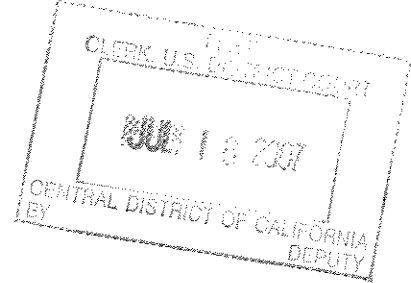


1 Jeffrey A. LeVee (State Bar No. 125863)
jlevee@jonesday.com
2 Samantha S. Eisner (State Bar No. 230344)
seisner@jonesday.com
3 JONES DAY
555 South Flower Street
4 Fiftieth Floor
Los Angeles, CA 90071-2300
5 Telephone: (213) 489-3939
Facsimile: (213) 243-2539
6

Attorneys for Plaintiff
7 The Internet Corporation for Assigned Names
and Numbers
8



9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11
12 The Internet Corporation for Assigned
Names and Numbers,
13

14 Plaintiff,

15 v.

16 RegisterFly.Com, Inc., and
UnifiedNames, Inc.,
17

Defendants.
18
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22
23
24
25
26
27
28

Case No. CV 07-2089 R (PLAx)

**DECLARATION OF
SAMANTHA EISNER IN
SUPPORT OF MOTION FOR
ATTORNEYS' FEES**

[Notice Of Motion And Motion For
Attorneys' Fees filed concurrently
herewith; [Proposed] Order lodged
concurrently herewith]

Hearing Date: August 6, 2007

Hearing Time: 10:00 a.m.

Judge: Hon. Manuel L. Real

1 I, Samantha Eisner, declare:

2 1. I am an associate with the law firm Jones Day, counsel of record for
3 plaintiff Internet Corporation for Assigned Names and Numbers (“ICANN”) in this
4 action. I am admitted to practice before this Court. I submit this declaration in
5 support of ICANN’s Motion for Attorneys’ Fees and Costs From Defendants for
6 Bad Faith Conduct against defendants RegisterFly.Com, Inc. and UnifiedNames,
7 Inc. (collectively, “RegisterFly”). I have personal knowledge of the facts set forth
8 in this declaration and am competent to testify if called as a witness.

9 2. After ICANN filed its Complaint against RegisterFly on March 29,
10 2007, the Court granted ICANN a Temporary Restraining Order (“TRO”). The
11 TRO was converted to a Preliminary Injunction (“PI”) on April 26, 2007.
12 RegisterFly did not appear or comply with either the TRO or the PI upon entry,
13 although ICANN, through my office, served RegisterFly with all papers in support
14 of the TRO and the PI, the notices of the hearings on each separate matter, and the
15 actual TRO and PI as entered by the Court.

16 3. On May 2, 2007, ICANN filed an *Ex Parte* Application for Civil
17 Contempt Sanctions for RegisterFly’s failure to comply with the PI. This Court
18 granted ICANN’s application at a hearing on May 9, 2007. RegisterFly did not
19 appear at the May 9 hearing, and this Court then ordered the personal attendance of
20 RegisterFly’s president at an order to show cause regarding further contempt
21 sanctions. The Court required ICANN to personally serve RegisterFly with notice
22 of the Order to Show Cause, which was set for hearing on May 25, 2007, and I
23 directed the personal service of the Notice on the RegisterFly defendants.

24 4. On May 22, 2007, RegisterFly finally made its appearance through the
25 filing of a Notice of Appearance. On May 24, 2007, RegisterFly made its first
26 substantive filing with the Court, stating that “the terms of the provisional remedies
27 sought by ICANN up to this point *have not been objectionable* to defendants, so
28 they chose not to oppose the temporary restraining order or the preliminary

1 injunction.” (May 24, 2007 Response of Defendants to Order to Show Cause Why
2 Permanent Injunction Should Not Issue, at 2:2-4 (emphasis added).)

3 5. Despite RegisterFly’s proclaimed non-objection to the TRO and PI,
4 however, RegisterFly remained in violation of numerous provisions of those orders,
5 including the requirement to post a notice to consumers on its website (PI, ¶ 11),
6 the transmission of all privacy-related registration data (PI, ¶¶ 1-3), the submission
7 of data for inspection and audit by ICANN (PI, ¶ 8), and meeting technical
8 requirements for the transmission of the data.

