Lamberth, United States District Judge, on August 12, 2014

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**FILED**

**AUG 13 2014**

Clerk, U.S. District and  
Bankruptcy Courts

\_\_\_\_\_  
**Shaul Stern, et al.,**  
  
**Plaintiffs,**  
  
v.  
  
**The Islamic Republic of Iran, et al.,**  
  
**Defendants.**  
\_\_\_\_\_

Civil No. 00-2602 (RCL)

\_\_\_\_\_  
**Susan Weinstein, et al.,**  
  
**Plaintiffs,**  
  
v.  
  
**The Islamic Republic of Iran, et al.,**  
  
**Defendants.**  
\_\_\_\_\_

Civil No. 00-2601 (RCL)

\_\_\_\_\_  
**Jenny Rubin, et al.,**  
  
**Plaintiffs,**  
  
v.  
  
**The Islamic Republic of Iran, et al.,**  
  
**Defendants.**  
\_\_\_\_\_

Civil No. 01-1655 (RMU)

\_\_\_\_\_  
**Seth Charles Ben Haim, et al.,**  
  
**Plaintiffs,**  
  
v.  
  
**The Islamic Republic of Iran, et al.,**  
  
**Defendants.**  
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Civil No. 02-1811 (RCL)

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<b>Seth Charles Ben Haim, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil No. 08-520 (RCL)</b>
	)	
<b>The Islamic Republic of Iran, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	
_____	)	

_____	)	
<b>Ruth Calderon-Cardona, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Misc. No. 14-648 (UNA)</b>
	)	
<b>Democratic People’s Republic of Korea,</b>	)	
<b>et al.,</b>	)	
	)	
<b>Defendants.</b>	)	
_____	)	

_____	)	
<b>Mary Nell Wyatt, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil No. 08-502 (RCL)</b>
	)	
<b>Syrian Arab Republic, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	
_____	)	

**ORDER**

Upon consideration of Internet Corporation for Assigned Names and Numbers (“ICANN”) and Plaintiffs’ Consent Motion Superseding Previous Consent Motion For an Extension of Time to Respond to Writ of Attachment and Related Subpoena, and good cause

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appearing, it is hereby

**ORDERED** that ICANN and Plaintiffs' Consent Motion is **GRANTED**. ICANN's response to the writ of attachment and subpoena was due and filed on July 28, 2014. Plaintiffs' time periods pursuant to D.C. Superior Court Civil Rule 69-I (d) and (e) shall not begin to run until the parties agree, or absent such agreement, until the Court has determined, that ICANN has fulfilled its obligations in response to the Subpoena and in no event shall such periods expire before September 8, 2014. Plaintiffs' lien is correspondingly extended, unless ICANN's Motion to Quash, filed on July 29, 2014, is granted.

It is **SO ORDERED**.

Signed by Royce C. Lamberth, United States District Judge, on August 12, 2014

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
Shaul Stern, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 00-2602-RCL
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
_____	)	
Susan Weinstein, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 00-2601-RCL
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
_____	)	
Jenny Rubin, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 01-1655-RMU
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
_____	)	
Seth Charles Ben Haim, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION NO. 02-1811-RCL
	)	
v.	)	CIVIL ACTION NO. 08-520-RCL
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

Case 1:00-cv-02665-RCL Document 109 Filed 09/28/14 Page 2 of 30

Ruth Calderon-Cardona, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	MISC. NO. 14-648
	)	
Democratic People’s Republic of Korea, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
Mary Nell Wyatt, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 08-502-RCL
	)	
Syrian Arab Republic, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
	)	

**MOTION BY PLAINTIFFS-JUDGMENT CREDITORS  
FOR SIX MONTH DISCOVERY PERIOD**

COME NOW the plaintiffs, by and through their undersigned counsel, and respectfully move this Court pursuant to Fed. R. Civ. P. 69 for an order:

(1)    **AUTHORIZING** the parties to engage in discovery pursuant to the Federal Rules of Civil Procedure, specifically Federal Rules 26 and 30-34, with respect to the Writs of Attachment served by plaintiffs on Garnishee-The Internet Corporation for Assigned Names and Numbers (“ICANN”) and the Motion to Quash Writs of Attachment filed by ICANN, and **DIRECTING** that such discovery shall be completed by March 30, 2015;

(2)    **ENLARGING** the plaintiffs’ time to serve opposition to the Motion to Quash Writs of Attachment *sine die*, with a due date to be set after the completion of discovery;

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(3) **DIRECTING** that oral argument and any evidentiary hearing on the Motion to Quash be scheduled after briefing on the Motion to Quash is completed;

(4) **ENLARGING** plaintiffs' time to file (i) the Traverse of ICANN's Answers pursuant to D.C. Code §§ 16-522, 16-553 and/or D.C. Sup. Ct. Rule 69-I(d) and/or (ii) the Motion for Judgment of Condemnation pursuant to D.C. Code § 16-556 and/or D.C. Sup. Ct. Rule 69-I(e) until after the Court enters an Order either granting or denying ICANN's Motion to Quash; and

(5) **EXTENDING** plaintiffs' lien on the judgment debtors' top level domain names and internet protocol addresses in accordance with this Order.

Pursuant to Local Rule 7(m), plaintiffs' counsel state that plaintiffs' counsel conferred with garnishee's counsel regarding this matter in a good-faith effort to determine whether the parties could reach an agreement, and that garnishees have indicated that they will oppose this motion.

Dated: September 25, 2014

Respectfully submitted,

THE BERKMAN LAW OFFICE, LLC  
*Attorneys for the Plaintiffs*

By:   
Robert J. Tolchin

111 Livingston Street, Suite 1928  
Brooklyn, New York 11201  
718-855-3627  
[RTolchin@BerkmanLaw.com](mailto:RTolchin@BerkmanLaw.com)



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RAINES FELDMAN, LLP  
*Attorneys for the Plaintiffs*

By: /s/ Erik Syverson  
Erik Syverson

9720 Wilshire Boulevard, Fifth Floor  
Beverly Hills, California 90212  
310-440-4100  
Fax: 310-691-1036  
[ESyverson@RainesLaw.com](mailto:ESyverson@RainesLaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify on this 25<sup>th</sup> day of September, 2014, that a copy of the forgoing Motion to Compel Production of Documents in Response to Subpoena together with the Memorandum of Law in Support of Motion to Compel Production of Documents in Response to Subpoena and Exhibits A and B was served via United States District Court ECF filing system and/or via email on counsel for ICANN:

Tara Lynn R. Zurawski (DC Bar No. 980960)  
JONES DAY  
51 Louisiana Avenue, NW  
Washington, DC 20001-2113

Eric Enson (*pro hac vice*)  
JONES DAY  
555 S. Flower Street  
50th Floor  
Los Angeles, CA 90071

Jeffrey A. LeVee (*pro hac vice*)  
JONES DAY  
555 S. Flower Street  
50th Floor  
Los Angeles, CA 90071

Dated: September 25, 2014

By: /s/ Erik S. Syverson  
Erik S. Syverson (*pro hac vice*)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<hr/>	
Shaul Stern, <i>et al.</i> ,	)
	)
Plaintiffs,	)
	)
v.	)
	)
The Islamic Republic of Iran, <i>et al.</i> ,	)
	)
Defendants.	)
	)
<hr/>	
Susan Weinstein, <i>et al.</i> ,	)
	)
Plaintiffs,	)
	)
v.	)
	)
The Islamic Republic of Iran, <i>et al.</i> ,	)
	)
Defendants.	)
	)
<hr/>	
Jenny Rubin, <i>et al.</i> ,	)
	)
Plaintiffs,	)
	)
v.	)
	)
The Islamic Republic of Iran, <i>et al.</i> ,	)
	)
Defendants.	)
	)
<hr/>	
Seth Charles Ben Haim, <i>et al.</i> ,	)
	)
Plaintiffs,	)
	)
v.	)
	)
The Islamic Republic of Iran, <i>et al.</i> ,	)
	)
Defendants.	)
	)
<hr/>	

CIVIL ACTION NO. 00-2602-RCL

CIVIL ACTION NO. 00-2601-RCL

CIVIL ACTION NO. 01-1655-RMU

CIVIL ACTION NO. 02-1811-RCL

CIVIL ACTION NO. 08-520-RCL

Ruth Calderon-Cardona, <i>et al.</i> ,	)	
Plaintiffs,	)	
v.	)	MISC. NO. 14-648
Democratic People’s Republic of Korea, <i>et al.</i> ,	)	
Defendants.	)	
Mary Nell Wyatt, <i>et al.</i> ,	)	
Plaintiffs,	)	
v.	)	CIVIL ACTION NO. 08-502-RCL
Syrian Arab Republic, <i>et al.</i> ,	)	
Defendants.	)	
	)	

**DECLARATION OF ERIK S. SYVERSON**

I, Erik Swen Syverson, declare pursuant to 28 U.S.C. § 1746, as follows:

- I am an attorney at law, duly licensed to practice before all courts of the State of California. I am a partner with the law firm Raines Feldman, LLP, counsel of record in this matter for the plaintiffs-judgment creditors (“Plaintiffs”) and I make this declaration in support of Plaintiffs’ Motion for Discovery pursuant to F.R.C.P. 69. Based on a review of the case file for this matter and my personal knowledge, I have knowledge of all of the facts contained in this Declaration and, if called as a witness, I could and would competently testify to all said facts.

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2. Prior to filing this motion, I met and conferred with Eric Enson, Esq., counsel for ICANN and a partner at Jones Day.
3. To this end, I sent Mr. Enson an email on September 19, 2014 setting forth the discovery Plaintiffs required in order to oppose ICANN's Motion to Quash. A true and correct copy of this email is attached hereto as **Exhibit A**.
4. Mr. Enson responded by way of letter on September 23, 2014. A true and correct copy of this letter is attached hereto as **Exhibit B**.
5. I responded to Mr. Enson's letter on September 24, 2014. A true and correct copy of this letter is attached hereto as **Exhibit C**.
6. It is evident that the parties are unable to resolve their differences through the meet and confer process. As such, Plaintiffs have no choice but to file their motion for discovery.

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

This declaration was signed on September 24, 2014 at Beverly Hills, California



ERIK SWEN SYVERSON

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**Erik S. Syverson**

---

**From:** Erik S. Syverson  
**Sent:** Monday, September 22, 2014 11:15 AM  
**To:** 'Eric P. Enson'  
**Cc:** Dina Rovner (dsrovner@gmail.com); Meir Katz (mkatz@berkmanlaw.com); Nitsana Darshan-Leitner, Esq. (nitsanad@zahav.net.il); Nitsana Darshan-Leitner (nitsanaleitner@gmail.com); Robert Tolchin (rtolchin@berkmanlaw.com); Steven T. Gebelin; Scott M. Lesowitz  
**Subject:** RE: meet and confer letter

Thank you.

**From:** Eric P. Enson [mailto:epenson@JonesDay.com]  
**Sent:** Monday, September 22, 2014 11:13 AM  
**To:** Erik S. Syverson  
**Cc:** Dina Rovner (dsrovner@gmail.com); Meir Katz (mkatz@berkmanlaw.com); Nitsana Darshan-Leitner, Esq. (nitsanad@zahav.net.il); Nitsana Darshan-Leitner (nitsanaleitner@gmail.com); Robert Tolchin (rtolchin@berkmanlaw.com); Steven T. Gebelin; Scott M. Lesowitz  
**Subject:** Re: meet and confer letter

Erik,

I will try to get back to you by tomorrow. The disc containing ICANN's production was delivered to Bob on Friday. Thanks.

Eric

Eric P. Enson  
**JONES DAY® - One Firm Worldwide**  
555 S. Flower St., 50th Floor  
Los Angeles, CA. 90071  
Office +213.243.2304  
Mobile +310.503.1774  
Email [epenson@jonesday.com](mailto:epenson@jonesday.com)

From: "Erik S. Syverson" <[ESyverson@raineslaw.com](mailto:ESyverson@raineslaw.com)>  
To: "[epenson@jonesday.com](mailto:epenson@jonesday.com)" <[epenson@jonesday.com](mailto:epenson@jonesday.com)>,  
Cc: "Nitsana Darshan-Leitner ([nitsanaleitner@gmail.com](mailto:nitsanaleitner@gmail.com))" <[nitsanaleitner@gmail.com](mailto:nitsanaleitner@gmail.com)>, "Nitsana Darshan-Leitner, Esq. ([nitsanad@zahav.net.il](mailto:nitsanad@zahav.net.il))" <[nitsanad@zahav.net.il](mailto:nitsanad@zahav.net.il)>, "Meir Katz ([mkatz@berkmanlaw.com](mailto:mkatz@berkmanlaw.com))" <[mkatz@berkmanlaw.com](mailto:mkatz@berkmanlaw.com)>, "Dina Rovner ([dsrovner@gmail.com](mailto:dsrovner@gmail.com))" <[dsrovner@gmail.com](mailto:dsrovner@gmail.com)>, "Scott M. Lesowitz" <[slesowitz@raineslaw.com](mailto:slesowitz@raineslaw.com)>, "Steven T. Gebelin" <[sgebelin@raineslaw.com](mailto:sgebelin@raineslaw.com)>, "Robert Tolchin ([rtolchin@berkmanlaw.com](mailto:rtolchin@berkmanlaw.com))" <[rtolchin@berkmanlaw.com](mailto:rtolchin@berkmanlaw.com)>  
Date: 09/19/2014 02:28 PM  
Subject: meet and confer letter

Eric,

Below is a list of discovery that we will be seeking by way of our motion. We reserve the right to amend this list at a later date, including in our moving papers. Please let me know at your earliest convenience but no later than 5 p.m. Tuesday if you will agree to a six month period in order to conduct this discovery. We believe six months is the minimum that this can be completed because of several international and third party depositions, which inevitably lead to logistical challenges. Finally, I still haven't received your document production, are you having it delivered today as you stated yesterday? I believe you said it would be on a disk, which is

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fine. Let me know, thank you.

- **Depositions**

1. Kim Davies is the current manager of IANA Root Zone services and works within ICANN. IANA Root Zone services is responsible for coordinating ccTLD delegations and insuring that such delegations comply with IANA's policies and procedures. Mr. Davies will be able to testify that IANA is both authorized and able to transfer cc TLD's and has done so in the past. She can also testify as to the nature and origin of the Root Zone and the Assets location within the Root Zone.
2. Jeffrey LeVee and Joe Sims. Msrs. LeVee and Sims were intimately involved in the formation of ICANN and formed ICANN with input from Dr. Jon Postel. Mr. LeVee and Mr. Sims can testify as to ICANN's authority over the Root Zone, its history and control over the Root Zone, and government contracts granting ICANN authority over the Root Zone.
3. Jeff Neumann, vice president of Neustar, Inc.. Neustar is a publicly traded American company that purchased Columbia's ccTLD for \$109 million in 2014. Mr. Neumann's testimony will directly counter ICANN's assertion that ccTLD's are not property and money generating assets. Otherwise, Neustar will have spent a lot of money for nothing.
4. David Conrad, Chief Technical Officer for ICANN. Mr. Conrad works with internal and external stakeholders to develop a technology roadmap for the Internet identifiers system. He reports directly to Akram Atallah, president of ICANN's Global Domains Division.
5. Kevin Robert Elz is a computer programmer who registered .AU and lost it pursuant to an ICANN revocation. He can testify as to ICANN's authority over the internet and its ability to re-delegate ccTLDs. Mr. Elz is believed to reside in Thailand.
6. Person Most Knowledgeable from Verisign regarding Verisign's purchase of .TV and .CC. These transactions evidence that ccTLD's are economic assets freely capable of being transferred for the benefit of judgment creditors similar to a piece of real estate such as an apartment building.
7. Lesley Cowley, former Chief Executive at Nominet UK and the former Chair of ICANN's ccNSO Council. She was involved in the transfer of .UK away from the academic community and is involved in high-level ccTLD policy. She lives in Britain.

- **Documents needed from ICANN**

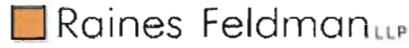
1. All documents relating to ICP-1. ICP-1 refers to the Internet Coordination Policy first proposed by ICANN in May 1999. This policy states that in cases where there is misconduct, or violation of ICANN policies, the IANA reserves the right to revoke and to re-delegate a Top Level Domain to another manager. The underlying correspondence and internal notes related to this policy will reveal that ICANN is fully capable of transferring the Assets to plaintiffs.
2. All documents relating to the re-delegations of cc TLD's of .ML (Mali); .KE (Kenya); .AU (Australia); .PN (Petcairn Island); .EH (Western Sahara); and .UM (US Minor Outlying Islands). All of these cc TLD's have been re-delegated or re-assigned by ICANN. These documents will reveal that, contrary to ICANN's representations in its Motion to Quash, ICANN is fully capable of transferring the Assets to plaintiffs just as it has with respect to the forementioned ccTLD's.
3. All documents relating to the IANA function, including but not limited to documents referring to the scope, purpose and/or role of the IANA function. The IANA function has full control and authority over ccTLD's pursuant to its monopolistic control over the Root Zone, where the Assets reside.
4. All documents relating to Kim Davies' presentation at an ICANN meeting in Marrakech in 2008. At this meeting Kim Davis discussed the scope, role and purpose of the IANA function.
5. All documents related to payments ICANN receives from registrars that offer .IR domain registrations to the public. These registrars include, but are not limited to, Instra Corporation and Only Domains.com. These companies are conducting business with the defendants and maintain an economic relationship with ICANN. This discovery is likely to reveal that these companies may not only be violating international sanctions treaties by conducting business with Iran, but that they derive income from the defendants and pass along a portion of that income to ICANN.
6. All documents related to the ccNSO (Country Code Names Supporting Organization) Framework of Interpretation Working Group, including, but not limited to its introduction, background, charter and recent version of the Framework of Interpretation WG Progress Report of March 2014. These documents will show that a large and reputable group of country code TLD and Government Advisory Committee representatives are working on policies with respect to delegation and re-delegation of ccTLD's that are in direct conflict with positions taken by ICANN in its Motion to Quash.
7. Any documents related to the United States government overruling, setting aside or failing to implement or execute a ccTLD delegation or re-delegation requested by ICANN.
8. All documents evidencing ccTLD registrars agreeing to provide funds to ICANN.

- **Additional Documents needed from third parties**

1. From Verisign, documents relating to its acquisition of the .TV and .CC ccTLD's.

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2.From Neustar, documents relating to its acquisition of the .CO ccTLD.



**Erik S. Syverson, Esq.**

**RAINES FELDMAN LLP** | 9720 Wilshire Boulevard, Fifth Floor | Beverly Hills, California 90212  
Main: 310 440-4100 | Direct: 310 988-4296 | Fax: 310 765-7730

Email: [esyverson@raineslaw.com](mailto:esyverson@raineslaw.com)  
Website: [www.RainesLaw.com](http://www.RainesLaw.com)

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## JONES DAY

555 SOUTH FLOWER STREET • FIFTIETH FLOOR • LOS ANGELES, CALIFORNIA 90071.2300  
TELEPHONE: +1.213.489.3939 • FACSIMILE: +1.213.243.2539

DIRECT NUMBER: (213) 243-2304  
EPENSON@JONESDAY.COM

September 23, 2014

### *VIA E-MAIL*

Erik S. Syverson  
Raines Feldman, LLP  
9720 Wilshire Blvd., Fifth Floor  
Beverly Hills, CA 90212

### *Re: Writs of Attachment Issued to ICANN*

Erik:

Thank you for your email regarding the additional discovery Plaintiffs are seeking in these matters. But for the reasons we have previously discussed, and those set forth below, ICANN cannot stipulate to such broad discovery or a six-month extension in the time for Plaintiffs to respond to ICANN's Motion to Quash.

First, Plaintiffs already sought and obtained over two months to respond to ICANN's Motion to Quash. Plaintiffs could have requested this kind of discovery at the time they sought their original extension, or shortly thereafter. Instead, Plaintiffs waited to make this request until just before their opposition to ICANN's Motion to Quash is due. Although ICANN does not believe that additional discovery is called for, it is ICANN's view that Plaintiffs could have requested this discovery at a time, and in a manner, that would not further delay resolution of ICANN's Motion to Quash.

Second, the depositions Plaintiffs seek are not relevant to ICANN's Motion to Quash and/or are impermissible. For instance, several of the proposed depositions, including those of Mr. Davies, Mr. Nueman, Mr. Elz, Verisign, and Ms. Cowley, are purportedly aimed at demonstrating that ICANN is "both authorized and able to transfer ccTLDs and has done so in the past." This contention is contradicted by the evidence and documents ICANN has already produced to Plaintiffs. Likewise, Plaintiffs offer no justification for wanting to depose Mr. Conrad, and Plaintiffs cannot depose ICANN's lawyers, Mr. Sims and Mr. LeVee, regarding the legal advice they provided to, and the legal work they performed for, ICANN.

Third, the document requests outlined by Plaintiffs do not seek relevant evidence, they call for publicly available documents and they would be unduly burdensome on ICANN. For instance, many of Plaintiffs' document requests seek documents revealing "that ICANN is fully capable of transferring the [relevant ccTLDs] to plaintiffs." ICANN possesses no such

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JONES DAY

Erik S. Syverson  
September 23, 2014  
Page 2

documents because, again, ICANN cannot unilaterally effectuate such a transfer, as evidenced in the materials ICANN has already provided Plaintiffs. Nor are there any documents relating to payments ICANN receives from .IR registrations, as ICANN has already certified. Likewise, as part of ICANN’s commitment to operate in an open and transparent manner, virtually all of the documents sought by Plaintiffs – such as those relating to ICP-1, the IANA functions, Mr. Davies’ presentations at ICANN meetings, the ccNSO, the Governmental Advisory Committee, the delegation and re-delegation of ccTLDs, and ICANN’s agreements with certain ccTLD managers – are publicly available on ICANN’s websites. It would be unduly burdensome to saddle a not for profit, nonparty, like ICANN, with the expense of searching for and then producing documents that do not relate to the legal issues raised in ICANN’s Motion to Quash and that are already available to Plaintiffs.

Finally, post-judgment discovery of a nonparty is limited to discovery that is “reasonably calculated to . . . provide the judgment creditor an opportunity to enforce its judgment.” *Falicia v. Advanced Tenant Servs., Inc.*, 235 F.R.D. 5, 10 (D.D.C. 2006) (quoting *GFL Advantage Fund, Ltd. v. Colkitt*, 216 F.R.D. 189, 194 (D.D.C. 2003)). “[A]sset discovery should be tailored to the specific purpose of enabling a judgment creditor to discover assets upon which it can seek to execute a judgment.” *E.I. DuPont de Nemours & Co. v. Kolon Indus.*, 286 F.R.D. 288, 292 (E.D. Va. 2012); *Caisson Corp. v. County W. Bldg. Corp.*, 62 F.R.D. 331, 334 (E.D. Pa. 1974) (the “inquiry must be kept pertinent to the goal of discovering concealed assets of the judgment debtor and not be allowed to become a means of harassment of the debtor or third persons.”). Here, the information Plaintiffs seek is not aimed at enabling Plaintiffs to enforce their judgments because ICANN possesses no assets of the defendants. As such, there is no justification for the additional discovery Plaintiffs now seek. *Peterson v. Islamic Republic of Iran*, 938 F. Supp. 2d 93, 97 (D.D.C 2013) (Lamberth, J.), *aff’d*, 561 F. App’x. 9 (D.C. Cir. 2014) (ruling that additional discovery of a garnishee was not justified based on the Court’s finding that the garnishee’s statements that it was not “indebted to” the defendants and did not possess any of their “goods, chattels, or credits” was “legally accurate.”).

ICANN has already produced documents responsive to Plaintiffs’ subpoenas. ICANN has already responded to the interrogatories contained in Plaintiffs writs of attachment. And ICANN has already explained and demonstrated why it holds no assets of the defendants that are subject to attachment. Moreover, Plaintiffs have had more than sufficient time to develop any factual material necessary to evaluate and respond to ICANN’s Motion to Quash. For these reasons, we do not believe additional discovery is appropriate or further delay in Plaintiffs’ opposition to the Motion to Quash is called for.

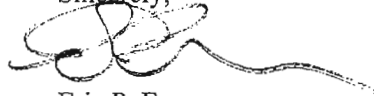
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JONES DAY

Erik S. Syverson  
September 23, 2014  
Page 3

Again, thank you for raising these issues with me. If you would like to discuss this further, please do not hesitate to give me a call. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric P. Enson', with a long, sweeping horizontal flourish extending to the right.

Eric P. Enson

cc: Robert J. Tolchin  
Dina Rovner



**Beverly Hills**  
9720 Wilshire Boulevard, 5<sup>th</sup> Floor  
Beverly Hills, California 90212

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[esyverson@raineslaw.com](mailto:esyverson@raineslaw.com)

September 24, 2014

VIA E-MAIL

Eric Enson, Esq.  
555 South Flower Street  
Fiftieth Floor  
Los Angeles, California 90071  
[epenson@jonesday.com](mailto:epenson@jonesday.com)

Re: Motion for Discovery Regarding ICANN

Eric,

Thank you for your meet and confer letter regarding our proposed motion for discovery. We will attach it as an exhibit to our papers as proof that both parties have met and conferred in good faith and fulfilled our obligations under the local rules. For the reasons stated herein, ICANN’s opposition to our discovery lacks merit.

First, your argument that Plaintiffs have been dilatory is neither true nor a legal basis for denying our discovery request. ICANN stonewalled Plaintiffs’ basic document requests and only provided Plaintiffs with responsive documents on September 19. Plaintiffs diligently conducted their own independent investigation of ICANN’s positions. However, there is only so much we can do without subpoena power to obtain documents and depose crucial witnesses. Furthermore, due to ICANN’s tardy production, we are still evaluating the import and responsiveness of these documents. They are certainly not responsive to many of the enumerated categories of our planned

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Eric Enson, Esq.  
September 24, 2014  
Page 2

Direct: 310.988.4296  
Fax: 310.765.7730  
esyverson@raineslaw.com

motion nor are documents the equivalent of a deposition. Finally, my firm was only admitted to this case on September 11 – so we have been counsel of record for less than two weeks.

Second, your argument that the depositions Plaintiffs seek are not relevant is not well taken. We have laid out in detail for you why such depositions are relevant and necessary. By contrast, you have failed to identify even one specific piece of evidence that would contradict the justifications set forth in my previous letter. With regard to Messrs. LeVee and Sims, I fully anticipated your objection based upon attorney client privilege/work product. However, we do not wish to invade the attorney client privilege. The fact of the matter is that ICANN and Jones Day have a deeply intertwined relationship. You know this and it is widely known that Jones Day played a central and controlling role in the ICANN formation story. That formation story, as laid out for you in my previous correspondence, is central to our ability to oppose ICANN's motion. ICANN cannot avoid this simply by wrapping itself in a blanket attorney client privilege. In fact, Messrs. Sims and LeVee have proudly recounted some of the broader strokes of their involvement in the press. They cannot now shrink from such assertions under a claim of privilege.

You continue only to stonewall and put forth general statements to the effect that "no contradictory evidence exists, no depositions are relevant and you need to accept my word as gospel because I'm a Jones Day lawyer". We do not believe this will cut it with the Court. Nor does it pass muster with the clients we proudly serve. Our clients have suffered greatly from horrific acts of terrorism, they deserve to know the truth and we are surprised by ICANN's obstruction of our search for truth and assets.

Third, your representations concerning documents are only representations and not under oath. Additionally, as you will see in our moving papers, your assertions are not true. ICANN has control of the Root Zone. The ccTLD's at issue reside in the Root and are, in fact, property of the judgment debtors. ICANN has the power to transfer, revoke or cancel ccTLD's. Many re-delegations and/or cancellations, both hostile and non-hostile, have taken place pursuant to ICANN's powers. We are simply amazed at your position that this is not so. Furthermore, it is disingenuous that all responsive documents are publicly available. It is not true and we know this because a few highly

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Eric Enson, Esq.  
September 24, 2014  
Page 3

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Fax: 310.765.7730  
esyverson@raineslaw.com

relevant responsive documents have dropped into our lap by luck rather than from ICANN or a subpoena.

Also, we understand that ICANN is non-profit but it is well funded. This is easily verified by reviewing its current balance sheet. Also, it is still sitting on hundreds of millions of dollars generated in the recent generic TLD auctions<sup>1</sup>. As you know, it cost \$185,000 just to apply for a new generic TLD. Finally, ICANN spends over \$2,000,000 per year on legal fees with your law firm. ICANN is not a modest non-profit struggling to keep the lights on. It is a powerful juggernaut with near total control of one of the world's most lucrative resources. It also houses property belonging to many countries, companies and individuals. It needs to turn over the judgment debtors' property residing in the Root Zone.

Finally, your citation to *Falicia v. Advanced Tenant Servs., Inc.*, 235 F.R.D. 5, 10 (D.D.C. 2006) is not persuasive. We are not conducting a fishing expedition; we have provided you with specific categories of documents and witnesses and explained the relevance in detail. We are in full compliance with the controlling law. Similarly unconvincing is your citation to *Peterson v. Islamic Republic of Iran*, 938 F.Supp. 2d 93, 97 (D.D.C. 2013)(Lamberth, J.), aff'd, 561 F.App'x.9(D.C. Cir.2014). The key distinguishing phrase in that case is "legally accurate". ICANN's enumerated positions in its motion and your letter are not "legally accurate". To this end, we have identified documents and witnesses directly contradicting ICANN's position.

We wish that we could have worked this out. We do not want to file a motion but your positions have forced us to. We are duty bound to serve our clients and uncover assets that may be used to satisfy their judgments.

---

<sup>1</sup> ICANN's position in this case would appear to be troubling both to applicants and current owners of generic TLD's because clearly these parties have no property rights according to ICANN – despite spending exorbitant sums of money to obtain them. Who owns generic TLD's? ICANN?

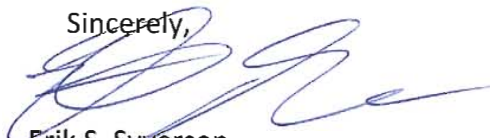
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Eric Enson, Esq.  
September 24, 2014  
Page 4

Direct: 310.988.4296  
Fax: 310.765.7730  
esyverson@raineslaw.com

Please call me anytime to discuss our motion or the associated proceedings.

Sincerely,



Erik S. Syverson  
of RAINES FELDMAN LLP

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
Shaul Stern, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 00-2602-RCL
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
_____	)	
Susan Weinstein, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 00-2601-RCL
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
_____	)	
Jenny Rubin, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 01-1655-RMU
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
_____	)	
Seth Charles Ben Haim, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION NO. 02-1811-RCL
	)	
v.	)	CIVIL ACTION NO. 08-520-RCL
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	



Ruth Calderon-Cardona, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	MISC. NO. 14-648
	)	
Democratic People’s Republic of Korea, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
Mary Nell Wyatt, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 08-502-RCL
	)	
Syrian Arab Republic, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
	)	

**DECLARATION OF STEVEN T. GEBELIN**

I, Steven T. Gebelin, declare pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney at law, duly licensed to practice before all courts of the State of California. I am an associate with the law firm Raines Feldman, LLP, counsel of record in this matter for the plaintiffs-judgment creditors (“Plaintiffs”) in this matter and I make this declaration in support of Plaintiffs’ Motion for Discovery pursuant to F.R.C.P. 69. Based on a review of the case file for this matter and my personal knowledge, I have knowledge of all of the facts contained in this Declaration and, if called as a witness, I could and would competently testify to all said facts.
  
2. Since at least early August 2014, Plaintiffs have been in communication with William “Bill” Manning, an internet infrastructure management and domain name systems

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operations and development expert with extensive knowledge regarding top level domain and root functions, seeking his assistance to provide testimony regarding ICANN's control over the root zone and IP address assignments. In pursuit of that goal, Plaintiffs and Mr. Manning were able to reach an agreement and Mr. Manning executed an expert retention agreement with Plaintiffs on or about September 16, 2014. Attached hereto as **Exhibit A** is a true and accurate copy of a CV for Mr. Manning that is published by ICANN at <https://www.icann.org/en/system/files/files/manning-cv-01aug10-en.pdf>.

3. Following the execution of Mr. Manning's expert retention agreement, I participated in a conference call with Mr. Manning on September 17, 2014 to discuss the state of Plaintiffs' knowledge and evidentiary record regarding ICANN's control over and ability to transfer the country code top level domains ("ccTLDs") and internet protocol ("IP") addresses of the judgment debtors in these cases (the "Assets").

4. During that conversation, Mr. Manning stressed that ICANN had a monopoly or complete control over the "root zone" such that ICANN is wholly and solely responsible for the mapping of top level domains (including ccTLDs) to their respective registries / name servers.

5. Mr. Manning also discussed several instances in which ICANN changed and redirected who runs certain ccTLDs, including the ccTLDs .au, .co, .uk, and others in varying circumstances. Several of these ccTLD transfers were in conjunction with the "monetization" of the ccTLDs by their respective governments, including instances where the governments transferred control away from academic communities to government approved third parties that acquired contractual property rights to exploit the ccTLD and generate revenue.

6. Mr. Manning also provided intelligence regarding relevant individuals, third parties, and classes of documents outside of Plaintiffs' control that would provide evidence

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regarding ICANN's control over and ability to transfer ccTLDs and IP addresses. Mr. Manning confirmed that the depositions of the following Persons with Relevant Knowledge are likely to provide evidence relevant to the issues before the court:

- a. Kim Davies, who is the current manager of IANA Root Zone services and works within ICANN. IANA Root Zone services is responsible for coordinating ccTLD delegations and insuring that such delegations comply with IANA's policies and procedures. Mr. Davies should have information showing that IANA is both authorized and able to transfer ccTLDs and has done so in the past. Attached hereto as **Exhibit B** is a true and correct copy of Mr. Davies' September 2008 presentation "An Introduction to IANA, ICANN At Large Community Briefing" as published by ICANN at <https://www.iana.org/about/presentations/davies-atlarge-iana101-080929.pdf>
- b. Jeffrey LeVee and Joe Simms. Mr. LeVee was a signatory of ICANN's Articles of Incorporation. Mr. LeVee was intimately involved in the formation of ICANN and formed ICANN with his law firm partner Joe Sims with input from Dr. Jon Postel. Mr. Levee and Mr. Sims should have information regarding ICANN's authority over the Root Zone, its history and control over the Root Zone, and government contracts granting ICANN authority over the Root Zone. Attached hereto as **Exhibit C** is a true and accurate copy of a 2011 interview of Mr. LeVee and Mr. Simms titled "Present At The Creations: ICANN's Birth, Domain Expansion And Jones Day's Role," published by The Metropolitan Corporate Counsel at <http://www.metrocorpocounsel.com/pdf/2011/August/44.pdf>

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- c. Jeff Neumann, vice president of Neustar, Inc.. Neustar is a publicly traded American company that purchased Columbia's ccTLD (.CO) for \$109 million in 2014. Mr. Neumann's testimony will directly counter ICANN's assertion that ccTLD's are not property; otherwise, Neustar will have spent a lot of money for nothing. Attached hereto as **Exhibit D** is a true and accurate copy of excerpts from the June 2014 Form 10-Q filed with the U.S. Securities and Exchange Commission filed by NeuStar, Inc., in which Neustar details its April 2014 acquisition of ".CO Internet S.A.S (.CO Internet) and certain associated assets," explaining that ".CO Internet is the exclusive operator of the worldwide registry for Internet addresses with the ".co" top-level domain."
- d. David Conrad, Chief Technical Officer for ICANN. Mr. Conrad works with internal and external stakeholders to develop a technology roadmap for the Internet identifiers system. He reports directly to Akram Atallah, president of ICANN's Global Domains Division. Mr. Conrad was formerly the general manager of IANA at ICANN, and also advised ICANN's Board of Directors regarding the removal of the .UM ccTLD from the root. A description of his current position and a short biography was published by ICANN at <https://www.icann.org/news/announcement-2014-06-20-en>.
- e. Kevin Robert Elz is a computer programmer who registered .AU and lost it pursuant to an ICANN revocation. He can testify as to ICANN's authority over the internet and its ability to re-delegate ccTLDs. Mr. Elz is believed to reside in Thailand.

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- f. Person Most Knowledgeable from Verisign regarding Verisign's purchase of .TV and .CC. These transactions evidence that ccTLDs are economic assets freely capable of being transferred for economic consideration or for the benefit of judgment creditors similar to a piece of real estate such as an apartment building. Attached hereto as **Exhibit G** is a true and accurate copy of a New York Times article titled "As Online Video Surges, the .TV Domain Rides the Wave," by Noam Cohen, published on August 26, 2014 as retrieved from the website [http://www.nytimes.com/2014/08/27/business/media/a-newly-valuable-virtual-address.html?\\_r=1](http://www.nytimes.com/2014/08/27/business/media/a-newly-valuable-virtual-address.html?_r=1), discussing the millions of dollars generated for the government of Tuvalu from its transfer of rights in the .TV ccTLD to Verisign.
- g. Lesley Cowley, former Chief Executive at Nominet UK and the former Chair of ICANN's ccNSO Council. She was involved in the transfer of .UK away from the academic community and is involved in high-level ccTLD policy. She lives in Britain.

7. Mr. Manning also confirmed that the following document categories are likely to provide evidence relevant to the issues before the court:

- a. All documents relating to ICP-1. ICP-1 refers to the Internet Coordination Policy first proposed by ICANN in May 1999. This policy states that in cases where there is misconduct, or violation of ICANN policies, the IANA (Internet Assigned Numbers Authority) reserves the right to revoke and to re-delegate a Top Level Domain to another manager. The underlying correspondence and internal notes related to this policy will reveal that ICANN is fully capable of transferring the Assets to plaintiffs.

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- b. All documents relating to the re-delegations of ccTLDs of .ML (Mali); .KE (Kenya); .AU (Australia); .PN (Petcairn Island); .EH (Western Sahara); .UM (US Minor Outlying Islands); and .CN (China). All of these ccTLDs have been re-delegated or re-assigned by ICANN. These documents will reveal that, contrary to ICANN's representations in its Motion to Quash, ICANN is fully capable of transferring the Assets to plaintiffs just as it has with respect to the aforementioned ccTLDs.
- c. All documents relating to the IANA function, including but not limited to documents referring to the scope, purpose and/or role of the IANA function. The IANA function has full control and authority over ccTLDs.
- d. All documents relating to Kim Davies' presentation at an ICANN meeting in Marrakesh in 2008. At this meeting Kim Davies discussed the scope, role and purpose of the IANA function.
- e. All documents related to payments ICANN receives from registrars that offer .IR domain registrations to the public. These registrars include, but are not limited to, Instra Corporation and Only Domains.com. These companies are conducting business with the judgment debtors and maintain an economic relationship with ICANN.
- f. All documents related to the ccNSO (Country Code Names Supporting Organization) Framework of Interpretation Working Group, including, but not limited to its introduction, background, charter and recent version of the Framework of Interpretation WG Progress Report of March 2014. These documents will show that a large and reputable group of country code TLD

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and Government Advisory Committee representatives are working on policies with respect to delegation and re-delegation of ccTLDs that are in direct conflict with positions taken by ICANN in its Motion to Quash.

- g. Any documents related to the United States government overruling, setting aside or failing to implement or execute a ccTLD delegation or re-delegation requested by ICANN.
- h. All documents evidencing ccTLD registrars agreeing to provide funds to ICANN.
- i. Documents relating to the transfer to or acquisition of .TV and .CC by Verisign.
- j. Documents relating to the transfer to or acquisition of .CO by Neustar.

8. Following our conversation with Mr. Manning on Wednesday, September 17, 2014, Mr. Manning assured Plaintiffs that he would prepare a declaration regarding his knowledge regarding ICANN's treatment of ccTLDs and his insight regarding the above discovery topics, and that he intended have that declaration prepared by Friday, September 19, 2014. As of today's date, Plaintiffs have not received a declaration from Mr. Manning, and have received no response to numerous voicemails and emails made since Monday, September 22, 2014.

9. On September 23, 2014, Plaintiffs received a copy of a May 2, 2008 letter from the U.S. Department of Commerce's National Telecommunications and Information Administration ("NTIA") sent to Bill Manning regarding the Delegation Status of the .UM (United States Minor Outlying Islands) Top-Level Domain Name. A true and correct copy of the letter as received by Plaintiffs is attached as **Exhibit E**.

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10. After reviewing Exhibit E, Plaintiffs then retrieved the minutes for the January 16, 2007 ICANN Board of Directors Special Meeting referenced within the letter from ICANN's website. A true and correct copy of those minutes as published by ICANN at <https://www.icann.org/resources/board-material/minutes-2007-01-17-en> is attached hereto as **Exhibit F**.

11. On September 19, 2014, ICANN produced approximately 1660 of pages of documents that appear to be correspondence relating to IANA functions and ccTLDs at issue in this proceeding.

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

September 24, 2014



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Steven T. Gebelin



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
Shaul Stern, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 00-2602-RCL
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
_____	)	
Susan Weinstein, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 00-2601-RCL
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
_____	)	
Jenny Rubin, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 01-1655-RMU
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
_____	)	
Seth Charles Ben Haim, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION NO. 02-1811-RCL
	)	
v.	)	CIVIL ACTION NO. 08-520-RCL
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

_____	)	
Ruth Calderon-Cardona, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	MISC. NO. 14-648
	)	
Democratic People’s Republic of Korea, <i>et</i>	)	
<i>al.</i> ,	)	
	)	
Defendants.	)	
_____	)	
Mary Nell Wyatt, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 08-502-RCL
	)	
Syrian Arab Republic, <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

**PLAINTIFFS-JUDGMENT CREDITORS PRELIMINARY RESPONSE TO  
INTERNET CORPORATION FOR ASSIGNED NAME AND NUMBERS’  
MOTION TO QUASH WRIT OF ATTACHMENT**

Plaintiffs-Judgment Creditors’ (“Plaintiffs”), by and through their undersigned counsel, preliminarily respond as follows to the motion by non-party Internet Corporation for Assigned Names and Numbers (“ICANN”) to quash the Writs of Attachment served by Plaintiffs in the above entitled action (the “Motion to Quash”):

Currently pending before this Court is Plaintiffs’ motion requesting discovery regarding the numerous unilateral factual assertions made by ICANN in its Motion to Quash, along with related extensions of time for Plaintiffs’ opposition to the Motion to Quash and related filings, hearings, and liens (the “Motion for Discovery”).

A copy the Motion for Discovery is annexed hereto as Exhibit A.

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As set forth in Plaintiffs' Motion for discovery, Plaintiffs need to take discovery in order to present the complete evidentiary picture in opposition to ICANN's Motion to Quash and its claimed factual assertions.

