

COPY

1 JESSE W. MARKHAM, JR. (CA SBN 87788)
2 WILLIAM L. STERN (CA SBN 96105)
3 JENNIFER LEE TAYLOR (CA SBN 161368)
4 KEITH L. BUTLER (CA SBN 215670)
5 JMarkham@mofocom
6 MORRISON & FOERSTER LLP
7 425 Market Street
8 San Francisco, California 94105-2482
9 Telephone: 415.268.7000
10 Facsimile: 415.268.7522

11 Attorneys for Plaintiff
12 COALITION FOR ICANN TRANSPARENCY INC.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN JOSE DIVISION

16 COALITION FOR ICANN TRANSPARENCY
17 INC., a Delaware corporation,

18 Plaintiff,

19 v.

20 VERISIGN, INC., a Delaware corporation;
21 INTERNET CORPORATION FOR ASSIGNED
22 NAMES AND NUMBERS, a California
23 corporation,

24 Defendants.

No.:

**[PROPOSED] TEMPORARY
RESTRAINING ORDER**

Date:
Time:
Location:

25 **[PROPOSED] TEMPORARY RESTRAINING ORDER**

26 Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Local Rule 65-1, and
27 upon consideration of the Complaint, Plaintiff Coalition For ICANN Transparency Inc.'s
28 Memorandum In Support of Motion for Temporary Restraining Order, and accompanying
declarations, the Court hereby ORDERS:

That Defendants Internet Corporation for Assigned Names and Numbers ("ICANN") and
VeriSign, Inc. ("VeriSign") shall not enter into the proposed 2005 .com Agreement,

1 That Defendants ICANN and VeriSign shall abide by the terms of the current .com
2 Agreement (dated May 25, 2001) until it expires on November 10, 2007, and

3 That VeriSign shall not engage in any "Registry Services" as defined in the proposed
4 2005 .com Agreement, including without limitation the Central Listing Service, and excluding
5 services that are defined as "Registry Services" in the 2001 .com Agreement, pending further
6 order of this Court,

7 That no security is required in this matter, and

8 That this Order and all supporting pleadings and papers shall be served upon Defendants
9 by December ____, 2005.

10 **ORDER TO SHOW CAUSE**

11 Defendants and each of them are hereby ordered to appear before the Court at _____
12 o'clock AM / PM on _____, 200_, to show cause why this order should not be
13 extended until the conclusion of this litigation.

14
15
16 Dated: November ____, 2005

By: _____

United States District Judge