9 6. At the May 25, 2007 hearing, the Court imposed further contempt
10 sanctions on RegisterFly (and its principal, Kevin Medina) and also ordered the PI
11 to be converted to a Permanent Injunction (the “Injunction”.) The Court required
12 RegisterFly to comply with all terms of the PI by June 1, 2007.

13 7. On June 1, 2007, RegisterFly filed the Declaration of Kevin Medina re
14 Compliance with May 25, 2007 Order, purporting to detail for the Court how
15 RegisterFly “complied” with the PI. Mr. Medina’s declaration, however, was false
16 in several respects, which caused ICANN to file a Report on Defendants’
17 Compliance with Injunction to clarify the state of RegisterFly’s compliance.
18 ICANN also submitted two declarations in support of the Report, one from me and
19 one from Steve Conte, a staff member at ICANN.

20 8. After ICANN filed its Report, the Court set an Order to Show Cause re
21 Compliance with Injunction for June 12, 2007. On June 11, 2007, RegisterFly filed
22 documents again purporting to prove its compliance or to provide excuses for its
23 failures to comply the Injunction. At the hearing, however, counsel for ICANN
24 made clear that RegisterFly was *still* in violation of the Injunction, particularly in
25 regards to the provision of audit data, the sufficiency of the posting of the notice to
26 consumers, and an identification of all locations where RegisterFly’s data is
27 housed. The Court gave RegisterFly three days to resolve its compliance issues,
28 and ordered the parties to return on June 15, 2007.

1 9. In RegisterFly's June 11 papers, and again at the hearing on June 12,
2 RegisterFly told this Court that the required audit data was in the possession of a
3 third party – Tucows – and could not be produced for approximately three weeks.
4 On the afternoon of June 12, 2007, I contacted Heather McCloskey, counsel for
5 RegisterFly, to coordinate a conference call between representatives of ICANN,
6 RegisterFly, and Tucows to discuss the reasons for the three week delay. The
7 conference call went forward that afternoon, with Ms. McCloskey, Kevin Medina
8 and Robert O'Neill present for RegisterFly, Eliot Noss present for Tucows, and
9 John Jeffrey, Amy Stathos, Steve Conte and I present for ICANN.

10 10. During the June 12, 2007 conference call, Kevin Medina admitted that
11 Tucows was only in possession of one of the three audit data elements outstanding
12 to ICANN. Mr. Medina further admitted that ***RegisterFly maintained the other***
13 ***two portions of the audit data - the customer communications and billing records***
14 ***- and had never provided them to ICANN.*** I confirmed Mr. Medina's admission in
15 a June 13, 2007 email to Ms. McCloskey, a true and correct copy of which (without
16 attachment) is attached hereto as Exhibit A.

17 11. Prior to the June 15, 2007 hearing, on June 14, my office prepared
18 prepared another report from ICANN to update the Court on RegisterFly's
19 compliance with the Injunction. Only after ICANN filed the supplemental report
20 did RegisterFly ***finally*** appear to be in compliance with all pertinent provisions of
21 the Injunction. The last portion of compliance was obtained at the hearing, when
22 RegisterFly revealed the additional physical locations where RegisterFly's data is
23 housed.

24 12. ICANN is still not in a position to confirm that RegisterFly is in full
25 compliance with all terms of the Injunction. ICANN has not yet received a
26 response to recent communications seeking further clarification over a small
27 portion of the privacy related data. In addition, ICANN is still awaiting sufficient
28 data field mapping files necessary to complete a review of the files purporting to

1 contain the required audit data. I initially requested clarification of the privacy-
2 related data issues on June 18, 2007. Ms. McCloskey informed me that same day
3 that her client was looking into the matter. I have not received any further
4 communication on that topic. On July 6, 2007, I requested additional information
5 relating to the data mapping files that RegisterFly provided to ICANN in late June,
6 and have not received any response to that request either. A true and correct copy
7 of my June 18, 2007 email exchange with Ms. McCloskey is attached hereto as
8 Exhibit B. A true and correct copy of my July 6, 2007 email to Ms. McCloskey is
9 attached hereto as Exhibit C.