These factual assertions include claims that 1) the assets covered by the Writs of Attachment (the .IR, .SY and .KP country code top-level domains ("ccTLDs"), related non-ASCII ccTLDs, and supporting IP addresses (collectively, the "Assets")) are not "property"; 2) the Assets are not "owned" by the judgment debtors; 3) the Assets are not within the territorial reach of this Court; and 4) ICANN cannot transfer the Assets to Plaintiffs. Plaintiffs' Motion for Discovery also explains the state of discovery to date regarding these issues, including information showing apparent treatment of ccTLDs as property by governments and corporations and ICANN's apparent control over and ability to transfer of certain ccTLDs.

Plaintiffs' Motion for Discovery also explains why Plaintiffs believe that discovery will be fruitful in opposing ICANN's Motion to Quash and obtaining admissible evidence likely to contradict ICANN's position. Although Plaintiffs need the requested discovery in order to present this Court with the complete evidentiary picture, Plaintiffs, in the Discovery Motion, have already presented this Court with considerable reason to disbelieve and question the factual<sup>1</sup> and legal<sup>2</sup> assertions presented by ICANN in its Motion to Quash.

---

<sup>1</sup> For example, numerous ccTLDs have been monetized by their respective governments (*e.g.* .CO and .TV), moved away from prior registries or registrars (*e.g.* .AU and .ZU) and claimed as government property (.UM).

<sup>2</sup> As mentioned in previous filings, legal authority exists which supports the positions Plaintiffs expect to establish and bolster through the sought discovery, that the Assets are property and can be transferred by ICANN. *See, e.g. Office Depot Inc. v. Zuccarini*, 596 F. 3d 696 (9th Cir. 2010) (holding that second level domain name was property of judgment debtor and subject to transfer to receiver in action pending in jurisdiction where registry or registrar was located); *Kremen v. Cohen*, 337 F. 3d 1024 (9th Cir. 2003) (second level domain name was property subject to conversion claim against registrar for wrongful transfer).

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Accordingly, for the reasons set forth herein and in the attached Motion for Discovery, Plaintiffs respectfully request that the Court grant the pending Motion for Discovery, which *inter alia*, would permit Plaintiffs to file a complete opposition to ICANN’s Motion to Quash on the merits and with the benefit of fulsome discovery on the factual issues underlying the novel legal questions raised by these proceedings.

Dated: September 30, 2014

Respectfully submitted,

THE BERKMAN LAW OFFICE, LLC  
*Attorneys for the Plaintiffs*

By:  \_\_\_\_\_

Robert J. Tolchin

111 Livingston Street, Suite 1928  
Brooklyn, New York 11201  
718-855-3627  
[RTolchin@BerkmanLaw.com](mailto:RTolchin@BerkmanLaw.com)

RAINES FELDMAN, LLP  
*Attorneys for the Plaintiffs*

By:  \_\_\_\_\_

Erik Syverson

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Beverly Hills, California 90212  
310-440-4100  
Fax: 310-691-1036  
[ESyverson@RainesLaw.com](mailto:ESyverson@RainesLaw.com)

Case 1:00-cv-02601-RCL Document 108 Filed 09/30/14 Page 5 of 36

**CERTIFICATE OF SERVICE**

I hereby certify on this 30th day of September, 2014, that a copy of the forgoing Plaintiffs-Judgment Creditors Response to Internet Corporation for Assigned Name and Numbers' Motion To Quash Writ Of Attachment was served via United States District Court ECF filing system and/or via email on counsel for ICANN:

Tara Lynn R. Zurawski (DC Bar No. 980960)  
JONES DAY  
51 Louisiana Avenue, NW  
Washington, DC 20001-2113

Eric Enson (*pro hac vice*)  
JONES DAY  
555 S. Flower Street  
50th Floor  
Los Angeles, CA 90071

Jeffrey A. LeVee (*pro hac vice*)  
JONES DAY  
555 S. Flower Street  
50th Floor  
Los Angeles, CA 90071

Dated: September 30, 2014

By: /s/ Erik S. Syverson  
Erik S. Syverson (*pro hac vice*)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
Jenny Rubin, et al.	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 01-1655-RCL
	)	
The Islamic Republic of Iran, et al.	)	
	)	
Defendants.	)	
_____	)	
Susan Weinstein, et al.	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 00-2601-RCL
	)	
The Islamic Republic of Iran, et al.	)	
	)	
Defendants.	)	
_____	)	
Seth Charles Ben Haim, et al.	)	
	)	
Plaintiffs,	)	
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v.	)	CIVIL ACTION NO. 02-1811-RCL
	)	CIVIL ACTION NO. 08-520-RCL
	)	
The Islamic Republic of Iran, et al.	)	
	)	
Defendants.	)	
_____	)	

\_\_\_\_\_  
Ruth Calderon-Cardona, et al. )

Plaintiffs, )

v. )

Democratic People’s Republic of Korea, et )  
al. )

Defendants. )

MISC. NO. 14-648-RCL

\_\_\_\_\_  
Mary Nell Wyatt, et al. )

Plaintiffs, )

v. )

Syrian Arab Republic, et al. )

Defendants. )

CIVIL ACTION NO. 08-502-RCL

\_\_\_\_\_  
Shaul Stern, et al. )

Plaintiffs, )

v. )

The Islamic Republic of Iran, et al. )

Defendants. )

CIVIL ACTION NO. 00-2602-RCL

\_\_\_\_\_

**DECLARATION OF ERIC P. ENSON IN SUPPORT OF NONPARTY  
ICANN'S OPPOSITION TO PLAINTIFFS' MOTION FOR  
SIX-MONTH DISCOVERY PERIOD**

I, Eric P. Enson, declare and affirm as follows:

1. I am a partner with the law firm of Jones Day, am a member of the California Bar and have been admitted *pro hac vice* in the above-referenced matters. Jones Day is counsel of record to the Internet Corporation for Assigned Names and Numbers ("ICANN") in these actions. I have personal knowledge of the matters set forth herein and am competent to testify to those matters. I make this declaration in support of Nonparty ICANN's Opposition to Plaintiffs' Motion for Six-Month Discovery Period ("Motion").

2. As part of its commitment to operate in an open and transparent manner, ICANN publicly posts on its website documents and information regarding virtually every aspect of ICANN's operations, policies and policy development. Attached hereto as Exhibit A is a true and correct copy of a listing of the comprehensive set of materials that ICANN makes available on its website as a matter of course, which is also *available at* <https://www.icann.org/resources/pages/didp-2012-02-25-en>.

3. As set forth in Exhibit A, ICANN publicly posts on its website documents that fall into the following twenty-one categories: (1) Annual reports; (2) Articles of Incorporation; (3) Board meeting transcripts, minutes and resolutions; (4) ICANN's budgets; (5) Bylaws, both current and previous; (6) Correspondence; (7) Financial information; (8) Litigation documents; (9) Major agreements; (10) Monthly registry reports; (11) Operating plans; (12) Policy documents; (13) Speeches, presentations and publications; (14) Strategic plans; (15) Material information relating to ICANN's Address Supporting Organization, including policy documents, Regional Internet Registry ("RIR") policy documents, guidelines and procedures, meeting agendas and minutes,



presentations, routing statistics, and information regarding the RIRs; (16) Material information relating to ICANN's Generic Supporting Organization, including correspondence and presentations, council resolutions, requests for comments, draft documents, policies, and reference documents; (17) Material information relating to ICANN's country code Names Supporting Organization ("ccNSO"), including meeting agendas, minutes, reports, and presentations; (18) Material information relating to the At Large Advisory Committee, including correspondence, statements, and meeting minutes; (19) Material information relating to the Governmental Advisory Committee, including operating principles, gTLD principles, ccTLD principles, principles regarding gTLD Whois issues, communiqués, and meeting transcripts, and agendas; (20) Material information relating to the Root Server Advisory Committee ("RSSAC"), including meeting minutes and information surrounding ongoing projects; and (21) Material information relating to the Security and Stability Advisory Committee, including its charter, various presentations, work plans, reports, and advisories. By clicking on the links provided on Exhibit A, large volumes of information, data and documents relating to these twenty-one categories is available, many of which encompass the discovery Plaintiffs seek with their Motion.

4. More specifically, with their Motion, Plaintiffs seek discovery regarding ICANN's formation and operations, ICANN's management of the Root Zone Database, ICANN's contracts with the United States government regarding the Root Zone Database, the IANA functions ICANN performs and the ccNSO. (Dkt. No. 129 at 12-13, ¶ 2; 15, ¶ 3; 15, ¶ 6.) All of this information is available on the Welcome, Resources and Strategic Planning webpages on ICANN's website, as set forth below.

5. Attached hereto as Exhibit B is a true and correct copy of ICANN's Welcome webpage,

which is also *available at* <https://www.icann.org/resources/pages/welcome-2012-02-25-en>. ICANN's Welcome webpage, and the links embedded in that webpage, contain information about ICANN's formation, ICANN's mission, ICANN's management and organization and ICANN's policy development. ICANN's Welcome webpage also includes information about, and links to, ICANN's supporting organizations and advisory committees, including the ccNSO and the RSSAC.

6. Attached hereto as Exhibit C is a true and correct copy of ICANN's Resources webpage, which is also *available at* <https://www.icann.org/resources>. ICANN's Resources webpage contains information about ccTLDs, internationalized domain names, ICANN's governance, ICANN policy and the top-level domain ("TLD") registries, which are the entities that operate the Internet's TLDs. Within the Governance link, on the left-hand side of ICANN's Resources webpage, a true and correct copy of which is attached hereto as Exhibit D and is also *available at* <https://www.icann.org/resources/pages/governance-2012-02-25-en>, is a listing of ICANN's governing documents, such as ICANN's Articles of Incorporation and Bylaws. Within the Agreements link, located on the Governance webpage, a true and correct copy of which is attached hereto as Exhibit E and is also *available at* <https://www.icann.org/resources/pages/agreements-2012-02-25-en>, is a listing and links to every major agreement ICANN has entered into since its inception, including agreements with the United States government regarding ICANN's performance of the IANA functions and management of the Root Zone Database.

7. Attached hereto as Exhibit F is a true and correct copy of ICANN's Strategic Planning webpage, which is also *available at* <https://www.icann.org/resources/pages/strategic-engagement-2013-10-10-en>. ICANN's Strategic Planning webpage contains information about,

and links to, ICANN's operations, strategic objectives, operating plans, and supporting materials.

8. Plaintiffs seek discovery regarding Internet Coordination Policy 1 ("ICP-1"). (Dkt. No. 129 at 14, ¶ 1.) Attached hereto as Exhibit G is a true and correct copy of ICANN's webpage containing information about and links to ICP-1, which is also *available at* <https://www.icann.org/resources/pages/delegation-2012-02-25-en>.

9. Plaintiffs seek discovery regarding ccTLDs in general, ccTLD managers, certain ccTLD delegations and re-delegations and agreements by which ICANN receives funds from ccTLD managers. (Dkt. No. 129 at 13, ¶¶ 3, 5, 6, 7; 14, ¶ 2; 16 ¶ 8.) Attached hereto as Exhibit H is a true and correct copy of ICANN's ccTLD webpage, which is also *available at* <https://www.icann.org/resources/pages/cctlds-21-2012-02-25-en>. The Background Materials link on the left-hand side of the ccTLD webpage, which is attached hereto as Exhibit I and is also *available at* <https://www.icann.org/resources/pages/background-2012-02-25-en>, contains numerous documents and papers, going back as far as 2000, regarding ICANN's involvement with ccTLDs, standards and principles for ccTLD operations, overviews of ccTLD delegations and re-delegations and ICANN reports regarding ccTLD delegations and re-delegations. The Agreements link on the left-hand side of the ccTLD webpage, which is attached hereto as Exhibit J and is also *available at* <https://www.icann.org/resources/pages/cctlds-2012-02-25-en>, contains every existing agreement, going back as far as 2000, between ICANN and ccTLD managers regarding operation of a ccTLD. The Root Zone Database link on the left-hand side of the ccTLD webpage, which is attached hereto as Exhibit K and is also *available at* <http://www.iana.org/domains/root/db>, contains a listing of every top-level domain currently in existence. In addition, the delegation records for each of these TLDs, which lists the entities and servers that support each of these TLDs, can be found by clicking on the TLD links.

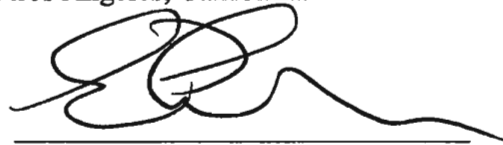
10. Although information regarding the IANA functions that ICANN performs and the ccNSO is contained in many of the links listed above, ICANN also hosts an IANA website, which can be found at <http://www.iana.org/>, and a ccNSO website which can be found at <http://ccnso.icann.org/>. Both of these websites contain a wealth of information about the IANA functions and ccTLDs.

11. Finally, Plaintiffs seek discovery regarding a presentation given by ICANN's Kim Davies during an ICANN meeting in Marrakech. (Dkt. No. 129 at 15, ¶ 4.) Attached hereto as Exhibit L is a true and correct copy of the Presentations webpage on ICANN's IANA website, which contains Mr. Davies' presentation and a multitude of other IANA presentations going back as far as 2005, and which is also *available at* <https://www.iana.org/about/presentations>.

12. Attached hereto as Exhibit M is a true and correct copy of a page from ICANN's Applicant Guidebook for the new gTLD program.

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

This declaration was signed on October 14, 2014 at Los Angeles, California.



Eric P. Enson

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
<b>Shaul Stern, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil No. 00-2602 (RCL)</b>
	)	
<b>The Islamic Republic of Iran, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	
_____	)	

_____	)	
<b>Susan Weinstein, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil No. 00-2601 (RCL)</b>
	)	
<b>The Islamic Republic of Iran, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	
_____	)	

_____	)	
<b>Jenny Rubin, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil No. 01-1655 (RCL)</b>
	)	
<b>The Islamic Republic of Iran, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	
_____	)	

_____	)	
<b>Seth Charles Ben Haim, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil No. 02-1811 (RCL)</b>
	)	
<b>The Islamic Republic of Iran, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

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)

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)  
**Seth Charles Ben Haim, et al.,** )

**Plaintiffs,** )

**v.** )

**Civil No. 08-520 (RCL)**

**The Islamic Republic of Iran, et al.,** )

**Defendants.** )

\_\_\_\_\_  
)  
**Ruth Calderon-Cardona, et al.,** )

**Plaintiffs,** )

**v.** )

**Misc. No. 14-648 (RCL)**

**Democratic People's Republic of Korea,** )  
**et al.,** )

**Defendants.** )

\_\_\_\_\_  
)  
**Mary Nell Wyatt, et al.,** )

**Plaintiffs,** )

**v.** )

**Civil No. 08-502 (RCL)**

**Syrian Arab Republic, et al.,** )

**Defendants.** )

**ORDER**

Pending before the Court is non-party garnishee Internet Corporation for Assigned Names and Numbers' ("ICANN's") motion to quash writ of attachment and plaintiffs' motion for a six month discovery period. For the reasons stated in the Memorandum Opinion issued this

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date and upon consideration of the parties' briefing and the relevant legal authorities, it is hereby

**ORDERED** that ICANN's motion to quash is **GRANTED** and plaintiffs' writs of attachment as to ICANN are quashed; and it is further

**ORDERED** that plaintiffs' motion for discovery is **DENIED** as moot.

It is **SO ORDERED**.

Signed by Royce C. Lamberth, United States District Judge, on November 10, 2014.



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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

\_\_\_\_\_  
**Shaul Stern, et al.,**  
  
**Plaintiffs,**  
  
**v.**  
  
**The Islamic Republic of Iran, et al.,**  
  
**Defendants.**  
\_\_\_\_\_

Civil No. 00-2602 (RCL)

\_\_\_\_\_  
**Susan Weinstein, et al.,**  
  
**Plaintiffs,**  
  
**v.**  
  
**The Islamic Republic of Iran, et al.,**  
  
**Defendants.**  
\_\_\_\_\_

Civil No. 00-2601 (RCL)

\_\_\_\_\_  
**Jenny Rubin, et al.,**  
  
**Plaintiffs,**  
  
**v.**  
  
**The Islamic Republic of Iran, et al.,**  
  
**Defendants.**  
\_\_\_\_\_

Civil No. 01-1655 (RCL)

\_\_\_\_\_  
**Seth Charles Ben Haim, et al.,**  
  
**Plaintiffs,**  
  
**v.**  
  
**The Islamic Republic of Iran, et al.,**  
  
**Defendants.**  
\_\_\_\_\_

Civil No. 02-1811 (RCL)

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\_\_\_\_\_  
)

**Seth Charles Ben Haim, et al.,** )

**Plaintiffs,** )

**v.** )

**The Islamic Republic of Iran, et al.,** )

**Defendants.** )

**Civil No. 08-520 (RCL)**

\_\_\_\_\_  
)

**Ruth Calderon-Cardona, et al.,** )

**Plaintiffs,** )

**v.** )

**Democratic People’s Republic of Korea,** )  
**et al.,** )

**Defendants.** )

**Misc. No. 14-648 (RCL)**

\_\_\_\_\_  
)

**Mary Nell Wyatt, et al.,** )

**Plaintiffs,** )

**v.** )

**Syrian Arab Republic, et al.,** )

**Defendants.** )

**Civil No. 08-502 (RCL)**

**MEMORANDUM OPINION**

Plaintiffs hold a set of substantial money judgments against defendants Islamic Republic of Iran, Democratic People’s Republic of Korea, and Syrian Arab Republic arising out of claims brought under the Foreign Sovereign Immunities Act (“FSIA”). Pursuant to those judgments,

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plaintiffs seek to attach the defendants' property allegedly in the possession of the Internet Corporation for Assigned Names and Numbers ("ICANN"). ICANN has moved to quash the writs of attachment served on it. Plaintiffs have, in turn, moved for a six month discovery period and a corresponding extension of time to respond to ICANN's motion to quash and its answers to the writs of attachment. For the following reasons and after consideration of the parties' briefing and the applicable law, the Court holds that ICANN's motion to quash is **GRANTED** and plaintiffs' motion for discovery is **DENIED**.

## **I. BACKGROUND**

### **A. The Internet and the Domain Name System**

Any device connected to the Internet is identified by a unique Internet Protocol ("IP") address, consisting of a series of numbers separated by periods. *Office Depot Inc. v. Zuccarini*, 596 F.3d 696, 698 (9th Cir. 2010) (internal citation and quotation marks omitted). Because IP addresses in their bare form are unmemorable, the Domain Name System was created to allow people to more easily remember and find places on the Internet. ICANN, *Beginner's Guide to Domain Names 3* (2010), available at <https://www.icann.org/en/system/files/files/domain-names-beginners-guide-06dec10-en.pdf>. Under this system, IP addresses are given alphanumeric identifiers called domain names. *Id.* A domain name consists of a top level domain ("TLD") and second level domains within that TLD. *Id.* The TLD is the series of characters that are to the right of the last period in a domain name. For example, ".gov" is the TLD for the domain name assigned to this Court. A second level domain is the series of characters to the left of the last period in a domain name. *Id.* For example, "google" is the second level domain in "google.com." Second level domains are subdivisions of TLDs and are registered within the TLDs. *Office Depot, Inc.*, 596 F.3d at 776 (internal citation and quotation marks omitted).

Country code TLDs ("ccTLDs") are a particular type of TLD which carry a two letter

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code identifying a relationship to a particular country. ICANN, *ICP-1: Internet Domain Name System Structure and Delegation (ccTLD Administration and Delegation)* (1999), available at <https://www.icann.org/resources/pages/delegation-2012-02-25-en>. The ccTLDs are operated by “managers” for that country. *Id.* Managers’ duties include “assignment of domain names, delegation of subdomains and operation of nameservers.” *Id.*

Information about the names and locations of the various TLDs on the Internet is stored on the “root zone file,” which is the authoritative listing of this information on the Internet. *IANA Functions and Related Root Zone Management Transition Questions and Answers*, Nat’l Telecomm’ns & Info. Admin., U.S. Dep’t of Commerce, <http://www.ntia.doc.gov/other-publication/2014/iana-functions-and-related-root-zone-management-transition-questions-and-answ> (last visited Nov. 6, 2014). The root can be analogized to a phone book for the Internet. *Id.*

With the foregoing foundational concepts in mind, the basic roadmap for what occurs between the moment a user types a domain name into an Internet browser and the moment the corresponding webpage appears on the user’s screen can be described. The D.C. Circuit has succinctly done so as follows:

When ordered to translate an unknown domain name into an Internet Protocol number, a computer will ask its Internet Service Provider’s server if it knows the domain name and corresponding Internet Protocol number. If that server lacks the information, it will pass the query to a ‘root server,’ also called a ‘root zone’ file, the authoritative and highest level of the domain name system database. The root zone file directs the query to the proper top-level domain zone file, which contains the domain names in a given domain and their corresponding Internet Protocol numbers.

*Thomas v. Network Solutions, Inc.*, 176 F.3d 500, 503–04 (D.C. Cir. 1999) (internal citations omitted). Thus, the Internet Domain Name System operates as something of a pyramid. The root zone file, at the top of the pyramid, contains information on the TLDs within the system and the location of the registries for those TLDs. *Id.* Registries of the TLDs, in turn, contain IP

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address information on domain names logged within that TLD, which ultimately leads a computer (and its user) to the final Internet destination looked for. *Office Depot, Inc.*, 596 F.3d at 698–99 (internal citation and quotation marks omitted).

### **B. ICANN's Role**

ICANN is a non-profit corporation that performs the Internet Assigned Numbers Authority (“IANA”) functions under a contract with the United States government. *IANA functions*, Nat’l Telecommc’ns & Info. Admin., U.S. Dep’t of Commerce, <http://www.ntia.doc.gov/category/iana-functions> (last visited Nov. 6, 2014). Of relevance to these proceedings, these IANA functions include managing the process of delegation and re-delegation of TLDs (including ccTLDs). Award/Contract No. SA1301-12-CN-0035 Between U.S. Dep’t of Commerce and ICANN ¶ C.2.9.2.c, *available at* [http://www.ntia.doc.gov/files/ntia/publications/sf\\_26\\_pg\\_1-2-final\\_award\\_and\\_sacs.pdf](http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf). This means that ICANN is responsible for recommending the entities that shall perform the functions of a ccTLD manager and for recommending corresponding changes to the root zone file. *See id.* (stating that ICANN “shall submit its recommendations” regarding delegation or re-delegation of a ccTLD to the Contracting Officer’s Representative, i.e. a U.S. government official). “The delegation or redelegation process is designed to assign or re-assign a ccTLD to a manager,” with such a change being implemented by a change to the root zone to indicate the TLD and its related manager. *Delegating or redelegating a country-code top-level domain (ccTLD)*, IANA, <http://www.iana.org/help/cctld-delegation> (last visited Nov. 6, 2014).

### **C. Procedural History**

Writs of attachment were issued against ICANN on June 24, 2014, seeking defendants’ money, property, or credits in ICANN’s possession. ECF No. 24.<sup>1</sup> ICANN responded with (1)

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<sup>1</sup> For the sake of simplicity, all citations of the filings in these matters are to the first named case in the caption, *Stern v. Islamic Republic of Iran*, Civil No. 00-2602 (RCL).

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objections and answers to the writs, ECF No. 28, and (2) a motion to quash the writs of attachment, ECF No. 29. Plaintiffs then filed a motion for discovery and for an extension of time to respond to ICANN’s motion to quash the writs of attachment in order to better respond to certain factual assertions made in ICANN’s motion. ECF No. 46. Each motion is now ripe for consideration.

## II. LEGAL STANDARD AND DISCUSSION

### A. Applicable Law

Federal Rule of Civil Procedure 69(a)(1) provides that the “procedure on execution—and in proceedings supplementary to and in aid of judgment or execution—must accord with the procedure of the state where the court is located.” Fed. R. Civ. P. 69(a)(1). Furthermore, “[u]nder the FSIA, local law on attachment and execution control[s] any dispute.” *Estate of Heiser v. Islamic Republic of Iran*, 807 F. Supp. 2d 9, 20 (D.D.C. 2011). The District of Columbia Code states that an “attachment may be levied upon the judgment debtor’s goods, chattels, and credits.” D.C. Code § 16-544. This includes property in the possession of a third person. *Id.* § 16-507.

### B. Country Code Top Level Domains Are Not Subject to Attachment in the District of Columbia

There is little authority on the question of whether Internet domain names may be attached in satisfaction of a judgment. Indeed, no reported decision of any American court appears to have decided the specific issue of whether a ccTLD may be attached. The Virginia Supreme Court’s discussion of these issues in *Network Solutions, Inc. v. Umbro Int’l, Inc.*, 529 S.E.2d 80 (Va. 2000) is helpful in illuminating the questions presented. There, the court held that a domain name could not be garnished by a judgment creditor under the relevant Virginia statute because it was “inextricably bound” to the domain name services provided by the registry operator. *Id.* at 86. The court elaborated: “[W]hatever contractual rights the judgment debtor

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has in the domain names at issue in this appeal, those rights do not exist separate and apart from [the registry] services that make the domain names operational Internet addresses.” *Id.* The court further observed that allowing garnishment of a registry’s services as part of garnishing a right to a domain name would mean that “practically any service would be garnishable.” *Id.* at 86–87.

The Court finds this reasoning persuasive as applied to District of Columbia attachment law as well. The ccTLDs exist only as they are made operational by the ccTLD managers that administer the registries of second level domain names within them and by the parties that cause the ccTLDs to be listed on the root zone file. A ccTLD, like a domain name, cannot be conceptualized apart from the services provided by these parties. The Court cannot order plaintiffs’ insertion into this arrangement. *Cf. United States ex rel. Global Bldg. Supply, Inc. v. Harkins Builders, Inc.*, 45 F.3d 830, 833 (4th Cir. 1995) (holding that “where the property is in the form of a contract right, the judgment creditor does not ‘step into the shoes’ of the judgment debtor and become a party to the contract, but merely has the right to hold the garnishee liable for the value of that contract right”).

While interpretations of the D.C. Code are sparse, they tend to support this understanding of ccTLDs. The District of Columbia Court of Appeals has held that “money payable upon a contingency or condition is not subject to garnishment until the contingency has happened or the condition has been fulfilled.” *Cummings Gen. Tire Co. v. Volpe Constr. Co.*, 230 A.2d 712, 713 (D.C. 1967). Thus, payments under a contract that are conditioned upon completion of the work contracted for are not subject to garnishment because the “existence and amount” of the debt is “contingent and uncertain.” *Id.* While this suit does not squarely fit within the rule articulated by the court in *Cummings General Tire*, that rule does illuminate the fact that courts may not, through garnishment proceedings, insert a judgment creditor into an ongoing contractual

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arrangement that necessarily requires continued work or services to have value. Here, the ccTLDs only have value because they are operated by ccTLD managers and because they are connected to computers around the world through the root zone.<sup>2</sup> D.C. law does not allow their attachment.<sup>3</sup>

### III. CONCLUSION

For the preceding reasons, the Court concludes that the country code Top Level Domain names at issue may not be attached in satisfaction of plaintiffs' judgments because they are not property subject to attachment under District of Columbia law.

An Order shall issue this date consistent with this Memorandum Opinion.

Signed by Royce C. Lamberth, United States District Judge, on November 10, 2014.

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<sup>2</sup> The Court notes that judicial decisions have construed domain names to be a form of intangible property. *See, e.g., Kremen v. Cohen*, 337 F.3d 1024, 1030 (9th Cir. 2002). But the conclusion that ccTLDs may not be attached in satisfaction of a judgment under District of Columbia law does not mean that they cannot be property. It simply means that they are not attachable property within this statutory scheme. Indeed, in *Network Solutions*, the Virginia Supreme Court nodded to this precise point in stating that it was not "essential to the outcome of this case to decide whether the circuit court correctly characterized a domain name as a 'form of intellectual property.'" *Network Solutions, Inc.*, 529 S.E.2d at 86.

<sup>3</sup> Because the Court concludes that ccTLDs may not be attached as a matter of District of Columbia law, there are no factual disputes that require further consideration. Therefore, the Court denies plaintiffs' motion for discovery as moot.



**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

	)	
<b>Susan Weinstein, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil No. 00-2601 (RCL)</b>
	)	
<b>Islamic Republic of Iran, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	

**MEMORANDUM AND ORDER**

The Court entered a default judgment in favor of plaintiffs by an Order and Judgment dated February 6, 2002. ECF No. 23. Pending before the Court is plaintiffs’ motion to revive that judgment pursuant to sections 15-101 and 15-103 of the District of Columbia Code. Pl.’s Mot. to Revive J., ECF No. 91. For the reasons that follow, plaintiffs’ motion is **GRANTED**.

Under D.C. Code § 15-101, every final judgment rendered in this Court “is enforceable, by execution issued thereon, for the period of twelve years only from the date when an execution might first be issued thereon, or from the date of the last order of revival thereof.” *Id.* Judgment in this case was rendered pursuant to the Foreign Sovereign Immunities Act (“FSIA”), which does not permit “attachment or execution” on a judgment against a foreign state until a “reasonable time” has elapsed following (1) the entry of judgment and (2) service of a copy of any default judgment on the defendant foreign state as required by section 1608(e) of the FSIA. 28 U.S.C. 1610(c). The Court’s Order and Judgment was served upon defendants on July 15, 2002. ECF No. 29. Thus, plaintiffs’ judgment only became “enforceable by execution issued thereon” after a “reasonable time” had elapsed from July 15, 2002. A corollary to this fact is that the twelve year limitations clock on this judgment only began running on the date when this reasonable time period had elapsed.

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The Court does not appear to have previously stated in this case the precise date that plaintiffs' judgment became enforceable. In determining what constitutes a reasonable time under the FSIA, courts are to consider "the procedures necessary for the foreign state to pay the judgment (such as the passage of legislation), evidence that the foreign state is actively taking steps to pay the judgment, and evidence that the foreign state is attempting to evade payment of the judgment." *Ned Chartering and Trading, Inc. v. Republic of Pakistan*, 130 F. Supp. 2d 64, 67 (D.D.C. 2001). In *Ned Chartering*, the Court concluded that six weeks was a reasonable time because, in part, this period was "sufficient for most governments to pass the minor legislation necessary to appropriate funds, and to organize and transfer the appropriate assets" and because there was "no evidence that the defendant ha[d] taken any steps towards the payment of its debt." *Id.* For similar reasons, the Court concludes that plaintiffs' judgment in this case became enforceable by execution six weeks from July 15, 2002.

Plaintiffs' judgment, therefore, expired during the last week of August this year. Nonetheless, a court may still order revival if plaintiffs' motion for revival was filed before expiration of the judgment. *See Nat'l Bank of Washington v. Carr*, 829 A.2d 942, 944 (D.C. 2003) (citing *Michael v. Smith*, 221 F.2d 59, 61 (D.C. Cir. 1955)) (concluding that a motion to revive a judgment under D.C. Code § 15-101 which was filed before expiration of the limitations period was timely and the court could order revival even if the order was issued after the twelve year period's expiration). Plaintiffs' motion, filed on August 4, 2014, was timely. *See* Mot. to Revive J.

The District of Columbia Court of Appeals has held that if no defense is offered showing cause why the judgment should not be revived, a trial court should grant a motion for revival. *Nat'l Bank*, 829 A.2d at 945 (citing *Michael*, 221 F.2d at 61). Such defenses could include release, payment, or discharge of judgment. *Id.* No defenses have been raised and defendants

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have not appeared. The Court shall grant the motion to revive.

Section 15-103 states that an order of revival extends the effect and operation of the judgment for a twelve year period “from the date of the order.” D.C. Code § 15-103. Therefore, plaintiffs’ judgment shall be revived for twelve years from this date.

For the reasons stated above, it is hereby

**ORDERED** that plaintiffs’ motion is **GRANTED** and this Court’s Judgment issued February 6, 2002 is hereby revived; and it is further

**ORDERED** that, in accordance with D.C. Code § 15-103, the twelve year limitations period applicable to the Judgment revived by today’s Order shall expire twelve years from this date.

It is **SO ORDERED**.

Signed by Royce C. Lamberth, United States District Judge, on November 25, 2014.

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF COLUMBIA

SUSAN WEINSTEIN, individually as )  
Co-Administrator of the Estate of Ira William )  
Weinstein, and as natural guardian of plaintiff )  
David Weinstein (minor), JEFFREY A. )  
MILLER, as Co-Administrator of the Estate of )  
Ira William Weinstein, JOSEPH WEINSTEIN, )  
JENNIFER WEINSTEIN HAZI, and DAVID )  
WEINSTEIN, minor, by his guardian and next )  
friend Susan Weinstein, )

Case No. 1:00-cv-2601-RCL

Plaintiffs )

v. )

THE ISLAMIC REPUBLIC OF IRAN, THE )  
IRANIAN MINISTRY OF INFORMATION )  
AND SECURITY, AYATOLLAH ALI )  
HOSEINI KHARNENEI, Supreme Leader of )  
the Islamic Republic of Iran, ALI AKBAR )  
HASHEMI-RAFSANJANI, Former President )  
of the Islamic Republic of Iran, and ALI )  
FALLAHIAN-KHUZESTANI, Former )  
Minister of Information and Security, )

Defendants )

**NOTICE OF APPEAL**

Notice is hereby given that SUSAN WEINSTEIN, individually and as legal representative of the Estate of Ira William Weinstein, and as natural guardian of plaintiff David Weinstein (minor), JEFFREY A. MILLER, as Co-Administrator of the Estate of Ira William Weinstein, JOSEPH WEINSTEIN, JENNIFER WEINSTEIN HAZI, and DAVID WEINSTEIN, minor, by his guardian and next friend Susan Weinstein (the "Plaintiffs"), judgment creditor plaintiffs in the above named case, hereby appeal to the United States Court of Appeals for the District of Columbia Circuit from an order quashing Plaintiffs' writs of attachment to third party the Internet Corporation for Assigned Names and Numbers and denying as moot Plaintiffs' related motion for discovery and scheduling relief, entered in this action on November 12, 2014. The Plaintiffs appeal from each and every part of that order.

Case 1:00-cv-02601-RCL Document 115 Filed 12/12/14 Page 2 of 2

Date: December 12, 2014

Respectfully submitted,

THE BERKMAN LAW OFFICE, LLC  
*Attorneys for the Plaintiffs*

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APPEAL,CLOSED,TYPE-E

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:02-cv-01811-RCL**

BEN HAIM, et al v. ISLAMIC REPUBLIC, et al  
Assigned to: Chief Judge Royce C. Lamberth  
Demand: \$300,000,000  
Cases: [1:02-cv-01811-RCL](#)  
[1:08-cv-00520-RCL](#)  
[1:08-cv-01460-RCL](#)

Date Filed: 09/12/2002  
Date Terminated: 03/24/2006  
Jury Demand: None  
Nature of Suit: 890 Other Statutory  
Actions  
Jurisdiction: Federal Question

Case in other court: 14-07194  
Cause: 18:2331 Anti-terrorism Act

**Plaintiff**

**SETH CHARLES (KLEIN) BEN  
HAIM**

represented by **SETH CHARLES (KLEIN) BEN  
HAIM**  
Moshav Nir-Hen 126  
D.N. Lakish 79330  
Israel  
PRO SE

**Erik Swen Syverson**  
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**David J. Strachman**

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Email: djs@mtlesq.com  
*TERMINATED: 05/06/2013*

**Plaintiff**

**BERNARD (KLEIN) BEN HAIM**

represented by **BERNARD (KLEIN) BEN HAIM**  
Sderot Yerushalyim, #31/14  
Ashkelon 78617  
Israel  
PRO SE

**Erik Swen Syverson**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**David J. Strachman**  
(See above for address)  
*TERMINATED: 05/06/2013*

**Plaintiff**

**LAVI (KLEIN) BEN HAIM**

represented by **LAVI (KLEIN) BEN HAIM**  
Jerusalem Blv. 31/14  
Ashkelon 78617  
Israel  
PRO SE

**Erik Swen Syverson**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**David J. Strachman**

(See above for address)  
*TERMINATED: 05/06/2013*

V.

**Defendant**

**ISLAMIC REPUBLIC OF IRAN**

**Defendant**

**IRANIAN MINISTRY OF  
INFORMATION AND SECURITY**

**Defendant**

**AYATOLLAH SAYYID ALI  
HOSSEINI KHAMENEI**  
*Supreme Leader of the Islamic Republic  
of Iran*  
*TERMINATED: 11/29/2005*

**Defendant**

**ALI AKBAR HASHEMI-  
RAFSANJANI**  
*Former President of the Islamic  
Republic of Iran*  
*TERMINATED: 11/29/2005*

**Defendant**

**ALI FALLAHIAN-KHUZESTANI**  
*Former Minister of Information and  
Security*  
*TERMINATED: 11/29/2005*

**Defendant**

**PALESTINE ISLAMIC JIHAD**  
*TERMINATED: 11/29/2005*  
*also known as*  
**PALESTINE ISLAMIC JIHAD-  
SHAQAQI FACTION**  
*TERMINATED: 11/29/2005*  
*also known as*  
**PALESTINIAN ISLAMIC JIHAD**  
*TERMINATED: 11/29/2005*  
*also known as*  
**ISLAMIC JIHAD OF PALESTINE**  
*TERMINATED: 11/29/2005*  
*also known as*  
**HARAKAT AL-JIHAD AL-ISLAMI  
AL-FILASTINI**



District of Columbia live database

Page 4 of 13

*TERMINATED: 11/29/2005*

V.

