

1 Jeffrey A. LeVee (State Bar No. 125863)
2 Sean W. Jaquez (State Bar No. 223132)
3 Samantha S. Eisner (State Bar No. 230344)
4 JONES DAY
5 555 South Flower Street
6 Fiftieth Floor
7 Los Angeles, CA 90071-2300
8 Telephone: (213) 489-3939
9 Facsimile: (213) 243-2539

6 Attorneys for Defendants
INTERNET CORPORATION FOR ASSIGNED
7 NAMES AND NUMBERS and INTERNET
8 ASSIGNED NUMBERS AUTHORITY

9 Robert A. Sacks (Cal. Bar No. 150146)
10 Edward E. Johnson (Cal. Bar. No. 241065)
11 SULLIVAN & CROMWELL LLP
12 1888 Century Park East
13 Los Angeles, California 90067-1725
14 Telephone: (310) 712-6600
15 Facsimile: (310) 712-8800

16 Attorneys for Plaintiff
17 C. ITOH MIDDLE EAST E.C. (Bahrain), through the
18 real party in interest, NATIONAL UNION FIRE
19 INSURANCE COMPANY OF PITTSBURGH, PA.

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF LOS ANGELES**

18 C. ITOH MIDDLE EAST E.C. (Bahrain)
19 through the real party in interest, NATIONAL
20 UNION FIRE INSURANCE COMPANY OF
21 PITTSBURGH, PA,

21 Plaintiff,

22 v.

23 INTERNET CORPORATION FOR
24 ASSIGNED NAMES AND NUMBERS,
25 INTERNET ASSIGNED NUMBERS
26 AUTHORITY, the PEOPLE'S REPUBLIC
27 OF THE CONGO, and THE CONGOLESE
28 REDEMPTION FUND,

Defendants.

ORIGINAL FILED
JUL 19 2006
RECEIVED
LOS ANGELES
SUPERIOR COURT
JUL 19 2006
SUPERIOR COURT
WEST DISTRICT
SANTA MONICA

CASE NO. SC090220

Assigned for all purposes to
Honorable John L. Segal

**STIPULATION GRANTING
EXTENSION OF TIME TO
RESPOND TO COMPLAINT;
[PROPOSED] ORDER**

Cal. Civ. Proc. Code § 1054

Complaint Filed: June 28, 2006

1 WHEREAS Defendants Internet Corporation for Assigned Names and Numbers
2 ("ICANN") and Internet Assigned Numbers Authority ("IANA") (collectively, "Defendants")
3 currently must file a response to Plaintiff's Complaint on July 28, 2006; and

4 WHEREAS the parties, by counsel, have agreed, for good cause, that Defendants shall
5 have an additional 30 (thirty) days to file their response to Plaintiff's Complaint.

6 THE PARTIES, BY COUNSEL, HEREBY STIPULATE:

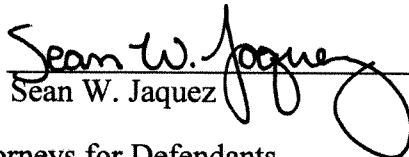
7 Defendants may have an extension of 30 days from July 28, 2006 to file their response to
8 Plaintiff's Complaint. Defendants must file their response by August 28, 2006.

9 In entering into this stipulation, Defendants do not hereby waive any defense to the
10 Complaint.

11 SO STIPULATED:

12 Dated: July 18, 2006

Jones Day

14 By: 
15 Sean W. Jaquez

16 Attorneys for Defendants
17 INTERNET CORPORATION FOR
18 ASSIGNED NAMES AND NUMBERS AND
19 INTERNET ASSIGNED NUMBERS
20 AUTHORITY

21 Dated: July __, 2006

Sullivan & Cromwell

22 By: _____
23 Robert A. Sacks

24 Attorneys for Plaintiff
25 C. ITOH MIDDLE EAST E.C. (Bahrain),
26 through the real party in interest, NATIONAL
27 UNION FIRE INSURANCE COMPANY OF
28 PITTSBURGH, PA.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

WHEREAS Defendants Internet Corporation for Assigned Names and Numbers ("ICANN") and Internet Assigned Numbers Authority ("IANA") (collectively, "Defendants") currently must file a response to Plaintiff's Complaint on July 28, 2006; and

WHEREAS the parties, by counsel, have agreed, for good cause, that Defendants shall have an additional 30 (thirty) days to file their response to Plaintiff's Complaint.

THE PARTIES, BY COUNSEL, HEREBY STIPULATE:

Defendants may have an extension of 30 days from July 28, 2006 to file their response to Plaintiff's Complaint. Defendants must file their response by August 28, 2006.

In entering into this stipulation, Defendants do not hereby waive any defense to the Complaint.

SO STIPULATED:

Dated: July __, 2006

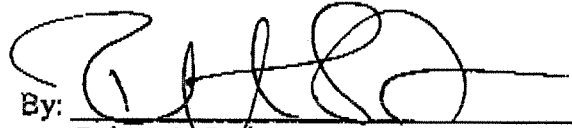
Jones Day

By: _____
Scan W. Jaquez

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

Dated: July 17, 2006

Sullivan & Cromwell LLP

By:  _____
Robert A. Sacks

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


~~PROPOSED~~ **ORDER GRANTING EXTENSION OF TIME**

Upon presentation of the Stipulation Granting Extension Of Time To Respond To
Complaint, and good cause appearing therefore,

IT IS HEREBY ORDERED THAT:

Defendants Internet Corporation for Assigned Names and Numbers and Internet Assigned
Numbers Authority shall have an additional 30 (thirty) days to file a response to Plaintiff's
Complaint. Defendants shall file their response to Plaintiff's Complaint on or before August 28,
2006.

DATED: JUL 19 2006



HONORABLE JOHN L. SEGAL
JUDGE OF THE SUPERIOR COURT

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE BY MAIL

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 555 South Flower Street, Fiftieth Floor, Los Angeles, California 90071-2300. I am readily familiar with this firm's practice for collection and processing of correspondence for mailing with the United States Postal Service. On July 19, 2006, I placed with this firm at the above address for deposit with the United States Postal Service a true and correct copy of the within document(s):

STIPULATION GRANTING EXTENSION OF TIME TO RESPOND TO COMPLAINT; (PROPOSED ORDER)

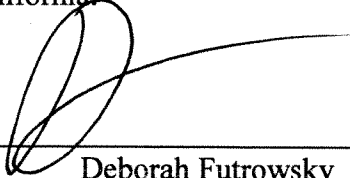
in a sealed envelope, postage fully paid, addressed as follows:

SEE ATTACHED SERVICE LIST

Following ordinary business practices, the envelope was sealed and placed for collection and mailing on this date, and would, in the ordinary course of business, be deposited with the United States Postal Service on this date.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 19, 2006, at Los Angeles, California



Deborah Futrowsky

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

Robert A. Sacks, Esq.
Edward E. Johnson, Esq.
Sullivan & Cromwell, LLP
1888 Century Park East
Suite 2100
Los Angeles CA 90067-1725
Phone: (310) 712-6600
Fax: (310) 712-8800

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

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