10 13. RegisterFly's mode of handling the hearings also imposed extra work
11 on ICANN. At the June 12, 2007, hearing, Ms. McCloskey indicated that
12 RegisterFly would bring witnesses to June 15, 2007 hearing and seek to have a full-
13 blown evidentiary hearing. I contacted Ms. McCloskey regarding this matter, and
14 in a telephone call on June 14, 2007, informed her that ICANN intended to oppose
15 any attempt to have an evidentiary hearing, and inquiring as to RegisterFly's actual
16 intentions of presenting witnesses. On that June 14, 2007 call, Ms. McCloskey
17 informed me that it had not yet made a determination as to the presentation of
18 witnesses. Just before 6:00 p.m. on June 14, 2007, I sent Ms. McCloskey an email
19 seeking further information on RegisterFly's intention to present witness at the
20 hearing, and the identities of those witnesses. I did not receive any response to my
21 request prior to the June 15 hearing. A true and correct copy of my June 14, 2007
22 email to Ms. McCloskey is attached hereto as Exhibit D.

23 14. Without prior clarification to ICANN, RegisterFly *did not* attempt to
24 present any witnesses at the June 15, 2007 hearing. Because of RegisterFly's
25 failure to communicate this decision to me or anyone else at my firm, my office
26 was forced to devote unnecessary attorney time to preparing for the possibility of
27 witness examination, including the preparation of argument in opposition to
28

1 RegisterFly's request for an evidentiary hearing, as well as the preparation of cross-
2 examination outlines.

3 15. At the end of the June 15, 2007 hearing, the Court directed ICANN to
4 file an application for attorneys' fees and costs incurred as a result of RegisterFly's
5 "malarkey" in skirting compliance with the Court's orders.

6 16. ICANN's briefing and court appearances account for only a portion of
7 the time that my office has devoted to obtaining RegisterFly's compliance with this
8 Court's orders. Due to the variety of issues and the technical requirements within
9 the Injunction, I, along with Jeffrey A. LeVee and Kristina Ayers, also with Jones
10 Day, have spent a substantial amount of time working with ICANN staff in an
11 attempt to decipher RegisterFly's data submissions (many of which were
12 indecipherable or simply duplicates of prior submissions) to understand the
13 outstanding compliance issues. I have also coordinated calls between the parties to
14 assist in working through technical issues, and performed regular follow up on
15 outstanding items with RegisterFly's counsel at Ervin Cohen & Jessup. Certain
16 compliance requirements, such as the provision of audit data, proved to be
17 extremely frustrating and time consuming, with RegisterFly wasting enormous
18 numbers of hours of my time and ICANN staff time in trying to simply open the
19 submissions, only to find that the submissions *were not* audit materials.

20 RegisterFly's actions and inactions multiplied the time that ICANN and my office
21 needed to devote to this project.

22 17. Aside from the compliance issues, RegisterFly also caused ICANN to
23 pay for attorney time to oppose a wholly groundless *ex parte* motion. On May 31,
24 2007, Ms. McCloskey notified me that RegisterFly intended to file on June 1, 2007
25 an application for *ex parte* relief to seek a modification of the Injunction based
26 upon "changed circumstances." On June 1, Ms. McCloskey notified me that the
27 application would not be filed until June 4. When RegisterFly finally filed the *ex*
28 *parte* application on June 4, 2007, the papers simply reiterated the arguments that

1 Ms. McCloskey presented at the May 25 hearing on behalf of RegisterFly -- and
2 that the Court firmly rejected -- as to why RegisterFly should not have to post a
3 notice to consumers on its website. Despite the complete deficiency of
4 RegisterFly's argument, ICANN still had to prepare an opposition to the *ex parte*
5 application. This Court denied RegisterFly's Application on the papers.

6 18. ICANN has concerns with respect to RegisterFly's ongoing
7 commitment to following the Injunction. For example, on July 2, 2007, I logged
8 onto RegisterFly's website (at <http://www.registerfly.com>) only to find the notice to
9 consumers was not visible on the computer screen. I immediately sent a letter to
10 Ms. McCloskey notifying her of RegisterFly's renewed violation of the Injunction
11 and reminding her that RegisterFly had a continuing obligation to make sure the
12 notice to consumers was always visible. Ms. McCloskey responded that same day,
13 stating that the hiding of the notice was a "glitch" caused by updates performed by
14 a substitute webmaster while the normal webmaster was unavailable. The fact that
15 a substitute webmaster is available to ICANN is quite interesting, considering that
16 in RegisterFly's June 11 filings with the Court, RegisterFly claimed the initial delay
17 in the posting of the notice to consumers was due to the normal webmaster being
18 "out of town." A true and correct copy of my July 2, 2007 letter to Ms. McCloskey
19 is attached hereto as Exhibit E. A true and correct copy of Ms. McCloskey's July
20 2, 2007 email response is attached hereto as Exhibit F.