**Garnishee**

**INTERNET CORPORATION FOR  
ASSIGNED NAMES AND NUMBER**

represented by **Eric Enson**  
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*ATTORNEY TO BE NOTICED*

Date Filed	#	Docket Text
09/12/2002	1	MOTION filed by plaintiff SETH CHARLES (KLEIN) BEN HAIM, plaintiff BERNARD (KLEIN) BEN HAIM, plaintiff LAVI (KLEIN) BEN HAIM to waive LCvR 5.1 (e) (mpt) (Entered: 09/13/2002)
09/12/2002	2	ORDER by Chief Judge Thomas F. Hogan : granting motion to waive LCvR 5.1 (e) [1-1] by LAVI (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN

		HAIM, SETH CHARLES (KLEIN) BEN HAIM (N) (mpt) (Entered: 09/13/2002)
09/12/2002	3	COMPLAINT filed by plaintiff SETH CHARLES (KLEIN) BEN HAIM, plaintiff BERNARD (KLEIN) BEN HAIM, plaintiff LAVI (KLEIN) BEN HAIM (mpt) (Entered: 09/13/2002)
09/12/2002		SUMMONS (6) issued for defendant ISLAMIC REPUBLIC, defendant IRANIAN MINISTRY, defendant AYATOLLAH ALI HOSEINI KHAMENEI, defendant ALI AKBAR HASHEMI-RAFSANJANI, defendant ALI FALLAHIAN-KHUZESTANI, defendant PALESTINE ISLAMIC (mpt) (Entered: 09/13/2002)
09/12/2002	4	NOTIFICATION OF RELATED CASE: Case related to Case No(s): 97cv396 (mpt) (Entered: 09/13/2002)
10/11/2002	5	REQUEST by plaintiff SETH CHARLES (KLEIN) BEN HAIM, plaintiff BERNARD (KLEIN) BEN HAIM, plaintiff LAVI (KLEIN) BEN HAIM for the Clerk to mail summons, copy of the complaint, and translation by registered mail, return receipt requested, to the Ministry of Foreign Affairs for service upon defendants Islamic Republic of Iran, Iranian Ministry of Information Security, Ayatollah Ali Hoseini Khamenei, Ali Akbar Hashemi-Rafsanjani, Ali Fallahian-Khuzestani pursuant to 28 USC 1608(a)(3) and 1608(b)(3)(B) of the Foreign Sivereigh Immunities Act (mpt) (Entered: 10/17/2002)
01/16/2003	6	RETURN OF SERVICE/AFFIDAVIT of summons and complaint executed on 11/10/02 upon defendant IRANIAN MINISTRY, defendant ISLAMIC REPUBLIC (mpt) (Entered: 02/13/2003)
02/13/2003	7	AFFIDAVIT in support of default by plaintiffs against defendants Islamic Republic and Iranian Ministry of Information and Security. (mpt) Modified on 02/13/2003 (Entered: 02/13/2003)
02/13/2003	8	DEFAULT vs. defendant ISLAMIC REPUBLIC, defendant IRANIAN MINISTRY By Clerk (N) (mpt) (Entered: 02/13/2003)
08/06/2003	<a href="#">9</a>	ORDER by Judge Royce C. Lamberth : directing counsel for plaintiffs to file a status report within 10 days. (N) (mon) (Entered: 08/06/2003)
08/14/2003	10	STATUS REPORT by plaintiffs SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM; pursuant to court's order of 8/6/03. (mpt) (Entered: 08/15/2003)
12/16/2004	<a href="#">11</a>	ORDER that counsel for plaintiffs shall file a status report with the Court on or before January 5, 2005.. Signed by Judge Royce C. Lamberth on 12/15/2004. (lcrcl1, ) (Entered: 12/16/2004)
12/31/2004	<a href="#">12</a>	STATUS REPORT by SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM. (Strachman, David) (Entered: 12/31/2004)
02/17/2005	<a href="#">13</a>	MOTION to Submit Evidence by Affidavit and to Schedule a Hearing by SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, LAVI

		(KLEIN) BEN HAIM. (Attachments: # <a href="#">1</a> # <a href="#">2</a> )(Strachman, David) (Entered: 02/17/2005)
09/28/2005	<a href="#">14</a>	ORDER granting Plaintiffs' Motion <a href="#">13</a> to schedule a hearing and to submit evidence by affidavit; hearing scheduled for 11/1/05; requiring affidavits to be submitted no less than 14 days prior to the hearing. Signed by Judge Royce C. Lamberth on 9/28/05. (lcrcl2, ) (Entered: 09/28/2005)
09/28/2005		Set/Reset Hearings: Hearing as to damages set for 11/1/2005 10:00 AM in Courtroom 21 before Judge Royce C. Lamberth. (mon, ) Modified on 9/29/2005 (mon, ). (Entered: 09/29/2005)
10/17/2005	<a href="#">15</a>	Letter from David J. Strachman,Esq to Judge Royce C. Lamberth in reference to canceling evidentiary hearing. "Let the be filed" by Lamberth,J. (mon, ) (Entered: 10/17/2005)
10/17/2005		ORDER directing that plaintiffs' letter dated 10/12/05 be deemed a Motion to Cancel the evidentiary hearing regarding determination of damages and granting said motion; Directing plaintiffs to submit their depositions and other evidence by 12/1/05.. Signed by Judge Royce C. Lamberth on 10/13/05. (mon, ) (Entered: 10/17/2005)
11/16/2005	<a href="#">16</a>	ORDER directing plaintiffs to show cause why this case should not be dismissed as to those defendants who have not yet been served. Signed by Judge Royce C. Lamberth on 11/16/05. (lcrcl2, ) (Entered: 11/16/2005)
11/16/2005	<a href="#">17</a>	ORDER directing briefing on the effect of recent case law. Signed by Judge Royce C. Lamberth on 11/16/05. (lcrcl2, ) (Entered: 11/16/2005)
11/28/2005	<a href="#">18</a>	RESPONSE to <a href="#">16</a> <i>the Court's Order to Show Cause Regarding Absence of Service on Certain Defendants</i> filed by SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM. (Strachman, David) (Entered: 11/28/2005)
11/28/2005	<a href="#">19</a>	MOTION For a Scheduling Order by SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM. (Strachman, David) (Entered: 11/28/2005)
11/29/2005	<a href="#">20</a>	ORDER (1) deeming Plaintiffs' Response <a href="#">18</a> as a motion to withdraw the complaint as to certain defendants; (2) granting said motion; and (3) discharging the Order <a href="#">16</a> to Show Cause issued on November 16, 2005. Signed by Judge Royce C. Lamberth on 11/29/05. (lcrcl2, ) (Entered: 11/29/2005)
11/29/2005	<a href="#">21</a>	ORDER granting in part and denying in part Plaintiffs' Motion <a href="#">19</a> for a Scheduling Order. Plaintiff shall submit, by January 2, 2006, both: (1) the Memorandum of Law requested by this Court in its November 16, 2005 Order; and (2) its Proposed Findings of Fact and Conclusions of Law. Signed by Judge Royce C. Lamberth on 11/29/05. (lcrcl2, ) (Entered: 11/29/2005)
11/29/2005		Set/Reset Deadlines: Supplemental Memorandum of Law and Proposed Findings and Conclusions of Law due by 1/2/2006. (zmon, ) (Entered: 12/15/2005)

01/03/2006	<a href="#">22</a>	RESPONSE to <a href="#">21</a> <i>the Court's Order to Address Issues Raised in Intervening Law</i> filed by SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM. (Attachments: # <a href="#">1</a> )(Strachman, David) (Entered: 01/03/2006)
01/03/2006	<a href="#">23</a>	Proposed Findings of Fact by SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM. (Strachman, David) (Entered: 01/03/2006)
01/03/2006	<a href="#">24</a>	Exhibit List in Support of <a href="#">23</a> <i>Their Proposed Findings of Fact</i> by SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM.. (Attachments: # <a href="#">1</a> # <a href="#">2</a> # <a href="#">3</a> # <a href="#">4</a> # <a href="#">5</a> # <a href="#">6</a> # <a href="#">7</a> # <a href="#">8</a> # <a href="#">9</a> # <a href="#">10</a> # <a href="#">11</a> # <a href="#">12</a> # <a href="#">13</a> # <a href="#">14</a> # <a href="#">15</a> # <a href="#">16</a> # <a href="#">17</a> # <a href="#">18</a> # <a href="#">19</a> # <a href="#">20</a> # <a href="#">21</a> # <a href="#">22</a> # <a href="#">23</a> # <a href="#">24</a> # <a href="#">25</a> # <a href="#">26</a> # <a href="#">27</a> # <a href="#">28</a> # <a href="#">29</a> # <a href="#">30</a> # <a href="#">31</a> # <a href="#">32</a> # <a href="#">33</a> )(Strachman, David) Modified on 1/4/2006 (tg, ). (Entered: 01/03/2006)
03/24/2006	<a href="#">25</a>	FINDINGS OF FACT AND CONCLUSIONS OF LAW. Signed by Judge Royce C. Lamberth on 3/24/06. (lcrl2, ) (Entered: 03/24/2006)
03/24/2006	<a href="#">26</a>	JUDGMENT in favor of plaintiffs and against defendants, jointly and severally. Signed by Judge Royce C. Lamberth on 3/24/06. (lcrl2, ) (Entered: 03/24/2006)
04/12/2006	<a href="#">27</a>	ENTERED IN ERROR..... MOTION Excusal from Attendance by SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM. (Strachman, David) Modified on 4/13/2006 (nmw, ). (Entered: 04/12/2006)
04/13/2006		NOTICE OF CORRECTED DOCKET ENTRY: re <a href="#">27</a> MOTION Excusal from Attendance was entered in error and counsel was instructed to refile said pleading in the proper format. (nmw, ) (Entered: 04/13/2006)
04/13/2006	<a href="#">28</a>	MOTION Excusal from Attendance by SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM. (Attachments: # <a href="#">1</a> )(Strachman, David) (Entered: 04/13/2006)
06/15/2006		Writ of Attachment on Judgment as to ISLAMIC REPUBLIC OF IRAN, IRANIAN MINISTRY OF INFORMATION AND SECURITY. Bank of America, Garnishee. (tg, ) (Entered: 06/15/2006)
06/28/2006	<a href="#">29</a>	AFFIDAVIT re Writ of Garnishment issued to <i>Bank of America Served 6/21/06</i> by SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM. (Strachman, David) (Entered: 06/28/2006)
09/25/2006	<a href="#">30</a>	NOTICE of service by the United States Department of State. (Attachments) (tg, ). (Entered: 09/28/2006)
11/14/2006	<a href="#">31</a>	ORDER DENYING AS MOOT petitioners' <a href="#">28</a> Motion to Be Excused. Signed by Judge Royce C. Lamberth on 11/14/06. (lcrl2, ) (Entered: 11/14/2006)
03/28/2008	<a href="#">32</a>	MOTION for Order Pursuant to <i>§1083(c)(2) of the National Defense Authorization Act</i> by BERNARD (KLEIN) BEN HAIM (Attachments: # <a href="#">1</a>

		Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Exhibit C, # <a href="#">4</a> Text of Proposed Order) (Strachman, David) (Entered: 03/28/2008)
07/22/2008	<a href="#">33</a>	MEMORANDUM AND OPINION. Signed by Chief Judge Royce C. Lamberth on 07/22/2008. (lcrl2, ) (Entered: 07/22/2008)
07/22/2008	<a href="#">34</a>	ORDER denying <a href="#">32</a> Motion for Order Pursuant to §1083(c)(2) of the National Defense Authorization Act. Signed by Chief Judge Royce C. Lamberth on 07/22/2008. (lcrl2, ) (Entered: 07/22/2008)
09/30/2009	<a href="#">35</a>	MEMORANDUM AND OPINION. Signed by Chief Judge Royce C. Lamberth on 09/30/2009. (lcrl6, ) (Entered: 09/30/2009)
09/30/2009	<a href="#">36</a>	ORDER denying 435 MOTION Authorize Payment To Special Masters by ALL PLAINTIFFS; denying <a href="#">30</a> MOTION for Reconsideration of Judgment by ESTELLE CARROLL, HARRY BEER, ANNA BEER, PHYLLIS MAISEL; denying MOTION <a href="#">31</a> for Hearing on Issues Presented in Motion to Reconsider and Leave to File a 1083(c)(2) Motion Nunc Pro Tunc by ESTELLE CARROLL, HARRY BEER, ANNA BEER, PHYLLIS MAISEL; denying <a href="#">32</a> MOTION for Reconsideration of Judgment and Leave to file motion nunc pro tunc by ALL PLAINTIFFS; denying MOTION <a href="#">33</a> for Hearing on Issues Presented in Plaintiff's Motion to Reconsider and Leave to File 1083 (c)(2) Motion Nunc Pro Tunc by ALL PLAINTIFFS. Signed by Chief Judge Royce C. Lamberth on 09/30/2009. (lcrl6, ) (Entered: 09/30/2009)
11/30/2009	<a href="#">37</a>	RESPONSE re (21 in 1:06-cv-00750-RCL, 17 in 1:07-cv-01302-RCL, 6 in 1:08-cv-01807-RCL, 3 in 1:08-cv-00520-RCL, 38 in 1:06-cv-00596-RCL, 10 in 1:08-cv-00531-RCL, 35 in 1:02-cv-01811-RCL, 35 in 1:06-cv-00473-RCL, 6 in 1:08-cv-01273-RCL, 9 in 1:08-cv-01615-RCL, 6 in 1:08-cv-01814-RCL, 15 in 1:06-cv-00690-RCL, 15 in 1:06-cv-00516-RCL, 27 in 1:06-cv-01116-RCL) Memorandum & Opinion filed by UNITED STATES OF AMERICA. (znmw, ) (Entered: 12/01/2009)
04/29/2013	<a href="#">38</a>	Consent MOTION to Withdraw as Attorney by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM (Attachments: # <a href="#">1</a> Exhibit consent to withdraw, # <a href="#">2</a> Exhibit Notice per LR 83.6, # <a href="#">3</a> Text of Proposed Order)(Strachman, David) (Entered: 04/29/2013)
05/02/2013	<a href="#">39</a>	MOTION 28 U.S.C. sec 1610(c) finding by SETH CHARLES (KLEIN) BEN HAIM (Attachments: # <a href="#">1</a> Text of Proposed Order)(Strachman, David) (Entered: 05/02/2013)
05/06/2013	<a href="#">40</a>	ORDER granting <a href="#">39</a> Motion for an Order pursuant to 28 U.S.C. 1610(c). Signed by Chief Judge Royce C. Lamberth on May 6, 2013. (lcrl5) (Entered: 05/06/2013)
05/06/2013	<a href="#">41</a>	ORDER granting <a href="#">38</a> Motion to Withdraw as Attorney. Attorney David J. Strachman terminated. Signed by Chief Judge Royce C. Lamberth on May 6, 2013. (lcrl5) (Entered: 05/06/2013)
07/07/2014	<a href="#">43</a>	Consent MOTION for Extension of Time to <i>RESPOND TO WRIT OF ATTACHMENT AND RELATED SUBPOENA</i> by INTERNET

		CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/07/2014)
07/28/2014	<a href="#">44</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Eric Enson, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792142. Fee Status: Fee Paid. by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">45</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Jeffrey LeVee, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792144. Fee Status: Fee Paid. by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">46</a>	OBJECTIONS to Answer to Writ by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/29/2014	<a href="#">47</a>	MOTION to Quash by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Memorandum in Support, # <a href="#">2</a> Declaration Jeffrey, # <a href="#">3</a> Declaration Enson, # <a href="#">4</a> Text of Proposed Order) (Zurawski, Tara Lynn) (Entered: 07/29/2014)
07/29/2014	<a href="#">48</a>	MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/29/2014)
08/04/2014	<a href="#">49</a>	Consent MOTION for Extension of Time to <i>Superseding Previous Consent Motion For an Extension of Time to Respond to Writ of Attachment and Related Subpoena</i> by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/04/2014)
08/11/2014	<a href="#">50</a>	WITHDRAWN PER ORDER FILED 9/9/2014.....MOTION to Compel <i>Production of Documents in Response to Subpoena</i> by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Text of Proposed Order) (Tolchin, Robert) Modified on 9/9/2014 (zmm, ). (Entered: 08/11/2014)
08/11/2014	<a href="#">51</a>	MOTION for Extension of Time to File Response/Reply as to <a href="#">47</a> MOTION to Quash by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/11/2014)

08/13/2014	<a href="#">53</a>	ORDER: Upon consideration of Internet Corporation for Assigned Names and Numbers("ICANN") and Plaintiffs' Consent Motion Superseding Previous Consent Motion for an Extension of Time to Respond to Writ of Attachment and Related Subpoena, and good cause appearing, it is hereby ORDERED that ICANN and Plaintiffs' Consent Motion is GRANTED. ICANN's response to the writ of attachment and subpoena was due and filed on July 28, 2014. Plaintiff's time period pursuant to D.C. Superior Court Civil Rule 69-I(d) and (e) shall not begin to run until the parties agree, or absent such agreement, until the Court has determined, that ICANN has fulfilled its obligation in response to the Subpoena and in no event shall such periods expire before September 8, 2014. Plaintiff's lien is correspondingly extended unless ICANN's to Quash, filed on July 29, 2014, is granted. Signed by Judge Royce C. Lamberth on 8/12/2014. (tr). Modified on 8/14/2014 (ztr, ). (Entered: 08/13/2014)
08/13/2014	<a href="#">52</a>	ORDER granting (71) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:08-cv-00502-RCL; granting (45) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:08-cv-00520-RCL; granting (107) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:01-cv-01655-RMU; granting (8) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:14-mc-00648-UNA; granting (48) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:02-cv-01811-RCL; granting (90) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02601-RCL; granting (30) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02602-RCL; The Court will consolidate the consideration of, and hearing on, all seven of ICANN's Motion to Quash, including the motion filed in civil case number 01-1655(RMU) and miscellaneous case number 14-648 (UNA); and it is further ORDERED that the Clerk of the Court shall transfer civil case number 01-1655 (RMU) and miscellaneous case number 14-648 (UNA) to this Court for further proceedings. Signed by Judge Royce C. Lamberth on 8/12/2014. (tr) . Modified on 8/14/2014 (ztr, ). (Entered: 08/13/2014)
08/13/2014	<a href="#">54</a>	ORDER re: <a href="#">44</a> MOTION for Leave to Appear Pro Hac Vice :Attorney Name-Eric Enson; ORDERED that the Motion for Admission pro hac vice is GRANTED, and that Eric P. Enson be, and that the same hereby is, admitted pro hac vice to appear and participate fully in the above-captioned case. Signed by Judge Royce C. Lamberth on 8/12/2014. (tr) (Entered: 08/14/2014)
08/13/2014	<a href="#">55</a>	ORDER re: <a href="#">45</a> MOTION for Leave to Appear Pro Hac Vice :Attorney Name-Jeffrey LeVee; ORDERED that the Motion for Admission pro hac vice is

		GRANTED, and that Jeffrey A. LeVee be, and that the same hereby is, admitted pro hac vice to appear and participate fully in the above-captioned case. Signed by Judge Royce C. Lamberth on 8/12/2014. (tr) (Entered: 08/14/2014)
08/18/2014	<a href="#">56</a>	Memorandum in opposition to re <a href="#">51</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">47</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Proposed Order, # <a href="#">2</a> Declaration of Eric Enson)(Francisco, Noel) (Entered: 08/18/2014)
08/28/2014	<a href="#">57</a>	REPLY to opposition to motion re <a href="#">51</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">47</a> MOTION to Quash filed by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. (Attachments: # <a href="#">1</a> Exhibit A)(Tolchin, Robert) (Entered: 08/28/2014)
08/28/2014	<a href="#">58</a>	Memorandum in opposition to re <a href="#">50</a> MOTION to Compel <i>Production of Documents in Response to Subpoena</i> filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order)(Francisco, Noel) (Entered: 08/28/2014)
08/29/2014	<a href="#">59</a>	ORDER granting <a href="#">51</a> Motion for Extension of Time to File Response/Reply re <a href="#">47</a> MOTION to Quash Writs of Attachment for Assigned Names and Numbers shall be due on 9/30/2014. Signed by Judge Royce C. Lamberth on 8/28/14. (mpt, ) (Entered: 08/29/2014)
09/08/2014	<a href="#">60</a>	Consent MOTION Plaintiffs' Motion to Compel by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Francisco, Noel) (Entered: 09/08/2014)
09/09/2014	<a href="#">61</a>	ORDER granting (57) Motion Regarding Plaintiffs' Motion to Compel in case 1:08-cv-00520-RCL; granting (119) Motion Regarding Plaintiffs' Motion to Compel in case 1:01-cv-01655-RCL; granting (60) Motion Regarding Plaintiffs' Motion to Compel in case 1:02-cv-01811-RCL; granting (103) Motion Regarding Plaintiffs' Motion to Compel in case 1:00-cv-02601-RCL; granting (42) Motion Regarding Plaintiffs' Motion to Compel in case 1:00-cv-02602-RCL. Plaintiffs' Motion to Compel is ordered withdrawn. Signed by Judge Royce C. Lamberth on 9/9/2014. (zmm, ) (Entered: 09/09/2014)
09/16/2014	<a href="#">62</a>	STIPULATION [PROPOSED] PROTECTIVE ORDER by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Francisco, Noel) (Entered: 09/16/2014)
09/19/2014	<a href="#">63</a>	STIPULATED PROTECTIVE ORDER setting forth procedures for handling confidential material; signed by Judge Royce C. Lamberth on 9/18/14. (Attachment: Exhibit A) (kk) (Entered: 09/19/2014)
09/28/2014	<a href="#">64</a>	MOTION for Discovery , MOTION for Extension of Time to File Response/Reply as to <a href="#">47</a> MOTION to Quash by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM



		(Attachments: # <a href="#">1</a> Declaration Erik S. Syverson, # <a href="#">2</a> Declaration Steven T. Gebelin)(Tolchin, Robert) (Entered: 09/28/2014)
09/30/2014	<a href="#">65</a>	RESPONSE re <a href="#">47</a> MOTION to Quash <i>Writ of Attachment</i> filed by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. (Syverson, Erik) (Entered: 09/30/2014)
10/10/2014	<a href="#">66</a>	REPLY to opposition to motion re <a href="#">47</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Francisco, Noel) (Entered: 10/10/2014)
10/14/2014	<a href="#">67</a>	Memorandum in opposition to re <a href="#">64</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply as to <a href="#">47</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order) (Francisco, Noel) (Entered: 10/14/2014)
10/24/2014	<a href="#">68</a>	REPLY to opposition to motion re <a href="#">64</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply as to <a href="#">47</a> MOTION to Quash filed by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. (Syverson, Erik) (Entered: 10/24/2014)
11/10/2014	<a href="#">69</a>	ORDER Granting <a href="#">47</a> Motion to Quash; Denied as Moot <a href="#">64</a> Motion for Discovery and writs of attachment as to ICANN are quashed. Signed by Judge Royce C. Lamberth on 11/10/14. (mpt, ) (Entered: 11/12/2014)
11/10/2014	<a href="#">70</a>	MEMORANDUM AND OPINION (See Image for Details). Signed by Judge Royce C. Lamberth on 11/10/14. (mpt, ) (Entered: 11/12/2014)
12/12/2014	<a href="#">71</a>	NOTICE OF APPEAL TO DC CIRCUIT COURT as to <a href="#">69</a> Order on Motion to Quash, Order on Motion for Discovery, Order on Motion for Extension of Time to File Response/Reply by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. Filing fee \$ 505, receipt number 0090-3934567. Fee Status: Fee Paid. Parties have been notified. (Syverson, Erik) (Entered: 12/12/2014)
12/15/2014	<a href="#">72</a>	Transmission of the Notice of Appeal, Order Appealed, and Docket Sheet to US Court of Appeals. The Court of Appeals fee was paid this date re <a href="#">71</a> Notice of Appeal to DC Circuit Court. (rdj) (Entered: 12/15/2014)
12/17/2014		USCA Case Number 14-7194 for <a href="#">71</a> Notice of Appeal to DC Circuit Court, filed by LAVI (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. (erd) (Entered: 12/18/2014)

<b>PACER Service Center</b>		
<b>Transaction Receipt</b>		
06/01/2015 14:31:19		
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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
<b>SETH CHARLES BEN HAIM, <i>et al.</i>,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 02-1811 (RCL)</b>
	)	
<b>THE ISLAMIC REPUBLIC</b>	)	
<b>OF IRAN, <i>et al.</i>,</b>	)	
	)	
<b>Defendants.</b>	)	
_____	)	

**JUDGMENT**

In accord with the Findings of Fact and Conclusions of Law issued this date, it is hereby ORDERED that Default Judgment be entered in favor of plaintiffs and against defendants, jointly and severally, in the amount of \$16,000,000.00, of which \$11,000,000.00 shall be allocated to Seth Klein Ben Haim; \$3,500,000.00 shall be allocated to Bernard Klein Ben Haim; and \$1,500,000.00 shall be allocated to Lavi Klein Ben Haim. It is further

ORDERED that plaintiffs, at their own cost and consistent with the requirements of 28 U.S.C. § 1608(e), send a copy of this Judgment and the Findings of Fact and Conclusions of Law issued this date to defendants. It is further

ORDERED that this case be terminated from the dockets of this Court.

SO ORDERED.

Signed by Royce C. Lamberth, United States District Judge, March 24, 2006.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

Seth Charles Ben Haim, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 02-1811-RCL
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	<b>HEARING REQUEST</b>
	)	
Defendants.	)	
	)	
	)	
	)	

**INTERNET CORPORATION FOR ASSIGNED NAME AND NUMBERS’  
MOTION TO QUASH WRIT OF ATTACHMENT**

The Internet Corporation for Assigned Names and Numbers (“ICANN”), a non-party, by counsel, respectfully moves this Court to quash the Writ of Attachment on Judgment Other Than Wages, Salary And Commissions (“Writ of Attachment”) issued by Plaintiffs in the above-entitled action, for the reasons set forth in ICANN’s accompanying Memorandum.<sup>1</sup>

Furthermore, ICANN, in accordance with Local Civil Rule 78.1, requests that an oral hearing be scheduled to inform the Court’s ruling on the Motion.

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<sup>1</sup> Plaintiffs issued to ICANN, and ICANN is moving to quash, writs of attachment in seven actions: (1) *Rubin, et al. v. Islamic Republic of Iran, et al.*, Case No. 01-1655-RMU; (2) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 02-1811-RCL; (3) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 08-520-RCL; (4) *Stern, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2602-RCL; (5) *Weinstein, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2601-RCL; (6) *Wyatt, et al. v. Syrian Arab Republic, et al.*, Case No. 08-502-RCL; and (7) *Calderon-Cardona, et al. v. Democratic People’s Republic of North Korea, et al.*, Case No. 14-mc-648-RCL. All of these actions were assigned to this Court, with the exception of the *Calderon-Cardona* matter, which is unassigned, and the *Rubin* matter, which was assigned to now-retired Judge Ricardo M. Urbina, but has not been re-assigned to another Judge. Accordingly, ICANN has filed a Motion to Consolidate Consideration of, and Hearing on, ICANN’s Motions to Quash requesting that this Court consider and rule upon all of ICANN’s Motions to Quash, including the motions filed in the *Calderon-Cardona* and *Rubin* cases.

Case 1:02-cv-01811-RCL Document 47 Filed 07/29/14 Page 2 of 3

Dated: July 28, 2014

Respectfully submitted,

*/s/ Tara Lynn R. Zurawski*

---

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Jeffrey A. Levee (*pro hac vice* to be filed)  
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*Counsel for Non-Party INTERNET  
CORPORATION FOR ASSIGNED NAMES  
AND NUMBERS*

Case 1:02-cv-01811-RCL Document 47 Filed 07/29/14 Page 3 of 3

**CERTIFICATE OF SERVICE**

I certify that on July 28, 2014, I filed the foregoing Motion To Quash Writ of Attachment, and a [Proposed] Order thereon, with the Clerk of the Court for the U.S. District Court for the District of Columbia using its CM/ECF System, and I caused to be served one copy of the foregoing Motion by First Class Mail, postage prepaid, on the following:

Robert J. Tolchin  
Berkman Law Office, LLC  
111 Livingston Street, Suite 1928  
Brooklyn, NY 11201

*Counsel for Plaintiffs*

/s/ Tara Lynn R. Zurawski

Tara Lynn R. Zurawski (DC Bar No. 980960)

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF COLUMBIA

SETH CHARLES (KLEIN) BEN HAIM, )  
BERNARD (KLEIN) BEN HAIM, and LAVI )  
(KLEIN) BEN HAIM, )  
 )  
Plaintiffs )

v. )

THE ISLAMIC REPUBLIC OF IRAN, THE )  
IRANIAN MINISTRY OF INFORMATION )  
AND SECURITY, AYATOLLAH ALI )  
HOSEINI KHARNENEI, Supreme Leader of )  
the Islamic Republic of Iran, ALI AKBAR )  
HASHEMI-RAFSANJANI, Former President )  
of the Islamic Republic of Iran, ALI )  
FALLAHIAN-KHUZESTANI, Former )  
Minister of Information and Security, and )  
PALESTINE ISLAMIC JIHAD, also known as )  
PALESTINE ISLAMIC JIHAD-SHAQAQI )  
FACTION, also known as, PALESTINIAN )  
ISLAMIC JIHAD, also known as, ISLAMIC )  
JIHAD OF PALESTINE, also known as )  
HARAKAT AL-JIHAD AL-ISLAMI )  
AL-FILASTINI, )  
 )  
Defendants )

Case No. 1:02-cv-1811-RCL

Case No. 1:08-cv-0520-RCL

**NOTICE OF APPEAL**

Notice is hereby given that SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, and LAVI (KLEIN) BEN HAIM (the "Plaintiffs"), judgment creditor plaintiffs in the above named case, hereby appeal to the United States Court of Appeals for the District of Columbia Circuit from an order quashing Plaintiffs' writs of attachment to third party the Internet Corporation for Assigned Names and Numbers and denying as moot Plaintiffs' related motion for discovery and scheduling relief, entered in this action on November 12, 2014. The Plaintiffs appeal from each and every part of that order.

Case 1:02-cv-01811-RCL Document 71 Filed 12/12/14 Page 2 of 2

Date: December 12, 2014

Respectfully submitted,

THE BERKMAN LAW OFFICE, LLC  
*Attorneys for the Plaintiffs*

By:   
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*Attorneys for the Plaintiffs*

By: /s/ Erik S. Syverson  
Erik S. Syverson

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APPEAL,CLOSED,TYPE-B

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:08-cv-00520-RCL**

BEN HAIM et al v. ISLAMIC REPUBLIC OF IRAN et al  
Assigned to: Chief Judge Royce C. Lamberth

Cases: [1:02-cv-01811-RCL](#)  
[1:08-cv-01460-RCL](#)

Case in other court: 14-07195

Cause: 28:1602 Foreign Sovereign Immunities Act

Date Filed: 03/26/2008

Date Terminated: 08/04/2011

Jury Demand: None

Nature of Suit: 360 P.I.: Other

Jurisdiction: Federal Question

**Plaintiff**

**SETH CHARLES (KLEIN) BEN  
HAIM**

represented by **David J. Strachman**  
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*TERMINATED: 05/06/2013*  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Erik Swen Syverson**  
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*LEAD ATTORNEY*  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*



**Plaintiff**

**BERNARD (KLEIN) BEN HAIM**

represented by **David J. Strachman**

(See above for address)

*TERMINATED: 05/06/2013*

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Erik Swen Syverson**

(See above for address)

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**

(See above for address)

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Plaintiff**

**LAVI (KLEIN) BEN HAIM**

represented by **David J. Strachman**

(See above for address)

*TERMINATED: 05/06/2013*

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Erik Swen Syverson**

(See above for address)

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**

(See above for address)

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

V.

**Defendant**

**ISLAMIC REPUBLIC OF IRAN**

**Defendant**

**IRANIAN MINISTRY OF  
INFORMATION AND SECURITY**

**Defendant**

**AYATOLLAH SAYYID ALI  
HOSSEINI KHAMENEI**  
*Supreme Leader of the Islamic Republic*

District of Columbia live database

Page 3 of 13

*of Iran*

*TERMINATED: 04/14/2010*

**Defendant**

**ALI AKBAR HASHEMI-  
RAFSANJANI**

*Former President of the Islamic  
Republic of Iran*

*TERMINATED: 04/14/2010*

**Defendant**

**ALI FALLAHIAN-KHUZESTANI**

*Former Minister of Information and  
Security*

*TERMINATED: 04/14/2010*

V.

**Garnishee**

**INTERNET CORPORATION FOR  
ASSIGNED NAMES AND NUMBER**

represented by **Eric P Enson**

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*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

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**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
03/26/2008	<a href="#">1</a>	COMPLAINT against ALI AKBAR HASHEMI-RAFSANJANI, ALI FALLAHIAN-KHUZESTANI, ISLAMIC REPUBLIC OF IRAN, IRANIAN MINISTRY OF INFORMATION AND SECURITY, AYATOLLAH ALI HOSEINI KHAMENEI ( Filing fee \$ 350, receipt number 4616011242) filed by SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM. (Attachments: # <a href="#">1</a> Civil Cover Sheet)(tg, ) (Entered: 03/27/2008)
03/26/2008		Summons (5) Issued as to ALI AKBAR HASHEMI-RAFSANJANI, ALI FALLAHIAN-KHUZESTANI, ISLAMIC REPUBLIC OF IRAN, IRANIAN MINISTRY OF INFORMATION AND SECURITY, AYATOLLAH ALI HOSEINI KHAMENEI. (tg, ) (Entered: 03/27/2008)
03/26/2008	<a href="#">2</a>	NOTICE OF RELATED CASE by SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM. Case related to Case No. 02-1811. (tg, ) (Entered: 03/27/2008)
09/30/2009	<a href="#">3</a>	MEMORANDUM AND OPINION. Signed by Chief Judge Royce C. Lamberth on 09/30/2009. (lcrl6, ) (Entered: 09/30/2009)
09/30/2009	<a href="#">4</a>	ORDER denying 435 MOTION Authorize Payment To Special Masters by ALL PLAINTIFFS; denying <a href="#">30</a> MOTION for Reconsideration of Judgment by ESTELLE CARROLL, HARRY BEER, ANNA BEER, PHYLLIS MAISEL; denying MOTION <a href="#">31</a> for Hearing on Issues Presented in Motion to Reconsider and Leave to File a 1083(c)(2) Motion Nunc Pro Tunc by ESTELLE CARROLL, HARRY BEER, ANNA BEER, PHYLLIS MAISEL; denying 32 MOTION for Reconsideration of Judgment and Leave to file motion nunc pro tunc by ALL PLAINTIFFS; denying MOTION <a href="#">33</a> for Hearing on Issues Presented in Plaintiff's Motion to Reconsider and Leave to File 1083 (c)(2) Motion Nunc Pro Tunc by ALL PLAINTIFFS. Signed by Chief Judge Royce C. Lamberth on 09/30/2009. (lcrl6, ) (Entered: 09/30/2009)
11/30/2009	<a href="#">5</a>	RESPONSE re (21 in 1:06-cv-00750-RCL, 17 in 1:07-cv-01302-RCL, 6 in 1:08-cv-01807-RCL, 3 in 1:08-cv-00520-RCL, 38 in 1:06-cv-00596-RCL, 10 in 1:08-cv-00531-RCL, 35 in 1:02-cv-01811-RCL, 35 in 1:06-cv-00473-RCL, 6 in 1:08-cv-01273-RCL, 9 in 1:08-cv-01615-RCL, 6 in 1:08-cv-01814-RCL, 15 in 1:06-cv-00690-RCL, 15 in 1:06-cv-00516-RCL, 27 in 1:06-cv-01116-RCL) Memorandum & Opinion filed by UNITED STATES OF AMERICA. (znmw, )

		(Entered: 12/01/2009)
04/14/2010	<a href="#">6</a>	ORDER DROPPING INDIVIDUALLY NAMED DEFENDANTS. Signed by Chief Judge Royce C. Lamberth on 4/14/10. (lcrcl6, ) (Entered: 04/14/2010)
04/14/2010	<a href="#">7</a>	STATUS REPORT ORDER REGARDING SERVICE Status Report due by 4/21/2010. Signed by Chief Judge Royce C. Lamberth on 4/14/10. (lcrcl6, ) (Modified on 4/15/2010 (rje, ). (Entered: 04/14/2010)
04/14/2010		Set/Reset Deadlines: Status Report due by 4/21/2010. (rje, ) (Entered: 04/14/2010)
04/21/2010	<a href="#">8</a>	STATUS REPORT <i>PLAINTIFFS' RESPONSE TO ORDER OF APRIL 14, 2010</i> by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. (Strachman, David) (Entered: 04/21/2010)
04/28/2010	<a href="#">9</a>	STATUS REPORT <i>Service Update</i> by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. (Attachments: # <a href="#">1</a> Exhibit letter requesting assistance)(Strachman, David) (Entered: 04/28/2010)
04/30/2010		SUMMONS (2) REISSUED as to IRANIAN MINISTRY OF INFORMATION AND SECURITY, ISLAMIC REPUBLIC OF IRAN (rdj) (Entered: 04/30/2010)
04/30/2010	<a href="#">10</a>	CERTIFICATE OF CLERK of mailing one copy of the summons, complaint, and notice of suit, together with a translation of each into the official language of the foreign state on April 30, 2010 upon IRANIAN MINISTRY OF INFORMATION AND SECURITY, ISLAMIC REPUBLIC OF IRAN by International registered mail, return receipt requested pursuant to 28 U.S.C. 1608(a)(3). (Attachments: # <a href="#">1</a> Request to the Clerk for Service, # <a href="#">2</a> Receipt from Post Office) (rdj) (Entered: 04/30/2010)
07/01/2010	<a href="#">11</a>	REQUEST from Plaintiff for the Clerk to effect service of two copies of the summons, complaint, and notice of suit, together with a translation of each into the official language of the foreign state, by certified mail, return receipt requested, to the U. S. Department of State, Director of Overseas Citizens Services, pursuant to 28 U.S.C. 1608(a)(4). (rdj) (Entered: 07/06/2010)
07/06/2010	<a href="#">12</a>	CERTIFICATE OF CLERK of mailing two copies of the summons, complaint, and notice of suit, together with a translation of each into the official language of the foreign state on July 6, 2010, by certified mail, return receipt requested, to the U. S. Department of State, Edward Betancourt, Director, Office of Policy Review and Interagency Liaison Overseas Citizens Services, 2100 Pennsylvania Avenue, NW, 4th Floor, Washington, DC 20520, pursuant to 28 U.S.C. 1608(a)(4). (Attachments: # <a href="#">1</a> Front of envelope) (rdj) (Entered: 07/06/2010)
07/16/2010	<a href="#">13</a>	NOTICE of return receipt of certified mail to the Department of State re <a href="#">12</a> Certificate of Clerk - 28USC1608(a)(4) (rdj) (Entered: 07/19/2010)

12/16/2010	<a href="#">14</a>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to IRANIAN MINISTRY OF INFORMATION AND SECURITY served on 9/5/2010, answer due 11/4/2010; ISLAMIC REPUBLIC OF IRAN served on 9/5/2010, answer due 11/4/2010. <i>Diplomatic notes numbers 1120-IE and 1121-IE</i> (Original Documents sent to Attorney) (dr) (Entered: 12/20/2010)
12/21/2010	<a href="#">15</a>	ORDER CONCERNING DEFAULT. Signed by Chief Judge Royce C. Lamberth on December 21, 2010. (lcrcl5) (Entered: 12/21/2010)
12/24/2010	<a href="#">16</a>	AFFIDAVIT FOR DEFAULT of <i>THE ISLAMIC REPUBLIC OF IRAN and IRANIAN MINISTRY OF INFORMATION AND SECURITY</i> by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. (Strachman, David) (Entered: 12/24/2010)
12/27/2010	<a href="#">17</a>	Clerk's ENTRY OF DEFAULT as to IRANIAN MINISTRY OF INFORMATION AND SECURITY, ISLAMIC REPUBLIC OF IRAN (rdj) (Entered: 12/27/2010)
01/05/2011	<a href="#">18</a>	MOTION for Default Judgment as to <i>the Islamic Republic of Iran and Ministry of Informaton and Security</i> by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM (Strachman, David) (Entered: 01/05/2011)
05/19/2011	<a href="#">19</a>	MEMORANDUM OPINION. Signed by Chief Judge Royce C. Lamberth on May 19, 2011. (lcrcl5) (Entered: 05/19/2011)
05/19/2011	<a href="#">20</a>	ORDER AND JUDGMENT granting <a href="#">18</a> Motion for Default Judgment. Signed by Chief Judge Royce C. Lamberth on May 19, 2011. (lcrcl5) (Entered: 05/19/2011)
09/09/2011	<a href="#">21</a>	REQUEST from All Plaintiffs for the Clerk to effect service of two copies of the <a href="#">20</a> ORDER AND JUDGMENT, and two notices Judgment, together with a translation of each into the official language of the foreign state, by DHL, to the head of the ministry of foreign affairs, pursuant to 28 U.S.C. 1608(a)(3). (rdj) (Entered: 09/15/2011)
09/27/2011	<a href="#">22</a>	CERTIFICATE OF CLERK of mailing two copies of the <a href="#">20</a> ORDER AND JUDGMENT, together with a translation of each into the official language of the foreign state on September 27, 2011, by DHL, to the agency or instrumentality of the foreign state, pursuant to 28 U.S.C. 1608(a)(3). (Attachments: # <a href="#">1</a> Exhibit) (rdj) (Entered: 09/27/2011)
07/31/2012		MINUTE ORDER. More than ten months have passed since plaintiffs attempted to serve the final judgment on defendants via 28 U.S.C. 1608(a)(3). In light of this, it is ORDERED that plaintiffs attempt service on defendants through diplomatic channels in accordance with 28 U.S.C. 1608(a)(4) within 14 days. Otherwise, plaintiffs shall SHOW CAUSE for their failure to obey this Court's Order and Judgment of May 19, 2011. Signed by Chief Judge Royce C. Lamberth on 7/31/2012. (lcrcl5) (Entered: 07/31/2012)
08/10/2012	<a href="#">23</a>	RESPONSE TO ORDER OF THE COURT re Order, filed by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES

		(KLEIN) BEN HAIM. (Attachments: # <a href="#">1</a> DHL Express proof of service) (Strachman, David) (Entered: 08/10/2012)
08/14/2012		MINUTE ORDER. Three statutes at issue, 28 U.S.C. § 1608(a)(3), § 1608(b)(3)(B) and § 1608(c)(2), all require "a signed receipt." DHL's letter, ECF No. 23-1, is insufficient because it is not a signed receipt. However, since DHL Express has "purged" its system, it appears that any signed receipt from October 2011 may be forever lost. Accordingly, it is hereby ORDERED that, no later than August 17, 2012, plaintiffs again attempt service under § 1608(a)(3) and (b)(3)(B). If service has not been effected by September 17, 2012, plaintiffs shall, on that date, initiate diplomatic service under 28 U.S.C. § 1608(a)(4). Signed by Chief Judge Royce C. Lamberth on 8/14/2012. (lcrcl5) (Entered: 08/14/2012)
08/15/2012		Set/Reset Deadlines: Plaintiff's Time to effectuate service upon party due by 8/17/2012. (rje) (Entered: 08/15/2012)
08/15/2012	<a href="#">24</a>	NOTICE <i>Request for Clerk to dispatch post judgment service</i> by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM (Strachman, David) (Entered: 08/15/2012)
08/16/2012	<a href="#">25</a>	REQUEST from BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM for the Clerk to effect service of two copies of <a href="#">19</a> MEMORANDUM OPINION & <a href="#">20</a> ORDER AND JUDGMENT, together with a translation of each into the official language of the foreign state, by DHL, to the agency or instrumentality of the foreign state, pursuant to 28 U.S.C. 1608(b)(3)(B) and to the head of the ministry of foreign affairs, pursuant to 28 U.S.C. 1608(a)(3). (See docket entry <a href="#">24</a> to view document)(rdj) (Entered: 08/16/2012)
08/16/2012	<a href="#">26</a>	CERTIFICATE OF CLERK of mailing two copies of <a href="#">19</a> MEMORANDUM OPINION & <a href="#">20</a> ORDER AND JUDGMENT, together with a translation of each into the official language of the foreign state on 8/16/2012, by DHL, to the agency or instrumentality of the foreign state, pursuant to 28 U.S.C. 1608(a)(3) and 28 U.S.C. 1608(b)(3)(B). (Attachments: # <a href="#">1</a> DHL Waybills) (rdj) (Entered: 08/16/2012)
09/09/2012	<a href="#">27</a>	NOTICE OF POST JUDGMENT SERVICE by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Exhibit C, # <a href="#">4</a> Exhibit D) (Strachman, David) (Entered: 09/09/2012)
10/02/2012	<a href="#">28</a>	MEMORANDUM AND ORDER as to <a href="#">27</a> plaintiff's Notice of Post Judgment Service, ordering that plaintiffs shall either submit a supplemental brief by October 12, 2012 supporting their assertions about the adequacy of service on defendants, or again attempt service on defendants under 28 U.S.C. 1608(e) no later than October 31, 2012. Signed by Chief Judge Royce C. Lamberth on October 2, 2012. (lcrcl5) (Entered: 10/02/2012)
10/02/2012		Set/Reset Deadlines: Plaintiffs' Supplemental Brief due by 10/12/2012. (rje) (Entered: 10/02/2012)

10/12/2012	<a href="#">29</a>	RESPONSE TO ORDER OF THE COURT re <a href="#">28</a> Order, filed by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. (Strachman, David) (Entered: 10/12/2012)
11/05/2012	<a href="#">30</a>	MEMORANDUM OPINION and ORDER regarding post judgment service. As there is no legal basis for this Court to conclude that service by mail has been effectuated, it is ORDERED that no later than November 30, 2012, plaintiffs attempt post judgment service on both defendants through diplomatic channels under § 1608(a)(4). Signed by Chief Judge Royce C. Lamberth on November 5, 2012. (lrcrl5) (Entered: 11/05/2012)
11/07/2012		Set/Reset Deadlines: Plaintiff's Time to effectuate service upon party due by 11/30/2012. (rje) (Entered: 11/07/2012)
11/15/2012	<a href="#">31</a>	AFFIDAVIT REQUESTING FOREIGN MAILING by BERNARD (KLEIN) BEN HAIM. (Strachman, David) (Entered: 11/15/2012)
11/15/2012	<a href="#">32</a>	REQUEST from BERNARD (KLEIN) BEN HAIM for the Clerk to effect service of two copies of <a href="#">20</a> ORDER AND JUDGMENT, <a href="#">19</a> MEMORANDUM OPINION, and notice of Default Judgment, together with a translation of <a href="#">20</a> ORDER AND JUDGMENT & Notice of Default Judgment into the official language of the foreign state, by certified mail, return receipt requested, to the U. S. Department of State, Director of Overseas Citizens Services, pursuant to 28 U.S.C. 1608(a)(4). (See docket entry <a href="#">31</a> to view document) (rdj) (Entered: 11/21/2012)
11/21/2012	<a href="#">33</a>	CERTIFICATE OF CLERK of mailing two copies of the <a href="#">19</a> MEMORANDUM OPINION, <a href="#">20</a> ORDER AND JUDGMENT, and notice of Default Judgment, together with a translation of <a href="#">20</a> ORDER AND JUDGMENT & Notice of Default Judgment into the official language of the foreign state on 11/21/2012, by certified mail, return receipt requested, to the U. S. Department of State, Director, Special Consular Services, 2201 C Street, NW, SA-29, 4th Floor, Washington, DC 20520, pursuant to 28 U.S.C. 1608(a)(4). (Attachments: # <a href="#">1</a> Exhibit) (rdj) (Entered: 11/21/2012)
03/13/2013	<a href="#">34</a>	AFFIDAVIT OF SERVICE by U.S. Department of State upon defendants under diplomatic notes, numbers 1005-IE and 1006-IE, dated February 3, 2013 and delivered on February 4, 2013. re <a href="#">20</a> Order on Motion for Default Judgment, <a href="#">19</a> Memorandum & Opinion by IRANIAN MINISTRY OF INFORMATION AND SECURITY, ISLAMIC REPUBLIC OF IRAN. (Attachments: # <a href="#">1</a> Exhibit)*Originals mailed to Plaintiff's Counsel*(rdj) (Entered: 03/15/2013)
04/29/2013	<a href="#">35</a>	Consent MOTION to Withdraw as Attorney by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM (Attachments: # <a href="#">1</a> Exhibit consent to withdraw, # <a href="#">2</a> Exhibit notice per LR 83.6, # <a href="#">3</a> Text of Proposed Order)(Strachman, David) (Entered: 04/29/2013)
05/02/2013	<a href="#">36</a>	MOTION 28 USC 1610(c) finding by SETH CHARLES (KLEIN) BEN HAIM (Attachments: # <a href="#">1</a> Text of Proposed Order)(Strachman, David) (Entered: 05/02/2013)

