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CENTRAL DISTRICT OF CALIFORNIA  
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14 VERISIGN, INC.

15 UNITED STATES DISTRICT COURT  
16 CENTRAL DISTRICT OF CALIFORNIA

LOGGED

17 VERISIGN, INC., a Delaware  
Corporation,

Case No. CV 04-1292 AHM (CTx)

18 Plaintiff,

STIPULATION EXTENDING TIME:  
(1) FOR PLAINTIFF TO FILE FIRST  
AMENDED COMPLAINT AND  
(2) FOR PLAINTIFF AND  
DEFENDANT TO ENGAGE IN RULE  
26 DISCLOSURES; AND  
[PROPOSED] ORDER THEREON

19 v.

20 INTERNET CORPORATION FOR  
21 ASSIGNED NAMES AND  
22 NUMBERS, a California corporation;  
DOES 1-50,

23 Defendants.

24  
25  
26  
27 DOCKETED ON CM  
JUN - 7 2004  
BY 007

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1 Plaintiff VeriSign, Inc. ("VeriSign") and defendant Internet Corporation for  
2 Assigned Names and Numbers ("ICANN"), through their respective counsel of  
3 record herein, enter into this Stipulation with reference to the following  
4 circumstances:

5 A. In its Order entered on May 19, 2004, the Court, *inter alia*, granted  
6 VeriSign until June 7, 2004, within which to file a First Amended Complaint in this  
7 action.

8 B. For scheduling reasons, and to facilitate VeriSign's preparation and filing  
9 of its amended pleading, VeriSign has requested, and ICANN has agreed (subject to  
10 the approval of the Court) that VeriSign may have, an additional week within which  
11 to serve and file the First Amended Complaint. ICANN has also requested, and  
12 VeriSign has agreed that ICANN may have, 20 days within which to respond to the  
13 First Amended Complaint.

14 C. Since the pleadings have not yet been finalized and no scheduling  
15 conference has been set by the Court, VeriSign and ICANN mutually believe that any  
16 requirement that they engage now in the meeting of counsel and mutual disclosures  
17 contemplated by Rule 26 of the Federal Rules of Civil Procedure should be  
18 temporarily extended.

19  
20 Accordingly, IT IS HEREBY STIPULATED AND AGREED by and between  
21 VeriSign and ICANN as follows:

22 1. VeriSign may have through and including June 14, 2004, within which to  
23 serve and file a First Amended Complaint.

24 2. ICANN may have 20 days after service of a First Amended Complaint  
25 within which to respond thereto.

26 3. To the extent Rules 26 and 16 of the Federal Rules of Civil Procedure could  
27 be construed as requiring VeriSign and ICANN to engage in the meeting of counsel

1 and disclosures provided for therein at this juncture in the proceedings, the deadline  
 2 for such meeting and disclosures will be extended until the earlier of (i) 21 days prior  
 3 to any scheduling conference set by the Court pursuant to Rule 16(b) or (ii) 20 days  
 4 after the Court rules on a Rule 12(b)(6) motion by ICANN to dismiss and on a special  
 5 motion by ICANN to strike, the First Amended Complaint, if such motions are made  
 6 and denied.

7 4. Nothing in this Stipulation is intended, or shall be construed, as waiver of  
 8 any of the respective claims or defenses of the parties on the merits or as a waiver of  
 9 VeriSign's request for certain discovery set forth in VeriSign's previously filed  
 10 opposition to ICANN's special motion to strike.

11 DATED: June 2, 2004

ARNOLD & PORTER LLP

13 By:

14 LAURENCE J. HUTT  
 Attorneys for Plaintiff  
 VeriSign, Inc.

16 DATED: June 2, 2004

JONES DAY

18 By:

19 JEFFREY A. DEVEE  
 Attorneys for Defendant  
 Internet Corporation for Assigned  
 Names and Numbers

21 **ORDER**

22 Based upon the foregoing Stipulation of the parties, and good cause appearing  
 23 therefor, IT IS HEREBY SO ORDERED.

26 DATED:

UNITED STATES DISTRICT JUDGE

1 and disclosures provided for therein at this juncture in the proceedings, the deadline  
2 for such meeting and disclosures will be extended until the earlier of (i) 21 days prior  
3 to any scheduling conference set by the Court pursuant to Rule 16(b) or (ii) 20 days  
4 after the Court rules on a Rule 12(b)(6) motion by ICANN to dismiss and on a special  
5 motion by ICANN to strike, the First Amended Complaint, if such motions are made  
6 and denied.

7 4. Nothing in this Stipulation is intended, or shall be construed, as waiver of  
8 any of the respective claims or defenses of the parties on the merits or as a waiver of  
9 VeriSign's request for certain discovery set forth in VeriSign's previously filed  
10 opposition to ICANN's special motion to strike.

11 DATED: June 2, 2004

ARNOLD & PORTER LLP

12  
13 By:   
14 LAURENCE J. HUTT  
15 Attorneys for Plaintiff  
VeriSign, Inc.

16 DATED: June 2, 2004


JONES DAY

17  
18 By: \_\_\_\_\_  
19 JEFFREY A. LEVEE  
20 Attorneys for Defendant  
Internet Corporation for Assigned  
Names and Numbers

21 **ORDER**

22 Based upon the foregoing Stipulation of the parties, and good cause appearing  
23 therefor, IT IS HEREBY SO ORDERED.

24  
25  
26 DATED: 6/4/04

  
27 UNITED STATES DISTRICT JUDGE

28 A. HOWARD MATZ