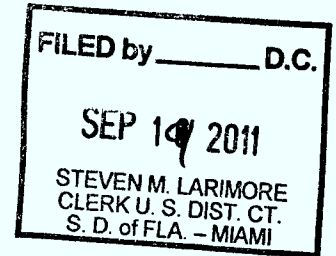


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 11-14052-CIV-MARTINEZ-LYNCH

JOHN ZUCCARINI,	)
	)
Plaintiff,	)
	)
v.	)
	)
NETWORK SOLUTIONS, LLC,	)
a Delaware Limited Liability Company;	)
NAMEJET, LLC,	)
a Delaware Limited Liability Company;	)
INTERNET CORPORATION	)
FOR ASSIGNED NAMES	)
AND NUMBERS, INC.	)
a California non-profit Corporation;	)
	)
Defendants.	)
_____	)



**PLAINTIFF JOHN ZUCCARINI'S RESPONSE TO THE INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS, INC. MOTION TO STAY DISCOVERY PENDING RULING ON ITS MOTION TO DISMISS AND MEMORANDUM IN SUPPORT**

Plaintiff, John Zuccarini ("Zuccarini") hereby responds to the Internet Corporation for Assigned Names and Numbers, Inc. ("ICANN") Motion to Stay Discovery pending their Motion to Dismiss.

**I. ARGUMENT**

In ICANN's Motion to Stay Discovery, ICANN makes the same arguments as it relates to the substance of this action that ICANN made in their motion to dismiss which is still pending before the Court.

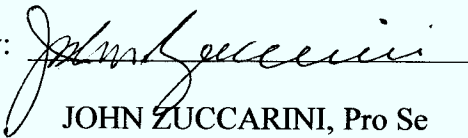
Zuccarini disagrees with ICANN's position on these issues and has addressed all of those

arguments in his amended complaint and in his response to ICANN's motion to dismiss.

Zuccarini in his view has waited till the latest possible date to serve his initial disclosures and request for interrogatories in consideration of the November 30, 2011 date set by the Court when all discovery is to be completed. This is reason that Zuccarini has not agreed to stay discovery at this time with ICANN and the other defendants. Zuccarini believes it would not be possible to complete effective discovery if a stay is granted with the November 30, 2011 date still in place to complete all discovery.

## II. CONCLUSION

While Zuccarini disagrees with the arguments made as it relates to the substance of this action to delay discovery, Zuccarini would not oppose the delay of further discovery till ICANN's motion to dismiss is ruled upon if the Court would extend the time for discovery from the current November 30, 2011 date, till a date the Court deems appropriate if ICANN's motion to dismiss is denied.

By:   
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Plaintiff John Zuccarini's Repsonse to ICANN's Motion to Stay Discovery was served by first class mail, postage prepaid, on September 15, 2011, on all counsel or parties of record on the service list and by email to their respective addresses.

  
John Zuccarini

**SERVICE LIST**

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**Internet Corporation for Assigned Names and Numbers, Inc.**

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