05/06/2013	<a href="#">37</a>	ORDER granting <a href="#">36</a> Motion for 28 U.S.C. 1610(c). Signed by Chief Judge Royce C. Lamberth on May 6, 2013. (lcrcl5) (Entered: 05/06/2013)
05/06/2013	<a href="#">38</a>	ORDER granting <a href="#">35</a> Motion to Withdraw as Attorney. Attorney David J. Strachman terminated. Signed by Chief Judge Royce C. Lamberth on May 6, 2013.(lcrcl5) (Entered: 05/06/2013)
07/07/2014	<a href="#">40</a>	Consent MOTION for Extension of Time to <i>RESPOND TO WRIT OF ATTACHMENT AND RELATED SUBPOENA</i> by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/07/2014)
07/28/2014	<a href="#">41</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Eric Enson, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792147. Fee Status: Fee Paid. by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">42</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Jeffrey LeVee, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792149. Fee Status: Fee Paid. by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">43</a>	OBJECTIONS to Answer to Writ by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/29/2014	<a href="#">44</a>	MOTION to Quash by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Memorandum in Support, # <a href="#">2</a> Declaration Jeffrey, # <a href="#">3</a> Declaration Enson, # <a href="#">4</a> Text of Proposed Order) (Zurawski, Tara Lynn) (Entered: 07/29/2014)
07/29/2014	<a href="#">45</a>	MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/29/2014)
08/04/2014	<a href="#">46</a>	Consent MOTION for Extension of Time to <i>Superseding Previous Consent Motion For an Extension of Time to Respond to Writ of Attachment and Related Subpoena</i> by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/04/2014)
08/11/2014	<a href="#">47</a>	WITHDRAWN PER ORDER FILED 9/9/2014.....MOTION to Compel <i>Production of Documents in Response to Subpoena</i> by BERNARD (KLEIN)



		BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Text of Proposed Order) (Tolchin, Robert) Modified on 9/9/2014 (zmm, ). (Entered: 08/11/2014)
08/11/2014	<u>48</u>	MOTION for Extension of Time to File Response/Reply as to <u>44</u> MOTION to Quash by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM (Attachments: # <u>1</u> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/11/2014)
08/13/2014	<u>50</u>	ORDER: Upon consideration of Internet Corporation for Assigned Names and Numbers("ICANN") and Plaintiffs' Consent Motion Superseding Previous Consent Motion for an Extension of Time to Respond to Writ of Attachment and Related Subpoena, and good cause appearing, it is hereby ORDERED that ICANN and Plaintiffs' Consent Motion is GRANTED. ICANN's response to the writ of attachment and subpoena was due and filed on July 28, 2014. Plaintiff's time period pursuant to D.C. Superior Court Civil Rule 69-I(d) and (e) shall not begin to run until the parties agree, or absent such agreement, until the Court has determined, that ICANN has fulfilled its obligation in response to the Subpoena and in no event shall such periods expire before September 8, 2014. Plaintiff's lien is correspondingly extended unless ICANN's to Quash, filed on July 29, 2014, is granted. Signed by Judge Royce C. Lamberth on 8/12/2014. (tr). (Entered: 08/13/2014)
08/13/2014	<u>49</u>	ORDER granting (71) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:08-cv-00502-RCL; granting (45) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:08-cv-00520-RCL; granting (107) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:01-cv-01655-RMU; granting (8) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:14-mc-00648-UNA; granting (48) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:02-cv-01811-RCL; granting (90) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02601-RCL; granting (30) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02602-RCL; The Court will consolidate the consideration of, and hearing on, all seven of ICANN's Motion to Quash, including the motion filed in civil case number 01-1655(RMU) and miscellaneous case number 14-648 (UNA); and it is further ORDERED that the Clerk of the Court shall transfer civil case number 01-1655 (RMU) and miscellaneous case number 14-648 (UNA) to this Court for further proceedings. Signed by Judge Royce C. Lamberth on 8/12/2014. (tr) . (Entered: 08/13/2014)

08/13/2014	<a href="#">51</a>	ORDER re: <a href="#">42</a> MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Jeffrey LeVee; ORDERED that the Motion for Admission pro hac vice is GRANTED, and that Jeffrey A. LeVee be, and that the same hereby is, admitted pro hac vice to appear and participate fully in the above-captioned case. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr) (Entered: 08/14/2014)
08/13/2014	<a href="#">52</a>	ORDER granting <a href="#">41</a> MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Eric Enson; ORDERED that the Motion for Admission pro hac vice is GRANTED, and that Eric P. Enson be, and that the same hereby is, admitted pro hac vice to appear and participate fully in the above-captioned case. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr) (Entered: 08/14/2014)
08/18/2014	<a href="#">53</a>	Memorandum in opposition to re <a href="#">48</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">44</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Proposed Order, # <a href="#">2</a> Declaration of Eric Enson)(Francisco, Noel) (Entered: 08/18/2014)
08/28/2014	<a href="#">54</a>	REPLY to opposition to motion re <a href="#">48</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">44</a> MOTION to Quash filed by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. (Attachments: # <a href="#">1</a> Exhibit A)(Tolchin, Robert) (Entered: 08/28/2014)
08/28/2014	<a href="#">55</a>	Memorandum in opposition to re <a href="#">47</a> MOTION to Compel <i>Production of Documents in Response to Subpoena</i> filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order)(Francisco, Noel) (Entered: 08/28/2014)
09/05/2014	<a href="#">56</a>	ORDER granting <a href="#">48</a> Motion for Extension of Time to Respond to Motion to Quash Writ of Attachment; Plaintiffs' response to the Motion to Quash Writs of Attachment filed by the Internet Corporation for Assigned Names and Numbers due by 9/30/2014. Signed by Judge Royce C. Lamberth on 8/28/2014. (tth) (Entered: 09/05/2014)
09/08/2014	<a href="#">57</a>	Consent MOTION Plaintiffs' Motion to Compel by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Francisco, Noel) (Entered: 09/08/2014)
09/09/2014	<a href="#">58</a>	ORDER granting (57) Motion Regarding Plaintiffs' Motion to Compel in case 1:08-cv-00520-RCL; granting (119) Motion Regarding Plaintiffs' Motion to Compel in case 1:01-cv-01655-RCL; granting (60) Motion Regarding Plaintiffs' Motion to Compel in case 1:02-cv-01811-RCL; granting (103) Motion Regarding Plaintiffs' Motion to Compel in case 1:00-cv-02601-RCL; granting (42) Motion Regarding Plaintiffs' Motion to Compel in case 1:00-cv-02602-RCL. Plaintiffs' Motion to Compel is ordered withdrawn. Signed by Judge Royce C. Lamberth on 9/9/2014. (zmm, ) (Entered: 09/09/2014)
09/16/2014	<a href="#">59</a>	STIPULATION [ <i>PROPOSED</i> ] <i>PROTECTIVE ORDER</i> by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Francisco,

		Noel) (Entered: 09/16/2014)
09/19/2014	<a href="#">60</a>	STIPULATED PROTECTIVE ORDER setting forth procedures for handling confidential material; signed by Judge Royce C. Lamberth on 9/18/14. (Attachment: Exhibit A) (kk) (Entered: 09/19/2014)
09/28/2014	<a href="#">61</a>	MOTION for Discovery , MOTION for Extension of Time to File Response/Reply as to <a href="#">44</a> MOTION to Quash by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM (Attachments: # <a href="#">1</a> Declaration Erik S. Syverson, # <a href="#">2</a> Declaration Steven T. Gebelin)(Tolchin, Robert) (Entered: 09/28/2014)
09/30/2014	<a href="#">62</a>	RESPONSE re <a href="#">44</a> MOTION to Quash <i>Writ of Attachment</i> filed by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. (Syverson, Erik) (Entered: 09/30/2014)
10/10/2014	<a href="#">63</a>	REPLY to opposition to motion re <a href="#">44</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Francisco, Noel) (Entered: 10/10/2014)
10/14/2014	<a href="#">64</a>	Memorandum in opposition to re <a href="#">61</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply as to <a href="#">44</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order) (Francisco, Noel) (Entered: 10/14/2014)
10/24/2014	<a href="#">65</a>	REPLY to opposition to motion re <a href="#">61</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply as to <a href="#">44</a> MOTION to Quash filed by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. (Syverson, Erik) (Entered: 10/24/2014)
11/10/2014	<a href="#">66</a>	ORDER Granting <a href="#">44</a> Motion to Quash; Denied as Moot <a href="#">61</a> Motion for Discovery and writ of attachment as to ICANN are quashed. Signed by Judge Royce C. Lamberth on 11/10/14. (mpt, ) (Entered: 11/12/2014)
11/10/2014	<a href="#">67</a>	MEMORANDUM AND OPINION (See Image for Details). Signed by Judge Royce C. Lamberth on 11/10/14. (mpt, ) (Entered: 11/12/2014)
12/12/2014	<a href="#">68</a>	NOTICE OF APPEAL TO DC CIRCUIT COURT as to <a href="#">66</a> Order on Motion to Quash, Order on Motion for Discovery, Order on Motion for Extension of Time to File Response/Reply by BERNARD (KLEIN) BEN HAIM, LAVI (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. Filing fee \$ 505, receipt number 0090-3934587. Fee Status: Fee Paid. Parties have been notified. (Syverson, Erik) (Entered: 12/12/2014)
12/15/2014	<a href="#">69</a>	Transmission of the Notice of Appeal, Order Appealed, and Docket Sheet to US Court of Appeals. The Court of Appeals fee was paid this date re <a href="#">68</a> Notice of Appeal to DC Circuit Court. (rdj) (Entered: 12/15/2014)
12/17/2014		USCA Case Number 14-7195 for <a href="#">68</a> Notice of Appeal to DC Circuit Court, filed by LAVI (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, SETH CHARLES (KLEIN) BEN HAIM. (erd) (Entered: 12/18/2014)

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

SETH CHARLES BEN HAIM, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	08-cv-520 (RCL)
	)	
ISLAMIC REPUBLIC OF IRAN, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**ORDER AND JUDGMENT**

In accordance with the Memorandum Opinion issued this day, it is hereby  
ORDERED that plaintiffs’ Motion for Default Judgment, Jan. 5, 2011 [18] is  
GRANTED; it is furthermore  
ORDERED that final judgment is entered in favor of plaintiffs and against all defendants;  
it is furthermore  
ORDERED that plaintiffs are awarded \$300 million in punitive damages, to be  
distributed as follows:

1. plaintiff Seth Klein Ben Haim is entitled to \$206,250,000;
2. plaintiff Bernard Klein Ben Haim is entitled to \$65,625,000; and
3. plaintiff Lavi Klein Ben Haim is entitled to \$28,125,000; it is furthermore

ORDERED that defendants shall be liable, jointly and severally, for the entire  
\$300,000,000 amount; it is furthermore

Case 1:08-cv-00520-RCL Document 20 Filed 05/19/11 Page 2 of 2

ORDERED that plaintiffs shall, at their own cost and consistent with the requirements of 28 U.S.C. § 1608(e), send a copy of this Opinion and Judgment, and the Memorandum Opinion issued this date, to defendants.

SO ORDERED.

Signed by Royce C. Lamberth, Chief Judge, on May 19, 2011.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

Seth Charles Ben Haim, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 08-520-RCL
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	<b>HEARING REQUEST</b>
	)	
Defendants.	)	
	)	
	)	
	)	

**INTERNET CORPORATION FOR ASSIGNED NAME AND NUMBERS’  
MOTION TO QUASH WRIT OF ATTACHMENT**

The Internet Corporation for Assigned Names and Numbers (“ICANN”), a non-party, by counsel, respectfully moves this Court to quash the Writ of Attachment on Judgment Other Than Wages, Salary And Commissions (“Writ of Attachment”) issued by Plaintiffs in the above-entitled action, for the reasons set forth in ICANN’s accompanying Memorandum.<sup>1</sup>

Furthermore, ICANN, in accordance with Local Civil Rule 78.1, requests that an oral hearing be scheduled to inform the Court’s ruling on the Motion.

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<sup>1</sup> Plaintiffs issued to ICANN, and ICANN is moving to quash, writs of attachment in seven actions: (1) *Rubin, et al. v. Islamic Republic of Iran, et al.*, Case No. 01-1655-RMU; (2) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 02-1811-RCL; (3) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 08-520-RCL; (4) *Stern, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2602-RCL; (5) *Weinstein, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2601-RCL; (6) *Wyatt, et al. v. Syrian Arab Republic, et al.*, Case No. 08-502-RCL; and (7) *Calderon-Cardona, et al. v. Democratic People’s Republic of North Korea, et al.*, Case No. 14-mc-648-RCL. All of these actions were assigned to this Court, with the exception of the *Calderon-Cardona* matter, which is unassigned, and the *Rubin* matter, which was assigned to now-retired Judge Ricardo M. Urbina, but has not been re-assigned to another Judge. Accordingly, ICANN has filed a Motion to Consolidate Consideration of, and Hearing on, ICANN’s Motions to Quash requesting that this Court consider and rule upon all of ICANN’s Motions to Quash, including the motions filed in the *Calderon-Cardona* and *Rubin* cases.

Case 1:08-cv-00520-RCL Document 44 Filed 07/29/14 Page 2 of 3

Dated: July 28, 2014

Respectfully submitted,

*/s/ Tara Lynn R. Zurawski*

---

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*Counsel for Non-Party INTERNET  
CORPORATION FOR ASSIGNED NAMES  
AND NUMBERS*

Case 1:08-cv-00520-RCL Document 44 Filed 07/29/14 Page 3 of 3

**CERTIFICATE OF SERVICE**

I certify that on July 28, 2014, I filed the foregoing Motion To Quash Writ of Attachment, and a [Proposed] Order thereon, with the Clerk of the Court for the U.S. District Court for the District of Columbia using its CM/ECF System, and I caused to be served one copy of the foregoing Motion by First Class Mail, postage prepaid, on the following:

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111 Livingston Street, Suite 1928  
Brooklyn, NY 11201

*Counsel for Plaintiffs*

/s/ Tara Lynn R. Zurawski

Tara Lynn R. Zurawski (DC Bar No. 980960)



UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF COLUMBIA

SETH CHARLES (KLEIN) BEN HAIM, )  
BERNARD (KLEIN) BEN HAIM, and LAVI )  
(KLEIN) BEN HAIM, )

Plaintiffs )

v. )

THE ISLAMIC REPUBLIC OF IRAN, THE )  
IRANIAN MINISTRY OF INFORMATION )  
AND SECURITY, AYATOLLAH ALI )  
HOSEINI KHARNENEI, Supreme Leader of )  
the Islamic Republic of Iran, ALI AKBAR )  
HASHEMI-RAFSANJANI, Former President )  
of the Islamic Republic of Iran, ALI )  
FALLAHIAN-KHUZESTANI, Former )  
Minister of Information and Security, and )  
PALESTINE ISLAMIC JIHAD, also known as )  
PALESTINE ISLAMIC JIHAD-SHAQAQI )  
FACTION, also known as, PALESTINIAN )  
ISLAMIC JIHAD, also known as, ISLAMIC )  
JIHAD OF PALESTINE, also known as )  
HARAKAT AL-JIHAD AL-ISLAMI )  
AL-FILASTINI, )

Defendants )

Case No. 1:02-cv-1811-RCL

Case No. 1:08-cv-0520-RCL

**NOTICE OF APPEAL**

Notice is hereby given that SETH CHARLES (KLEIN) BEN HAIM, BERNARD (KLEIN) BEN HAIM, and LAVI (KLEIN) BEN HAIM (the "Plaintiffs"), judgment creditor plaintiffs in the above named case, hereby appeal to the United States Court of Appeals for the District of Columbia Circuit from an order quashing Plaintiffs' writs of attachment to third party the Internet Corporation for Assigned Names and Numbers and denying as moot Plaintiffs' related motion for discovery and scheduling relief, entered in this action on November 12, 2014. The Plaintiffs appeal from each and every part of that order.

Case 1:08-cv-00520-RCL Document 68 Filed 12/12/14 Page 2 of 2

Date: December 12, 2014

Respectfully submitted,

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APPEAL,CONSOL,TYPE-B

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:01-cv-01655-RCL**

RUBIN, et al v. ISLAMIC REP/IRAN, et al

Assigned to: Judge Royce C. Lamberth

Demand: \$0

Cases: [1:08-cv-00521-RMU](#)[1:05-cv-00220-RCL](#)

Case in other court: USCA, 05-05162

USCA-DC, 05-05170

USCA, 14-07198

Cause: 28:1331 Fed. Question: Personal Injury

Date Filed: 07/31/2001

Date Terminated: 09/10/2003

Jury Demand: None

Nature of Suit: 360 P.I.: Other

Jurisdiction: Federal Question

**Plaintiff****JENNY RUBIN**represented by **David J. Strachman**

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**Plaintiff**

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**Plaintiff**

**DANIEL MILLER**

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**Plaintiff**

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**Plaintiff**

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**Plaintiff**

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**Plaintiff**

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**Plaintiff**

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V.

**Defendant**

**ISLAMIC REPUBLIC OF IRAN**

**Defendant**

**IRANIAN MINISTRY OF  
INFORMATION AND SECURITY**

**Defendant**

**AYATOLLAH SAYYID ALI  
HOSSEINI KHAMENEI**  
*Supreme Leader of the Islamic Republic  
of Iran*

District of Columbia live database

Page 8 of 32

**Defendant**

**ALI AKBAR HASHEMI-  
RAFSANJANI**

*Former President of the Islamic  
Republic of Iran*

**Defendant**

**ALI FALLAHIAN-KHUZESTANI**

*Former Minister of Information and  
Security*

V.

**Garnishee**

**INTERNET CORPORATION FOR  
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**Movant**

**PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE**  
*TERMINATED: 09/08/2010*

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**Movant**

**MUSEUM OF FINE ARTS**  
*TERMINATED: 09/08/2010*

represented by **Ariel B. Levinson-Waldman**  
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TERMINATED: 09/08/2010  
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**Movant**

**UNIVERSITY OF CHICAGO**  
*TERMINATED: 09/08/2010*

represented by **Ariel B. Levinson-Waldman**  
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**Movant**

**ORIENTAL INSTITUTE**  
*TERMINATED: 09/08/2010*

represented by **Ariel B. Levinson-Waldman**  
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**Movant**

**FIELD MUSEUM**  
*TERMINATED: 09/08/2010*

represented by **Ariel B. Levinson-Waldman**  
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**Intervenor**

**UNITED STATES OF AMERICA**

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*TERMINATED: 08/07/2009*  
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Date Filed	#	Docket Text
07/31/2001	1	COMPLAINT filed by plaintiff JENNY RUBIN, plaintiff DEBORAH RUBIN, plaintiff DANIEL MILLER, plaintiff ABRAHAM MENDELSON, plaintiff STUART ELLIOT HERSH, plaintiff RENAY FRYM, plaintiff NOAM ROZENMAN, plaintiff ELENA ROZENMAN, plaintiff TZVI ROZENMAN (act) (Entered: 08/02/2001)
07/31/2001		SUMMONS (5) issued for defendant ISLAMIC REP/IRAN, defendant

		IRANIAN MINISTRY, defendant AYATOLLAH ALI HOSEINI KHAMENEI, defendant ALI AKBAR HASHEMI-RAFSANJANI, defendant ALI FALLAHIAN-KHUZESTANI (act) (Entered: 08/02/2001)
07/31/2001	2	NOTIFICATION OF RELATED CASE: Case related to Case No(s): 00-2328 (act) (Entered: 08/02/2001)
09/29/2001	3	REQUEST by plaintiffs for the Clerk to send a copy of the summons, complaint and a notice of suit, together with a translation of each into the official language of the foreign state, by registered mail to the Islamic Republic of Iran, Ministry of Foreign Affairs pursuant to 28 USC 1608(a)(3). (td) (Entered: 10/03/2001)
09/29/2001	4	REQUEST by plaintiffs for the clerk to send a copy of the summons and complaint with translation pursuant to 28 USC 1608 (b)(3)(B) to the Iranian Ministry of Information and Security, Ayatollah Ali Hoseini Khamenei, Ali Akbar Hashemi-Rafsanjani and Ali Fallhian-Khuzestani. (td) (Entered: 10/03/2001)
11/01/2001	5	REQUEST by plaintiff for Clerk to serve defendants a copy of the summons, complaint, notice of suit and translations through the Department of State, Special Consular Services, 2201 C Street, NW, Washington, DC requiring a signed receipt, in the manner provided by 28 U.S.C. 1608(a)(4) (td) (Entered: 11/01/2001)
01/11/2002	6	(ENTERED IN ERROR; SEE ENTRY NEW ENTRY NUMBER 7) RETURN OF SERVICE/AFFIDAVIT of summons and complaint unexecuted as to defendant ISLAMIC REPUBLIC. (td) Modified on 03/06/2002 (Entered: 01/14/2002)
01/11/2002	7	RETURN OF SERVICE/AFFIDAVIT of summons and complaint executed on 12/5/01 upon defendant ISLAMIC REPUBLIC. (td) Modified on 03/06/2002 (Entered: 03/06/2002)
01/11/2002	8	RETURN OF SERVICE/AFFIDAVIT of summons and complaint executed on 12/5/01 upon defendant IRANIAN MINISTRY (td) (Entered: 03/06/2002)
02/28/2002	9	AFFIDAVIT in support of default by plaintiffs. (td) (Entered: 03/06/2002)
03/06/2002	10	DEFAULT vs. defendant ISLAMIC REPUBLIC, defendant IRANIAN MINISTRY By Clerk (N) (td) (Entered: 03/06/2002)
06/19/2002	11	MOTION filed by plaintiffs to consolidate case with civil action number 00-2328 ; (COPY) (act) (Entered: 08/06/2002)
08/02/2002		ALL PLEADINGS WILL NOW BE DOCKETED IN THE LEAD CASE 00-2328 AS OF 8/2/02 (cdw) (Entered: 08/07/2002)
08/02/2002	12	ORDER by Judge Ricardo M. Urbina : granting motion to consolidate case with civil action number 00-2328 [11-1] by plaintiffs in 1:01-cv-01655 pretrial conference set for 1:30 12/19/02 in 1:00-cv-02328, in 1:01-cv-01655; consolidating case number 01-1655 with case number 00-2328 and all future submission for both cases shall be captioned with case number 00-2328;

		vacating pretrial conference set for 9/16/02 and resetting to 12/19/02 at 1:30 p.m.; vacating trial set for 9/30/20 and resetting trial for 10:00 1/6/03 in 1:00-cv-02328, in 1:01-cv-01655; directing that plaintiff comply with the following orders issued in case number00-2328; order regarding Civil Trial Procedures dated 3/21/02; Pretrial Scheduling and Procedures Order deated 3/21/02; and order dated 4/29/02 (regarding the motion fordefault judgment); directing that plaintiffs in case number 01-1655 file the motion for default judgment no later than 10/1/02; plaintiffs file the pretrial report no later than 12/5/02. (N) (N) (jwd) Modified on 12/19/2002 (Entered: 08/07/2002)
08/06/2002	13	STANDING ORDER by Judge Ricardo M. Urbina : (N) (jwd) (Entered: 08/07/2002)
10/01/2002	14	MOTION filed by plaintiffs in 1:01-cv-01655 for entry of default judgment (aet) (Entered: 10/07/2002)
11/21/2002	15	MOTION (EMERGENCY) filed by plaintiff in 1:01-cv-01655 to appoint commissioner for the taking of depositions abroad (aet) (Entered: 11/22/2002)
11/22/2002	16	MOTION filed by plaintiff in 1:01-cv-01655 for Bennett J. Bergman to appear pro hac vice ( 750 East Avenue, Pawtucket, RI 02860, (401)723-1010) ; Affidavit (1). (aet) Modified on 12/02/2002 (Entered: 11/25/2002)
11/26/2002	<a href="#">17</a>	ORDER by Judge Ricardo M. Urbina : granting motion for Bennett J. Bergman to appear pro hac vice ( 750 East Avenue, Pawtucket, RI 02860, (401)723-1010) [16-1] by plaintiffs (N) (jwd) (Entered: 11/26/2002)
12/03/2002	18	ORDER by Judge Ricardo M. Urbina : granting motion to appoint commissioner for the taking of depositions abroad [31-1] by plaintiffs in 1:00-cv-02328, 1:01-cv-01655; appointing Mitchell Coopersmith of 1274 N.W. 106 Terrace, Plantation, Florida 33322, as a Commissioner of this Court pursuant to Fed.R.Civ.P. 28(b) for purposes of administering oaths and taking testimony abroad in this matter. (N) (jwd) (Entered: 12/03/2002)
12/05/2002		PRETRIAL STATEMENTS by plaintiffs in 1:00-cv-02328 filed pursuant to Court's Order of 8/2/02. (ks) (Entered: 12/10/2002)
12/06/2002		PRETRIAL STATEMENTS by Rubin plaintiffs; attachments (20) (bm) (Entered: 12/11/2002)
01/06/2003		NON-JURY TRIAL before Judge Ricardo M. Urbina begun and continued to 9:45 a.m. 1/7/03 in 1:00-cv-02328, in 1:01-cv-01655. (Witnesses: Dr. Bruce Tefft, Dr. Reuven Paz, Ronnie Shakked, Patrick Clawson, Avi Elishis, Brenda Elishis, Dr. Milgalter (vodotape), and Gregg Salzman; Reporter: William D. McAllister (jwd) (Entered: 01/06/2003)
01/07/2003		NON-JURY TRIAL before Judge Ricardo M. Urbina resumed and continued to 10:00 1/8/03 in 1:00-cv-02328, in 1:01-cv-01655 (Witnesses: 1. Videotape of Dr. Hope; 2. Sherri Wise; 3. Diana Campuzano; 4. Ramiro Campuzano; 5. Mabel Campuzano; 6. Videotape Dr. Sergey Spektor; 7. Videotape of Dr. Lisa Mellman; 8. John P. Devlin; 9. Elana Rozenman; 10. Tzvi Rosenman; and 11. Stewart Elliot Hersh; Reporter: William D. McAllister (jwd) (Entered: 01/07/2003)

		01/07/2003)
01/08/2003		NON-JURY TRIAL before Judge Ricardo M. Urbina resumed and continued to 10:00 1/9/03 in 1:00-cv-02328, in 1:01-cv-01655 ; (Witnesses: 1. Renay Frym Hersh; 2. Deborah Rubin; 3. Jenny Rubin; 4. Avi Mendelson; and 5. Dr. Alan Friedman) Reporter: William D. McAllister (jwd) (Entered: 01/08/2003)
01/09/2003		NON-JURY TRIAL before Judge Ricardo M. Urbina resumed and concluded. Findings: Taken under advisement. (Witnesses: 1. Daniel Miller and 2. Dr. Edgar Garcia-Rill) Reporter: William D. McAllister (jwd) (Entered: 01/09/2003)
02/19/2003		TRANSCRIPT filed for date(s) of 1/8/03. Reporter: William D. McAllister (aet) (Entered: 02/21/2003)
02/19/2003		TRANSCRIPT filed for date(s) of 1/7/03. Reporter: William D. McAllister (aet) (Entered: 02/21/2003)
02/19/2003		TRANSCRIPT filed for date(s) of 1/6/03. Reporter: William D. McAllister (aet) (Entered: 02/21/2003)
02/19/2003		TRANSCRIPT filed for date(s) of 01/09/03. Reporter: William D. Mc Allister (td) (Entered: 03/11/2003)
03/31/2003		PLAINTIFFS' POST-TRIAL PROPOSED FINDINGS OF FACT and Conclusions of Law . (aet) (Entered: 06/16/2003)
04/07/2003		PROPOSED FINDINGS OF FACT and Conclusions of Law of plaintiffs. (aet) (Entered: 04/08/2003)
05/23/2003		MOTION (URGENT) filed by plaintiff DIANA CAMPUZANO in 1:00-cv-02328, plaintiff AVI ELISHIS in 1:00-cv-02328, plaintiff GREG SALZMAN in 1:00-cv-02328 for expedited disposition (aet) (Entered: 05/28/2003)
07/22/2003	20	MOTION filed by plaintiffs in 1:01-cv-01655 to modify caption ; exhibits (2) (bjsp) (Entered: 07/24/2003)
07/22/2003	21	NOTICE OF RELEVANT AUTHORITY by plaintiffs in 1:01-cv-01655 in further support of their motion for judgment by default; exhibits (2) (bjsp) (Entered: 07/24/2003)
07/24/2003	<a href="#">19</a>	ORDER by Judge Ricardo M. Urbina : denying motion for expedited disposition [47-1] by GREG SALZMAN, AVI ELISHIS, DIANA CAMPUZANO in 1:00-cv-02328; the Campuzano plaintiffs provide electronic and filed versions of the Findings of Fact document, after replacing "Cite to record" with citations, using Microsoft Word, by 8/6/03 (N) (bm) (Entered: 07/24/2003)
09/10/2003	<a href="#">22</a>	FINDINGS OF FACT and Conclusions of Law . (jwd) Modified on 09/11/2003 (Entered: 09/11/2003)
09/10/2003	<a href="#">23</a>	ORDER AND JUDGMENT by Judge Ricardo M. Urbina : granting motion to modify caption [20-1] by JENNY RUBIN, granting motion for entry of



		default judgment [14-1] by plaintiffs; judgment is entered on behalf of plaintiff Jenny Rubin against all defendants, jointly and severally, for compensatory damages in the amount of \$7,000,000.00; judgment entered on behalf of plaintiff Daniel Miller against defendants, jointly and severally, for compensatory damages in the amount or \$12,000,000.00; judgment entered on behalf of plaintiff Abraham Mendelson against all defendants, jointly and severally, for compensatory damages in the amount of \$12,000,000.00; judgment entered on behalf of plaintiff Stuart Hersh against all defendants, jointly and severally, for compensatory damages in the amount of \$15,000,000.00; judgment entered on behalf of plaintiff Deborah Rubin against all defendants, jointly and severally, for compensatory damages in the amount of \$2,500,000.00; judgment entered on behalf of plaintiff Renay Frym against all defendants, jointly and severally, for compensatory damages in the amount of \$6,000,000.00; judgment entered on behalf of plaintiff Elena Rozenman against all defendants, jointly and severally, for compensatory damages in the amount or \$2,500,000.00; judgment entered on behalf of plaintiff Tzvi Rozenman against all defendants, jointly and severally for compensatory damages in the amount of \$2,500,000.00; judgment entered on behalf of plaintiffs Jenny Rubin, Daniel Miller, Abraham Mendelson, Stuart Hersh, and Noam Rozenman against all defendants except for Iran, jointly and severally, for punitive damages in the amount of \$37,500,000.00 for each of these plaintiffs; plaintiff may arrange for this Judgment and Order to be translated into Farsi and, at the plaintiffs' request, the Clerk of the Court shall cause a copy of the translated Judgment and Order and the accompanying Findings of Fact and Conclusions of Law to be transmitted to the U. S. Department of State for service upon the defendants through diplomatic channels. (N) (jwd) (Entered: 09/11/2003)
10/31/2003	<a href="#">26</a>	REQUEST from Plaintiff for Clerk to send a copy of the judgment in Farsi to the defendants via Fedex to Edward A. Betancourt, Director of Special Consular Services, U.S. Department of State. (bcs, ) (Entered: 05/27/2004)
12/15/2003	<a href="#">24</a>	NOTICE by plaintiffs of Foreign Judgment, filed in the Montgomery County Circuit Court, Md., Instrument No. 558; in the amount of \$37,500,000.00; Case No. 248058-V. (cp, ) (Entered: 12/18/2003)
05/10/2004	<a href="#">25</a>	ANSWER to Interrogatories on Writ of Garnishment by Bank of America, N.A., Garnishee. (cp, ) (Entered: 05/12/2004)
05/27/2004	<a href="#">29</a>	CERTIFICATE of Clerk of mailing copies of order and judgment along with the findings of facts, together with a translation of each into the official language of the foreign state by Fedex to Edward A. Betancourt, Director of Special Consular Services U.S. Department of State, 2100 Pennsylvania Avenue, NW, Washington, DC. 20037, pursuant to the provisions of 28U.S.C.1608(a)(4) (bcs, ) (Entered: 06/08/2004)
06/01/2004	<a href="#">27</a>	MOTION for Writ of Execution by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. (Attachments: # <a href="#">1</a> # <a href="#">2</a> # <a href="#">3</a> )(Strachman, David)

		(Entered: 06/01/2004)
06/01/2004	<a href="#">28</a>	MOTION for Extension of Time to File <i>a Motion for a Writ of Execution</i> by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. (Attachments: # <a href="#">1</a> # <a href="#">2</a> ) (Strachman, David) (Entered: 06/01/2004)
06/08/2004		MINUTE ORDER granting <a href="#">28</a> Motion for Extension of Time. The plaintiffs shall file a motion for a writ of execution or other appropriate relief by July 12, 2004. Signed by Judge Ricardo M. Urbina on 6/8/04. (Entered: 06/08/2004)
06/25/2004	<a href="#">30</a>	MOTION <i>Pursuant to Local Rule 7.1(b)</i> by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. (Attachments: # <a href="#">1</a> )(Strachman, David) (Entered: 06/25/2004)
07/08/2004	<a href="#">31</a>	NOTICE of potential participation in writ proceedings by UNITED STATES OF AMERICA (jf, ) (Entered: 07/09/2004)
07/13/2004	<a href="#">32</a>	MOTION to Vacate <i>Writ of Attachment Without Prejudice in Respect to Certain Assets</i> by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. (Attachments: # <a href="#">1</a> # <a href="#">2</a> # <a href="#">3</a> )(Strachman, David) (Entered: 07/13/2004)
07/15/2004		MINUTE ORDER: The United States shall, by August 2, 2004, either advise the court that it will not participate in the litigation, or file a substantive memorandum setting forth its interest with respect to this matter. Signed by Judge Ricardo M. Urbina on 7/15/04. (Entered: 07/15/2004)
08/02/2004	<a href="#">33</a>	MOTION to Quash <i>Plaintiffs' Writ of Attachment</i> by UNITED STATES OF AMERICA. (Attachments: # <a href="#">1</a> Taylor Declaration# <a href="#">2</a> Text of Proposed Order) (Bhattacharyya, Rupa) (Entered: 08/02/2004)
08/13/2004	<a href="#">34</a>	Consent MOTION for Extension of Time to File Response/Reply <i>to the Government's Motion to Quash</i> by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. (Attachments: # <a href="#">1</a> )(Strachman, David) (Entered: 08/13/2004)
09/13/2004	<a href="#">35</a>	NOTICE regarding the service of the default judgment and notice fo default judgment to the Iranian Ministry of Foreign Affairs on 8/3/04. (td, ) (Entered: 09/17/2004)
09/20/2004	<a href="#">36</a>	MOTION to Permit <i>Plaintiffs to Examine Affiant and for Other Relief</i> by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. (Attachments: # <a href="#">1</a> # <a href="#">2</a> #

		<a href="#">3</a> # <a href="#">4</a> )(Strachman, David) (Entered: 09/20/2004)
10/01/2004	<a href="#">37</a>	MOTION for Extension of Time to File Response/Reply as to <a href="#">36</a> MOTION to Permit <i>Plaintiffs to Examine Affiant and for Other Relief</i> by UNITED STATES OF AMERICA. (Attachments: # <a href="#">1</a> Text of Proposed Order) (Bhattacharyya, Rupa) (Entered: 10/01/2004)
10/04/2004		MINUTE ORDER granting <a href="#">34</a> Motion for Extension of Time to File Response/Reply nunc pro tunc, granting <a href="#">37</a> Motion for Extension of Time to File Response/Reply. The United States shall file its response to the plaintiff's motion to examine affiant by October 15, 2004. Signed by Judge Ricardo M. Urbina on 10/4/04. Modified on 10/4/2004 (jwd, ). (Entered: 10/04/2004)
10/04/2004		Set/Reset Deadlines: The United States Response to Plaintiff's Motion to Examine Affiant due by 10/15/2004 (jwd) (Entered: 10/04/2004)
10/15/2004	<a href="#">38</a>	Memorandum in opposition to motion re <a href="#">36</a> filed by UNITED STATES OF AMERICA. (Bhattacharyya, Rupa) (Entered: 10/15/2004)
10/20/2004	<a href="#">39</a>	ERRATA by UNITED STATES OF AMERICA. (Bhattacharyya, Rupa) (Entered: 10/20/2004)
10/22/2004	<a href="#">40</a>	Consent MOTION for Extension of Time to File Response/Reply to <i>the Government's memorandum in opposition to Plaintiffs' motion to examine affiant</i> by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. (Attachments: # <a href="#">1</a> # <a href="#">2</a> )(Strachman, David) (Entered: 10/22/2004)
10/22/2004		MINUTE ORDER granting <a href="#">40</a> Motion for Extension of Time to File Response/Reply. The plaintiffs' reply to the defendants' opposition to the plaintiffs' motion to permit examination is due by November 15, 2004. Signed by Judge Ricardo M. Urbina on 10/22/04. (Entered: 10/22/2004)
10/22/2004		Set Deadlines/Hearings: Reply to motion to permit examination due by 11/15/2004. (jwd) (Entered: 10/22/2004)
11/17/2004	<a href="#">41</a>	MOTION for Extension of Time to File Response/Reply by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. (Attachments: # <a href="#">1</a> # <a href="#">2</a> ) (Strachman, David) (Entered: 11/17/2004)
11/17/2004		MINUTE ORDER granting <a href="#">41</a> Motion for Extension of Time to File Response/Reply. The plaintiffs' reply to the United States' opposition to the plaintiffs' motion to examine affiant and other relief is due by November 22, 2004. Signed by Judge Ricardo M. Urbina on 11/17/04. (Entered: 11/17/2004)
11/17/2004		Set Deadlines/Hearings: Reply to <a href="#">36</a> due by 11/22/2004. (cdw) (Entered: 11/19/2004)
11/22/2004	<a href="#">42</a>	RESPONSE to <i>Further Support of Plaintiffs' Motion to Examine Affiant and for Other Relief</i> filed by RENAY E. FRYM, STUART ELLIOT HERSH,

		ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. (Attachments: # <a href="#">1</a> )(Strachman, David) (Entered: 11/22/2004)
11/29/2004	<a href="#">43</a>	ERRATA for Reply Memorandum in Further Support of Plaintiffs' Motion to Examine Affiant and For Other Relief by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. (Strachman, David) (Entered: 11/29/2004)
11/29/2004	<a href="#">44</a>	NOTICE in Respect to Plaintiffs' Motion to Examine Affiant and for Other Relief by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN (Attachments: # <a href="#">1</a> )(Strachman, David) (Entered: 11/29/2004)
01/10/2005	<a href="#">45</a>	ORDER granting <a href="#">32</a> Motion to Vacate Writ of Attachment Without Prejudice in Respect to Certain Assets. Signed by Judge Ricardo M. Urbina on 1/10/05. (Entered: 01/10/2005)
01/31/2005	<a href="#">46</a>	ORDER requesting further briefing. Signed by Judge Ricardo M. Urbina on 1/31/05. (Entered: 01/31/2005)
02/04/2005	<a href="#">47</a>	MOTION for Extension of Time to File <i>Supplemental Brief</i> by JENNY RUBIN, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAM ROZENMAN, ELENA ROZENMAN, TZVI ROZENMAN. (Attachments: # <a href="#">1</a> )(Strachman, David) (Entered: 02/04/2005)
02/04/2005		MINUTE ORDER granting <a href="#">47</a> Motion for Extension of Time. The supplemental brief shall be filed by February 28, 2005. The court will not grant any further extensions of time beyond this date. Signed by Judge Ricardo M. Urbina on 2/4/05. (Entered: 02/04/2005)
02/28/2005	<a href="#">48</a>	RESPONSE to Order Directing the Parties to Submit Further Briefing filed by UNITED STATES OF AMERICA. (Bhattacharyya, Rupa) (Entered: 02/28/2005)
02/28/2005	<a href="#">49</a>	MEMORANDUM by JENNY RUBIN. (Strachman, David) (Entered: 02/28/2005)
03/23/2005	<a href="#">50</a>	VACATED PURSUANT TO MEMORANDUM ORDER FILED 6/3/2008.....ORDER granting <a href="#">27</a> Motion for Writ of Execution, denying <a href="#">33</a> Motion to Quash, denying <a href="#">36</a> Motion to Permit Examination. Signed by Judge Ricardo M. Urbina on 3/23/05. Modified on 6/3/2008 (nmw, ). (Entered: 03/23/2005)
03/23/2005	<a href="#">51</a>	VACATED PURSUANT TO MEMORANDUM ORDER FILED 6/3/2008.....MEMORANDUM OPINION. Signed by Judge Ricardo M. Urbina on 3/23/05. Modified on 6/3/2008 (nmw, ). (Entered: 03/23/2005)
03/23/2005		MINUTE ORDER denying <a href="#">30</a> Motion Pursuant to Local Rule 7.1(b) at moot.