21 19. For the briefing of the May 2, 2007 Application for Civil Contempt
22 Sanctions, and attendance at the May 9, 2007 hearing, ICANN incurred legal fees
23 of \$20,824.03 and related estimated costs of \$576.49 (including service costs for
24 orders after the hearing.) ICANN's civil contempt application raised complex
25 issues of ICANN's ability to obtain access to information contained on
26 RegisterFly's servers, and required extensive research and planning. A summary of
27 all costs claimed in the Motion is attached hereto as Exhibit G.

28

1 20. After the hearing, ICANN had to prepare for the Court's mandated
2 Order to Show Cause re Further Sanctions, set for May 25, 2007. During that time,
3 RegisterFly retained Ervin Cohen & Jessup as counsel, and my office began
4 working with RegisterFly's counsel to work towards obtaining RegisterFly's
5 compliance with the entirety of the PI. In preparation for and attendance at the May
6 25, 2007 hearing, ICANN incurred legal fees of \$8,548.94 and related estimated
7 costs of \$261.00.

8 21. On June 1, 2007, RegisterFly filed the Declaration of Kevin Medina
9 regarding RegisterFly's compliance with the Court's orders. The declaration,
10 however, did not reveal that RegisterFly was *still* in violation of the Court's orders.
11 As described above, my office prepared a Report on RegisterFly's compliance, filed
12 on June 5, 2007, along with the supporting declarations. The Court set a further
13 hearing on sanctions against RegisterFly for June 12, 2007. Up to the time of the
14 hearing, ICANN continued to work to identify and clarify the items necessary for
15 RegisterFly to achieve full compliance with the Court's orders. For the time
16 period from May 26, 2007 through the June 12, 2007 hearing, ICANN incurred
17 \$13,087.16 in legal fees for counsels' work in attempting to obtain RegisterFly's
18 compliance with the Injunction and providing reports to the Court on RegisterFly's
19 insufficient conduct. ICANN also incurred related estimated costs of \$115.50.

20 22. At the June 12, 2007 hearing, upon learning that RegisterFly was still
21 not in compliance with many of the terms of the injunction, including the notice to
22 consumers and the audit data turnover, the Court set a further hearing for June 15,
23 2007. Immediately after the June 12, 2007 hearing, ICANN resumed its efforts to
24 determine how RegisterFly could fulfill its obligations under the Injunction.
25 Between ICANN's continued efforts to obtain RegisterFly's compliance, and the
26 preparation for the hearing, ICANN incurred legal fees in the amount of \$11,050.92
27 to prepare for and attend the June 15, 2007 hearing. This amount includes the fees
28 that ICANN incurred in preparing a Supplemental Declaration Regarding

1 Compliance for the Court, as well as the fees incurred to address the evidentiary
2 hearing issue. ICANN also incurred estimated costs in the amount of \$115.50.

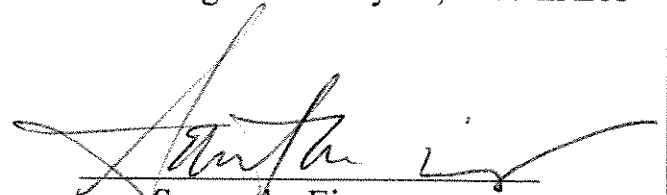
3 23. In defending itself against RegisterFly's baseless *ex parte* application
4 (filed June 4, 2007) ICANN incurred \$8,242.89 in attorneys' fees.

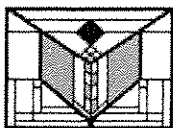
5 24. Since the June 15 hearing, ICANN has incurred at least \$979.89 in
6 attorneys' fees relating only to counsel's continued efforts in assuring compliance
7 with the Injunction. I have continued to attempt to follow up with Ms. McCloskey
8 relating to the outstanding privacy related data issues and the need for revised data
9 field mapping, as discussed above in Paragraph 12. In addition, the July 2, 2007
10 hidden notice to consumers issue (discussed at Paragraph 18) required my firm's
11 involvement to obtain resolution.

12 25. The fees and costs detailed in the Motion and this Declaration are
13 exclusive of the fees and costs related to actual drafting of this Motion and related
14 papers.

