

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION.



GRAHAM SCHREIBER,  
Plaintiff,

CASE NO. 1:12-cv-00852.

v.

LORRAINE LESLEY DUNABIN; CENTRALNIC LTD.;  
NETWORK SOLUTIONS LLC; VERISIGN INC.;  
INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS;  
AND ENOM, INC.,

Defendants.

**OPPOSITION TO: Verisign Inc's Motion to dismiss**

- (1) Mr. Hyland has made an error, in advising twenty (20) days for rebuttal. As per: <http://www.vaed.uscourts.gov/localrules/LocalRulesEDVA.pdf> (1) *The pro se party is entitled to file a response opposing the motion and that any such response must be filed within **twenty-one (21)** days of the date on which the dispositive or partially dispositive motion is filed; and*
- (2) Plaintiff filed a response electronically, (via email) to Defendants on December 12th, 2012. (with cc to the all other parties.) Emails are sent via the servers of Network Solutions, Defendant # 3, as 'witness'. As such, no appropriate grounds for dismissal are present.
- (3) Plaintiff will 'walk' Defendant through the files, as currently in the Courts stamped receipt and published by ICANN, (Defendant 5) on their Litigation page, at [www.icann.org](http://www.icann.org).

I, Graham Schreiber as Plaintiff submit to the Court that everything written was done so by Me and information furnished is substantiated by external documents, connecting VeriSign Inc D/B/A VeriSign Global Registry Services, to "knowing".

Through and by such "knowing" have failed to protect consumers from fraud; and businesses, from fraudulent representation, as the sole Registry of ".com".

Registrar: From Wikipedia. - A registrar is an official keeper of records made in a register.

As ICANN's / IANA's exclusive Registry of ".com" it's beyond comprehension that VeriSign; and it's multitude of internal companies missed these "Red flags" of the DMCA that are "*infringing activity which would have been apparent to a reasonable person*".

For the record, VeriSign has a page at [http://www.verisigninc.com/en\\_US/legal/dmca/index.xhtml](http://www.verisigninc.com/en_US/legal/dmca/index.xhtml) and email contact of [DMCA@verisign.com](mailto:DMCA@verisign.com) whom I've contacted, email in evidence.

(4) Done.

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