		Signed by Judge Ricardo M. Urbina on 3/23/05. (Entered: 03/23/2005)
04/22/2005	<a href="#">52</a>	MOTION to Intervene <i>for Purposes of Appeal</i> by UNITED STATES OF AMERICA. (Attachments: # <a href="#">1</a> Text of Proposed Order)(Bhattacharyya, Rupa) (Entered: 04/22/2005)
04/22/2005	<a href="#">53</a>	NOTICE OF APPEAL as to <a href="#">50</a> Order on Motion for Writ, Order on Motion to Quash, Order on Motion to Permit by UNITED STATES OF AMERICA. U.S. Government, No fee. (jf, ) (Entered: 04/25/2005)
04/25/2005		Transmission of Notice of Appeal and Docket Sheet to US Court of Appeals re <a href="#">53</a> Notice of Appeal (jf, ) (Entered: 04/25/2005)
04/29/2005		USCA Case Number 05-5162 for <a href="#">53</a> Notice of Appeal filed by UNITED STATES OF AMERICA,. (jf, ) (Entered: 05/02/2005)
05/05/2005	<a href="#">54</a>	ENTERED IN ERROR.....NOTICE of Appeal to the United States Court of Appeals for the District of Columbia Circuit by JENNY RUBIN, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAM ROZENMAN, ELENA ROZENMAN, TZVI ROZENMAN (Strachman, David) Modified on 5/6/2005 (nmw, ). (Entered: 05/05/2005)
05/05/2005	<a href="#">55</a>	NOTICE OF APPEAL as to <a href="#">50</a> Order on Motion for Writ, Order on Motion to Quash, Order on Motion to Permit, <a href="#">51</a> Memorandum & Opinion by JENNY RUBIN, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAM ROZENMAN, ELENA ROZENMAN, TZVI ROZENMAN. No Filing Fee. (nmw, ) (Entered: 05/06/2005)
05/06/2005		NOTICE OF CORRECTED DOCKET ENTRY: Document No. 54 was entered in error and will be refiled. (nmw, ) (Entered: 05/06/2005)
05/06/2005		Transmission of Notice of Appeal and Docket Sheet to US Court of Appeals re <a href="#">55</a> Notice of Appeal, (lc, ) (Entered: 05/06/2005)
05/06/2005	<a href="#">56</a>	Memorandum in opposition to motion re <a href="#">52</a> <i>the United States' Motion to Intervene for Purposes of Appeal</i> filed by JENNY RUBIN, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAM ROZENMAN, ELENA ROZENMAN, TZVI ROZENMAN. (Strachman, David) (Entered: 05/06/2005)
05/06/2005	<a href="#">57</a>	ENTERED IN ERROR.....NOTICE OF APPEAL as to <a href="#">50</a> Order on Motion for Writ, Order on Motion to Quash, Order on Motion to Permit entered on 03/23/05 by JENNY RUBIN, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAM ROZENMAN, ELENA ROZENMAN, TZVI ROZENMAN. Filing fee \$ 255, receipt number 134606. (jf, ) Modified on 5/11/2005 (jf, ). (Entered: 05/11/2005)
05/11/2005		NOTICE OF CORRECTED DOCKET ENTRY: Document No. 57 was entered in error as a duplicate to document No. 55.(jf, ) (Entered: 05/11/2005)

05/11/2005		USCA Appeal Fees received \$ 255 receipt number 134606 re <a href="#">55</a> Notice of Appeal, filed by JENNY RUBIN,, DEBORAH RUBIN,, DANIEL MILLER,, ABRAHAM MENDELSON,, STUART ELLIOT HERSH,, RENAY E. FRYM,, NOAM ROZENMAN,, ELENA ROZENMAN,, TZVI ROZENMAN, (jf, ) (Entered: 05/11/2005)
05/11/2005		Supplemental Record on Appeal transmitted to US Court of Appeals re <a href="#">55</a> Notice of Appeal, (jf, ) (Entered: 05/11/2005)
05/13/2005	<a href="#">58</a>	REPLY to opposition to motion re <a href="#">52</a> filed by UNITED STATES OF AMERICA. (Bhattacharyya, Rupa) (Entered: 05/13/2005)
05/24/2005		USCA Case Number 05-5170 for <a href="#">55</a> Notice of Appeal, filed by JENNY RUBIN,, DEBORAH RUBIN,, DANIEL MILLER,, ABRAHAM MENDELSON,, STUART ELLIOT HERSH,, RENAY E. FRYM,, NOAM ROZENMAN,, ELENA ROZENMAN,, TZVI ROZENMAN,. (jf, ) (Entered: 05/25/2005)
05/24/2005		USCA Case Number 05-5170 for <a href="#">55</a> Notice of Appeal, filed by JENNY RUBIN,, DEBORAH RUBIN,, DANIEL MILLER,, ABRAHAM MENDELSON,, STUART ELLIOT HERSH,, RENAY E. FRYM,, NOAM ROZENMAN,, ELENA ROZENMAN,, TZVI ROZENMAN,. (lc, ) (Entered: 05/25/2005)
05/26/2005	<a href="#">59</a>	Emergency MOTION to Stay <i>Pending Appeal</i> by UNITED STATES OF AMERICA. (Attachments: # <a href="#">1</a> Text of Proposed Order)(Warden, Andrew) (Entered: 05/26/2005)
05/31/2005		MINUTE ORDER: The plaintiffs shall file their opposition, if any, to the government's emergency motion for stay pending appeal by 5:00 pm on Friday, June 3, 2005. Signed by Judge Ricardo M. Urbina on 5/31/05. (Entered: 05/31/2005)
05/31/2005		Set Deadlines/Hearings: Plaintiffs opposition, if any, to the government's emergency motion for stay pending appeal due 5:00 p.m. on Friday, 6/3/2005 (jwd) (Entered: 05/31/2005)
06/03/2005	<a href="#">60</a>	RESPONSE to the <i>United States' Emergency Motion for Stay Pending Appeal</i> filed by JENNY RUBIN, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAM ROZENMAN, ELENA ROZENMAN, TZVI ROZENMAN. (Strachman, David) (Entered: 06/03/2005)
06/08/2005		MINUTE ORDER granting <a href="#">52</a> Motion to Intervene, granting <a href="#">59</a> Motion to Stay. The United States is hereby considered an intervening party in these proceedings for purposes of appeal. The court's March 23, 2005 Order granting the plaintiff's motion for writ of execution is stayed pending the resolution of the appeal of the Order. Signed by Judge Ricardo M. Urbina on 6/8/05. (Entered: 06/08/2005)
06/13/2005		Supplemental Record on Appeal transmitted to US Court of Appeals re <a href="#">57</a> Notice of Appeal, (jf, ) (Entered: 06/13/2005)

09/07/2005	<a href="#">61</a>	ORDER of USCA (certified copy) as to <a href="#">53</a> Notice of Appeal filed by UNITED STATES OF AMERICA; It is hereby ordered that the motion to dismiss the appeal as moot be granted; It is further ordered that the case be remanded to the District Court with instructions to consider the motion for vacatur as a motion for relief from judgment; USCA#05-5162 (jsc) (Entered: 09/16/2005)
04/12/2006	<a href="#">62</a>	ENTERED IN ERROR..... MOTION Excusal from Attendance by JENNY RUBIN, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAM ROZENMAN, ELENA ROZENMAN, TZVI ROZENMAN. (Strachman, David) Modified on 4/13/2006 (nmw, ). (Entered: 04/12/2006)
04/13/2006		NOTICE OF CORRECTED DOCKET ENTRY: re <a href="#">62</a> MOTION Excusal from Attendance was entered in error and counsel was instructed to refile said pleading in the proper format. (nmw, ) (Entered: 04/13/2006)
04/13/2006	<a href="#">63</a>	MOTION Excusal from Attendance by JENNY RUBIN, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAM ROZENMAN, ELENA ROZENMAN, TZVI ROZENMAN. (Attachments: # <a href="#">1</a> )(Strachman, David) (Entered: 04/13/2006)
04/13/2006		MINUTE ORDER denying <a href="#">63</a> the plaintiffs' motion to be excused from attending court proceedings between April 12-21, 2006 because there the court has not scheduled any court proceedings for those dates. Signed by Judge Ricardo M. Urbina on 4/13/06. (md) (Entered: 04/13/2006)
05/16/2006	<a href="#">64</a>	MOTION to Vacate <i>Plaintiffs' Writs of Attachment and Execution and to Vacate the Court's Opinion and Order of March 23, 2005</i> by UNITED STATES OF AMERICA. (Attachments: # <a href="#">1</a> Exhibit Ex. A -- Joint Motion to Vacate in D.C. Cir.# <a href="#">2</a> Exhibit Ex. B -- D.C. Cir. Order# <a href="#">3</a> Text of Proposed Order)(Bhattacharyya, Rupa) (Entered: 05/16/2006)
05/26/2006	<a href="#">65</a>	MOTION for Extension of Time to File Response/Reply as to <a href="#">64</a> MOTION to Vacate <i>Plaintiffs' Writs of Attachment and Execution and to Vacate the Court's Opinion and Order of March 23, 2005</i> by JENNY RUBIN, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAM ROZENMAN, ELENA ROZENMAN, TZVI ROZENMAN. (Attachments: # <a href="#">1</a> )(Strachman, David) (Entered: 05/26/2006)
05/26/2006		MINUTE ORDER granting <a href="#">65</a> consent motion for extension of time. The plaintiff's response to the Intervenor's motion to vacate the plaintiffs' writ of attachment shall be due on or before June 16, 2006. Signed by Judge Ricardo M. Urbina on 5/26/06. (md) (Entered: 05/26/2006)
05/26/2006		Set Deadlines/Hearings: plaintiff's response to the Intervenor's motion to vacate the plaintiffs' writ of attachment shall be due on or before June 16, 2006. (jwd) (Entered: 05/26/2006)

06/16/2006	<a href="#">66</a>	Memorandum in opposition to re <a href="#">64</a> MOTION to Vacate <i>Plaintiffs' Writs of Attachment and Execution and to Vacate the Court's Opinion and Order of March 23, 2005</i> filed by JENNY RUBIN, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAM ROZENMAN, ELENA ROZENMAN, TZVI ROZENMAN. (Attachments: # <a href="#">1</a> # <a href="#">2</a> # <a href="#">3</a> # <a href="#">4</a> )(Strachman, David) (Entered: 06/16/2006)
06/22/2006	<a href="#">67</a>	Unopposed MOTION for Extension of Time to File Response/Reply as to <a href="#">64</a> MOTION to Vacate <i>Plaintiffs' Writs of Attachment and Execution and to Vacate the Court's Opinion and Order of March 23, 2005</i> by UNITED STATES OF AMERICA. (Attachments: # <a href="#">1</a> Text of Proposed Order) (Bhattacharyya, Rupa) (Entered: 06/22/2006)
06/23/2006		MINUTE ORDER granting <a href="#">67</a> consent motion for extension of time. The United States' reply in support of its motion to vacate the plaintiffs' writ of attachment shall be due on or before July 10, 2006. Signed by Judge Ricardo M. Urbina on 6/23/06. (md) (Entered: 06/23/2006)
06/23/2006		Set Deadlines/Hearings: The United States' reply in support of its motion to vacate the plaintiffs' writ of attachment shall be due on or before July 10, 2006. (jwd) (Entered: 06/29/2006)
07/10/2006	<a href="#">68</a>	REPLY to opposition to motion re <a href="#">64</a> MOTION to Vacate <i>Plaintiffs' Writs of Attachment and Execution and to Vacate the Court's Opinion and Order of March 23, 2005</i> filed by UNITED STATES OF AMERICA. (Attachments: # <a href="#">1</a> Exhibit A# <a href="#">2</a> Exhibit B# <a href="#">3</a> Exhibit C# <a href="#">4</a> Exhibit D)(Bhattacharyya, Rupa) (Entered: 07/10/2006)
07/28/2006	<a href="#">69</a>	MOTION for Leave to File <i>Concise Surreply in Response to the United States' Reply in Support of its Motion to Vacate</i> by JENNY RUBIN, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAM ROZENMAN, ELENA ROZENMAN, TZVI ROZENMAN. (Attachments: # <a href="#">1</a> )(Strachman, David) (Entered: 07/28/2006)
07/28/2006	<a href="#">70</a>	SURREPLY to <i>The United States' Reply in Support of its <a href="#">64</a> Motion to Vacate</i> filed by JENNY RUBIN, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAM ROZENMAN, ELENA ROZENMAN, TZVI ROZENMAN. (Strachman, David) Modified on 1/22/2008 (lc, ). (Entered: 07/28/2006)
01/20/2008		MINUTE ORDER granting <a href="#">69</a> the plaintiffs' Motion for Leave to File a Surreply. Signed by Judge Ricardo M. Urbina on 1/20/08. (lcrmu2) (Entered: 01/20/2008)
01/20/2008		MINUTE ORDER: It is hereby ORDERED that the parties submit supplemental briefing discussing the impact of the "mandate rule" on the government's request to vacate this court's March 23, 2005 Memorandum Opinion. See <i>Briggs v. Pennsylvania R.R. Co.</i> 334 U.S. 304, 306 (1948); accord <i>Indep. Petroleum Ass'n of Am.</i> , 235 F.3d 588, 596-97 (D.C. Cir. 2001).



		The government's supplemental brief is due on or before Friday, February 8, 2008. The plaintiffs' opposition is due on or before Friday, February 22, 2008, and the government's reply is due on or before Monday, March 3, 2008. SO ORDERED. Signed by Judge Ricardo M. Urbina on 1/20/08. (lcrmu2) (Entered: 01/20/2008)
01/22/2008		Set Deadlines/Hearings: The government's supplemental brief is due on or before Friday, February 8, 2008. The plaintiffs' opposition is due on or before Friday, February 22, 2008, and the government's reply is due on or before Monday, March 3, 2008 (jwd, ) (Entered: 01/22/2008)
01/30/2008	<a href="#">71</a>	NOTICE of Appearance by Lesley R. Farby on behalf of UNITED STATES OF AMERICA (Farby, Lesley) (Entered: 01/30/2008)
02/08/2008	<a href="#">72</a>	SUPPLEMENTAL MEMORANDUM to re <a href="#">64</a> MOTION to Vacate <i>Plaintiffs' Writs of Attachment and Execution and to Vacate the Court's Opinion and Order of March 23, 2005</i> filed by UNITED STATES OF AMERICA. (Farby, Lesley) (Entered: 02/08/2008)
02/26/2008	<a href="#">73</a>	Consent MOTION for Extension of Time to File Response/Reply by JENNY RUBIN (Attachments: # <a href="#">1</a> Memorandum in Support of Consent Motion, # <a href="#">2</a> Text of Proposed Order)(Strachman, David) (Entered: 02/26/2008)
02/27/2008		MINUTE ORDER granting <a href="#">73</a> Consent Motion for Extension of Time to File Opposition. Although the court finds the plaintiff's reason for delay unmoving and notes with displeasure counsel's disregard of this court's deadlines and Standing Order, the court grants the consent motion in the interest of justice. It is hereby ORDERED that the plaintiffs' opposition is due on or before Monday, March 3, 2008, and the government's reply is due on or before Monday, March 17, 2008. SO ORDERED. Signed by Judge Ricardo M. Urbina on 2/27/08. (lcrmu2) (Entered: 02/27/2008)
02/27/2008		Set/Reset Deadlines/Hearings: plaintiffs' opposition is due on or before Monday, March 3, 2008, and the government's reply is due on or before Monday, March 17, 2008 (jwd, ) (Entered: 02/27/2008)
03/03/2008	<a href="#">74</a>	SUPPLEMENTAL MEMORANDUM to <i>Brief Application of the "Mandate Rule"</i> filed by DEBORAH RUBIN. (Strachman, David) (Entered: 03/03/2008)
03/17/2008	<a href="#">75</a>	REPLY to opposition to motion re <a href="#">64</a> MOTION to Vacate <i>Plaintiffs' Writs of Attachment and Execution and to Vacate the Court's Opinion and Order of March 23, 2005</i> filed by UNITED STATES OF AMERICA. (Farby, Lesley) (Entered: 03/17/2008)
03/28/2008	<a href="#">76</a>	MOTION for Order Pursuant to §1083(c)(2) of the National Defense Authorization Act by JENNY RUBIN (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Exhibit C, # <a href="#">4</a> Exhibit D, # <a href="#">5</a> Exhibit E, # <a href="#">6</a> Exhibit F, # <a href="#">7</a> Exhibit G, # <a href="#">8</a> Exhibit H)(Strachman, David) (Entered: 03/28/2008)
03/28/2008	<a href="#">77</a>	ERRATA <i>Conveying Proposed Order</i> by JENNY RUBIN <a href="#">76</a> MOTION for Order Pursuant to §1083(c)(2) of the National Defense Authorization Act MOTION for Order Pursuant to §1083(c)(2) of the National Defense

		<i>Authorization Act</i> filed by JENNY RUBIN. (Strachman, David) (Entered: 03/28/2008)
03/28/2008	<a href="#">78</a>	ENTERED IN ERROR.....MOTION for Entry of Final Judgment / <i>Supplemental Relief</i> by DIANA CAMPUZANO, AVI ELISHIS, GREG SALZMAN (Attachments: # <a href="#">1</a> Exhibit National Defense Authorization Act of 2008, # <a href="#">2</a> Text of Proposed Order)Associated Cases: 1:00-cv-02328-RMU, 1:01-cv-01655-RMU(Gaston, Paul) Modified on 6/3/2008 (jf, ). (Entered: 03/28/2008)
04/30/2008	<a href="#">79</a>	NOTICE of Appearance by Joshua M. Ambush on behalf of DIANA CAMPUZANO, AVI ELISHIS, GREG SALZMAN Associated Cases: 1:00-cv-02328-RMU, 1:01-cv-01655-RMU(Ambush, Joshua) (Entered: 04/30/2008)
06/02/2008	<a href="#">80</a>	MEMORANDUM ORDER granting <a href="#">64</a> the Government's Motion to Vacate the Plaintiffs' Writs of Attachment and Execution and the Court's Opinion and Order of March 23, 2005; granting <a href="#">76</a> the Plaintiffs' Motion to Amend their Complaint; denying <a href="#">78</a> the Plaintiffs' Motion for Punitive Damages. Signed by Judge Ricardo M. Urbina on 6/2/08. (lcrmu2) (Entered: 06/02/2008)
06/03/2008		NOTICE OF CORRECTED DOCKET ENTRY: Document No. <a href="#">78</a> MOTION for Entry of Final Judgment / <i>Supplemental Relief</i> was entered in error by direction of Chambers. This case is no longer consolidated with CA-00-2328. (jf, ) (Entered: 06/03/2008)
06/03/2008		MINUTE ORDER directing that 01cv1655 no longer be consolidated with 00cv2328. SO ORDERED. Signed by Judge Ricardo M. Urbina on 6/3/08. (lcrmu2) (Entered: 06/03/2008)
06/03/2008	<a href="#">81</a>	MEMORANDUM ORDER replacing Memorandum Order <a href="#">80</a> issued June 2, 2008; granting <a href="#">64</a> the Government's Motion to Vacate the Plaintiffs' Writs of Attachment and Execution and the Court's Opinion and Order of March 23, 2005; granting <a href="#">76</a> the Plaintiffs' Motion Pursuant to the Defense Authorization Act. Signed by Judge Ricardo M. Urbina on 6/3/08. (lcrmu2) (Entered: 06/03/2008)
06/16/2008	<a href="#">82</a>	MOTION to Intervene by PRESIDENT AND FELLOWS OF HARVARD COLLEGE, MUSEUM OF FINE ARTS, UNIVERSITY OF CHICAGO, ORIENTAL INSTITUTE, FIELD MUSEUM (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Exhibit C, # <a href="#">4</a> Exhibit D, # <a href="#">5</a> Rule 7.1 Certificate, # <a href="#">6</a> Text of Proposed Order)(nmw, ) Modified on 6/17/2008 (jf, ). (Entered: 06/17/2008)
06/17/2008		NOTICE re <a href="#">82</a> Motion to Intervene; emailed to nicole_wilkens@dcd.uscourts.gov, cc'd 6 associated attorneys -- The PDF file you docketed contained errors: 1. Pleading modified to Court's received date of June 16, 2008 (jf, ) (Entered: 06/17/2008)
06/18/2008	<a href="#">83</a>	NOTICE of Appearance by Ariel B. Waldman on behalf of PRESIDENT AND FELLOWS OF HARVARD COLLEGE (Waldman, Ariel) (Entered: 06/18/2008)

06/18/2008	<a href="#">84</a>	ERRATA to Memorandum of Law in Support of Motion for Reconsideration of This Court's Memorandum Orders of June 2, 2008 and June 3, 2008 (correcting the document that was attached as Exhibit B to Motion to Intervene [Dkt. No. 82] filed June 16, 2008) by PRESIDENT AND FELLOWS OF HARVARD COLLEGE, MUSEUM OF FINE ARTS, UNIVERSITY OF CHICAGO, ORIENTAL INSTITUTE, FIELD MUSEUM <a href="#">82</a> MOTION to Intervene filed by PRESIDENT AND FELLOWS OF HARVARD COLLEGE, FIELD MUSEUM, ORIENTAL INSTITUTE, UNIVERSITY OF CHICAGO, MUSEUM OF FINE ARTS. (Attachments: # <a href="#">1</a> Memorandum of Law in Support of Motion for Reconsideration of This Court's Memorandum Orders of June 2, 2008 and June 3, 2008)(Waldman, Ariel) (Entered: 06/18/2008)
06/24/2008	<a href="#">85</a>	Joint MOTION for Extension of Time to File Response/Reply as to <a href="#">82</a> MOTION to Intervene by JENNY RUBIN, PRESIDENT AND FELLOWS OF HARVARD COLLEGE, MUSEUM OF FINE ARTS, UNIVERSITY OF CHICAGO, ORIENTAL INSTITUTE, FIELD MUSEUM, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAM ROZENMAN, ELENA ROZENMAN, TZVI ROZENMAN (Attachments: # <a href="#">1</a> Text of Proposed Order)(Waldman, Ariel) (Entered: 06/24/2008)
06/25/2008		MINUTE ORDER granting <a href="#">85</a> Joint Motion for Extension of Time. It is hereby ordered that the plaintiffs' opposition to the museum's motion to intervene is due on or before July 22, 2008. It is further ordered that the museum's reply is due on or before August 15, 2008. Signed by Judge Ricardo M. Urbina on 6/25/08. (lcrmu2) (Entered: 06/25/2008)
06/25/2008		Set/Reset Deadlines/Hearings: plaintiffs' opposition to the museum's motion to intervene is due on or before July 22, 2008. It is further ordered that the museum's reply is due on or before August 15, 2008. (jwd, ) (Entered: 06/25/2008)
07/16/2008	<a href="#">86</a>	Consent MOTION for Extension of Time to File Response/Reply as to <a href="#">82</a> MOTION to Intervene by JENNY RUBIN (Attachments: # <a href="#">1</a> Text of Proposed Order)(Strachman, David) (Entered: 07/16/2008)
07/17/2008		MINUTE ORDER granting <a href="#">86</a> the Consent Motion for an Extension of Time to File Response/Reply. It is hereby ordered that the plaintiff's opposition is due on or before July 28, 2008 and the proposed intervenor's reply is due on or before August 21, 2008. SO ORDERED. Signed by Judge Ricardo M. Urbina on 7/17/08. (lcrmu2) (Entered: 07/17/2008)
07/18/2008		Set/Reset Deadlines: Opposition due on or before 7/28/2008; reply due on or before 8/21/2008. (mpt, ) (Entered: 07/18/2008)
07/21/2008	<a href="#">87</a>	NOTICE of Appearance by Eric Randal Columbus on behalf of PRESIDENT AND FELLOWS OF HARVARD COLLEGE (Columbus, Eric) (Entered: 07/21/2008)
07/29/2008	<a href="#">88</a>	MOTION for Extension of Time to <i>FILE INSTANTER</i> by JENNY RUBIN

		(Attachments: # <a href="#">1</a> Text of Proposed Order)(Strachman, David) (Entered: 07/29/2008)
07/29/2008	<a href="#">89</a>	Memorandum in opposition to re <a href="#">82</a> MOTION to Intervene filed by JENNY RUBIN. (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Exhibit C, # <a href="#">4</a> Exhibit D, # <a href="#">5</a> Exhibit E, # <a href="#">6</a> Exhibit F, # <a href="#">7</a> Exhibit G, # <a href="#">8</a> Exhibit H) (Strachman, David) (Entered: 07/29/2008)
07/31/2008		MINUTE ORDER granting <a href="#">88</a> the Plaintiffs' Unopposed Motion to Late-file their Opposition. Signed by Judge Ricardo M. Urbina on 7/31/08. (lcrmu2) (Entered: 07/31/2008)
08/04/2008	<a href="#">90</a>	MOTION for Extension of Time to <i>File Notice of Appeal</i> by PRESIDENT AND FELLOWS OF HARVARD COLLEGE, MUSEUM OF FINE ARTS, UNIVERSITY OF CHICAGO, ORIENTAL INSTITUTE, FIELD MUSEUM (Attachments: # <a href="#">1</a> Text of Proposed Order)(Columbus, Eric) (Entered: 08/04/2008)
08/18/2008	<a href="#">91</a>	MOTION to Strike <a href="#">90</a> MOTION for Extension of Time to <i>File Notice of Appeal AND RESPONSE IN OPPOSITION TO GARNISHEES' MOTION FOR AN EXTENSION OF TIME TO APPEAL</i> by JENNY RUBIN (Attachments: # <a href="#">1</a> Text of Proposed Order)(Strachman, David) (Entered: 08/18/2008)
08/19/2008		MINUTE ORDER construing the plaintiffs' motion to strike as simply an opposition to the prospective intervenors' motion for an extension of time. Motions to strike only apply to pleadings. <i>Sidney-Vinstein v. A.H. Robins Co.</i> , 697 F.2d 880, 885 (9th Cir. 1983). Signed by Judge Ricardo M. Urbina on 8/19/08. (lcrmu2) (Entered: 08/19/2008)
08/21/2008	<a href="#">92</a>	REPLY to opposition to motion re <a href="#">82</a> MOTION to Intervene filed by PRESIDENT AND FELLOWS OF HARVARD COLLEGE, MUSEUM OF FINE ARTS, UNIVERSITY OF CHICAGO, ORIENTAL INSTITUTE, FIELD MUSEUM. (Attachments: # <a href="#">1</a> Exhibit A)(Waldman, Ariel) (Entered: 08/21/2008)
08/27/2008	<a href="#">93</a>	NOTICE of decision of First Circuit Court of Appeals by JENNY RUBIN (Attachments: # <a href="#">1</a> Exhibit A- decision of First Circuit Court of Appeals) (Strachman, David) (Entered: 08/27/2008)
08/28/2008	<a href="#">94</a>	REPLY to opposition to motion re <a href="#">90</a> MOTION for Extension of Time to <i>File Notice of Appeal</i> filed by PRESIDENT AND FELLOWS OF HARVARD COLLEGE, MUSEUM OF FINE ARTS, UNIVERSITY OF CHICAGO, ORIENTAL INSTITUTE, FIELD MUSEUM. (Columbus, Eric) (Entered: 08/28/2008)
09/02/2008	<a href="#">95</a>	RESPONSE re <a href="#">93</a> Notice (Other) of Decision of the First Circuit filed by PRESIDENT AND FELLOWS OF HARVARD COLLEGE, MUSEUM OF FINE ARTS, UNIVERSITY OF CHICAGO, ORIENTAL INSTITUTE, FIELD MUSEUM. (Columbus, Eric) (Entered: 09/02/2008)
08/07/2009	<a href="#">96</a>	NOTICE OF SUBSTITUTION OF COUNSEL by Lynn Yuhee Lee on behalf

		of UNITED STATES OF AMERICA Substituting for attorney Lesley Farby (Lee, Lynn) (Entered: 08/07/2009)
09/08/2010	<a href="#">97</a>	ORDER denying the proposed intervenors' <a href="#">82</a> motion to intervene; denying the proposed intervenors' <a href="#">90</a> motion for an extension of time to file a notice of appeal. Signed by Judge Ricardo M. Urbina on 9/8/10. (lcrmu2) (Entered: 09/08/2010)
09/08/2010	<a href="#">98</a>	MEMORANDUM OPINION. Signed by Judge Ricardo M. Urbina on 9/8/10. (lcrmu2) (Entered: 09/08/2010)
03/15/2013	<a href="#">99</a>	MOTION for Leave to File by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN (Attachments: # <a href="#">1</a> Exhibit Heiser opinion, # <a href="#">2</a> Exhibit Heiser order, # <a href="#">3</a> Exhibit Notice of Lis Pendens)(Tolchin, Robert) Forwarded to Chief Judge Lamberth on 5/7/2013 (ds). (Entered: 03/15/2013)
05/02/2013	<a href="#">100</a>	ERRATA relating to proposed notice of lis pendens by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN <a href="#">99</a> MOTION for Leave to File filed by DEBORAH RUBIN, RENAY E. FRYM, DANIEL MILLER, TZVI ROZENMAN, ABRAHAM MENDELSON, NOAM ROZENMAN, STUART ELLIOT HERSH, JENNY RUBIN, ELENA ROZENMAN. (Attachments: # <a href="#">1</a> Exhibit notice of lis pendens)(Tolchin, Robert) (Entered: 05/02/2013)
07/07/2014	<a href="#">102</a>	Consent MOTION for Extension of Time to <i>RESPOND TO WRIT OF ATTACHMENT AND RELATED SUBPOENA</i> by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/07/2014)
07/28/2014	<a href="#">103</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Eric Enson, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792154. Fee Status: Fee Paid. by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">104</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Jeffrey LeVee, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792158. Fee Status: Fee Paid. by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">105</a>	OBJECTIONS to Answer to Writ by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Zurawski, Tara Lynn) (Entered: 07/28/2014)

		07/28/2014)
07/29/2014	<a href="#">106</a>	MOTION to Quash by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Memorandum in Support, # <a href="#">2</a> Declaration Jeffrey, # <a href="#">3</a> Declaration Enson, # <a href="#">4</a> Text of Proposed Order) (Zurawski, Tara Lynn) (Entered: 07/29/2014)
07/29/2014	<a href="#">107</a>	MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order) (Zurawski, Tara Lynn) (Entered: 07/29/2014)
08/04/2014	<a href="#">108</a>	Consent MOTION for Extension of Time to <i>Superseding Previous Consent Motion For an Extension of Time to Respond to Writ of Attachment and Related Subpoena</i> by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/04/2014)
08/11/2014	<a href="#">109</a>	WITHDRAWN PER ORDER FILED 9/9/2014.....MOTION to Compel <i>Production of Documents in Response to Subpoena</i> by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Text of Proposed Order)(Tolchin, Robert) Modified on 9/9/2014 (zmm, ). (Entered: 08/11/2014)
08/11/2014	<a href="#">110</a>	MOTION for Extension of Time to File Response/Reply as to <a href="#">106</a> MOTION to Quash by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/11/2014)
08/13/2014	<a href="#">112</a>	ORDER: Upon consideration of Internet Corporation for Assigned Names and Numbers("ICANN") and Plaintiffs' Consent Motion Superseding Previous Consent Motion for an Extension of Time to Respond to Writ of Attachment and Related Subpoena, and good cause appearing, it is hereby ORDERED that ICANN and Plaintiffs' Consent Motion is GRANTED. ICANN's response to the writ of attachment and subpoena was due and filed on July 28, 2014. Plaintiff's time period pursuant to D.C. Superior Court Civil Rule 69-I(d) and (e) shall not begin to run until the parties agree, or absent such agreement, until the Court has determined, that ICANN has fulfilled its obligation in response to the Subpoena and in no event shall such periods expire before September 8, 2014. Plaintiff's lien is correspondingly extended unless ICANN's to Quash, filed on July 29, 2014, is granted. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr). Modified on 8/14/2014 (ztc, ). (Entered: 08/13/2014)

08/13/2014	<a href="#">111</a>	ORDER granting (71) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:08-cv-00502-RCL; granting (45) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:08-cv-00520-RCL; granting (107) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:01-cv-01655-RMU; granting (8) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:14-mc-00648-UNA; granting (48) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:02-cv-01811-RCL; granting (90) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02601-RCL; granting (30) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02602-RCL; The Court will consolidate the consideration of, and hearing on, all seven of ICANN's Motion to Quash, including the motion filed in civil case number 01-1655(RMU) and miscellaneous case number 14-648 (UNA); and it is further ORDERED that the Clerk of the Court shall transfer civil case number 01-1655 (RMU) and miscellaneous case number 14-648 (UNA) to this Court for further proceedings. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr) . Modified on 8/14/2014 (ztrc, ). (Entered: 08/13/2014)
08/13/2014	<a href="#">113</a>	ORDER re: <a href="#">104</a> MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Jeffrey LeVee; ORDERED that the Motion for Admission pro hac vice is GRANTED, and that Jeffrey A. LeVee be, and that the same hereby is, admitted pro hac vice to appear and participate fully in the above-captioned case. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr) (Entered: 08/14/2014)
08/13/2014	<a href="#">114</a>	ORDER re: <a href="#">103</a> MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Eric Enson; ORDERED that the Motion for Admission pro hac vice is GRANTED, and that Eric P. Enson be, and that the same hereby is, admitted pro hac vice to appear and participate fully in the above-captioned case. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr) (Entered: 08/14/2014)
08/14/2014		Case reassigned to Judge Royce C. Lamberth pursuant to order issued 8/12/14. Judge Ricardo M. Urbina no longer assigned to the case. (ztnr, ) (Entered: 08/14/2014)
08/18/2014	<a href="#">115</a>	Memorandum in opposition to re <a href="#">110</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">106</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Proposed Order, # <a href="#">2</a> Declaration of Eric Enson)(Francisco, Noel) (Entered: 08/18/2014)

		08/18/2014)
08/28/2014	<a href="#">116</a>	REPLY to opposition to motion re <a href="#">110</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">106</a> MOTION to Quash filed by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. (Attachments: # <a href="#">1</a> Exhibit A)(Tolchin, Robert) (Entered: 08/28/2014)
08/28/2014	<a href="#">117</a>	Memorandum in opposition to re <a href="#">109</a> MOTION to Compel <i>Production of Documents in Response to Subpoena</i> filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order)(Francisco, Noel) (Entered: 08/28/2014)
08/29/2014	<a href="#">118</a>	ORDER granting <a href="#">110</a> Motion for Extension of Time to File Response/Reply re <a href="#">106</a> MOTION to Quash Writs of Attachment for Assigned Names and Numbers shall be due by 9/30/2014. Signed by Judge Royce C. Lamberth on 8/28/14. (mpt, ) (Entered: 08/29/2014)
09/08/2014	<a href="#">119</a>	Consent MOTION Regarding Plaintiffs' Motion to Compel by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Francisco, Noel) (Entered: 09/08/2014)
09/09/2014	<a href="#">120</a>	ORDER granting (57) Motion Regarding Plaintiffs' Motion to Compel in case 1:08-cv-00520-RCL; granting (119) Motion Regarding Plaintiffs' Motion to Compel in case 1:01-cv-01655-RCL; granting (60) Motion Regarding Plaintiffs' Motion to Compel in case 1:02-cv-01811-RCL; granting (103) Motion Regarding Plaintiffs' Motion to Compel in case 1:00-cv-02601-RCL; granting (42) Motion Regarding Plaintiffs' Motion to Compel in case 1:00-cv-02602-RCL. Plaintiffs' Motion to Compel is ordered withdrawn. Signed by Judge Royce C. Lamberth on 9/9/2014. (zmm, ) (Entered: 09/09/2014)
09/09/2014	<a href="#">121</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Scott Michael Lesowitz, :Firm- Raines Feldman LLP, :Address- 9720 Wilshire Blvd., 5th fl., Beverly Hills, CA 90212. Phone No. - 310-440-4100. Fax No. - 310-691-1367 Filing fee \$ 100, receipt number 0090-3833479. Fee Status: Fee Paid. by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN (Tolchin, Robert) (Entered: 09/09/2014)
09/09/2014	<a href="#">122</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Erik Swen Syverson, :Firm- Raines Feldman LLP, :Address- 9720 Wilshire Blvd., 5th fl., Beverly Hills, CA 90212. Phone No. - 310-440-4100. Fax No. - 310-691-1367 Filing fee \$ 100, receipt number 0090-3833481. Fee Status: Fee Paid. by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN (Tolchin, Robert) (Entered: 09/09/2014)



09/09/2014	<a href="#">123</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Steven Thomas Gebelin, :Firm- Raines Feldman LLP, :Address- 9720 Wilshire Blvd., 5th fl., Beverly Hills, CA 90212. Phone No. - 310-440-4100. Fax No. - 310-691-1367 Filing fee \$ 100, receipt number 0090-3833482. Fee Status: Fee Paid. by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN (Tolchin, Robert) (Entered: 09/09/2014)
09/10/2014	<a href="#">124</a>	ORDER granting <a href="#">121</a> Motion by Plaintiffs for Admission Pro Hac Vice of Scott Michael Lesowitz; signed by Judge Royce C. Lamberth on 9/10/14. (kk) (Entered: 09/11/2014)
09/10/2014	<a href="#">125</a>	ORDER granting <a href="#">122</a> Plaintiffs' Motion for Admission Pro Hac Vice of Erik Swen Syverson; signed by Judge Royce C. Lamberth on 9/10/14. (kk) (Entered: 09/11/2014)
09/10/2014	<a href="#">126</a>	ORDER granting <a href="#">123</a> Plaintiffs' Motion for Admission Pro Hac Vice of Steven Thomas Gebelin; signed by Judge Royce C. Lamberth on 9/10/14. (kk) (Entered: 09/11/2014)
09/16/2014	<a href="#">127</a>	STIPULATION [ <i>PROPOSED</i> ] <i>PROTECTIVE ORDER</i> by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Francisco, Noel) (Entered: 09/16/2014)
09/19/2014	<a href="#">128</a>	STIPULATED PROTECTIVE ORDER setting forth procedures for handling confidential material; signed by Judge Royce C. Lamberth on 9/18/14. (Attachment: Exhibit A) (kk) (Entered: 09/19/2014)
09/25/2014	<a href="#">129</a>	MOTION for Discovery , MOTION for Extension of Time to File Response/Reply by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN (Attachments: # <a href="#">1</a> Declaration Declaration of Erik S. Syverson, # <a href="#">2</a> Declaration Declaration of Steven T. Gebelin)(Syverson, Erik) (Entered: 09/25/2014)
09/30/2014	<a href="#">130</a>	RESPONSE re <a href="#">106</a> MOTION to Quash <i>Writ of Attachment</i> filed by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. (Syverson, Erik) (Entered: 09/30/2014)
10/10/2014	<a href="#">131</a>	REPLY to opposition to motion re <a href="#">106</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Francisco, Noel) (Entered: 10/10/2014)
10/14/2014	<a href="#">132</a>	Memorandum in opposition to re <a href="#">129</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order)(Francisco, Noel)

		(Entered: 10/14/2014)
10/24/2014	<a href="#">133</a>	REPLY to opposition to motion re <a href="#">129</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply filed by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. (Syverson, Erik) (Entered: 10/24/2014)
11/10/2014	<a href="#">134</a>	ORDER Granting <a href="#">106</a> Motion to Quash; Denied as Moot <a href="#">129</a> Motion for Discovery writs of attachment as to ICANN are quashed. Signed by Judge Royce C. Lamberth on 11/10/14. (mpt, ) (Entered: 11/12/2014)
11/10/2014	<a href="#">135</a>	MEMORANDUM AND OPINION (See Image for Details). Signed by Judge Royce C. Lamberth on 11/10/14. (mpt, ) (Entered: 11/12/2014)
12/12/2014	<a href="#">136</a>	NOTICE OF APPEAL TO DC CIRCUIT COURT as to <a href="#">134</a> Order on Motion to Quash, Order on Motion for Discovery, Order on Motion for Extension of Time to File Response/Reply by RENAY E. FRYM, STUART ELLIOT HERSH, ABRAHAM MENDELSON, DANIEL MILLER, ELENA ROZENMAN, NOAM ROZENMAN, TZVI ROZENMAN, DEBORAH RUBIN, JENNY RUBIN. Filing fee \$ 505, receipt number 0090-3934599. Fee Status: Fee Paid. Parties have been notified. (Syverson, Erik) (Entered: 12/12/2014)
12/15/2014	<a href="#">137</a>	Transmission of the Notice of Appeal, Order Appealed, and Docket Sheet to US Court of Appeals. The Court of Appeals fee was paid this date re <a href="#">136</a> Notice of Appeal to DC Circuit Court. (rdj) (Entered: 12/15/2014)
12/18/2014		USCA Case Number 14-7198 for <a href="#">136</a> Notice of Appeal to DC Circuit Court, filed by DEBORAH RUBIN, RENAY E. FRYM, DANIEL MILLER, TZVI ROZENMAN, ABRAHAM MENDELSON, NOAM ROZENMAN, STUART ELLIOT HERSH, JENNY RUBIN, ELENA ROZENMAN. (rd) (Entered: 12/19/2014)
05/27/2015	<a href="#">138</a>	MOTION revival of motion <i>to revive judgment</i> by JENNY RUBIN (Attachments: # <a href="#">1</a> Text of Proposed Order)(Strachman, David) (Entered: 05/27/2015)

<b>PACER Service Center</b>			
<b>Transaction Receipt</b>			
06/01/2015 14:50:35			
<b>PACER Login:</b>	php10east0660:2616006:0	<b>Client Code:</b>	
<b>Description:</b>	Docket Report	<b>Search Criteria:</b>	1:01-cv-01655-RCL
<b>Billable Pages:</b>	24	<b>Cost:</b>	2.40



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**ORDERED** that judgment be and is entered on behalf of plaintiff Abraham Mendelson against all defendants, jointly and severally, for compensatory damages in the amount of \$12,000,000; and it is

**FURTHER ORDERED** that judgment be and is entered on behalf of plaintiff Stuart Hersh against all defendants, jointly and severally, for compensatory damages in the amount of \$12,000,000; and it is

**ORDERED** that judgment be and is entered on behalf of plaintiff Noam Rozenman against all defendants, jointly and severally, for compensatory damages in the amount of \$15,000,000; and it is

**FURTHER ORDERED** that judgment be and is entered on behalf of plaintiff Deborah Rubin against all defendants, jointly and severally, for compensatory damages in the amount of \$2,500,000; and it is

**ORDERED** that judgment be and is entered on behalf of plaintiff Renay Frym against all defendants, jointly and severally, for compensatory damages in the amount of \$6,000,000; and it is

**FURTHER ORDERED** that judgment be and is entered on behalf of plaintiff Elena Rozenman against all defendants, jointly and severally, for compensatory damages in the amount of \$2,500,000; and it is

**ORDERED** that judgment be and is entered on behalf of plaintiff Tzvi Rozenman against all defendants, jointly and severally, for compensatory damages in the amount of \$2,500,000; and it is

**FURTHER ORDERED** that judgment be and is entered on behalf of plaintiffs Jenny Rubin, Daniel Miller, Abraham Mendelson, Stuart Hersh, and Noam Rozenman


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against all defendants except for Iran, jointly and severally, for punitive damages in the amount of \$37,500,000 for each of these plaintiffs; and it is

**ORDERED** that the plaintiffs' motion to modify the case caption is granted; and it is

**FURTHER ORDERED** that the plaintiffs may arrange for this Judgment and Order to be translated into Farsi and, at the plaintiffs' request, the Clerk of the Court shall cause a copy of the translated Judgment and Order and the accompanying Findings of Fact and Conclusions of Law to be transmitted to the U.S. Department of State for service upon the defendants through diplomatic channels.

