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8 INTERNET CORPORATION FOR ASSIGNED
NAMES AND NUMBERS and erroneously named
9 INTERNET ASSIGNED NUMBERS AUTHORITY

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES**

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

16 Plaintiff,

17 v.

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

22 Defendants.

CASE NO. SC090220

Assigned for all purposes to
Honorable John L. Segal

**COMPENDIUM OF NON-
CALIFORNIA AUTHORITIES IN
SUPPORT OF REPLY IN SUPPORT
OF DEMURRER TO COMPLAINT
BY DEFENDANT INTERNET
CORPORATION FOR ASSIGNED
NAMES AND NUMBERS AND
ERRONEOUSLY-NAMED
DEFENDANT INTERNET
ASSIGNED NUMBERS AUTHORITY**

[Reply In Support of Demurrer; Reply In
Support of Request for Judicial Notice
and Declaration of Sean W. Jaquez; and
Supplemental Request for Judicial Notice
and Declaration of Samantha Eisner filed
concurrently herewith; [Proposed] Order
in Support of Supplemental Request
lodged concurrently herewith]
DATE: September 20, 2006
TIME: 8:30 a.m.
DEPT: M

Complaint Filed: June 28, 2006

Pursuant to California Rule of Court 313(h), defendant Internet Corporation For Assigned Names And Numbers And Erroneously-Named Defendant Internet Assigned Numbers Authority submits copies of the following non-California authorities, in support of its Reply Memorandum filed concurrently herewith:

AUTHORITIES

Tab

Cases

8	<i>FG Hemisphere Assocs. v. Republique du Congo,</i> 455 F.3d 575 (5th Cir. 2006).....	1
10	<i>Flatow v. Islamic Republic of Iran,</i> 308 F.3d 1065 (9th Cir. 2003).....	2
11	<i>In re Barnes,</i> 276 F.3d 927 (7th Cir. 2002).....	3
13	<i>In re Petruzzelli,</i> 139 B.R. 241 (Bnkr., E.D. Cal. 1992).....	4
14	<i>Lloyd's Underwriters v. AO Gazsnabtranzit,</i> No. CIVAI:00-MI-0242-CAP, 2000 WL 1719493 (N.D. Ga. Nov. 2, 2002).....	5
16	<i>Ministry of Defense & Support for the Armed Forces for the Islamic Republic of Iran v. Cubic Defense Sys.,</i> 385 F.3d 1206 (9th Cir. 2004) vac'd on other grounds 126 S.Ct. 1143 (2006).....	6
18	<i>National Union Fire Ins. Co. v. People's Republic of Congo,</i> No. 91 C 3172, Doc. No. 84 (N.D. Ill. December 5, 1991).....	7
20	<i>Republic of Austria v. Altmann,</i> 541 U.S. 677 (2004).....	8
21	<i>Rubin v. Islamic Republic of Iran,</i> No. 06-11053, 2006 U.S. Dist. LEXIS 73383 (D. Mass. Sept. 30, 2006).....	9
23	<i>Tenen v. Winter,</i> 94-cv-7934-CJS, Doc. No. 295 (W.D.N.Y. Apr. 12, 2002).....	10
24	<i>Verlinden B.V. v. Central Bank of Nigeria,</i> 461 U.S. 480 (1983).....	11
26	<i>Zurakov v. Register.com, Inc.,</i> 304 A.D.2d 176 (N.Y. App. Div. 2003).....	12

Statutes

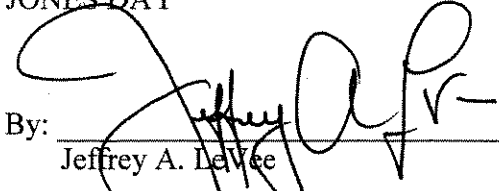
28	28 U.S.C. §§ 1604-05.....	13
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Other Authorities

Black's Law Dictionary,
Eight Edition (2004)..... 14

JONES DAY



By: _____
Jeffrey A. LeVee

Attorneys for Defendants
INTERNET CORPORATION FOR
ASSIGNED NAMES AND NUMBERS
AND ERRONEOUSLY NAMED
INTERNET ASSIGNED NUMBERS
AUTHORITY

1 **PROOF OF SERVICE**

2 I, Grace M. Salter, declare:

3 I am a citizen of the United States and employed in Los Angeles County, California. I am
4 over the age of eighteen years and not a party to the within-entitled action. My business address
5 is 555 South Flower Street, Fiftieth Floor, Los Angeles, California 90071-2300. On October 27,
6 2006, I caused to be served a copy of the within document(s):

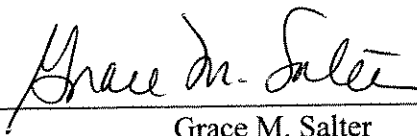
7 **COMPENDIUM OF NON-CALIFORNIA AUTHORITIES IN SUPPORT
8 OF REPLY IN SUPPORT OF DEMURRER TO COMPLAINT BY
9 DEFENDANT INTERNET CORPORATION FOR ASSIGNED NAMES AND
10 NUMBERS AND ERRONEOUSLY-NAMED DEFENDANT INTERNET
11 ASSIGNED NUMBERS AUTHORITY**

- 12 by transmitting via facsimile the document(s) listed above to the fax number(s) set
13 forth below on this date before 5:00 p.m.
- 14 by placing the document(s) listed above in a sealed envelope with postage thereon
15 fully prepaid, in the United States mail at Los Angeles, California addressed as set
16 forth in the attached Service List.
- 17 by placing the document(s) listed above in a sealed Federal Express envelope and
18 affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal
19 Express agent for delivery.
- 20 by personally delivering the document(s) listed above to the person(s) at the
21 address(es) set forth below.

22 I am readily familiar with the firm's practice of collection and processing correspondence
23 for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same
24 day with postage thereon fully prepaid in the ordinary course of business. I am aware that on
25 motion of the party served, service is presumed invalid if postal cancellation date or postage
26 meter date is more than one day after date of deposit for mailing in affidavit.

27 I declare that I am employed in the office of a member of the bar of this court at whose
28 direction the service was made.

Executed on October 27, 2006, at Los Angeles, California.


Grace M. Salter

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SERVICE LIST
C. ITOH MIDDLE EAST E.C. (Bahrain) v. INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS, et al.
LOS ANGELES SUPERIOR COURT, CASE NO. SC090220

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The People's Republic of the Congo Via U.S. Mail
Regie National Des Travaux Publics et de la Construction
B.P. 2073
Brazzaville
Republique Populaire du Congo

The Congolese Redemption Fund Via U.S. Mail
Regis National Des Travaux Publics et de la Construction
B.P. 2073
Brazzaville
Republique Populaire du Congo