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6 Attorneys for Defendant  
VERISIGN, INC.

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF LOS ANGELES

10 REGISTERSITE.COM, an Assumed Name of )  
ABR PRODUCTS INC., a New York )  
11 Corporation; NAME.COM, LLC, a Wyoming )  
Limited Liability Company; R. LEE )  
12 CHAMBERS COMPANY LLC, a Tennessee )  
Limited Liability Company *d/b/a* )  
13 DOMAINSTOBESEEN.COM; FIDUCIA LLC, )  
a Nevada Limited Liability Company; SPOT )  
14 DOMAIN, LLC, a Wyoming Limited Liability )  
Company; !\$6.25 DOMAINS NETWORK, INC., )  
15 a Delaware Corporation *d/b/a* ESITE )  
Corporation; AUSREGISTRY GROUP PTY )  
16 LTD., an Australian Proprietary Limited )  
Company; ! \$ ! BID IT WIN IT, INC., a )  
17 Minnesota Corporation, )

18 Plaintiffs, )

19 v. )

20 INTERNET CORPORATION FOR ASSIGNED )  
NAMES AND NUMBERS, a California )  
21 Corporation; VERISIGN, INC., a Delaware )  
Corporation; NETWORK SOLUTIONS, LLC, )  
22 a Limited Liability Company of unknown origin; )  
NETWORK SOLUTIONS, INC., a Delaware )  
23 Corporation; ENOM, INCORPORATED, a )  
Nevada Corporation; ENOM, INC., a Washington )  
24 Corporation; and DOES 1-10, inclusive; )

25 Defendants. )  
26 )  
27 )  
28 )

Case No. SC 082479

**NOTICE OF MOTION AND MOTION  
BY DEFENDANT VERISIGN, INC. TO  
DISMISS OR, IN THE ALTERNATIVE,  
TO STAY THE FIRST, FIFTH, SIXTH,  
SEVENTH, AND EIGHTH CAUSES OF  
ACTION ON THE BASIS OF FORUM  
NON CONVENIENS**

Date: November 16, 2004

Time: 8:30 a.m.

Department: F

Judge: Hon. Gerald Rosenberg

Action Filed: August 4, 2004

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:  
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3 PLEASE TAKE NOTICE that on November 16, 2004, at 8:30 a.m., or as soon thereafter as  
4 the matter can be heard, in Department F of the above-entitled Court, located at 1725 Main Street,  
5 Santa Monica, California 90401, defendant VERISIGN, INC. ("VeriSign") will, and hereby does,  
6 move this Court for an order dismissing, or, in the alternative, staying, the purported First, Fifth,  
7 Sixth, Seventh, and Eighth Causes of Action asserted against VeriSign in the Complaint herein.

8 This motion will be made pursuant to California Code of Civil Procedure sections 410.30(a)  
9 and 418.10(a)(2), on the grounds that Plaintiffs entered into a Registry-Registrar Agreement with  
10 VeriSign containing a valid forum selection clause, which mandates that all legal actions relating to  
11 the agreement be brought in a court located within the Eastern District of Virginia; that the  
12 purported First, Fifth, Sixth, Seventh, and Eighth Causes of Action asserted against VeriSign in the  
13 Complaint herein all relate to the agreement and are subject to the forum selection clause therein;  
14 that Plaintiffs freely and voluntarily entered into the agreement; and that the Eastern District of  
15 Virginia has a reasonable connection to the subject matter of said causes of action and enforcement  
16 of the forum selection clause is reasonable and consistent with public policy.

17 This motion will be based upon this Notice of Motion and Motion; upon the accompanying  
18 Memorandum of Points and Authorities, the Appendix of Non-California Authorities, and the  
19 Declaration of Barbara Knight, each of which is served and filed concurrently herewith; upon all  
20 pleadings and the record herein; and upon such other matters as may properly be presented to the  
21 Court before or at the hearing of the motion.

22 DATED: October 4, 2004.

ARNOLD & PORTER LLP  
RONALD L. JOHNSTON  
LAURENCE J. HUTT  
SUZANNE V. WILSON  
JAMES S. BLACKBURN

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27 By:   
LAURENCE J. HUTT  
Attorneys for Defendant VeriSign, Inc.

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