**SO ORDERED.**

  
Ricardo M. Urbina  
United States District Judge

(M)

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Service List for *Campuzano v. Islamic Republic of Iran*, Civil Action No. 00-2328

Jacob A. Stein  
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Washington, DC 20036  
*Counsel for the Plaintiffs*

Service List for *Rubin v. Islamic Republic of Iran*, Civil Action No. 01-1655

David J. Strachman  
McIntyre, Tate, Lynch & Holt  
321 South Main St, Suite 400  
Providence, RI 02903  
*Counsel for the Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
Jenny Rubin, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 01-1655-RMU
	)	
The Islamic Republic of Iran, <i>et al.</i> ,	)	<b>HEARING REQUEST</b>
	)	
Defendants.	)	
	)	
	)	
	)	
_____	)	

**INTERNET CORPORATION FOR ASSIGNED NAME AND NUMBERS’  
MOTION TO QUASH WRIT OF ATTACHMENT**

The Internet Corporation for Assigned Names and Numbers (“ICANN”), a non-party, by counsel, respectfully moves this Court to quash the Writ of Attachment on Judgment Other Than Wages, Salary And Commissions (“Writ of Attachment”) issued by Plaintiffs in the above-entitled action, for the reasons set forth in ICANN’s accompanying Memorandum.<sup>1</sup>

Furthermore, ICANN, in accordance with Local Civil Rule 78.1, requests that an oral hearing be scheduled to inform the Court’s ruling on the Motion.

<sup>1</sup> Plaintiffs issued to ICANN, and ICANN is moving to quash, writs of attachment in seven actions: (1) *Rubin, et al. v. Islamic Republic of Iran, et al.*, Case No. 01-1655-RMU; (2) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 02-1811-RCL; (3) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 08-520-RCL; (4) *Stern, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2602-RCL; (5) *Weinstein, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2601-RCL; (6) *Wyatt, et al. v. Syrian Arab Republic, et al.*, Case No. 08-502-RCL; and (7) *Calderon-Cardona, et al. v. Democratic People’s Republic of North Korea, et al.*, Case No. 14-mc-648-RCL. All of these actions were assigned to this Court, with the exception of the *Calderon-Cardona* matter, which is unassigned, and the *Rubin* matter, which was assigned to now-retired Judge Ricardo M. Urbina, but has not been re-assigned to another Judge. Accordingly, ICANN has filed a Motion to Consolidate Consideration of, and Hearing on, ICANN’s Motions to Quash requesting that this Court consider and rule upon all of ICANN’s Motions to Quash, including the motions filed in the *Calderon-Cardona* and *Rubin* cases.

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Dated: July 28, 2014

Respectfully submitted,

*/s/ Tara Lynn R. Zurawski*

---

Tara Lynn R. Zurawski (DC Bar No. 980960)  
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*Counsel for Non-Party INTERNET  
CORPORATION FOR ASSIGNED NAMES  
AND NUMBERS*



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**CERTIFICATE OF SERVICE**

I certify that on July 28, 2014, I filed the foregoing Motion To Quash Writ of Attachment, and a [Proposed] Order thereon, with the Clerk of the Court for the U.S. District Court for the District of Columbia using its CM/ECF System, and I caused to be served one copy of the foregoing Motion by First Class Mail, postage prepaid, on the following:

Robert J. Tolchin  
Berkman Law Office, LLC  
111 Livingston Street, Suite 1928  
Brooklyn, NY 11201

*Counsel for Plaintiffs*

/s/ Tara Lynn R. Zurawski

Tara Lynn R. Zurawski (DC Bar No. 980960)

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF COLUMBIA

JENNY RUBIN, DEBORAH RUBIN, )  
DANIEL MILLER, ABRAHAM )  
MENDELSON, STUART ELLIOT HERSH, )  
RENAY E. FRYM, NOAH ROZENMAN, )  
ELENA ROZENMAN, and TZVI )  
ROZENMAN, )

Case No. 1:01-cv-1655-RCL

Plaintiffs )

v. )

THE ISLAMIC REPUBLIC OF IRAN, THE )  
IRANIAN MINISTRY OF INFORMATION )  
AND SECURITY, AYATOLLAH ALI )  
HOSEINI KHARNENEI, Supreme Leader of )  
the Islamic Republic of Iran, ALI AKBAR )  
HASHEMI-RAFSANJANI, Former President )  
of the Islamic Republic of Iran, and ALI )  
FALLAHIAN-KHUZESTANI, Former )  
Minister of Information and Security, )

Defendants )

**NOTICE OF APPEAL**

Notice is hereby given that JENNY RUBIN, DEBORAH RUBIN, DANIEL MILLER, ABRAHAM MENDELSON, STUART ELLIOT HERSH, RENAY E. FRYM, NOAH ROZENMAN, ELENA ROZENMAN, and TZVI ROZENMAN (the "Plaintiffs"), judgment creditor plaintiffs in the above named case, hereby appeal to the United States Court of Appeals for the District of Columbia Circuit from an order quashing Plaintiffs' writs of attachment to third party the Internet Corporation for Assigned Names and Numbers and denying as moot Plaintiffs' related motion for discovery and scheduling relief, entered in this action on November 12, 2014. The Plaintiffs appeal from each and every part of that order.

Case 1:01-cv-01655-RCL Document 136 Filed 12/12/14 Page 2 of 2

Date: December 12, 2014

Respectfully submitted,

THE BERKMAN LAW OFFICE, LLC  
*Attorneys for the Plaintiffs*

By:   
Robert J. Tolchin

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RAINES FELDMAN, LLP  
*Attorneys for the Plaintiffs*

By: /s/ Erik S. Syverson  
Erik S. Syverson

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APPEAL,CLOSED,TYPE-B

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:08-cv-00502-RCL**

WYATT et al v. SYRIAN ARAB REPUBLIC et al  
Assigned to: Chief Judge Royce C. Lamberth  
Case: [1:01-cv-01628-RCL](#)  
Case in other court: USCA, 13-07007  
USCA, 13-07018  
USCA, 14-07202  
Cause: 28:1602 Foreign Sovereign Immunities Act

Date Filed: 03/24/2008  
Date Terminated: 12/17/2012  
Jury Demand: None  
Nature of Suit: 360 P.I.: Other  
Jurisdiction: Federal Question

**Plaintiff**

**MARY NELL WYATT**  
*individually and as executrix of the  
Estate of Ronald E. Wyatt*

represented by **Erik Swen Syverson**  
RAINES FELDMAN LLP  
9720 Wilshire Boulevard  
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**ATTORNEY TO BE NOTICED**

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**LEAD ATTORNEY**  
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**David J. Strachman**  
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Email: [djs@mtlesq.com](mailto:djs@mtlesq.com)  
**TERMINATED: 05/17/2012**

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**Plaintiff**

**DANIEL WYATT**

represented by **Erik Swen Syverson**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**David J. Strachman**  
(See above for address)  
*TERMINATED: 05/17/2012*

**Plaintiff**

**AMANDA LIPPELT**

represented by **Erik Swen Syverson**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
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**David J. Strachman**  
(See above for address)  
*TERMINATED: 05/17/2012*

**Plaintiff**

**MICHELLE BROWN**

represented by **Erik Swen Syverson**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
(See above for address)  
*LEAD ATTORNEY*  
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**David J. Strachman**  
(See above for address)  
*TERMINATED: 05/17/2012*

**Plaintiff**

**MARVIN T. WILSON**

represented by **Erik Swen Syverson**

(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
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*LEAD ATTORNEY*  
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**David J. Strachman**  
(See above for address)  
*TERMINATED: 05/17/2012*

**Plaintiff**

**RENETTA WILSON**

represented by **Erik Swen Syverson**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**David J. Strachman**  
(See above for address)  
*TERMINATED: 05/17/2012*

**Plaintiff**

**MARTY R. WILSON**

represented by **Erik Swen Syverson**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**David J. Strachman**  
(See above for address)  
*TERMINATED: 05/17/2012*

**Plaintiff**

**GINA R. BROWN**

represented by **Erik Swen Syverson**  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**David J. Strachman**  
(See above for address)  
*TERMINATED: 05/17/2012*

**Plaintiff**

**BRADLEY G. KEY**

represented by **Erik Swen Syverson**  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
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*ATTORNEY TO BE NOTICED*

**David J. Strachman**  
(See above for address)  
*TERMINATED: 05/17/2012*

**Plaintiff**

**KIMI L. JOHNS**

represented by **Erik Swen Syverson**  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**David J. Strachman**  
(See above for address)  
*TERMINATED: 05/17/2012*

**Plaintiff**

**BARRY T. KEY**

represented by **Erik Swen Syverson**  
(See above for address)  
*LEAD ATTORNEY*  
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**Robert Joseph Tolchin**  
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ATTORNEY TO BE NOTICED*

**David J. Strachman**  
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*TERMINATED: 05/17/2012*

V.

**Defendant**

**SYRIAN ARAB REPUBLIC**

represented by **William Ramsey Clark**  
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*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Defendant**

**KURDISTAN WORKERS PARTY**

*also known as*

HSK

*also known as*

HALU MESRU SAVUNMA

KUVVETI

*also known as*

PEOPLES DEFENSE FORCE

*also known as*

KURDISTAN FREEDOM AND

DEMOCRACY CONGRESS

*also known as*

PARTIYA KARKERAN KURDISTAN

*also known as*

KADEK

*also known as*

PKK

V.

**Interested Party**

**UNITED STATES DEPARTMENT  
OF TREASURY**

*Office of Foreign Assets Control  
(OFAC)*

represented by **Tamra Tyree Moore**  
U.S. DEPARTMENT OF JUSTICE  
Civil Division/Federal Programs  
Branch  
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*LEAD ATTORNEY*  
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V.

**Garnishee**

**INTERNET CORPORATION FOR  
ASSIGNED NAMES AND NUMBER**

represented by **Eric P Enson**  
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**Movant****RAMSEY CLARK**

represented by **Carl L. Messineo**  
PARTNERSHIP FOR CIVIL JUSTICE  
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Fax: (202) 747-7747  
Email: cm@JusticeOnline.org  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Movant****LAWRENCE SCHILLING**

represented by **Carl L. Messineo**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Movant****Francis Gates**

represented by **Steven R. Perles**  
PERLES LAW FIRM, PC  
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(202) 955-9055  
Fax: (202) 772-3101  
Email: sperles@perleslaw.com  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Movant****Pati Hensley**

represented by **Steven R. Perles**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Movant****Sara Hensley**

represented by **Steven R. Perles**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Movant****Jan Smith**

represented by **Steven R. Perles**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

Date Filed	#	Docket Text
03/24/2008	<a href="#">1</a>	MOTION to Waive LCvR 5.1(e)(1) by BRADLEY G. KEY, KIMI L. JOHNS, BARRY T. KEY, MARY NELL WYATT, DANIEL WYATT, AMANDA LIPPELT, MICHELLE BROWN, MARVIN T. WILSON, RENETTA WILSON, MARTY R. WILSON, GINA R. BROWN. (jf, ) (Entered: 03/25/2008)
03/24/2008	<a href="#">2</a>	ORDER granting <a href="#">1</a> MOTION to Waive LCvR 5.1(e)(1), subject to further order of the Court. Signed by Chief Judge Thomas F. Hogan on March 24, 2008. (jf, ) (Entered: 03/25/2008)
03/24/2008	<a href="#">3</a>	COMPLAINT against SYRIAN ARAB REPUBLIC, KURDISTAN WORKERS PARTY ( Filing fee \$ 350, receipt number 4616011185) filed by BRADLEY G. KEY, KIMI L. JOHNS, BARRY T. KEY, MARY NELL WYATT, DANIEL WYATT, AMANDA LIPPELT, MICHELLE BROWN, MARVIN T. WILSON, RENETTA WILSON, MARTY R. WILSON, GINA R. BROWN. (Attachments: # <a href="#">1</a> Civil Cover Sheet)(jf, ) (Entered: 03/25/2008)
03/24/2008		Summons (2) Issued as to SYRIAN ARAB REPUBLIC, KURDISTAN WORKERS PARTY. (jf, ) (Entered: 03/25/2008)
03/24/2008	<a href="#">4</a>	NOTICE OF RELATED CASE by BRADLEY G. KEY, KIMI L. JOHNS, BARRY T. KEY, MARY NELL WYATT, DANIEL WYATT, AMANDA LIPPELT, MICHELLE BROWN, MARVIN T. WILSON, RENETTA WILSON, MARTY R. WILSON, GINA R. BROWN. Case related to Case No. 01-1628. (jf, ) (Entered: 03/25/2008)
03/25/2008	<a href="#">5</a>	NOTICE of Lis Pendens by MARY NELL WYATT (Attachments: # <a href="#">1</a> Appendix Copy of the Complaint)(Strachman, David) (Entered: 03/25/2008)
02/13/2009		SUMMONS (1) REISSUED as to SYRIAN ARAB REPUBLIC. (jf, ) (Entered: 02/13/2009)
02/26/2009	<a href="#">6</a>	REQUEST from Plaintiffs for the Clerk to effect service of one copy of the summons, complaint, and notice of suit, together with a translation of each into the official language of the foreign state, by registered mail, return receipt requested, to the head of the ministry of foreign affairs, pursuant to 28 U.S.C. 1608(a)(3). (jf, ) (Entered: 03/07/2009)
03/11/2009	<a href="#">7</a>	CERTIFICATE OF CLERK of mailing one copy of the summons, complaint, and notice of suit, together with a translation of each into the official language of the foreign state on to the head of the ministry of foreign affairs, by registered mail, return receipt requested, to the head of the ministry of foreign affairs, pursuant to 28 U.S.C. 1608(a)(3). (Attachments: # <a href="#">1</a> Receipt of Mailing) (jf, ) (Entered: 03/11/2009)
04/22/2009	<a href="#">8</a>	CERTIFICATE OF CLERK of mailing two copies of the summons, complaint, and notice of suit, together with a translation of each into the official language of the foreign state on April 23, 2009, by certified mail,

		return receipt requested, to the U. S. Department of State, Edward Betancourt, Director, Office of Policy Review and Interagency Liaison Overseas Citizens Services, 2100 Pennsylvania Avenue, NW, 4th Floor, Washington, DC 20520, pursuant to 28 U.S.C. 1608(a)(4)., REQUEST from Plaintiffs for the Clerk to effect service of two copies of the summons, complaint, and notice of suit, together with a translation of each into the official language of the foreign state, by certified mail, return receipt requested, to the U. S. Department of State, Director of Overseas Citizens Services, pursuant to 28 U.S.C. 1608(a)(4). (jf, ) (Entered: 04/23/2009)
04/23/2009	<a href="#">9</a>	CERTIFICATE OF CLERK of mailing two copies of the summons, complaint, and notice of suit, together with a translation of each into the official language of the foreign state on April 23, 2009, by certified mail, return receipt requested, to the U. S. Department of State, Edward Betancourt, Director, Office of Policy Review and Interagency Liaison Overseas Citizens Services, 2100 Pennsylvania Avenue, NW, 4th Floor, Washington, DC 20520, pursuant to 28 U.S.C. 1608(a)(4). (Attachments: # <a href="#">1</a> Exhibit Certified Mail Receipt) (jf, ) (Entered: 04/23/2009)
04/27/2009	<a href="#">10</a>	Summons Returned Unexecuted as to SYRIAN ARAB REPUBLIC. (jf, ) (Entered: 05/04/2009)
05/08/2009	<a href="#">11</a>	AFFIDAVIT of Mailing re <a href="#">9</a> Certificate of Clerk - 28USC1608(a)(4), Certificate of Clerk - 28USC1608(a)(4), Certificate of Clerk - 28USC1608(a)(4), Certificate of Clerk - 28USC1608(a)(4), Certificate of Clerk - 28USC1608(a)(4). (jf, ) (Entered: 05/13/2009)
09/21/2009	<a href="#">12</a>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to SYRIAN ARAB REPUBLIC served on 9/7/2009, answer due 11/6/2009. (jf, ) (Entered: 09/23/2009)
10/05/2009	<a href="#">13</a>	Consent MOTION Entry of Consent Motion Regarding Briefing Schedule by BRADLEY G. KEY, KIMI L. JOHNS, BARRY T. KEY, MARY NELL WYATT, DANIEL WYATT, AMANDA LIPPELT, MICHELLE BROWN, MARVIN T. WILSON, RENETTA WILSON, GINA R. BROWN (Attachments: # <a href="#">1</a> Text of Proposed Order)(Strachman, David) (Entered: 10/05/2009)
11/12/2009	<a href="#">14</a>	Consent MOTION for Extension of Time to <i>for Rule 12b briefing schedule</i> by SYRIAN ARAB REPUBLIC (Clark, Ramsey) (Entered: 11/12/2009)
11/23/2009		MINUTE ORDER granting <a href="#">14</a> the parties' joint motion regarding further briefing schedule and denying as moot <a href="#">13</a> the parties' joint motion regarding briefing schedule. It is hereby ORDERED that the defendants shall file their Rule 12(b) motion for dismissal on or before 11/24/2009; and it is FURTHER ORDERED that within sixty days thereafter, the plaintiffs shall file their opposition brief; and it is ORDERED that within twenty days after the filing of the plaintiffs' opposition, the defendants shall file their reply brief. SO ORDERED. Signed by Judge Ricardo M. Urbina on 11/23/2009. (lcrmu1) (Entered: 11/23/2009)

11/23/2009		Set/Reset Deadlines: Rule 12(b) Motions for Dismissal is due by 11/24/2009. (tg, ) (Entered: 11/23/2009)
11/24/2009	<a href="#">15</a>	MOTION to Dismiss for Lack of Jurisdiction by SYRIAN ARAB REPUBLIC (Attachments: # <a href="#">1</a> Memorandum in Support, # <a href="#">2</a> Text of Proposed Order) (Clark, Ramsey) (Entered: 11/24/2009)
01/21/2010	<a href="#">16</a>	Consent MOTION for Extension of Time to File Response/Reply as to <a href="#">15</a> MOTION to Dismiss for Lack of Jurisdiction by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT (Attachments: # <a href="#">1</a> Text of Proposed Order)(Strachman, David) (Entered: 01/21/2010)
01/26/2010	<a href="#">17</a>	Memorandum in opposition to re <a href="#">15</a> MOTION to Dismiss for Lack of Jurisdiction filed by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT. (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B)(Strachman, David) (Entered: 01/26/2010)
01/27/2010		MINUTE ORDER granting <a href="#">16</a> the plaintiffs' consent motion for extension of time. The court notes with disapproval the plaintiffs' failure to comply with the court's Standing Order for Civil Cases (available at <a href="http://www.dcd.uscourts.gov/RMUrbina-page.html">www.dcd.uscourts.gov/RMUrbina-page.html</a> ), which requires, inter alia, that motions for extension of time be filed at least four business days prior to the deadline the motion is seeking to extend. Signed by Judge Ricardo M. Urbina on 01/27/2010. (lcrmu1) (Entered: 01/27/2010)
02/16/2010	<a href="#">18</a>	REPLY to opposition to motion re <a href="#">15</a> MOTION to Dismiss for Lack of Jurisdiction <i>REPLY</i> filed by SYRIAN ARAB REPUBLIC. (Clark, Ramsey) (Entered: 02/16/2010)
05/11/2010	<a href="#">19</a>	NOTICE OF SUPPLEMENTAL AUTHORITY by SYRIAN ARAB REPUBLIC (Attachments: # <a href="#">1</a> Exhibit CRS Report North Korea: Terrorism List Removal)(Clark, Ramsey) (Entered: 05/11/2010)
09/08/2010	<a href="#">20</a>	ORDER denying <a href="#">15</a> the defendant's motion to dismiss for lack of jurisdiction. Signed by Judge Ricardo M. Urbina on 09/8/10.(lcrmu1) (Entered: 09/08/2010)
09/08/2010	<a href="#">21</a>	MEMORANDUM OPINION denying <a href="#">15</a> the defendant's motion to dismiss for lack of jurisdiction. Signed by Judge Ricardo M. Urbina on 09/8/10. (lcrmu1) (Entered: 09/08/2010)
01/18/2011	<a href="#">22</a>	NOTICE re <a href="#">21</a> <i>PLAINTIFFS' SUPPLEMENTAL BRIEF REGARDING STATE LAW TORT CLAIMS AND CONSOLIDATION</i> by ALL PLAINTIFFS (Strachman, David) Modified to add link and filers on 1/19/2011 (znmw, ). (Entered: 01/18/2011)
01/31/2011	<a href="#">23</a>	SUPPLEMENTAL MEMORANDUM to re <a href="#">21</a> Memorandum & Opinion filed

		by SYRIAN ARAB REPUBLIC. (Clark, Ramsey) (Entered: 01/31/2011)
03/30/2012	<a href="#">24</a>	MOTION to Withdraw as Attorney <i>for Plaintiffs</i> by MARY NELL WYATT (Attachments: # <a href="#">1</a> Text of Proposed Order, # <a href="#">2</a> Exhibit A Consent of Mary Nell Wyatt, # <a href="#">3</a> Exhibit B Consent of Daniel Wyatt, # <a href="#">4</a> Exhibit C Consent of Amanda Lippelt, # <a href="#">5</a> Exhibit D Conent of Michelle Brown, # <a href="#">6</a> Exhibit E Consent of Marvin T. Wilson, # <a href="#">7</a> Exhibit F Consent of Renetta Wilson, # <a href="#">8</a> Exhibit G Consent of Marty R. Wilson, # <a href="#">9</a> Exhibit H Consent of Gina R. Brown, # <a href="#">10</a> Exhibit I Consent of Bradley G. Key, # <a href="#">11</a> Exhibit J Consent of Kimi Johns, # <a href="#">12</a> Exhibit K Consent of Barry T. Key, # <a href="#">13</a> Exhibit L Notice pursuant to L.Cv.R. 83.6(c))(Strachman, David) (Entered: 03/30/2012)
04/25/2012		Case directly reassigned to Chief Judge Royce C. Lamberth. Judge Ricardo M. Urbina no longer assigned to the case as the Judge is scheduled to retire. (gt, ) (Entered: 04/25/2012)
05/01/2012		NOTICE of Hearing:Status Conference set for 5/16/2012 at 10:00 AM in Courtroom 22A before Chief Judge Royce C. Lamberth. (rje) (Entered: 05/01/2012)
05/11/2012	<a href="#">25</a>	MOTION for Leave to Appear by telephone by SYRIAN ARAB REPUBLIC (Attachments: # <a href="#">1</a> Proposed Order)(Clark, Ramsey) (Entered: 05/11/2012)
05/11/2012	<a href="#">26</a>	ERRATA re <a href="#">25</a> MOTION for Leave to Appear by telephone by SYRIAN ARAB REPUBLIC (Clark, Ramsey) Modified on 5/14/2012 to correct event and enhance text(rdj). (Entered: 05/11/2012)
05/14/2012		Set/Reset Hearings: Status Conference reset for 5/16/2012 at 03:00 PM in Courtroom 22A before Chief Judge Royce C. Lamberth. (rje) (Entered: 05/14/2012)
05/14/2012		MINUTE ORDER granting <a href="#">25</a> Motion for Leave to Appear by Telephone. Counsel should note that the time for the May 16 hearing has been changed to 3:00PM EDT. Signed by Chief Judge Royce C. Lamberth on 5/14/2012. (lrcrl5) (Entered: 05/14/2012)
05/16/2012		Minute Entry for proceedings held before Chief Judge Royce C. Lamberth: Status Conference held on 5/16/2012. Status Conference set for 7/2/2012 10:00 AM in Courtroom 22A before Chief Judge Royce C. Lamberth. (Court Reporter Theresa Sorensen.) (rje, ) (Entered: 05/16/2012)
05/17/2012	<a href="#">27</a>	ORDER granting <a href="#">24</a> Motion to Withdraw as Attorney; DENYING AS MOOT consolidation; SETTING status conference; DISMISSING WITHOUT PREJUDICE defendant Kurdistan Workers Party; and other orders. Attorney David J. Strachman terminated. Signed by Chief Judge Royce C. Lamberth on 5/17/2012. (lrcrl5) (Entered: 05/17/2012)
06/04/2012		Mail Returned as undeliverable. sent to Michelle L. Wyatt Schelles; Type of Document Returned: Order dated 5/17/12. (rje) (Entered: 06/04/2012)
06/04/2012		***Civil Case Terminated without prejudice. (rje) (Entered: 06/04/2012)
06/04/2012		***Case Reopened (rje) (Entered: 06/04/2012)

07/01/2012	<a href="#">28</a>	NOTICE of Appearance by Robert Joseph Tolchin on behalf of All Plaintiffs (Tolchin, Robert) (Entered: 07/01/2012)
07/02/2012	<a href="#">29</a>	SCHEDULING ORDER. Signed by Chief Judge Royce C. Lamberth on 7/2/2012. (lrcrl5) (Entered: 07/02/2012)
07/02/2012		Minute Entry for proceedings held before Chief Judge Royce C. Lamberth: Status Conference held on 7/2/2012. Evidentiary Hearing set for 8/17/2012 at 01:30 PM in Courtroom 22A before Chief Judge Royce C. Lamberth. (Court Reporter Theresa Sorensen.) (rje) (Entered: 08/06/2012)
07/08/2012	<a href="#">30</a>	AFFIDAVIT FOR DEFAULT <i>as against the defendant Syrian Arab Republic</i> by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT. (Tolchin, Robert) (Entered: 07/08/2012)
07/09/2012	<a href="#">31</a>	Clerk's ENTRY OF DEFAULT as to SYRIAN ARAB REPUBLIC (rdj) (Entered: 07/09/2012)
07/27/2012		Set/Reset Hearings: Evidentiary Hearing set for 8/23/2012 at 10:00 AM in Courtroom 22A before Chief Judge Royce C. Lamberth. (rje) (Entered: 07/27/2012)
08/02/2012		Set/Reset Hearings: Evidentiary Hearing reset for 8/21/2012 at 02:00 PM in Courtroom 22A before Chief Judge Royce C. Lamberth. (rje) (Entered: 08/02/2012)
08/21/2012		Minute Entry for proceedings held before Chief Judge Royce C. Lamberth: Evidentiary Hearing held on 8/21/2012. (Plaintiff's Witnesses: Dr. Marius Deebes, Dr. Soner Cagaptay and Dr. Matthew Levitt) (Court Reporter Patricia Kaneshiro-Miller.) (rje) (Entered: 08/21/2012)
08/21/2012	<a href="#">32</a>	EXHIBIT LIST by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT. (rje) (Entered: 08/21/2012)
09/28/2012		MINUTE ORDER that in accordance with the suggestion of plaintiffs' counsel, plaintiff shall submit proposed findings of fact and conclusions of law no later than October 31, 2012. Signed by Chief Judge Royce C. Lamberth on September 28, 2012. (lrcrl5) (Entered: 09/28/2012)
09/28/2012		Set/Reset Deadlines: Plaintiff's Finding of Facts and conclusions of law due by 10/31/2012. (rje, ) (Entered: 09/28/2012)
11/01/2012		MINUTE ORDER amending Minute Order of September 28, 2012. It is hereby ORDERED that plaintiffs shall submit proposed findings of fact and conclusions of law no later than November 19, 2012. Signed by Chief Judge Royce C. Lamberth on November 1, 2012. (lrcrl5) (Entered: 11/01/2012)
11/02/2012		Set/Reset Deadlines: Plaintiffs' Proposed Findings of Fact and conclusion of Law due by 11/19/2012. (rje) (Entered: 11/02/2012)

11/19/2012	<a href="#">33</a>	MOTION for Extension of Time to <i>file proposed findings of fact and conclusions of law and damages affidavits</i> by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 11/19/2012)
11/20/2012	<a href="#">34</a>	Proposed Findings of Fact by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT. (Attachments: # <a href="#">1</a> Exhibit 1, Marvin Wilson declaration, # <a href="#">2</a> Exhibit 2, Renetta Wilson declaration, # <a href="#">3</a> Exhibit 3, Mary Nell Wyatt declaration, # <a href="#">4</a> Exhibit 4, Amanda Lippelt declaration, # <a href="#">5</a> Exhibit 5, Michelle Wyatt Schelles declaration, # <a href="#">6</a> Exhibit 6, Daniel Keith Wyatt declaration, # <a href="#">7</a> Exhibit 7, Kimi Wilson Johns declaration, # <a href="#">8</a> Exhibit 8, Marty Wilson declaration, # <a href="#">9</a> Exhibit 9, Gina Wilson Brown declaration, # <a href="#">10</a> Exhibit 10, Bradley Key declaration, # <a href="#">11</a> Exhibit 11, Barry Key declaration, # <a href="#">12</a> Exhibit 12, Amanda Lippelt birth certificate, # <a href="#">13</a> Exhibit 13, Marty Wilson birth certificate, # <a href="#">14</a> Exhibit 14, Daniel Wyatt passport)(Tolchin, Robert) (Entered: 11/20/2012)
11/21/2012	<a href="#">35</a>	ORDER granting <a href="#">33</a> Plaintiffs' Motion for Extension of Time for one day to file proposed findings of fact and conclusions of law. Signed by Chief Judge Royce C. Lamberth on 11/20/12. (rje, ) (Entered: 11/21/2012)
12/11/2012	<a href="#">36</a>	SUPPLEMENTAL MEMORANDUM to <i>transmit the final passport of plaintiff's decedent Ronald Wyatt</i> filed by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT. (Attachments: # <a href="#">1</a> Exhibit Final Passport of Ronald Wyatt)(Tolchin, Robert) (Entered: 12/11/2012)
12/17/2012	<a href="#">37</a>	ORDER AND JUDGMENT, granting final default judgment in favor of plaintiffs and against defendant, and awarding damages. Signed by Chief Judge Royce C. Lamberth on December 17, 2012. (lrc15) (Entered: 12/17/2012)
12/17/2012	<a href="#">38</a>	MEMORANDUM OPINION regarding final default judgment against Syria and plaintiffs' damages. Signed by Chief Judge Royce C. Lamberth on December 17, 2012. (lrc15) (Entered: 12/17/2012)
01/15/2013	<a href="#">39</a>	NOTICE OF APPEAL TO DC CIRCUIT COURT re <a href="#">37</a> & <a href="#">38</a> by SYRIAN ARAB REPUBLIC. Filing fee \$ 455, receipt number 0090-3187890. Fee Status: Fee Paid. Parties have been notified. (Clark, Ramsey) Modified on 1/15/2013 to add linkage (rdj). (Entered: 01/15/2013)
01/15/2013	<a href="#">40</a>	Transmission of the Notice of Appeal, Order Appealed, and Docket Sheet to US Court of Appeals. The Court of Appeals fee was paid this date re <a href="#">39</a> Notice of Appeal to DC Circuit Court. (rdj) (Entered: 01/15/2013)



01/15/2013	<a href="#">41</a>	MOTION for Protective Order by UNITED STATES DEPARTMENT OF TREASURY (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Text of Proposed Order)(rdj) (Entered: 01/16/2013)
01/16/2013		USCA Case Number 13-7007 for <a href="#">39</a> Notice of Appeal to DC Circuit Court filed by SYRIAN ARAB REPUBLIC. (rdj) (Entered: 01/16/2013)
01/28/2013	<a href="#">42</a>	NOTICE OF CROSS APPEAL as to <a href="#">38</a> Memorandum & Opinion, <a href="#">37</a> Order by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT. Filing fee \$ 455, receipt number 0090-3199750. Fee Status: Fee Paid. Parties have been notified. (Tolchin, Robert) (Entered: 01/28/2013)
01/29/2013	<a href="#">43</a>	Transmission of the Notice of Appeal, Order Appealed, and Docket Sheet to US Court of Appeals. The Court of Appeals fee was paid this date re <a href="#">42</a> Notice of Cross Appeal. (rdj) (Entered: 01/29/2013)
01/31/2013		USCA Case Number 13-7018 for <a href="#">42</a> Notice of Cross Appeal, filed by MARY NELL WYATT, AMANDA LIPPELT, KIMI L. JOHNS, MARVIN T. WILSON, BRADLEY G. KEY, GINA R. BROWN, DANIEL WYATT, MARTY R. WILSON, BARRY T. KEY, MICHELLE BROWN, RENETTA WILSON. (rdj) (Entered: 01/31/2013)
02/04/2013	<a href="#">44</a>	REQUEST from ALL PLAINTIFFS for the Clerk to effect service of Two copies of <a href="#">37</a> ORDER AND JUDGMENT & <a href="#">38</a> MEMORANDUM OPINION, together with a translation of each into the official language of the foreign state, by DHL, to the agency or instrumentality of the foreign state, pursuant to 28 U.S.C. 1608(e) of the FSIA. (rdj) (Entered: 02/05/2013)
02/05/2013	<a href="#">45</a>	CERTIFICATE OF CLERK of mailing Two copies of <a href="#">37</a> ORDER AND JUDGMENT & <a href="#">38</a> MEMORANDUM OPINION, together with a translation of each into the official language of the foreign state on 2/5/2013, by DHL, to the agency or instrumentality of the foreign state, pursuant to 28 U.S.C. 1608 (e) of the FSIA. (Attachments: # <a href="#">1</a> DHL Waybill) (rdj) (Entered: 02/05/2013)
02/13/2013	<a href="#">46</a>	REQUEST from ALL PLAINTIFFS for the Clerk to effect service of Two copies of <a href="#">37</a> ORDER AND JUDGMENT & <a href="#">38</a> MEMORANDUM OPINION, together with a translation of each into the official language of the foreign state, by DHL, to the agency or instrumentality of the foreign state, pursuant to 28 U.S.C. 1608(e) of the FSIA. (rdj) (Entered: 02/14/2013)
02/14/2013	<a href="#">47</a>	CERTIFICATE OF CLERK of mailing Two copies of <a href="#">37</a> ORDER AND JUDGMENT & <a href="#">38</a> MEMORANDUM OPINION, together with a translation of each into the official language of the foreign state on 2/14/2013, by DHL, to the agency or instrumentality of the foreign state, pursuant to 28 U.S.C. 1608(e) of the FSIA. (Attachments: # <a href="#">1</a> DHL Waybill) (rdj) (Entered: 02/14/2013)
02/21/2013	<a href="#">48</a>	REQUEST from ALL PLAINTIFFS for the Clerk to effect service of Two copies of <a href="#">37</a> ORDER AND JUDGMENT & <a href="#">38</a> MEMORANDUM OPINION,

		together with a translation of each into the official language of the foreign state, by DHL, to the agency or instrumentality of the foreign state, pursuant to 28 U.S.C. 1608(e). (rdj) (Entered: 02/22/2013)
02/22/2013	<a href="#">49</a>	CERTIFICATE OF CLERK of mailing Two copies of <a href="#">37</a> ORDER AND JUDGMENT & <a href="#">38</a> MEMORANDUM OPINION, together with a translation of each into the official language of the foreign state on 2/22/2013, by DHL, to the agency or instrumentality of the foreign state, pursuant to 28 U.S.C. 1608(e). (Attachments: # <a href="#">1</a> DHL Waybill) (rdj) (Entered: 02/22/2013)
03/15/2013	<a href="#">50</a>	MOTION for Leave to File <i>Notice of Lis Pendens</i> by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT (Attachments: # <a href="#">1</a> Exhibit Heiser opinion, # <a href="#">2</a> Exhibit Heiser order, # <a href="#">3</a> Exhibit notice of lis pendens)(Tolchin, Robert) (Entered: 03/15/2013)
04/05/2013	<a href="#">51</a>	PROTECTIVE ORDER setting forth procedures for handling confidential material; allowing designated material to be filed under seal. Signed by Chief Judge Royce C. Lamberth on 4/4/13. (rje) (Entered: 04/05/2013)
04/25/2013	<a href="#">52</a>	MOTION for Order <i>pursuant to 28 U.S.C. 1610(c)</i> by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT (Attachments: # <a href="#">1</a> Exhibit signature confirmation of delivery, # <a href="#">2</a> Exhibit electronic confirmation of delivery, # <a href="#">3</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 04/25/2013)
05/02/2013	<a href="#">53</a>	MOTION for Order <i>Pursuant to 28 USC 1963</i> by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT (Attachments: # <a href="#">1</a> Exhibit email correspondence, # <a href="#">2</a> Text of Proposed Order) (Tolchin, Robert) (Entered: 05/02/2013)
05/19/2013	<a href="#">54</a>	MOTION for Order <i>Granting as Unopposed and on the Merits Plaintiffs Pending Motion (DE 52) for an Order Under FSIA § 1610(c)</i> by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT (Tolchin, Robert) (Entered: 05/19/2013)
06/27/2013	55	ORDER denying without prejudice <a href="#">50</a> Motion for Leave to File Lis Pendens; denying without prejudice [52 & 54] Motion for Order to Enforce the Judgment Pursuant to 28 U.S.C. 1610(c); and denying without prejudice <a href="#">53</a> Motion for Order Pursuant to 28 U.S.C. 1963. These motions are denied without prejudice to reconsideration after the appeal of this matter has been resolved. Signed by Chief Judge Royce C. Lamberth on June 27, 2013. (lcrcl5) (Entered: 06/27/2013)

03/12/2014	<a href="#">56</a>	MANDATE of USCA (certified copy) as to <a href="#">39</a> Notice of Appeal to DC Circuit Court filed by SYRIAN ARAB REPUBLIC ; ORDERED AND ADJUDGED that the judgment of the District Court be affirmed for the reasons stated in the attached memorandum. USCA Case Number 13-7007. (md, ) (Entered: 03/13/2014)
03/31/2014	<a href="#">57</a>	Unopposed MOTION for Protective Order by UNITED STATES DEPARTMENT OF TREASURY (Attachments: # <a href="#">1</a> Exhibit, # <a href="#">2</a> Text of Proposed Order)(Moore, Tamra) (Entered: 03/31/2014)
04/04/2014	<a href="#">58</a>	PROTECTIVE ORDER; setting forth procedures for handling confidential material; allowing designated material to be filed under seal, Signed by Judge Royce C. Lamberth on 4/3/2014. (hs) (Entered: 04/04/2014)
05/09/2014	<a href="#">59</a>	MOTION Post-Appeal Renewed Motion for Relief Pursuant to 28 U.S.C. § 1610(c) re <a href="#">52</a> MOTION for Order <i>pursuant to 28 U.S.C. 1610(c) (Pursuant to the Courts Minute Order of June 27, 2013 )</i> by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT (Tolchin, Robert) (Entered: 05/09/2014)
05/19/2014	<a href="#">60</a>	ORDER granting <a href="#">59</a> Motion for Entry of 1610(c) Order. Signed by Judge Royce C. Lamberth on May 19, 2014. (lcrcl5) (Entered: 05/19/2014)
07/07/2014	<a href="#">63</a>	MOTION filed by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Text of Proposed Order)(Tolchin, Robert) (Main Document 63 replaced on 4/9/2015) (ztnr, ). (Attachment 3 replaced on 4/9/2015) (ztnr, ). (Entered: 07/07/2014)
07/07/2014	<a href="#">64</a>	Consent MOTION for Extension of Time to <i>RESPOND TO WRIT OF ATTACHMENT AND RELATED SUBPOENA</i> by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/07/2014)
07/11/2014	<a href="#">65</a>	MOTION filed by RAMSEY CLARK, lawrence schilling (Attachments: # <a href="#">1</a> Exhibit, # <a href="#">2</a> Affidavit, # <a href="#">3</a> Affidavit, # <a href="#">4</a> Exhibit Pleading, # <a href="#">5</a> Text of Proposed Order)(Messineo, Carl) (Main Document 65 replaced on 4/9/2015) (ztnr, ). (Entered: 07/11/2014)
07/28/2014	<a href="#">66</a>	OPPOSITION filed by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT. re <a href="#">65</a> SEALED MOTION filed by RAMSEY CLARK, lawrence schilling (Tolchin, Robert) (Main Document 66 replaced on 4/9/2015) (ztnr, ). Modified on 4/9/2015 (ztnr, ). (Entered: 07/28/2014)

07/28/2014	<a href="#">67</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Eric Enson, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792180. Fee Status: Fee Paid. by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">68</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Jeffrey LeVee, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792181. Fee Status: Fee Paid. by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">69</a>	OBJECTIONS to Answer to Writ by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/29/2014	<a href="#">70</a>	MOTION to Quash by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Memorandum in Support, # <a href="#">2</a> Declaration Jeffrey, # <a href="#">3</a> Declaration Enson, # <a href="#">4</a> Text of Proposed Order) (Zurawski, Tara Lynn) (Entered: 07/29/2014)
07/29/2014	<a href="#">71</a>	MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order) (Zurawski, Tara Lynn) (Entered: 07/29/2014)
08/04/2014	<a href="#">72</a>	Consent MOTION for Extension of Time to <i>Superseding Previous Consent Motion For an Extension of Time to Respond to Writ of Attachment and Related Subpoena</i> by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/04/2014)
08/04/2014	<a href="#">73</a>	REPLY TO OPPOSITION filed by RAMSEY CLARK, LAWRENCE SCHILLING re <a href="#">65</a> MOTION filed by RAMSEY CLARK, lawrence schilling (Messineo, Carl) (Main Document 73 replaced on 4/9/2015) (ztnr, ). (Entered: 08/04/2014)
08/11/2014	<a href="#">74</a>	WITHDRAWN PER ORDER FILED 9/9/2014.....MOTION to Compel <i>Production of Documents in Response to Subpoena</i> by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Text of Proposed Order)(Tolchin, Robert) Modified on 9/9/2014 (zmm, ). (Entered: 08/11/2014)

08/11/2014	<a href="#">75</a>	MOTION for Extension of Time to File Response/Reply as to <a href="#">70</a> MOTION to Quash by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/11/2014)
08/13/2014	<a href="#">77</a>	ORDER: Upon consideration of Internet Corporation for Assigned Names and Numbers("ICANN") and Plaintiffs' Consent Motion Superseding Previous Consent Motion for an Extension of Time to Respond to Writ of Attachment and Related Subpoena, and good cause appearing, it is hereby ORDERED that ICANN and Plaintiffs' Consent Motion is GRANTED. ICANN's response to the writ of attachment and subpoena was due and filed on July 28, 2014. Plaintiff's time period pursuant to D.C. Superior Court Civil Rule 69-I(d) and (e) shall not begin to run until the parties agree, or absent such agreement, until the Court has determined, that ICANN has fulfilled its obligation in response to the Subpoena and in no event shall such periods expire before September 8, 2014. Plaintiff's lien is correspondingly extended unless ICANN's to Quash, filed on July 29, 2014, is granted. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr). (Entered: 08/13/2014)
08/13/2014	<a href="#">76</a>	ORDER granting (71) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:08-cv-00502-RCL; granting (45) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:08-cv-00520-RCL; granting (107) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:01-cv-01655-RMU; granting (8) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:14-mc-00648-UNA; granting (48) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:02-cv-01811-RCL; granting (90) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02601-RCL; granting (30) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02602-RCL; The Court will consolidate the consideration of, and hearing on, all seven of ICANN's Motion to Quash, including the motion filed in civil case number 01-1655(RMU) and miscellaneous case number 14-648 (UNA); and it is further ORDERED that the Clerk of the Court shall transfer civil case number 01-1655 (RMU) and miscellaneous case number 14-648 (UNA) to this Court for further proceedings. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr) . (Entered: 08/13/2014)
08/13/2014	<a href="#">78</a>	ORDER re: <a href="#">68</a> MOTION for Leave to Appear Pro Hac Vice :Attorney Name-

