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EAST E.C. (Bahrain), through the real  
6 party in interest, NATIONAL UNION  
FIRE INSURANCE COMPANY OF  
7 PITTSBURGH, PA.

8  
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF LOS ANGELES  
11 WEST DISTRICT

13 C. ITOH MIDDLE EAST E.C. (Bahrain) )  
through the real party in interest, NATIONAL )  
14 UNION FIRE INSURANCE COMPANY )  
OF PITTSBURGH, PA, )  
15 Plaintiff, )  
16 )  
17 v. )  
18 INTERNET CORPORATION FOR )  
ASSIGNED NAMES AND NUMBERS, )  
19 INTERNET ASSIGNED NUMBERS )  
AUTHORITY, the PEOPLE'S )  
20 REPUBLIC OF THE CONGO, and THE )  
CONGOLESE REDEMPTION FUND, )  
21 Defendants. )  
22 )

Case No. SC090220  
The Hon. John L. Segal  
**NOTICE OF LODGING OF  
NON-CALIFORNIA AUTHORITIES**  
Hearing: November 3, 2006  
Time 8:30 a.m.  
Dept.: M  
Action Filed: June 28, 2006

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 C. Itoh Middle East E.C. (Bahrain), through the real party in interest, National  
3 Union Fire Insurance Company of Pittsburgh, Pa., hereby lodges the following non-California  
4 authorities, true and correct copies of which are attached hereto, cited in its Opposition to  
5 Defendants' Demurrer and Opposition to Defendants' Request for Judicial Notice:

6 **Exhibit**

7 *In re Barnes,*  
8 276 F.3d 927 (7th Cir. 2002) ..... 1

9 *Bosley Medical Institute, Inc. v. Kremer,*  
10 403 F.3d 672 (9th Cir. 2005) ..... 2

11 *Caribbean Trading and Fidelity Corp. v. Nigerian Nat'l Petroleum Corp.,*  
12 948 F.2d 111 (2d Cir. 1991)..... 3

13 *Conn. Bank of Commerce v. Republic of Congo,*  
14 309 F.3d 240 (5th Cir. 2002) ..... 4

15 *Globalsantafe Corp. v. Globalsantafe.com,*  
16 250 F. Supp. 2d 610 (E.D. Va. 2003) ..... 5

17 *G.S. Rasmussen & Assocs., Inc. v. Kalitta Flying Svc., Inc.,*  
18 958 F.2d 896 (9th Cir. 1992) ..... 6

19 *Kensington Int'l Ltd. v. Republic of Congo,*  
20 No. 03-4578, U.S. Dist. LEXIS 4331 (S.D.N.Y. March 21, 2005) ..... 7

21 *Kremen v. Cohen,*  
22 337 F.3d 1024 (9th Cir. 2003) ..... 8

23 *Lloyd's Underwriters v. AO Gazsnabtranzit,*  
24 No. 00-0242, 2000 WL 1719493 (N.D. Ga. Nov. 2, 2000) ..... 9

25 *Ministry of Def. & Support for the Armed Forces of the Islamic Republic of Iran v.*  
26 *Cubic Def. Sys.,* 385 F.3d 1206 (9th Cir. 2004)..... 10

27 *Ministry of Def. & Support for the Armed Forces of the Islamic Republic of Iran v.*  
28 *Elahi,* 126 S. Ct. 1193 (2006) ..... 11

*Name.Space Inc. v. Network Solutions, Inc.,*  
202 F.3d 573 (2d Cir. 2000)..... 12

*Nat'l Union Fire Ins. Co. of Pittsburgh, Pa. v. People's Republic of the Congo,*  
No. 91 C 3172, Doc. No. 84 (N.D. Ill. December 5, 1991) ..... 13

1	<i>NBC Universal, Inc. v. NBCUNIVERSAL.COM,</i>	
2	378 F. Supp. 2d 715 (E.D. Va. 2005) .....	14
3	<i>Network Solutions, Inc. v. Umbro Int'l, Inc.,</i>	
4	259 Va. 759 (Va. 2000).....	15
5	<i>In re Petruzzelli,</i>	
6	139 B.R. 241 (Bankr. E.D. Cal. 1992).....	16
7	<i>Powers v. Ohio,</i>	
8	499 U.S. 400 (1991) .....	17
9	<i>Republic of the Philippines v. Marcos,</i>	
10	806 F.2d 344 (2d Cir. 1986).....	18
11	<i>Rubin v. Islamic Republic of Iran,</i>	
12	408 F. Supp. 2d 549 (N.D. Ill. 2005) .....	19
13	<i>Rubin v. Islamic Republic of Iran,</i>	
14	436 F. Supp. 2d 938 (N.D. Ill. 2006) .....	20
15	<i>Walker Int'l Holdings Ltd. v. Republic of Congo,</i>	
16	395 F.3d 229 (5th Cir. 2004) .....	21
17	<i>Zurakov v. Register.com, Inc.,</i>	
18	304 A.D.2d 176 (N.Y. App. Div. 2003) .....	22
19	15 U.S.C. § 1125.....	23
20	28 U.S.C. § 1330.....	24
21	28 U.S.C. § 1606.....	25
22	28 U.S.C. § 1610.....	26
23	Statement of Policy on Management of Internet Names and Addresses, U.S. Dept. of	
24	Commerce, Nat'l Telecommunications and Info. Admin.,	
25	63 Fed. Reg. 31741, 31744 (June 10, 1998) .....	27
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Dated: October 10, 2006

Respectfully submitted,

*Robert A. Sacks / E.E.J.*

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