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9 Attorneys for Plaintiff  
10 The Internet Corporation for Assigned Names  
11 and Numbers

12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA

14 The Internet Corporation for Assigned  
15 Names and Numbers,

16 Plaintiff,

17 v.

18 RegisterFly.Com, Inc., and  
19 UnifiedNames, Inc.,

20 Defendants.

21 Case No. CV 07-2089 R (PLAx)

22 **NOTICE OF EX PARTE**  
23 **APPLICATION AND**  
24 **APPLICATION FOR CIVIL**  
25 **CONTEMPT SANCTIONS**

26 Date: [to be set]  
27 Time: [to be set]  
28 Judge: Hon. Manuel L. Real

29 TO DEFENDANTS REGISTERFLY, INC. AND UNIFIEDNAMES, INC.:  
30 NOTICE IS HEREBY GIVEN that, pursuant to this Court's rules for *ex*  
31 *parte* applications, Plaintiff The Internet Corporation for Assigned Names and  
32 Numbers ("ICANN") will, and hereby does, apply to this court for an Order  
33 Granting Civil Contempt Sanctions against defendants RegisterFly.Com, Inc. and  
34 UnifiedNames, Inc. (collectively referred to as "RegisterFly"), and those acting in  
35 concert with RegisterFly.

36 ICANN is requesting the Court order the following civil contempt sanctions:  
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38

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2007 MAY -2 PM 3:13  
CLERK U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

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9 UNITED STATES DISTRICT COURT  
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12 The Internet Corporation for Assigned  
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Defendants.  
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Case No. CV 07-2089 R (PLAx)

**NOTICE OF *EX PARTE*  
APPLICATION AND  
APPLICATION FOR CIVIL  
CONTEMPT SANCTIONS**

Date: [to be set]  
Time: [to be set]  
Judge: Hon. Manuel L. Real

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23 Granting Civil Contempt Sanctions against defendants RegisterFly.Com, Inc. and  
24 UnifiedNames, Inc. (collectively referred to as "RegisterFly"), and those acting in  
25 concert with RegisterFly.

26 ICANN is requesting the Court order the following civil contempt sanctions:  
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28

1 (1) Ordering a U.S. Marshal to accompany ICANN to physically obtain an  
2 electronic copy of all Data required under the Court's April 26, 2007 Preliminary  
3 Injunction;

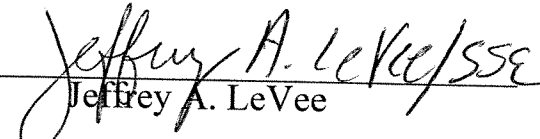
4 (2) Ordering a U.S. Marshall to accompany ICANN in gaining access to  
5 RegisterFly's books and records to perform the Court-ordered audit pursuant to the  
6 April 26, 2007 Preliminary Injunction; and

7 (3) All other sanctions necessary to coerce RegisterFly's compliance with the  
8 Court's April 26, 2007 Preliminary Injunction.

9 The grounds and facts in support of this Application are set forth in ICANN's  
10 Memorandum in Support of the *Ex Parte* Application for Civil Contempt Sanctions,  
11 the supporting Declaration of Jeffrey LeVee, and ICANN's proposed order, each of  
12 which accompanies this Application. This Application is also supported by the  
13 entirety of the record in this case, including ICANN's March 29, 2007 Complaint,  
14 its March 29, 2007 Memorandum of Points and Authorities in Support of Plaintiff's  
15 Ex Parte Application for Temporary Restraining Order, its April 11, 2007  
16 Supplement to TRO Application, and the April 24, 2007 Brief in Support of Entry  
17 of Preliminary Injunction and all supporting documents thereto.

18 Dated: May 1, 2007

JONES DAY

19  
20 By: /SSE  
21 Jeffrey A. LeVee

22 Attorneys for Plaintiff  
23 THE INTERNET CORPORATION  
24 FOR ASSIGNED NAMES AND  
25 NUMBERS  
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**PROOF OF SERVICE BY OVERNIGHT DELIVERY**

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. On May 2, 2007, I deposited with Federal Express, a true and correct copy of the within documents:

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**NOTICE OF EX PARTE APPLICATION AND  
APPLICATION FOR CIVIL CONTEMPT SANCTIONS**

in a sealed envelope, addressed as follows:

Kevin Medina  
RegisterFly.Com, Inc.  
960 Arthur Godfrey Road, St402  
Miami Beach, FL 33140  
Email:  
[kevin@unifiednames-inc.com](mailto:kevin@unifiednames-inc.com)  
President of RegisterFly.Com,  
Inc. and Unified Names, Inc.

Mitchell Novick, Esq.  
Law Offices of Mitchell P.  
Novick  
66 Park Street  
Montclair, NJ 07042  
Email:  
[mnovick@mitchellnovick.com](mailto:mnovick@mitchellnovick.com)  
Counsel for Kevin Medina,  
Registerfly, and Unified Names

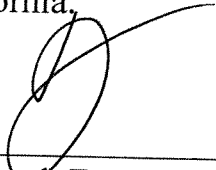
Harold Rabner, Esq.  
Rabner, Allcorn, Baumgart &  
Ben Asher, P.C.  
52 Upper Montclair Plaza  
(Upper Montclair)  
Montclair, NJ 07043  
Email:  
[hrabner@rabnerallcorn.com](mailto:hrabner@rabnerallcorn.com)  
Counsel for Kevin Medina,  
RegisterFly, and Unified Names

20 Following ordinary business practices, the envelope was sealed and placed  
21 for collection by Federal Express on this date, and would, in the ordinary course of  
22 business, be retrieved by Federal Express for overnight delivery on this date.

23 I have submitted a courtesy copy of the above described document via email  
24 to all parties listed above.

25 I declare that I am employed in the office of a member of the bar of this court  
26 at whose direction the service was made.

Executed on May 2, 2007, at Los Angeles, California.



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Deborah Futrowsky

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