		Jeffrey LeVee; ORDERED that the Motion for Admission pro hac vice is GRANTED, and that Jeffrey A. LeVee be, and that the same hereby is, admitted pro hac vice to appear and participate fully in the above-captioned case. Signed by Judge Royce C. Lamberth on 8/12/2014. (tr) (Entered: 08/14/2014)
08/13/2014	<a href="#">79</a>	ORDER re: <a href="#">67</a> MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Eric Enson; ORDERED that the Motion for Admission pro hac vice is GRANTED, and that Eric P. Enson be, and that the same hereby is, admitted pro hac vice to appear and participate fully in the above-captioned case. Signed by Judge Royce C. Lamberth on 8/12/2014. (tr) (Entered: 08/14/2014)
08/18/2014	<a href="#">80</a>	Memorandum in opposition to re <a href="#">75</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">70</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Proposed Order, # <a href="#">2</a> Declaration of Eric Enson)(Francisco, Noel) (Entered: 08/18/2014)
08/28/2014	<a href="#">81</a>	REPLY to opposition to motion re <a href="#">75</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">70</a> MOTION to Quash filed by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT. (Attachments: # <a href="#">1</a> Exhibit A)(Tolchin, Robert) (Entered: 08/28/2014)
08/28/2014	<a href="#">82</a>	Memorandum in opposition to re <a href="#">74</a> MOTION to Compel <i>Production of Documents in Response to Subpoena</i> filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order)(Francisco, Noel) (Entered: 08/28/2014)
08/29/2014	<a href="#">83</a>	ORDER granting <a href="#">75</a> Motion for Extension of Time to File Response/Reply re as to <a href="#">70</a> MOTION to Quash Writs of Attachment for assigned names and numbers shall be due on 9/30/2014. Signed by Judge Royce C. Lamberth on 8/28/14. (mpt, ) (Entered: 08/29/2014)
08/29/2014	<a href="#">84</a>	MOTION to Quash <i>Wyatt Plaintiffs' Subpoenas</i> by Francis Gates, Pati Hensley, Sara Hensley, Jan Smith (Attachments: # <a href="#">1</a> Exhibit Ex 1, # <a href="#">2</a> Exhibit Ex 2, # <a href="#">3</a> Text of Proposed Order)(Perles, Steven) (Entered: 08/29/2014)
09/08/2014	<a href="#">85</a>	Consent MOTION Plaintiffs' Motion to Compel by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Francisco, Noel) (Entered: 09/08/2014)
09/09/2014	<a href="#">86</a>	ORDER granting <a href="#">85</a> Motion Regarding Plaintiffs' Motion to Compel. Plaintiffs' Motion to Compel is ordered withdrawn. Signed by Judge Royce C. Lamberth on 9/9/2014. (zmm, ) (Entered: 09/09/2014)
09/10/2014	<a href="#">87</a>	NOTICE <i>Praeipice to notify of an Order entered by the Honorable Rosemary Collyer</i> by Francis Gates re <a href="#">84</a> MOTION to Quash <i>Wyatt Plaintiffs'</i>

		<i>Subpoenas</i> (Attachments: # <a href="#">1</a> Exhibit A)(Perles, Steven) (Entered: 09/10/2014)
09/14/2014	<a href="#">88</a>	RESPONSE re <a href="#">84</a> MOTION to Quash <i>Wyatt Plaintiffs' Subpoenas withdrawing the subpoenas without prejudice in light of the OSC recently issued by Judge Collyer in Gates v. Syrian Arab Republic, 06-CV-1500, and the Gates' appearance in Wyatt v. Syrian Arab Rep., N.D. Ill. 14-cv-6161</i> filed by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT. (Tolchin, Robert) (Entered: 09/14/2014)
09/16/2014	<a href="#">89</a>	STIPULATION [ <i>PROPOSED</i> ] <i>PROTECTIVE ORDER</i> by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Francisco, Noel) (Entered: 09/16/2014)
09/19/2014	<a href="#">90</a>	STIPULATED PROTECTIVE ORDER setting forth procedures for handling confidential material; signed by Judge Royce C. Lamberth on 9/18/14. (Attachment: Exhibit A) (kk) (Entered: 09/19/2014)
09/28/2014	<a href="#">91</a>	MOTION for Discovery , MOTION for Extension of Time to File Response/Reply as to <a href="#">70</a> MOTION to Quash by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT (Attachments: # <a href="#">1</a> Declaration Erik S. Syverson, # <a href="#">2</a> Declaration Steven T. Gebelin)(Tolchin, Robert) (Entered: 09/28/2014)
09/30/2014	<a href="#">92</a>	RESPONSE re <a href="#">70</a> MOTION to Quash <i>Writ of Attachment</i> filed by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT. (Syverson, Erik) (Entered: 09/30/2014)
10/10/2014	<a href="#">93</a>	REPLY to opposition to motion re <a href="#">70</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Francisco, Noel) (Entered: 10/10/2014)
10/14/2014	<a href="#">94</a>	Memorandum in opposition to re <a href="#">91</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply as to <a href="#">70</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order)(Francisco, Noel) (Entered: 10/14/2014)
10/24/2014	<a href="#">95</a>	REPLY to opposition to motion re <a href="#">91</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply as to <a href="#">70</a> MOTION to Quash filed by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT. (Syverson, Erik) (Entered: 10/24/2014)

10/28/2014	<a href="#">96</a>	ORDERED that the U.S. shall notify the Court within 30 days of this date whether it intends to file a Statement of Interest and within 60 days of this date they shall file such document. (See Image for Details) Signed by Judge Royce C. Lamberth on 10/28/14.(zmpt, ) (Main Document 96 replaced on 4/9/2015) (ztnr, ). (Entered: 10/28/2014)
11/10/2014	<a href="#">97</a>	ORDER Granting <a href="#">70</a> Motion to Quash; Denied as Moot <a href="#">91</a> Motion for Discovery and writs of attachment as to ICANN are quashed. Signed by Judge Royce C. Lamberth on 11/10/14. (mpt, ) (Entered: 11/12/2014)
11/10/2014	<a href="#">98</a>	MEMORANDUM AND OPINION. Signed by Judge Royce C. Lamberth on 11/10/14. (mpt, ) (Entered: 11/12/2014)
11/25/2014	<a href="#">99</a>	DOCUMENT filed by UNITED STATES DEPARTMENT OF TREASURY re <a href="#">96</a> Sealed Order, (Moore, Tamra) (Main Document 99 replaced on 4/9/2015) (ztnr, ). (Entered: 11/25/2014)
11/25/2014		MINUTE ORDER denying <a href="#">84</a> Motion to Quash as moot. It is hereby ORDERED that non-party Francis Gates' motion [ECF No. 84] to quash plaintiffs' subpoenas is DENIED as moot in light of plaintiffs' decision to withdraw the subpoenas at issue. SO ORDERED. Signed by Judge Royce C. Lamberth on November 25, 2014. (lcrcl1) (Entered: 11/25/2014)
12/11/2014	<a href="#">100</a>	Notice filed by UNITED STATES DEPARTMENT OF TREASURY re <a href="#">96</a> Order,(Moore, Tamra) (Main Document 100 replaced on 4/9/2015) (ztnr, ). (Entered: 12/11/2014)
12/12/2014	<a href="#">101</a>	NOTICE OF APPEAL TO DC CIRCUIT COURT as to <a href="#">97</a> Order on Motion to Quash, Order on Motion for Discovery, Order on Motion for Extension of Time to File Response/Reply by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT. Filing fee \$ 505, receipt number 0090-3934551. Fee Status: Fee Paid. Parties have been notified. (Syverson, Erik) (Entered: 12/12/2014)
12/15/2014	<a href="#">102</a>	Transmission of the Notice of Appeal, Order Appealed, and Docket Sheet to US Court of Appeals. The Court of Appeals fee was paid this date re <a href="#">101</a> Notice of Appeal to DC Circuit Court. (rdj) (Entered: 12/15/2014)
12/16/2014	<a href="#">103</a>	Supplement of Record filed by RAMSEY CLARK, LAWRENCE SCHILLING re <a href="#">65</a> MOTION filed by RAMSEY CLARK, lawrence schilling (Attachments: # <a href="#">1</a> Exhibit)(Messineo, Carl) (Main Document 103 replaced on 4/9/2015) (ztnr, ). (Entered: 12/16/2014)
12/22/2014		USCA Case Number 14-7202 for <a href="#">101</a> Notice of Appeal to DC Circuit Court, filed by MARY NELL WYATT, AMANDA LIPPELT, KIMI L. JOHNS, MARVIN T. WILSON, BRADLEY G. KEY, GINA R. BROWN, DANIEL WYATT, MARTY R. WILSON, BARRY T. KEY, MICHELLE BROWN, RENETTA WILSON. (rd) (Entered: 12/22/2014)
01/06/2015	<a href="#">104</a>	Third Notice filed by UNITED STATES DEPARTMENT OF TREASURY re



		<a href="#">96</a> Order, (Moore, Tamra) (Main Document 104 replaced on 4/9/2015) (ztnr, ). (Entered: 01/06/2015)
01/23/2015	<a href="#">105</a>	DOCUMENT filed by UNITED STATES DEPARTMENT OF TREASURY re <a href="#">96</a> Order, (Moore, Tamra) Modified on 4/9/2015 (ztnr, ). (Entered: 01/23/2015)
01/27/2015	<a href="#">106</a>	ORDER that deadline for responses, if any, to United States' statement of interest [ECF No. 105] is 30 days from this date. Signed by Judge Royce C. Lamberth on January 27, 2015. (lrcrl1) (Entered: 01/27/2015)
02/26/2015	<a href="#">107</a>	DOCUMENT filed by RAMSEY CLARK, LAWRENCE SCHILLING re <a href="#">105</a> Document (Messineo, Carl) (Main Document 107 replaced on 4/9/2015) (ztnr, ). (Entered: 02/26/2015)
03/18/2015	<a href="#">108</a>	MEMORANDUM AND ORDER re <a href="#">63</a> MOTION filed by GINA R. BROWN, MICHELLE BROWN, KIMI L. JOHNS, BARRY T. KEY, BRADLEY G. KEY, AMANDA LIPPELT, MARTY R. WILSON, MARVIN T. WILSON, RENETTA WILSON, DANIEL WYATT, MARY NELL WYATT filed by MARY NELL WYATT, AMANDA LIPPELT, KIMI L. JOHNS, MARVIN T. WILSON, BRADLEY G. KEY, GINA R. BROWN, DANIEL WYATT, MARTY R. WILSON, BARRY T. KEY, is DENIED; and <a href="#">65</a> MOTION filed by RAMSEY CLARK, LAWRENCE SCHILLING is DENIED AS MOOT.Signed by Judge Royce C. Lamberth on 3/17/15.(zmp, ) (Main Document 108 replaced on 4/9/2015) (ztnr, ). (Entered: 03/18/2015)
03/23/2015	<a href="#">109</a>	Response filed by UNITED STATES DEPARTMENT OF TREASURY re <a href="#">108</a> Order, (Moore, Tamra) (Main Document 109 replaced on 4/9/2015) (ztnr, ). (Entered: 03/23/2015)
04/08/2015	<a href="#">110</a>	ORDERED that filings and orders shall be unsealed in this case. ORDERED that the Clerk of the Court shall publish the Court's Memorandum and Order signed March 17, 2015 <a href="#">108</a> . (See Image for Details) Signed by Judge Royce C. Lamberth on 4/8/15. (mpt, ) (Entered: 04/08/2015)
04/08/2015		***Case Unsealed pursuant to Order issued 4/8/15. (ztnr, ) (Entered: 04/09/2015)

<b>PACER Service Center</b>			
<b>Transaction Receipt</b>			
06/01/2015 15:04:44			
<b>PACER Login:</b>	php10east0660:2616006:0	<b>Client Code:</b>	
<b>Description:</b>	Docket Report	<b>Search Criteria:</b>	1:08-cv-00502-RCL
<b>Billable Pages:</b>	17	<b>Cost:</b>	1.70

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
MARY NELL WYATT, <i>et al.</i> ,	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
v.	)	<b>Civil No. 08-502 (RCL)</b>
	)	
SYRIAN ARAB REPUBLIC, <i>et al.</i> ,	)	
	)	
<b>Defendants.</b>	)	
_____	)	

**ORDER AND JUDGMENT**

For the reasons expressed in the Findings of Fact and Conclusions of Law issued this date, and in light of the representations to the court of Mr. Ramsay Clark, counsel for the defendant, that the defendant would not participate in this case after contesting jurisdiction, it is hereby

**ORDERED** that a default judgment is hereby granted in light of the Clerk’s entry of default, ECF No. 31, and the failure of defendant to appear at subsequent proceedings; and it is further

**ORDERED** that final judgment is entered in favor of plaintiffs and against defendant Syria in this matter; and it is further

**ORDERED** that plaintiffs are entitled to a total damages award of \$338,000,000, to be distributed as follows:

- Marvin Wilson and the Estate of Ronald Wyatt are each entitled to \$5,000,000 in pain and suffering damages;

Case 1:08-cv-00502-RCL Document 37 Filed 12/17/12 Page 2 of 2

-- Renetta Wilson and Mary Nell Wyatt are each entitled to \$4,000,000 in solatium damages;

-- Daniel Wyatt, Amanda Lippelt, Michelle Schelles, Marty Wilson, Kimi Johns, Gina Wilson, Bradley Key, and Barry Key, are each entitled to \$2,500,000 in solatium damages;

-- plaintiffs are entitled to one award of \$300,000,000 in punitive damages, to be distributed equally among the plaintiffs; and it is further

**ORDERED** that plaintiffs shall forthwith, at their own cost and consistent with the requirements of 28 U.S.C. § 1608(e), send a copy of this Order and Judgment, and the Memorandum Opinion issued this date, to defendants.

This is a final appealable order. See Fed. R. App. P. (4)(a).

**SO ORDERED.**

Signed December 17, 2012 by Royce C. Lamberth, Chief Judge.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

Mary Nell Wyatt, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 08-502-RCL
	)	
The Syrian Arab Republic, <i>et al.</i> ,	)	<b>HEARING REQUEST</b>
	)	
Defendants.	)	
	)	
	)	
	)	

**INTERNET CORPORATION FOR ASSIGNED NAME AND NUMBERS’  
MOTION TO QUASH WRIT OF ATTACHMENT**

The Internet Corporation for Assigned Names and Numbers (“ICANN”), a non-party, by counsel, respectfully moves this Court to quash the Writ of Attachment on Judgment Other Than Wages, Salary And Commissions (“Writ of Attachment”) issued by Plaintiffs in the above-entitled action, for the reasons set forth in ICANN’s accompanying Memorandum.<sup>1</sup>

Furthermore, ICANN, in accordance with Local Civil Rule 78.1, requests that an oral hearing be scheduled to inform the Court’s ruling on the Motion.

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<sup>1</sup> Plaintiffs issued to ICANN, and ICANN is moving to quash, writs of attachment in seven actions: (1) *Rubin, et al. v. Islamic Republic of Iran, et al.*, Case No. 01-1655-RMU; (2) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 02-1811-RCL; (3) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 08-520-RCL; (4) *Stern, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2602-RCL; (5) *Weinstein, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2601-RCL; (6) *Wyatt, et al. v. Syrian Arab Republic, et al.*, Case No. 08-502-RCL; and (7) *Calderon-Cardona, et al. v. Democratic People’s Republic of North Korea, et al.*, Case No. 14-mc-648-RCL. All of these actions were assigned to this Court, with the exception of the *Calderon-Cardona* matter, which is unassigned, and the *Rubin* matter, which was assigned to now-retired Judge Ricardo M. Urbina, but has not been re-assigned to another Judge. Accordingly, ICANN has filed a Motion to Consolidate Consideration of, and Hearing on, ICANN’s Motions to Quash requesting that this Court consider and rule upon all of ICANN’s Motions to Quash, including the motions filed in the *Calderon-Cardona* and *Rubin* cases.

Case 1:08-cv-00502-RCL Document 70 Filed 07/29/14 Page 2 of 3

Dated: July 28, 2014

Respectfully submitted,

*/s/ Tara Lynn R. Zurawski*

---

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*Counsel for Non-Party INTERNET  
CORPORATION FOR ASSIGNED NAMES  
AND NUMBERS*

**CERTIFICATE OF SERVICE**

I certify that on July 28, 2014, I filed the foregoing Motion To Quash Writ of Attachment, and a [Proposed] Order thereon, with the Clerk of the Court for the U.S. District Court for the District of Columbia using its CM/ECF System, and I caused to be served one copy of the foregoing Motion by First Class Mail, postage prepaid, on the following:

Robert J. Tolchin  
Berkman Law Office, LLC  
111 Livingston Street, Suite 1928  
Brooklyn, NY 11201

*Counsel for Plaintiffs*

/s/ Tara Lynn R. Zurawski

Tara Lynn R. Zurawski (DC Bar No. 980960)

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF COLUMBIA

MARY NELL WYATT, individually and as )  
executrix of the Estate of Ronald E. Wyatt, )  
DANIEL WYATT, AMANDA LIPPELT, )  
MICHELLE BROWN, MARVIN T. WILSON, )  
RENETTA WILSON, MARTY R. WILSON, )  
GINA R. BROWN, BRADLEY G. KEY, KIMI )  
L. JOHNS, and BARRY T. KEY, )

Case No. 1:08-cv-0502-RCL

Plaintiffs )

v. )

THE SYRIAN ARAB REPUBLIC, and THE )  
KURDISTAN WORKERS PARTY, also )  
known as HSK, also known as HALU MESRU )  
SAVUNMA KUVVETI, also known as )  
PEOPLES DEFENSE FORCE, also known as )  
KURDISTAN FREEDOM AND )  
DEMOCRACY CONGRESS, also known as )  
PARTIYA KARKERAN KURDISTAN, also )  
known as KADEK, also known as PKK, )

Defendants )

**NOTICE OF APPEAL**

Notice is hereby given that MARY NELL WYATT, individually and as executrix of the Estate of Ronald E. Wyatt, DANIEL WYATT, AMANDA LIPPELT, MICHELLE BROWN, MARVIN T. WILSON, RENETTA WILSON, MARTY R. WILSON, GINA R. BROWN, BRADLEY G. KEY, KIMI L. JOHNS, and BARRY T. KEY (the "Plaintiffs"), judgment creditor plaintiffs in the above named case, hereby appeal to the United States Court of Appeals for the District of Columbia Circuit from an order quashing Plaintiffs' writs of attachment to third party the Internet Corporation for Assigned Names and Numbers and denying as moot Plaintiffs' related motion for discovery and scheduling relief, entered in this action on November 12, 2014. The Plaintiffs appeal from each and every part of that order.

Case 1:08-cv-00502-RCL Document 101 Filed 12/12/14 Page 2 of 2

Date: December 12, 2014

Respectfully submitted,

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APPEAL,CLOSED,TYPE-E

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:00-cv-02602-RCL**

STERN, et al v. ISLAMIC REPUBLIC OF, et al  
Assigned to: Chief Judge Royce C. Lamberth  
Demand: \$330,000  
Case in other court: 14-07203  
Cause: 28:1602 Foreign Sovereign Immunities Act

Date Filed: 10/27/2000  
Date Terminated: 07/17/2003  
Jury Demand: None  
Nature of Suit: 890 Other Statutory  
Actions  
Jurisdiction: Federal Question

**Plaintiff**

**SHAUL STERN**  
*individually and as legal representative  
of the Estate of Leah Stern*

represented by **Erik Swen Syverson**  
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**ATTORNEY TO BE NOTICED**

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*TERMINATED: 03/05/2001*  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Plaintiff**

**JOSEPH STERN**

represented by **Erik Swen Syverson**  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Jeffrey A. Miller**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**William A. Davis**  
(See above for address)  
*TERMINATED: 03/05/2001*  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Plaintiff**

**SHIMSON STERN**

represented by **Erik Swen Syverson**  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Jeffrey A. Miller**  
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*LEAD ATTORNEY*  
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**Robert Joseph Tolchin**  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**William A. Davis**  
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*TERMINATED: 03/05/2001*  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Plaintiff**

**YOCHEVED KUSHNER**

represented by **Erik Swen Syverson**  
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*ATTORNEY TO BE NOTICED*

**Jeffrey A. Miller**  
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*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
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*ATTORNEY TO BE NOTICED*

**William A. Davis**  
(See above for address)  
*TERMINATED: 03/05/2001*  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

V.

**Defendant**

**ISLAMIC REPUBLIC OF IRAN**

**Defendant**

**IRANIAN MINISTRY OF  
INFORMATION AND SECURITY**

**Defendant**

**AYATOLLAH SAYYID ALI  
HOSSEINI KHAMENEI**  
*Supreme Leader of the Islamic Republic  
of Iran*

District of Columbia live database

Page 4 of 11

**Defendant**

**ALI AKBAR HASHEMI-  
RAFSANJANI**

*Former President of the Islamic  
Republic of Iran*

**Defendant**

**ALI FALLAHIAN-KHUZESTANI**

*Former Minister of Information and  
Security*

V.

**Garnishee**

**INTERNET CORPORATION FOR  
ASSIGNED NAMES AND NUMBER**

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 ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
10/27/2000	1	COMPLAINT filed by plaintiff SHAUL STERN, plaintiff JOSEPH STERN, plaintiff SHIMSON STERN, plaintiff YOICHEVED KUSHNER (ab) (Entered: 11/02/2000)
10/27/2000		SUMMONS (5) issued for defendant ISLAMIC REPUBLIC OF, defendant IRANIAN MINISTRY, defendant AYATOLLAH ALI KHAMENEI, defendant ALI AKBAR HASHEMI-RAFSANJANI, defendant ALI FALLAHIAN-KHUZESTANI (ab) (Entered: 11/02/2000)
10/27/2000	2	NOTIFICATION OF RELATED CASE: Case related to Case No(s): 98-1945 (ab) (Entered: 11/02/2000)
03/05/2001	3	SUBSTITUTION OF COUNSEL for plaintiff SHAUL STERN, plaintiff JOSEPH STERN, plaintiff SHIMSON STERN, plaintiff YOICHEVED KUSHNER , substituting Jeffrey A. Miller for attorney William A. Davis for YOICHEVED KUSHNER, attorney William A. Davis for SHIMSON STERN, attorney William A. Davis for JOSEPH STERN, attorney William A. Davis for SHAUL STERN (tth) (Entered: 03/07/2001)
03/23/2001	4	REQUEST by plaintiff SHAUL STERN, plaintiff JOSEPH STERN, plaintiff SHIMSON STERN, plaintiff YOICHEVED KUSHNER for the Clerk to mail by DHL Worldwide Express, a copy of the summons and complaint to defendant The Islamic Republic of Iran pursuant to 28 U.S.C. 1608 (a)(3) and defendants The Iranian Ministry of Information and Security, Ayatollah Ali Hoseini Khamenei, Ali Akbar Hashemi-Rafsanjani and Ali Fallahian-Khuzestani pursuant to 28 U.S.C. 1608 (b)(3)(B) (tth) (Entered: 03/27/2001)
03/27/2001		SUMMONS (5) REISSUED for defendant ISLAMIC REPUBLIC OF, defendant IRANIAN MINISTRY, defendant AYATOLLAH ALI HOSEINI KHAMENEI, defendant ALI AKBAR HASHEMI-RAFSANJANI, defendant ALI FALLAHIAN-KHUZESTANI. (tth) Modified on 03/27/2001 (Entered: 03/27/2001)
04/04/2001	5	CERTIFICATE OF MAILING to ISLAMIC REPUBLIC OF, IRANIAN MINISTRY, AYATOLLAH ALI HOSEINI KHAMENEI, ALI AKBAR HASHEMI-RAFSANJANI, ALI FALLAHIAN-KHUZESTANI of summons, complaint by registered mail, return receipt requested pursuant to FRCP/TITLE/SECTION: 28 U.S.C. 1608 (a)(3) and 28 U.S.C. 1608 (a)(3). (tth) (Entered: 04/04/2001)
04/17/2001		SUMMONS (5) REISSUED for defendant ISLAMIC REP/IRAN, defendant IRANIAN MINISTRY, defendant AYATOLLAH ALI HOSEINI KHAMENEI, defendant ALI AKBAR HASHEMI-RAFSANJANI, defendant ALI FALLAHIAN-KHUZESTANI . (tth) (Entered: 04/17/2001)

10/01/2001	6	MOTION filed by plaintiff SHAUL STERN, plaintiff JOSEPH STERN, plaintiff SHIMSON STERN, plaintiff YOCHAVED KUSHNER for entry of default as to ISLAMIC REP/IRAN, IRANIAN MINISTRY, AYATOLLAH ALI HOSEINI KHAMENEI, ALI AKBAR HASHEMI-RAFSANJANI, ALI FALLAHIAN-KHUZESTANI ; Exhibits (2) (tth) (Entered: 10/05/2001)
02/13/2002	7	AFFIDAVIT in support of default by plaintiffs against all defendants; Attachments. (nmr) (Entered: 02/13/2002)
02/13/2002	8	DEFAULT vs. defendant ISLAMIC REPUBLIC By Clerk (N) (nmr) (Entered: 02/13/2002)
02/13/2002	9	DEFAULT vs. defendant IRANIAN MINISTRY By Clerk (N) (nmr) (Entered: 02/13/2002)
02/13/2002	10	DEFAULT vs. defendant AYATOLLAH ALI HOSEINI KHAMENEI By Clerk (N) (nmr) (Entered: 02/13/2002)
02/13/2002	11	DEFAULT vs. defendant ALI AKBAR HASHEMI-RAFSANJANI By Clerk (N) (nmr) (Entered: 02/13/2002)
02/13/2002	12	DEFAULT vs. defendant ALI FALLAHIAN-KHUZESTANI By Clerk (N) (nmr) (Entered: 02/13/2002)
03/15/2002	13	MOTION filed by plaintiff for issuance of letter of request for judicial assistance pursuant to the Hague Convention of 18 March 1970 on the taking of evidence abroad in civil or commercial matters (nmr) (Entered: 03/18/2002)
03/18/2002	<a href="#">14</a>	ORDER by Judge Royce C. Lamberth : granting motion for issuance of letter of request for judicial assistance pursuant to the Hague Convention of 18 March 1970 on the taking of evidence abroad in civil or commercial matters [13-1] by YOCHAVED KUSHNER, SHIMSON STERN, JOSEPH STERN, SHAUL STERN; requesting the assistance of Israel in obtaining copies of certain documents relating to the death of Leah Stern in a bombing on 7/30/97, in Jerusalem, Israel. (N) (mon) (Entered: 03/18/2002)
09/11/2002	15	MOTION (EMERGENCY) filed by plaintiffs for expedited judgment and related relief ; exhibits (3) (mpt) (Entered: 09/12/2002)
09/17/2002	<a href="#">16</a>	ORDER by Judge James Robertson: status hearing set for 2:00 9/20/02 ; (N) (dam) (Entered: 09/18/2002)
09/19/2002	17	MOTION filed by plaintiffs SHAUL STERN, JOSEPH STERN, SHIMSON STERN, YOCHAVED KUSHNER to withdraw motion without prejudice for expedited judgment and related relief [15-1] (mpt) (Entered: 09/20/2002)
09/20/2002	<a href="#">18</a>	ORDER by Judge James Robertson : granting motion to withdraw motion without prejudice for expedited judgment and related relief [15-1] [17-1] by YOCHAVED KUSHNER, SHIMSON STERN, JOSEPH STERN, SHAUL STERN (N) (dam) (Entered: 09/20/2002)
12/18/2002	<a href="#">19</a>	ORDER by Judge Royce C. Lamberth : permitting plaintiffs to submit all expert and other testimony and evidence via affidavit testimony; directing the

		aforementioned documents and Proposed Findings of Fact and Conclusions of Law be filed by 1/3/03. (N) (mon) (Entered: 12/18/2002)
01/03/2003	20	RESPONSE by plaintiffs to 12/18/02 order [19-1]; Re: Testimony and Evidence via Affidavit Testimony (Vol. 1); Findings and Fact and Conclusions of Law (Vol. 2); bulkies (mpt) (Entered: 02/20/2003)
07/17/2003	<a href="#">21</a>	ORDER AND JUDGMENT by Judge Royce C. Lamberth : entering judgment on behalf of Leah Stern's surviving children, plaintiffs Joseph Stern, Shimson Stern, Shaul Stern and Yocheved Kushner against defendants, The Islamic Republic of Iran, the Iranian Ministry of Information and Security, Ayatollah Ali Hoseini Khamenei, Ali Akbar Hashemi-Rafsanjani and Ali Fallahian-Khuzestani, jointly and severally, for solatium, in the total amount of \$12,000,000(12 million dollars); allocated as follows: Joseph Stern-\$3,000,000; Yocheved Kushner-\$3,000,000; Shimson Stern-\$3,000,000; Shaul Stern-\$3,000,000; entering judgment for Shaul Stern against all defendants, jointly and severally, for pain and suffering of Leah Stern, in the amount of \$1,000,000; entering judgment for Shaul Stern against all defendants, jointly and severally, for punitive damages in the amount of \$300,000,000; directing that caption be amended(see order for details); directing that a copy ; directing that copy be sent to Dept of State for diplomatic service upon the defendants. (N) (mon) (Entered: 07/18/2003)
07/17/2003	<a href="#">22</a>	FINDINGS OF FACT and Conclusions of Law by Judge Royce C. Lamberth (N) . (mon) Modified on 07/21/2003 (Entered: 07/18/2003)
09/16/2003	23	CERTIFICATE FROM RECORDER OF DEEDS of Recording of Judgment on 9/5/03 . Instrument No.: 245667-V. (mpt) (Entered: 09/22/2003)
07/07/2014	<a href="#">25</a>	Consent MOTION for Extension of Time to <i>RESPOND TO WRIT OF ATTACHMENT AND RELATED SUBPOENA</i> by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/07/2014)
07/28/2014	<a href="#">26</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Eric Enson, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792166. Fee Status: Fee Paid. by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">27</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Jeffrey LeVee, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792171. Fee Status: Fee Paid. by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">28</a>	OBJECTIONS to Answer to Writ by INTERNET CORPORATION FOR

		ASSIGNED NAMES AND NUMBER. (Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/29/2014	<a href="#">29</a>	MOTION to Quash by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Memorandum in Support, # <a href="#">2</a> Declaration Jeffrey, # <a href="#">3</a> Declaration Enson, # <a href="#">4</a> Text of Proposed Order) (Zurawski, Tara Lynn) (Entered: 07/29/2014)
07/29/2014	<a href="#">30</a>	MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/29/2014)
07/30/2014	<a href="#">31</a>	MOTION TO QUASH (CORRECTED) by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Zurawski, Tara Lynn) (Entered: 07/30/2014)
08/04/2014	<a href="#">32</a>	Consent MOTION for Extension of Time to <i>Superseding Previous Consent Motion for an Extension of Time to Respond to Writ of Attachment and Related Subpoena</i> by YOCHVED KUSHNER, JOSEPH STERN, SHAUL STERN, SHIMSON STERN (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/04/2014)
08/11/2014	<a href="#">33</a>	WITHDRAWN PER ORDER FILED 9/9/2014.....MOTION to Compel <i>Production of Documents in Response to Subpoena</i> by YOCHVED KUSHNER, JOSEPH STERN, SHAUL STERN, SHIMSON STERN (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Text of Proposed Order) (Tolchin, Robert) Modified on 9/9/2014 (zmm, ). (Entered: 08/11/2014)
08/11/2014	<a href="#">34</a>	MOTION for Extension of Time to File Response/Reply as to <a href="#">29</a> MOTION to Quash by YOCHVED KUSHNER, JOSEPH STERN, SHAUL STERN, SHIMSON STERN (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/11/2014)
08/13/2014	<a href="#">36</a>	ORDER: Upon consideration of Internet Corporation for Assigned Names and Numbers("ICANN") and Plaintiffs' Consent Motion Superseding Previous Consent Motion for an Extension of Time to Respond to Writ of Attachment and Related Subpoena, and good cause appearing, it is hereby ORDERED that ICANN and Plaintiffs' Consent Motion is GRANTED. ICANN's response to the writ of attachment and subpoena was due and filed on July 28, 2014. Plaintiff's time period pursuant to D.C. Superior Court Civil Rule 69-I(d) and (e) shall not begin to run until the parties agree, or absent such agreement, until the Court has determined, that ICANN has fulfilled its obligation in response to the Subpoena and in no event shall such periods expire before September 8, 2014. Plaintiff's lien is correspondingly extended unless ICANN's to Quash, filed on July 29, 2014, is granted. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr). Modified on 8/14/2014 (ztc, ). (Entered: 08/13/2014)
08/13/2014	<a href="#">35</a>	ORDER granting (71) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS'



		WRITS OF ATTACHMENT in case 1:08-cv-00502-RCL; granting (45) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:08-cv-00520-RCL; granting (107) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:01-cv-01655-RMU; granting (8) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:14-mc-00648-UNA; granting (48) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:02-cv-01811-RCL; granting (90) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02601-RCL; granting (30) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02602-RCL; The Court will consolidate the consideration of, and hearing on, all seven of ICANN's Motion to Quash, including the motion filed in civil case number 01-1655(RMU) and miscellaneous case number 14-648 (UNA); and it is further ORDERED that the Clerk of the Court shall transfer civil case number 01-1655 (RMU) and miscellaneous case number 14-648 (UNA) to this Court for further proceedings. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr) . Modified on 8/14/2014 (ztcrr, ). (Entered: 08/13/2014)
08/13/2014	<a href="#">37</a>	ORDER re: <a href="#">26</a> MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Eric Enson; ORDERED that the Motion for Admission pro hac vice is GRANTED, and that Eric P. Enson be, and that the same hereby is, admitted pro hac vice to appear and participate fully in the above-captioned case. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr) (Entered: 08/14/2014)
08/13/2014		MINUTE ORDER Granting <a href="#">27</a> Motion for Leave to Appear Pro Hac Vice Jeffrey LeVee and participate fully in the above-captioned case. (mpt, ) (Entered: 08/19/2014)
08/18/2014	<a href="#">38</a>	Memorandum in opposition to re <a href="#">34</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">29</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Proposed Order, # <a href="#">2</a> Declaration of Eric Enson)(Francisco, Noel) (Entered: 08/18/2014)
08/28/2014	<a href="#">39</a>	REPLY to opposition to motion re <a href="#">34</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">29</a> MOTION to Quash filed by YOCHAVED KUSHNER, JOSEPH STERN, SHAUL STERN, SHIMSON STERN. (Attachments: # <a href="#">1</a> Exhibit A)(Tolchin, Robert) (Entered: 08/28/2014)
08/28/2014	<a href="#">40</a>	Memorandum in opposition to re <a href="#">33</a> MOTION to Compel <i>Production of Documents in Response to Subpoena</i> filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order)(Francisco, Noel) (Entered: 08/28/2014)

		08/28/2014)
08/29/2014	<a href="#">41</a>	ORDER granting <a href="#">34</a> Motion for Extension of Time to File Response/Reply re <a href="#">29</a> MOTION to Quash Writs of Attachment for Assigned Names and Numbers shall be due on 9/30/2014. Signed by Judge Royce C. Lamberth on 8/28/14. (mpt, ) (Entered: 08/29/2014)
09/08/2014	<a href="#">42</a>	Consent MOTION Plaintiffs' Motion to Compel by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER (Attachments: # <a href="#">1</a> Text of Proposed Order)(Francisco, Noel) (Entered: 09/08/2014)
09/09/2014	<a href="#">43</a>	ORDER granting (57) Motion Regarding Plaintiffs' Motion to Compel in case 1:08-cv-00520-RCL; granting (119) Motion Regarding Plaintiffs' Motion to Compel in case 1:01-cv-01655-RCL; granting (60) Motion Regarding Plaintiffs' Motion to Compel in case 1:02-cv-01811-RCL; granting (103) Motion Regarding Plaintiffs' Motion to Compel in case 1:00-cv-02601-RCL; granting (42) Motion Regarding Plaintiffs' Motion to Compel in case 1:00-cv-02602-RCL. Plaintiffs' Motion to Compel is ordered withdrawn. Signed by Judge Royce C. Lamberth on 9/9/2014. (zmm, ) (Entered: 09/09/2014)
09/16/2014	<a href="#">44</a>	STIPULATION [ <i>PROPOSED</i> ] <i>PROTECTIVE ORDER</i> by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Francisco, Noel) (Entered: 09/16/2014)
09/19/2014	<a href="#">45</a>	STIPULATED PROTECTIVE ORDER setting forth procedures for handling confidential material; signed by Judge Royce C. Lamberth on 9/18/14. (Attachment: Exhibit A) (kk) (Entered: 09/19/2014)
09/28/2014	<a href="#">46</a>	MOTION for Discovery , MOTION for Extension of Time to File Response/Reply as to <a href="#">29</a> MOTION to Quash by YOICHEVED KUSHNER, JOSEPH STERN, SHAUL STERN, SHIMSON STERN (Attachments: # <a href="#">1</a> Declaration Erik S. Syverson, # <a href="#">2</a> Declaration Steven T. Gebelin)(Tolchin, Robert) (Entered: 09/28/2014)
09/30/2014	<a href="#">47</a>	RESPONSE re <a href="#">29</a> MOTION to Quash <i>Writ of Attachment</i> filed by YOICHEVED KUSHNER, JOSEPH STERN, SHAUL STERN, SHIMSON STERN. (Syverson, Erik) (Entered: 09/30/2014)
10/10/2014	<a href="#">48</a>	REPLY to opposition to motion re <a href="#">29</a> MOTION to Quash , <a href="#">31</a> MOTION TO QUASH (CORRECTED) filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Francisco, Noel) (Entered: 10/10/2014)
10/14/2014	<a href="#">49</a>	Memorandum in opposition to re <a href="#">46</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply as to <a href="#">29</a> MOTION to Quash filed by INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBER. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order) (Francisco, Noel) (Entered: 10/14/2014)
10/24/2014	<a href="#">50</a>	REPLY to opposition to motion re <a href="#">46</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply as to <a href="#">29</a> MOTION to Quash filed by YOICHEVED KUSHNER, JOSEPH STERN, SHAUL STERN, SHIMSON

		STERN. (Syverson, Erik) (Entered: 10/24/2014)
11/10/2014	<a href="#">51</a>	ORDER Granting <a href="#">31</a> (Corrected) Motion to Quash and the Writs of Attachment as to ICANN are quashed; Denied as Moot <a href="#">46</a> Motion for Discovery. Signed by Judge Royce C. Lamberth on 11/10/14. (mpt) (Entered: 11/12/2014)
11/10/2014	<a href="#">52</a>	MEMORANDUM AND OPINION (See Image for Details). Signed by Judge Royce C. Lamberth on 11/10/14. (mpt, ) (Entered: 11/12/2014)
12/12/2014	<a href="#">53</a>	NOTICE OF APPEAL TO DC CIRCUIT COURT as to <a href="#">51</a> Order on Motion for Miscellaneous Relief, Order on Motion for Discovery, Order on Motion for Extension of Time to File Response/Reply by YOCHVED KUSHNER, JOSEPH STERN, SHAUL STERN, SHIMSON STERN. Filing fee \$ 505, receipt number 0090-3934593. Fee Status: Fee Paid. Parties have been notified. (Syverson, Erik) (Entered: 12/12/2014)
12/15/2014	<a href="#">54</a>	Transmission of the Notice of Appeal, Order Appealed, and Docket Sheet to US Court of Appeals. The Court of Appeals fee was paid this date re <a href="#">53</a> Notice of Appeal to DC Circuit Court. (rdj) (Entered: 12/15/2014)
12/22/2014		USCA Case Number 14-7203 for <a href="#">53</a> Notice of Appeal to DC Circuit Court, filed by SHIMSON STERN, JOSEPH STERN, YOCHVED KUSHNER, SHAUL STERN. (erd) (Entered: 12/22/2014)

<b>PACER Service Center</b>			
<b>Transaction Receipt</b>			
06/01/2015 14:29:08			
<b>PACER Login:</b>	php10east0660:2616006:0	<b>Client Code:</b>	
<b>Description:</b>	Docket Report	<b>Search Criteria:</b>	1:00-cv-02602-RCL
<b>Billable Pages:</b>	8	<b>Cost:</b>	0.80

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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SHAUL STERN, Individually and as legal representative  
of the Estate of LEAH STERN, JOSEPH STERN,  
SHIMSON STERN, YO CHEVED KUSHNER,

Case No.: 1:00CV02602 (RCL)

Plaintiffs,

-against-

THE ISLAMIC REPUBLIC OF IRAN,  
(aka Iran, The Republic of Iran, The Government of Iran,  
Iranian Government, and Imperial Government of Iran)  
THE IRANIAN MINISTRY OF INFORMATION  
AND SECURITY, AYATOLLAH ALI HOSEINI  
KHAMENEI, ALI AKBAR HASHEMI-RAFSANJANI, and  
ALI FALLAHIAN-KHUZESTANI,

Defendants.

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**FILED**

JUL 17 2003

NANCY MAYER-WHITTINGTON, CLERK  
U.S. DISTRICT COURT

**FILED**

JUL 18 2003

CLERK U.S. DISTRICT COURT  
DISTRICT OF COLUMBIA

ORDER AND JUDGMENT

For the reasons set forth in the accompanying Findings of Fact and Conclusions of Law,  
it is hereby

ORDERED that judgment be and it is entered on behalf of Leah Stern's surviving  
children, Plaintiffs Joseph Stern, Shimson Stern, Shaul Stern and Yocheved Kushner against  
Defendants, The Islamic Republic of Iran, the Iranian Ministry of Information and Security,  
Ayatollah Ali Hoseini Khamenei, Ali Akbar Hashemi-Rafsanjani and Ali Fallahian-Khuzestani,  
jointly and severally, for solatium, in the total amount of TWELVE MILLION DOLLARS  
(\$12,000,000.00), allocated as follows: to Decedent's son, Joseph Stern, THREE MILLION

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DOLLARS (\$3,000,000.00); to Decedent's daughter Yocheved Kushner, THREE MILLION DOLLARS (\$3,000,000.00); Decedent's son, Shimson Stern, THREE MILLION DOLLARS (\$3,000,000.00); to Decedent's son, Shaul Stern, THREE MILLION DOLLARS (\$3,000,000.00), and it is further

ORDERED that judgment be and it is entered on behalf of Plaintiff, SHAUL STERN, Individually and as legal representative of the Estate of Leah Stern against Defendants, The Islamic Republic of Iran, the Iranian Ministry of Information and Security, Ayatollah Ali Hoseini Khamenei, Ali Akbar Hashemi-Rafsanjani and Ali Fallahian-Khuzestani, jointly and severally, for the conscious pain and suffering of Leah Stern in the amount of ONE MILLION DOLLARS (\$1,000,000.00), and it is further

ORDERED that judgment be and it is entered on behalf of Plaintiff, SHAUL STERN, Individually and as legal representative of the Estate of Leah Stern against Defendants, the Iranian Ministry of Information and Security, Ayatollah Ali Hoseini Khamenei, Ali Akbar Hashemi-Rafsanjani and Ali Fallahian-Khuzestani, jointly and severally, for punitive damages in the amount of THREE HUNDRED MILLION DOLLARS (\$300,000,000.00), and it is further

ORDERED that the caption in this matter is amended so that it appears as follows:

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SHAUL STERN, Individually and as legal representative  
of the Estate of LEAH STERN, JOSEPH STERN,  
SHIMSON STERN, YOCHEVED KUSHNER,

Plaintiffs,

-against-

THE ISLAMIC REPUBLIC OF IRAN,  
(aka Iran, The Republic of Iran, Republic of Iran, The  
Government of Iran, Iranian Government, and  
Imperial Government of Iran)  
THE IRANIAN MINISTRY OF INFORMATION  
AND SECURITY, AYATOLLAH ALI HOSEINI  
KHAMENEI, ALI AKBAR HASHEMI-RAFSANJANI, and  
ALI FALLAHIAN-KHUZESTANI,

Defendants.

; and it is further

ORDERED that the Clerk of Court shall cause a copy of this Order and Judgment and the accompanying Findings of Fact and Conclusions of Law to be transmitted to the United States Department of State, to be translated into Farsi for diplomatic service upon the Defendants in accordance with the provisions of 28 U.S.C. §1608, with the costs of translation to be paid by the Plaintiffs.

SO ORDERED.

DATE: 7-17-03

  
Royce C. Lamberth  
United States District Judge

PAGES A200 TO A202 INTENTIONALLY OMITTED FROM APPENDIX

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

Shaul Stern, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 00-2602-RCL
	)	
The Islamic Republic of Iran, et al.,	)	<b>HEARING REQUEST</b>
	)	
Defendants.	)	
	)	
	)	
	)	

**INTERNET CORPORATION FOR ASSIGNED NAME AND NUMBERS’  
MOTION TO QUASH WRIT OF ATTACHMENT**

The Internet Corporation for Assigned Names and Numbers (“ICANN”), a non-party, by counsel, respectfully moves this Court to quash the Writ of Attachment on Judgment Other Than Wages, Salary And Commissions (“Writ of Attachment”) issued by Plaintiffs in the above-entitled action, for the reasons set forth in ICANN’s accompanying Memorandum.<sup>1</sup>

Furthermore, ICANN, in accordance with Local Civil Rule 78.1, requests that an oral hearing be scheduled to inform the Court’s ruling on the Motion.

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<sup>1</sup> Plaintiffs issued to ICANN, and ICANN is moving to quash, writs of attachment in seven actions: (1) *Rubin, et al. v. Islamic Republic of Iran, et al.*, Case No. 01-1655-RMU; (2) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 02-1811-RCL; (3) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 08-520-RCL; (4) *Stern, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2602-RCL; (5) *Weinstein, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2601-RCL; (6) *Wyatt, et al. v. Syrian Arab Republic, et al.*, Case No. 08-502-RCL; and (7) *Calderon-Cardona, et al. v. Democratic People’s Republic of North Korea, et al.*, Case No. 14-mc-648-RCL. All of these actions were assigned to this Court, with the exception of the *Calderon-Cardona* matter, which is unassigned, and the *Rubin* matter, which was assigned to now-retired Judge Ricardo M. Urbina and has not been re-assigned to another Judge. Accordingly, ICANN has filed a Motion to Consolidate Consideration of, and Hearing on, ICANN’s Motions to Quash requesting that this Court consider and rule upon all of ICANN’s Motions to Quash, including the motion filed in the *Calderon-Cardona* and *Rubin* cases.



Case 1:00-cv-02602-RCL Document 31 Filed 07/30/14 Page 2 of 3

Dated: July 29, 2014

Respectfully submitted,

*/s/ Tara Lynn R. Zurawski*

---

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CORPORATION FOR ASSIGNED NAMES  
AND NUMBERS*

Case 1:00-cv-02602-RCL Document 31 Filed 07/30/14 Page 3 of 3

**CERTIFICATE OF SERVICE**

I certify that on July 29, 2014, I filed the foregoing Motion To Quash Writ of Attachment, and a [Proposed] Order thereon, with the Clerk of the Court for the U.S. District Court for the District of Columbia using its CM/ECF System, and I caused to be served one copy of the foregoing Motion by First Class Mail, postage prepaid, on the following:

Robert J. Tolchin  
Berkman Law Office, LLC  
111 Livingston Street, Suite 1928  
Brooklyn, NY 11201

*Counsel for Plaintiffs*

/s/ Tara Lynn R. Zurawski

Tara Lynn R. Zurawski (DC Bar No. 980960)

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF COLUMBIA

SHAUL STERN, Individually and as legal )  
representative of the Estate of LEAH STERN, )  
JOSEPH STERN, SHIMSON STERN, and )  
YOCHEVED KUSHNER, )

Plaintiffs )

v. )

THE ISLAMIC REPUBLIC OF IRAN, THE )  
IRANIAN MINISTRY OF INFORMATION )  
AND SECURITY, AYATOLLAH ALI )  
HOSEINI KHARNENEI, Supreme Leader of )  
the Islamic Republic of Iran, ALI AKBAR )  
HASHEMI-RAFSANJANI, Former President )  
of the Islamic Republic of Iran, and ALI )  
FALLAHIAN-KHUZESTANI, Former )  
Minister of Information and Security, )

Defendants )

Case No. 1:00-cv-2602-RCL

**NOTICE OF APPEAL**

Notice is hereby given that SHAUL STERN, Individually and as legal representative of the Estate of LEAH STERN, JOSEPH STERN, SHIMSON STERN, and YOCHEVED KUSHNER (the "Plaintiffs"), judgment creditor plaintiffs in the above named case, hereby appeal to the United States Court of Appeals for the District of Columbia Circuit from an order quashing Plaintiffs' writs of attachment to third party the Internet Corporation for Assigned Names and Numbers and denying Plaintiffs' motion for discovery and related relief, entered in this action on November 12, 2014. The Plaintiffs appeal from each and every part of that order.

Case 1:00-cv-02602-RCL Document 53 Filed 12/12/14 Page 2 of 2

Date: December 12, 2014

Respectfully submitted,

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District of Columbia live database

Page 1 of 10

APPEAL

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:14-mc-00648-RCL**

CALDERON-CARDONA et al v. DEMOCRATIC  
PEOPLE'S REPUBLIC OF KOREA et al  
Assigned to: Judge Royce C. Lamberth  
Case in other court: USDC for the District of Puerto Rico,  
08-cv-1367(FAB)  
USCA, 14-07204  
Cause: Registration of Foreign Judgment

Date Filed: 06/20/2014  
Jury Demand: None  
Nature of Suit: 890 Other Statutory  
Actions  
Jurisdiction: Federal Question

**Plaintiff****RUTH CALDERON-CARDONA**

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*LEAD ATTORNEY*  
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**Plaintiff****LUZ CALDERON-CARDONA**

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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
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**Plaintiff**

**LUIS CALDERON-CARDONA**

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*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
(See above for address)  
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*ATTORNEY TO BE NOTICED*

**Plaintiff**

**GLORIA CALDERON-CARDONA**

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**Robert Joseph Tolchin**  
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**Plaintiff**

**JOSE RAUL CALDERON-CARDONA**

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*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
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*LEAD ATTORNEY*  
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**Plaintiff**

**ANA DELIA CALDERON-CARDONA**

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*ATTORNEY TO BE NOTICED*

**Robert Joseph Tolchin**  
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**Plaintiff**

**HILDA CALDERON-CARDONA**

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**Plaintiff**

**ANGEL CALDERON-GUZMAN**

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**Plaintiff**

**MIGUEL CALDERON-GUZMAN**

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**Plaintiff**

**SALVADOR CALDERON-  
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**Plaintiff**

**PABLO TIRADO-AYALA**

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**Robert Joseph Tolchin**

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**Plaintiff**

**ANTONIA RAMIREZ-FIERO**

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**Robert Joseph Tolchin**  
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*ATTORNEY TO BE NOTICED*

V.

**Defendant**

**DEMOCRATIC PEOPLE'S  
REPUBLIC OF KOREA**

**Defendant**

**CABINET GENERAL  
INTELLIGENCE BUREAU**

**Defendant**

**JOHN DOE**

V.

**Garnishee**

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Date Filed	#	Docket Text
06/20/2014	<a href="#">1</a>	REGISTRATION of Foreign Judgment from USDC for the District of Puerto Rico (Case Number 08-cv-1367FAB) ( Filing fee \$ 46 receipt number 4616064340.) filed by LUIS CALDERON-CARDONA, ANGEL CALDERON-GUZMAN, GLORIA CALDERON-CARDONA, ANA DELIA CALDERON-CARDONA, MIGUEL CALDERON-GUZMAN, PABLO TIRADO-AYALA, ANTONIA RAMIREZ-FIERO, JOSE RAUL CALDERON-CARDONA, RUTH CALDERON-CARDONA, SALVADOR CALDERON-MARTINEZ, HILDA CALDERON-CARDONA, LUZ CALDERON-CARDONA. (Attachments: # <a href="#">1</a> Cover Letter)(kb) (Entered: 06/23/2014)
07/07/2014	<a href="#">3</a>	Consent MOTION for Extension of Time to <i>RESPOND TO WRIT OF ATTACHMENT AND RELATED SUBPOENA</i> by INTERNET CORPORATION (Attachments: # <a href="#">1</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/07/2014)
07/28/2014	<a href="#">4</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Eric Enson, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792129. Fee Status: Fee Paid. by INTERNET CORPORATION (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order) (Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">5</a>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Jeffrey LeVee, :Firm- Jones Day, :Address- 555 S. Flower St., 50th Floor, Los Angeles, CA 90071. Phone No. - 213.243.2304. Fax No. - 213.243.2539 Filing fee \$ 100, receipt number 0090-3792137. Fee Status: Fee Paid. by INTERNET CORPORATION (Attachments: # <a href="#">1</a> Declaration, # <a href="#">2</a> Text of Proposed Order)

		(Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/28/2014	<a href="#">6</a>	OBJECTIONS to Answer to Writ by INTERNET CORPORATION. (Zurawski, Tara Lynn) (Entered: 07/28/2014)
07/29/2014	<a href="#">7</a>	MOTION to Quash by INTERNET CORPORATION (Attachments: # <a href="#">1</a> Memorandum in Support, # <a href="#">2</a> Declaration Jeffrey, # <a href="#">3</a> Declaration Enson, # <a href="#">4</a> Text of Proposed Order)(Zurawski, Tara Lynn) (Entered: 07/29/2014)
07/29/2014	<a href="#">8</a>	MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT by INTERNET CORPORATION (Attachments: # <a href="#">1</a> Text of Proposed Order) (Zurawski, Tara Lynn) (Entered: 07/30/2014)
07/30/2014	<a href="#">9</a>	ORDER granting <a href="#">5</a> Motion for Leave to Appear Pro Hac Vice of Jeffrey A. LeVec. Signed by Judge Colleen Kollar-Kotelly on 7/30/14. (dot ) (Entered: 07/30/2014)
07/30/2014	<a href="#">10</a>	ORDER granting <a href="#">4</a> Motion for Leave to Appear Pro Hac Vice of Eric P. Enson. Signed by Judge Colleen Kollar-Kotelly on 7/30/14. (dot ) (Entered: 07/30/2014)
07/30/2014	<a href="#">11</a>	ORDER granting nunc pro tunc <a href="#">3</a> Motion for Extension of Time to response to the writ of attachment and subpoena is due on 7/28/2014. Plaintiffs' time to apply for a judgment against ICANN, under D.C. Superior Court Civil Rule 69-I(e), shall not begin to run until the parties agree, or absent such agreement until the Court has determined, that ICANN has fulfilled its obligations in response to the Subpoena and in no event shall such period expire before 9/8/2014. Plaintiffs' lien is correspondingly granted. Signed by Judge Colleen Kollar-Kotelly on 7/30/14. (dot ) (Entered: 07/30/2014)
08/04/2014	<a href="#">12</a>	Consent MOTION for Extension of Time to <i>Superseding Previous Consent Motion For an Extension of Time to Respond to Writ of Attachment and Related Subpoena</i> by ANA DELIA CALDERON-CARDONA, GLORIA CALDERON-CARDONA, HILDA CALDERON-CARDONA, JOSE RAUL CALDERON-CARDONA, LUIS CALDERON-CARDONA, LUZ CALDERON-CARDONA, RUTH CALDERON-CARDONA, ANGEL CALDERON-GUZMAN, MIGUEL CALDERON-GUZMAN, SALVADOR CALDERON-MARTINEZ, ANTONIA RAMIREZ-FIERO, PABLO TIRADO-AYALA (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/04/2014)
08/11/2014	<a href="#">13</a>	WITHDRAWN PER ORDER FILED 9/9/2014.....MOTION to Compel <i>Production of Documents in Response to Subpoena</i> by ANA DELIA CALDERON-CARDONA, GLORIA CALDERON-CARDONA, HILDA CALDERON-CARDONA, JOSE RAUL CALDERON-CARDONA, LUIS CALDERON-CARDONA, LUZ CALDERON-CARDONA, RUTH CALDERON-CARDONA, ANGEL CALDERON-GUZMAN, MIGUEL CALDERON-GUZMAN, SALVADOR CALDERON-MARTINEZ, ANTONIA RAMIREZ-FIERO, PABLO TIRADO-AYALA (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Text of Proposed Order)(Tolchin, Robert)

		Modified on 9/9/2014 (zmm, ). (Entered: 08/11/2014)
08/11/2014	<a href="#">14</a>	MOTION for Extension of Time to File Response/Reply as to <a href="#">7</a> MOTION to Quash by ANA DELIA CALDERON-CARDONA, GLORIA CALDERON-CARDONA, HILDA CALDERON-CARDONA, JOSE RAUL CALDERON-CARDONA, LUIS CALDERON-CARDONA, LUZ CALDERON-CARDONA, RUTH CALDERON-CARDONA, ANGEL CALDERON-GUZMAN, MIGUEL CALDERON-GUZMAN, SALVADOR CALDERON-MARTINEZ, ANTONIA RAMIREZ-FIERO, PABLO TIRADO-AYALA (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tolchin, Robert) (Entered: 08/11/2014)
08/13/2014	<a href="#">16</a>	ORDER: Upon consideration of Internet Corporation for Assigned Names and Numbers("ICANN") and Plaintiffs' Consent Motion Superseding Previous Consent Motion for an Extension of Time to Respond to Writ of Attachment and Related Subpoena, and good cause appearing, it is hereby ORDERED that ICANN and Plaintiffs' Consent Motion is GRANTED. ICANN's response to the writ of attachment and subpoena was due and filed on July 28, 2014. Plaintiff's time period pursuant to D.C. Superior Court Civil Rule 69-I(d) and (e) shall not begin to run until the parties agree, or absent such agreement, until the Court has determined, that ICANN has fulfilled its obligation in response to the Subpoena and in no event shall such periods expire before September 8, 2014. Plaintiff's lien is correspondingly extended unless ICANN's to Quash, filed on July 29, 2014, is granted. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr). (Entered: 08/13/2014)
08/13/2014	<a href="#">15</a>	ORDER granting (71) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:08-cv-00502-RCL; granting (45) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:08-cv-00520-RCL; granting (107) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:01-cv-01655-RMU; granting (8) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:14-mc-00648-UNA; granting (48) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:02-cv-01811-RCL; granting (90) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02601-RCL; granting (30) MOTION TO CONSOLIDATE CONSIDERATION OF, AND HEARING ON, ICANN'S MOTIONS TO QUASH PLAINTIFFS' WRITS OF ATTACHMENT in case 1:00-cv-02602-RCL; The Court will consolidate the consideration of, and hearing on, all seven of ICANN's Motion to Quash, including the motion filed in civil case number 01-1655(RMU) and miscellaneous case number 14-648 (UNA); and it is further ORDERED that the Clerk of the Court shall transfer civil case number 01-1655 (RMU) and

		miscellaneous case number 14-648 (UNA) to this Court for further proceedings. Signed by Judge Royce C. Lamberth on 8/12/2014. (tcr) . (Entered: 08/13/2014)
08/14/2014		Case reassigned to Judge Royce C. Lamberth pursuant to order issued 8/12/14. Unassigned no longer assigned to the case. (ztnr, ) (Entered: 08/14/2014)
08/18/2014	<a href="#">17</a>	Memorandum in opposition to re <a href="#">14</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">7</a> MOTION to Quash filed by INTERNET CORPORATION. (Attachments: # <a href="#">1</a> Proposed Order, # <a href="#">2</a> Declaration of Eric Enson)(Francisco, Noel) (Entered: 08/18/2014)
08/28/2014	<a href="#">18</a>	REPLY to opposition to motion re <a href="#">14</a> MOTION for Extension of Time to File Response/Reply as to <a href="#">7</a> MOTION to Quash filed by ANA DELIA CALDERON-CARDONA, GLORIA CALDERON-CARDONA, HILDA CALDERON-CARDONA, JOSE RAUL CALDERON-CARDONA, LUIS CALDERON-CARDONA, LUZ CALDERON-CARDONA, RUTH CALDERON-CARDONA, ANGEL CALDERON-GUZMAN, MIGUEL CALDERON-GUZMAN, SALVADOR CALDERON-MARTINEZ, ANTONIA RAMIREZ-FIERO, PABLO TIRADO-AYALA. (Attachments: # <a href="#">1</a> Exhibit A)(Tolchin, Robert) (Entered: 08/28/2014)
08/28/2014	<a href="#">19</a>	Memorandum in opposition to re <a href="#">13</a> MOTION to Compel <i>Production of Documents in Response to Subpoena</i> filed by INTERNET CORPORATION. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order) (Francisco, Noel) (Entered: 08/28/2014)
08/29/2014	<a href="#">20</a>	ORDER Granting <a href="#">14</a> Motion for Extension of Time to File Response/Reply re <a href="#">7</a> MOTION to Quash Writs of Attachment for Assigned Names and Numbers shall be due by 9/30/14. Signed by Judge Royce C. Lamberth on 8/28/14. (mpt, ) (Entered: 08/29/2014)
09/08/2014	<a href="#">21</a>	Consent MOTION Plaintiffs' Motion to Compel by INTERNET CORPORATION (Attachments: # <a href="#">1</a> Text of Proposed Order)(Francisco, Noel) (Entered: 09/08/2014)
09/09/2014	<a href="#">22</a>	ORDER granting <a href="#">21</a> Motion Regarding Plaintiffs' Motion to Compel. Plaintiffs' Motion to Compel is ordered withdrawn. Signed by Judge Royce C. Lamberth on 9/9/2014. (zmm, ) (Entered: 09/09/2014)
09/16/2014	<a href="#">23</a>	STIPULATION [ <i>PROPOSED</i> ] <i>PROTECTIVE ORDER</i> by INTERNET CORPORATION. (Francisco, Noel) (Entered: 09/16/2014)
09/19/2014	<a href="#">24</a>	STIPULATED PROTECTIVE ORDER setting forth procedures for handling confidential material; signed by Judge Royce C. Lamberth on 9/18/14. (Attachment: Exhibit A) (kk) (Entered: 09/19/2014)
09/28/2014	<a href="#">25</a>	MOTION for Discovery , MOTION for Extension of Time to File Response/Reply as to <a href="#">7</a> MOTION to Quash by ANA DELIA CALDERON-CARDONA, GLORIA CALDERON-CARDONA, HILDA CALDERON-CARDONA, JOSE RAUL CALDERON-CARDONA, LUIS CALDERON-CARDONA, LUZ CALDERON-CARDONA, RUTH CALDERON-

		CARDONA, ANGEL CALDERON-GUZMAN, MIGUEL CALDERON-GUZMAN, SALVADOR CALDERON-MARTINEZ, ANTONIA RAMIREZ-FIERO, PABLO TIRADO-AYALA (Attachments: # <a href="#">1</a> Declaration Erik S. Syverson, # <a href="#">2</a> Declaration Steven T. Gebelin)(Tolchin, Robert) (Entered: 09/28/2014)
09/30/2014	<a href="#">26</a>	RESPONSE re <a href="#">7</a> MOTION to Quash <i>Writ of Attachment</i> filed by ANA DELIA CALDERON-CARDONA, GLORIA CALDERON-CARDONA, HILDA CALDERON-CARDONA, JOSE RAUL CALDERON-CARDONA, LUIS CALDERON-CARDONA, LUZ CALDERON-CARDONA, RUTH CALDERON-CARDONA, ANGEL CALDERON-GUZMAN, MIGUEL CALDERON-GUZMAN, SALVADOR CALDERON-MARTINEZ, ANTONIA RAMIREZ-FIERO, PABLO TIRADO-AYALA. (Syverson, Erik) (Entered: 09/30/2014)
10/10/2014	<a href="#">27</a>	REPLY to opposition to motion re <a href="#">7</a> MOTION to Quash filed by INTERNET CORPORATION. (Francisco, Noel) (Entered: 10/10/2014)
10/14/2014	<a href="#">28</a>	Memorandum in opposition to re <a href="#">25</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply as to <a href="#">7</a> MOTION to Quash filed by INTERNET CORPORATION. (Attachments: # <a href="#">1</a> Declaration of Eric Enson, # <a href="#">2</a> Text of Proposed Order)(Francisco, Noel) (Entered: 10/14/2014)
10/24/2014	<a href="#">29</a>	REPLY to opposition to motion re <a href="#">25</a> MOTION for Discovery MOTION for Extension of Time to File Response/Reply as to <a href="#">7</a> MOTION to Quash filed by ANA DELIA CALDERON-CARDONA, GLORIA CALDERON-CARDONA, HILDA CALDERON-CARDONA, JOSE RAUL CALDERON-CARDONA, LUIS CALDERON-CARDONA, LUZ CALDERON-CARDONA, RUTH CALDERON-CARDONA, ANGEL CALDERON-GUZMAN, MIGUEL CALDERON-GUZMAN, SALVADOR CALDERON-MARTINEZ, ANTONIA RAMIREZ-FIERO, PABLO TIRADO-AYALA. (Syverson, Erik) (Entered: 10/24/2014)
11/10/2014	<a href="#">30</a>	ORDER Granting <a href="#">25</a> Motion for Discovery; Denied as Moot <a href="#">25</a> Motion for Discovery and writs of attachment as to ICANN are quashed.Signed by Judge Royce C. Lamberth on 11/10/14. (mpt, ) (Entered: 11/12/2014)
11/10/2014	<a href="#">31</a>	MEMORANDUM AND OPINION. Signed by Judge Royce C. Lamberth on 11/10/14. (mpt, ) (Entered: 11/12/2014)
12/12/2014	<a href="#">32</a>	NOTICE OF APPEAL TO DC CIRCUIT COURT as to <a href="#">30</a> Order on Motion for Discovery, Order on Motion for Extension of Time to File Response/Reply, Order on Motion to Quash by ANA DELIA CALDERON-CARDONA, GLORIA CALDERON-CARDONA, HILDA CALDERON-CARDONA, JOSE RAUL CALDERON-CARDONA, LUIS CALDERON-CARDONA, LUZ CALDERON-CARDONA, RUTH CALDERON-CARDONA, ANGEL CALDERON-GUZMAN, MIGUEL CALDERON-GUZMAN, SALVADOR CALDERON-MARTINEZ, ANTONIA RAMIREZ-FIERO, PABLO TIRADO-AYALA. Filing fee \$ 505, receipt number 0090-3934512. Fee Status: Fee Paid. Parties have been notified. (Syverson, Erik) (Entered: 12/12/2014)

12/15/2014	<a href="#">33</a>	Transmission of the Notice of Appeal, Order Appealed, and Docket Sheet to US Court of Appeals. The Court of Appeals fee was paid this date re <a href="#">32</a> Notice of Appeal to DC Circuit Court. (rdj) (Entered: 12/15/2014)
12/23/2014		USCA Case Number 14-7204 for <a href="#">32</a> Notice of Appeal to DC Circuit Court,, filed by RUTH CALDERON-CARDONA, LUZ CALDERON-CARDONA, MIGUEL CALDERON-GUZMAN, ANA DELIA CALDERON-CARDONA, JOSE RAUL CALDERON-CARDONA, ANTONIA RAMIREZ-FIERO, SALVADOR CALDERON-MARTINEZ, PABLO TIRADO-AYALA, LUIS CALDERON-CARDONA, HILDA CALDERON-CARDONA, ANGEL CALDERON-GUZMAN, GLORIA CALDERON-CARDONA. (rd) (Entered: 12/24/2014)

<b>PACER Service Center</b>			
<b>Transaction Receipt</b>			
06/01/2015 15:16:22			
<b>PACER Login:</b>	php10east0660:2616006:0	<b>Client Code:</b>	
<b>Description:</b>	Docket Report	<b>Search Criteria:</b>	1:14-mc-00648-RCL
<b>Billable Pages:</b>	8	<b>Cost:</b>	0.80

Case 1:14-mc-00648-RCL Document 1 Filed 06/20/14 Page 1 of 6

AO 451 (Rev. 12/12) Clerk's Certification of a Judgment to be Registered in Another District

**UNITED STATES DISTRICT COURT**  
for the  
District of Puerto Rico

**FILED**  
**JUN 20 2014**  
Clerk, U.S. District and  
Bankruptcy Courts

Ruth Calderon Cardona, et al., )  
Plaintiff )  
v. )  
Democratic People's Republic of Korea, et al., )  
Defendant )

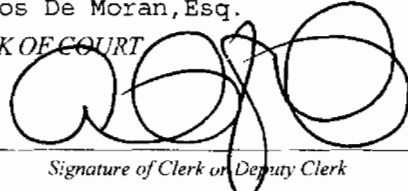
Civil Action No. 08-cv-1367(FAB)

**CLERK'S CERTIFICATION OF A JUDGMENT TO BE REGISTERED IN ANOTHER DISTRICT**

I certify that the attached judgment is a copy of a judgment entered by this court on (date) 08/05/2010

I also certify that, as appears from this court's records, no motion listed in Fed. R. App. P. 4(a)(4)(A) is pending before this court, the time for appeal has expired, and no appeal has been filed or, if one was filed, it is no longer pending.

Date: 06/17/2014

Frances Rios De Moran, Esq.  
CLERK OF COURT  
  
Signature of Clerk or Deputy Clerk

Case: 1:14-mc-00648  
Assigned To : Unassigned  
Assign. Date : 6/20/2014  
Description: Miscellaneous

*Fee Pd  
\$46.00*

RECEIVED  
Mail Room  
**JUN 20 2014**  
Angela D. Casar, Clerk of Court  
U.S. District Court, District of Columbia

Case 1:14-mc-00648-RCL Document 1 Filed 06/20/14 Page 2 of 6  
Case 3:08-cv-01367-FAB Document 40 Filed 08/05/10 Page 1 of 5

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

RUTH CALDERON-CARDONA,  
LUZ CALDERON-CARDONA,  
LUIS CALDERON-CARDONA,  
GLORIA CALDERON-CARDONA,  
JOSE RAUL CALDERON-CARDONA,  
ANA DELIA CALDERON-CARDONA,  
HILDA CALDERON-CARDONA,  
ANGEL CALDERON-GUZMAN,  
MIGUEL CALDERON-GUZMAN,  
SALVADOR CALDERON-MARTINEZ,  
PABLO TIRADO-AYALA,  
ANTONIA RAMIREZ-FIERO,  
**Plaintiffs,**

**v.**

**CIVIL NO. 08-1367 (FAB)**

DEMOCRATIC PEOPLE'S REPUBLIC  
OF KOREA, CABINET GENERAL  
INTELLIGENCE BUREAU, JOHN DOE,  
**Defendants.**

**AMENDED JUDGMENT**

In accordance with the order issued on July 16, 2010 (Docket No. 37), it is on August 5, 2010,

**ORDERED** that judgment be and is entered in favor of plaintiff Ruth Calderon-Cardona, in her individual capacity, against defendants DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA and CABINET GENERAL INTELLIGENCE BUREAU, jointly and severally, for compensatory damages in the amount of \$5,000,000.00 (five million dollars); and it is



Case 1:14-mc-00648-RCL Document 1 Filed 06/20/14 Page 3 of 6

Case 3:08-cv-01367-FAB Document 40 Filed 08/05/10 Page 2 of 5

Civil No. 08-1367 (FAB)

2

**FURTHER ORDERED** that judgment be and is entered in favor of plaintiff Ruth Calderon-Cardona, in her capacity as personal representative of the Estate of Eladia Cardona-Rosario, against defendants DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA and CABINET GENERAL INTELLIGENCE BUREAU, jointly and severally, for compensatory damages in the amount of \$8,000,000.00 (eight million dollars); and it is

**FURTHER ORDERED** that judgment be and is entered in favor of plaintiff Luz Calderon-Cardona, against defendants DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA and CABINET GENERAL INTELLIGENCE BUREAU, jointly and severally, for compensatory damages in the amount of \$5,000,000.00 (five million dollars); and it is

**FURTHER ORDERED** that judgment be and is entered in favor of plaintiff Luis Calderon-Cardona, against defendants DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA and CABINET GENERAL INTELLIGENCE BUREAU, jointly and severally, for compensatory damages in the amount of \$5,000,000.00 (five million dollars); and it is

**FURTHER ORDERED** that judgment be and is entered in favor of plaintiff Gloria Calderon-Cardona, against defendants DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA and CABINET GENERAL INTELLIGENCE BUREAU, jointly and severally, for compensatory damages in the amount of \$5,000,000.00 (five million dollars); and it is

Case 1:14-mc-00648-RCL Document 1 Filed 06/20/14 Page 4 of 6

Case 3:08-cv-01367-FAB Document 40 Filed 08/05/10 Page 3 of 5

Civil No. 08-1367 (FAB)

3

**FURTHER ORDERED** that judgment be and is entered in favor of plaintiff Jose Raul Calderon-Cardona, against defendants DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA and CABINET GENERAL INTELLIGENCE BUREAU, jointly and severally, for compensatory damages in the amount of \$5,000,000.00 (five million dollars); and it is

**FURTHER ORDERED** that judgment be and is entered in favor of plaintiff Ana Delia Calderon-Cardona, against defendants DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA and CABINET GENERAL INTELLIGENCE BUREAU, jointly and severally, for compensatory damages in the amount of \$5,000,000.00 (five million dollars); and it is

**FURTHER ORDERED** that judgment be and is entered in favor of plaintiff Hilda Calderon-Cardona, against defendants DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA and CABINET GENERAL INTELLIGENCE BUREAU, jointly and severally, for compensatory damages in the amount of \$5,000,000.00 (five million dollars); and it is

**FURTHER ORDERED** that judgment be and is entered in favor of plaintiff Salvador Calderon-Martinez, against defendants DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA and CABINET GENERAL INTELLIGENCE BUREAU, jointly and severally, for compensatory damages in the amount of \$5,000,000.00 (five million dollars); and it is

**FURTHER ORDERED** that judgment be and is entered in favor of plaintiffs Angel Calderon-Guzman and Miguel Calderon-Guzman, in

Case 1:14-mc-00648-RCL Document 1 Filed 06/20/14 Page 5 of 6

Case 3:08-cv-01367-FAB Document 40 Filed 08/05/10 Page 4 of 5

Civil No. 08-1367 (FAB) 4

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their capacity as personal representatives of the Estate of Miguel Calderon-Cardona, against defendants DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA and CABINET GENERAL INTELLIGENCE BUREAU, jointly and severally, for compensatory damages in the amount of \$5,000,000.00 (five million dollars); and it is

**FURTHER ORDERED** that judgment be and is entered in favor of plaintiff Angel Luis Ramirez-Colon in his capacity as personal representative of the Estate of Pablo Tirado-Ayala, against defendants DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA and CABINET GENERAL INTELLIGENCE BUREAU, jointly and severally, for compensatory damages in the amount of \$15,000,000.00 (fifteen million dollars); and it is

**FURTHER ORDERED** that judgment be and is entered in favor of plaintiff Antonia Ramirez-Fiero, against defendants DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA and CABINET GENERAL INTELLIGENCE BUREAU, jointly and severally, for compensatory damages in the amount of \$10,000,000.00 (ten million dollars); and it is

**FURTHER ORDERED** that judgment be and is entered on behalf of all plaintiffs collectively against defendants DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA and CABINET GENERAL INTELLIGENCE BUREAU, jointly and severally, for punitive damages in the amount of

Case 1:14-mc-00648-RCL Document 1 Filed 06/20/14 Page 6 of 6  
Case 3:08-cv-01367-FAB Document 40 Filed 08/05/10 Page 5 of 5

Civil No. 08-1367 (FAB) \_\_\_\_\_ 5

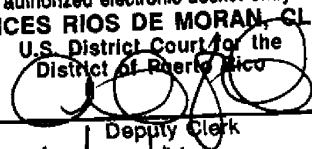
\$300,000,000.00 (three hundred million dollars), to be divided equally by the plaintiffs; and it is

**FURTHER ORDERED** that defendants JOHN DOES 1-10 shall be and hereby are **DISMISSED** from this action **WITH PREJUDICE**.

**IT IS SO ORDERED.**

San Juan, Puerto Rico, August 5, 2010.

s/ Francisco A. Besosa  
FRANCISCO A. BESOSA  
UNITED STATES DISTRICT JUDGE

Certified to be a true & exact copy of the document,  
or, an authorized electronic docket entry on file  
**FRANCES RIOS DE MORAN, CLERK**  
U.S. District Court for the  
District of Puerto Rico  
By:  Deputy Clerk  
Date: 6/17/14

Case 1:14-mc-00648-RCL Document 1-1 Filed 06/20/14 Page 1 of 1

**THE BERKMAN LAW OFFICE, LLC**

111 Livingston Street, Suite 1928  
Brooklyn, New York 11201

Tel: (718) 855-3627

Fax: (718) 855-4696

May 22, 2104

United States District Court  
For the District of Columbia  
333 Constitution Avenue NW  
Washington, D.C. 20001  
Attn: Clerk of Court

**Re: Calderon v. Democratic People's Republic of Korea,  
Case No. 08-1367 (FAB) (D.P.R.)**

Dear Sir or Madam:

Enclosed herewith, please find a certified copy of the Amended Judgment dated August 5, 2010 obtained in the District Court for the District of Puerto Rico with regards to the above captioned matter, along with a check in the amount of \$ 46.00 dollars made payable to The Clerk of the District Court, as payment for the filing fee.

I hereby request that the enclosed judgment be registered in the District Court for the District of Columbia for purposes of judgment enforcement. An envelope is enclosed.

In addition, I would appreciate your sending me the filing confirmation at the above address at your earliest convenience.

Should you have any questions with reference to the above, please do not hesitate to contact my office at (718) 855-3627.

Thank you for your courtesy and cooperation in this matter.

Very truly yours,



Robert J. Tolchin



Case 1:14-mc-00648-RCL Document 7 Filed 07/29/14 Page 1 of 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

Ruth Calderon-Cardona, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 14-mc-648
	)	
Democratic People's Republic of Korea, <i>et al.</i> ,	)	<b>HEARING REQUEST</b>
	)	
Defendants.	)	
	)	
	)	

**INTERNET CORPORATION FOR ASSIGNED NAME AND NUMBERS'  
MOTION TO QUASH WRIT OF ATTACHMENT**

The Internet Corporation for Assigned Names and Numbers (“ICANN”), a non-party, by counsel, respectfully moves this Court to quash the Writ of Attachment on Judgment Other Than Wages, Salary And Commissions (“Writ of Attachment”) issued by Plaintiffs in the above-entitled action, for the reasons set forth in ICANN’s accompanying Memorandum.<sup>1</sup>

Furthermore, ICANN, in accordance with Local Civil Rule 78.1, requests that an oral hearing be scheduled to inform the Court’s ruling on the Motion.

---

<sup>1</sup> Plaintiffs issued to ICANN, and ICANN is moving to quash, writs of attachment in seven actions: (1) *Rubin, et al. v. Islamic Republic of Iran, et al.*, Case No. 01-1655-RMU; (2) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 02-1811-RCL; (3) *Haim, et al. v. Islamic Republic of Iran, et al.*, Case No. 08-520-RCL; (4) *Stern, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2602-RCL; (5) *Weinstein, et al. v. Islamic Republic of Iran, et al.*, Case No. 00-2601-RCL; (6) *Wyatt, et al. v. Syrian Arab Republic, et al.*, Case No. 08-502-RCL; and (7) *Calderon-Cardona, et al. v. Democratic People’s Republic of North Korea, et al.*, Case No. 14-mc-648-RCL. All of these actions were assigned to this Court, with the exception of the *Calderon-Cardona* matter, which is unassigned, and the *Rubin* matter, which was assigned to now-retired Judge Ricardo M. Urbina, but has not been re-assigned to another Judge. Accordingly, ICANN has filed a Motion to Consolidate Consideration of, and Hearing on, ICANN’s Motions to Quash requesting that this Court consider and rule upon all of ICANN’s Motions to Quash, including the motions filed in the *Calderon-Cardona* and *Rubin* cases.

Case 1:14-mc-00648-RCL Document 7 Filed 07/29/14 Page 2 of 3

Dated: July 28, 2014

Respectfully submitted,

*/s/ Tara Lynn R. Zurawski*

---

Tara Lynn R. Zurawski (DC Bar No. 980960)  
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51 Louisiana Avenue, NW  
Washington, DC 20001-2113  
Telephone: (202) 879-2113  
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Jeffrey A. Levee (*pro hac vice* to be filed)  
Eric P. Enson (*pro hac vice* to be filed)  
JONES DAY  
555 South Flower Street, 50th Floor  
Los Angeles, CA 90071  
Telephone: (213) 243-2572  
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Email: epenson@jonesday.com

*Counsel for Non-Party INTERNET  
CORPORATION FOR ASSIGNED NAMES  
AND NUMBERS*

Case 1:14-mc-00648-RCL Document 7 Filed 07/29/14 Page 3 of 3

**CERTIFICATE OF SERVICE**

I certify that on July 28, 2014, I filed the foregoing Motion To Quash Writ of Attachment, and a [Proposed] Order thereon, with the Clerk of the Court for the U.S. District Court for the District of Columbia using its CM/ECF System, and I caused to be served one copy of the foregoing Motion by First Class Mail, postage prepaid, on the following:

Robert J. Tolchin  
Berkman Law Office, LLC  
111 Livingston Street, Suite 1928  
Brooklyn, NY 11201

*Counsel for Plaintiffs*

/s/ Tara Lynn R. Zurawski

Tara Lynn R. Zurawski (DC Bar No. 980960)



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
Ruth Calderon-Cardona, <i>et al.</i> ,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 14-mc-648-UNA
	)	
The Democratic People’s Republic of North	)	
Korea, <i>et al.</i> ,	)	
	)	
Defendant.	)	
_____	)	

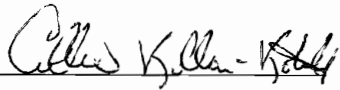
**ORDER**

Upon consideration of Internet Corporation for Assigned Names and Numbers (“ICANN”) and Plaintiffs’ Consent Motion For an Extension of Time to Respond to Writ of Attachment and Related Subpoena, and good cause appearing, it is hereby:

**ORDERED** that ICANN and Plaintiffs’ Consent Motion is **GRANTED**. ICANN’s response to the writ of attachment and subpoena is due on July 28, 2014. Plaintiffs’ time to apply for a judgment against ICANN, under D.C. Superior Court Civil Rule 69-I(e), shall not begin to run until the parties agree, or absent such agreement until the Court has determined, that ICANN has fulfilled its obligations in response to the Subpoena and in no event shall such period expire before September 8, 2014. Plaintiffs’ lien is correspondingly extended.

**IT IS SO ORDERED.**

Dated: July 30, 2014  
*name for time*

  
United States District Judge

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF COLUMBIA

RUTH CALDERON-CARDONA, LUZ )  
CALDERON-CARDONA, LUIS )  
CALDERON-CARDONA, GLORIA )  
CALDERON-CARDONA, JOSE RAUL )  
CALDERON-CARDONA, ANA DELIA )  
CALDERON-CARDONA, HILDA )  
CALDERON-CARDONA, ANGEL )  
CALDERON-GUZMAN, MIGUEL )  
CALDERON-GUZMAN, SALVADOR )  
CALDERON-MARTINEZ, PABLO )  
TIRADO-AYALA, and ANTONIA )  
RAMIREZ-FIERO, )

Case No. 1:14-mc-0648-RCL

Plaintiffs )

v. )

THE DEMOCRATIC PEOPLE’S REPUBLIC )  
OF KOREA, THE CABINET GENERAL )  
INTELLIGENCE BUREAU, and JOHN DOE )

Defendants )

**NOTICE OF APPEAL**

Notice is hereby given that RUTH CALDERON-CARDONA, LUZ CALDERON-CARDONA, LUIS CALDERON-CARDONA, GLORIA CALDERON-CARDONA, JOSE RAUL CALDERON-CARDONA, ANA DELIA CALDERON-CARDONA, HILDA CALDERON-CARDONA, ANGEL CALDERON-GUZMAN, MIGUEL CALDERON-GUZMAN, SALVADOR CALDERON-MARTINEZ, PABLO TIRADO-AYALA, and ANTONIA RAMIREZ-FIERO (the “Plaintiffs”), judgment creditor plaintiffs in the above named case, hereby appeal to the United States Court of Appeals for the District of Columbia Circuit from an order quashing Plaintiffs’ writs of attachment to third party the Internet Corporation for Assigned Names and Numbers and denying as moot Plaintiffs’ related motion for discovery and scheduling relief, entered in this action on November 12, 2014. The Plaintiffs appeal from each and every part of that order.

Case 1:14-mc-00648-RCL Document 32 Filed 12/12/14 Page 2 of 2

Date: December 12, 2014

Respectfully submitted,

THE BERKMAN LAW OFFICE, LLC  
*Attorneys for the Plaintiffs*

By:  \_\_\_\_\_  
Robert J. Tolchin

111 Livingston Street, Suite 1928  
Brooklyn, New York 11201  
718-855-3627  
[RTolchin@BerkmanLaw.com](mailto:RTolchin@BerkmanLaw.com)

RAINES FELDMAN, LLP  
*Attorneys for the Plaintiffs*

By: /s/ Erik S. Syverson  
Erik S. Syverson

9720 Wilshire Boulevard, Fifth Floor  
Beverly Hills, California 90212  
310-440-4100  
Fax: 310-691-1036  
[ESyverson@RainesLaw.com](mailto:ESyverson@RainesLaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on August 27, 2015, I filed the foregoing using the ECF system, which is expected to electronically serve ICANN's counsel of record.

Dated: Baltimore, Maryland  
August 27, 2015

\_\_\_\_\_  
/s/ Meir Katz  
Meir Katz