15 26. ICANN is prepared to make redacted portions of the relevant bills
16 available to the Court in the event the Court wishes to undertake an *in camera*
17 review of reasonableness of the requested attorneys' fees.

18
19 I declare under penalty of perjury under the laws of the United States that the
20 foregoing is true and correct. This declaration was signed on July 16, 2007 in Los
21 Angeles, California.

22
23 
24 Samantha Eisner



Samantha Eisner/JonesDay
Extension 32220
06/13/2007 01:52 PM

To hmccloskey@ecjlaw.com, kscott@ecjlaw.com
cc jlevec@JonesDay.com
bcc
Subject ICANN v. RegisterFly: Remaining Data Compliance Issues

Ms. McCloskey:

I write in follow up to our phone call yesterday afternoon.

First, ICANN has determined that the log of registration data, including updates, submitted to the Registry Operators (RAA, section 3.4.2.1) is not necessary at this time as we now understand it can be created at a later date. ICANN understands that this log can only be generated through Tucows. In the event this log becomes necessary in the future, ICANN will contact RegisterFly and Tucows to structure a timeframe for submission.

Second, RegisterFly confirmed that the written communication with Registered Name Holders (RAA, section 3.4.2.2) and the records of the accounts of all Registered Name Holders, including dates and amounts of all payments and refunds (RAA, section 3.4.2.3) are in RegisterFly's possession, and *are not* (and have never been) in Tucows' system or possession. ICANN expects this information to be provided to ICANN prior to June 15.

Third, ICANN still expects RegisterFly to comply with Paragraph 8 the Permanent Injunction and provide ICANN with its books and records in addition to the Section 3.4 audit data. As you know, on May 31, 2007 I provided you with further justification of ICANN's need for this financial information, including, but not limited to, a need to obtain the financials to confirm RegisterFly's financial dealings with its registered name holders. I have not yet received any response to this email. In addition, ICANN has not yet received any of this financial information from your client.

Fourth, as discussed on the call, attached to this email is a list (in Excel and raw text form) identifying the registration records that are still marked with a proxy name service identifier. Please let me know if your client is able to recover any additional information relating to the equitable registrants of these names. As Steve Conte pointed out, your client could have generated this list without ICANN's assistance to review the data upon first notification of the issue.

Samantha Eisner
Jones Day
555 South Flower Street, Fiftieth Floor
Los Angeles, CA 90071
(213) 243-2220
Fax: (213) 243-2539
seisner@JonesDay.com



protectfly-privacy.xls >



protectfly-privacy.csv

=====

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without copying it and notify sender by reply e-mail, so that our records can be corrected.
=====



"Heather McCloskey"
<hmccloskey@ECJLAW.COM
>

06/18/2007 11:36 AM

To "Samantha Eisner" <seisner@JonesDay.com>
cc "Kelly Scott" <kscott@ECJLAW.COM>, "Lauren Katunich"
<lkatunich@ECJLAW.COM>
bcc

Subject ICANN v. RegisterFly: Follow up

History:

This message has been replied to and forwarded.

Ms. Eisner,

The data field mapping is coming. The person who needs to prepare it is out until tomorrow. I will send it along as soon as I receive it.

I am checking on your other issue.

Thanks,
Heather McCloskey

Ervin, Cohen & Jessup LLP

9401 Wilshire Blvd, 9th Floor
Beverly Hills, CA 90212-2974
Phone: 310-281-6349
Direct Fax: 310-887-6853
Email: hmccloskey@ecjlaw.com



The information contained herein is confidential and privileged attorney-client information or work product intended only for the individual or entity to whom it is addressed. Any unauthorized use, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately.

From: Samantha Eisner [mailto:seisner@JonesDay.com]
Sent: Monday, June 18, 2007 11:25 AM
To: Heather McCloskey
Cc: jlevee@JonesDay.com; Kelly Scott; Lauren Katunich
Subject: ICANN v. RegisterFly: Follow up

Ms. McCloskey -

I had a couple of items to follow up on. First, ICANN still requires the data field mapping to review last Thursday's deposit of the audit-related data. Please forward that to me as soon as possible.

Second, in its review of the privacy/proxy related information for the approximately 2700 names that were identified as bogus, ICANN did some additional review of the file and, combined with the ticket information

provided for Mike Hink, reached the conclusion that these indeed could be Mr. Hink's registered domains, and not bogus, based on indications of RegisterFly's communications and activity in bulk registration of those names. Could you please ask your client to do a further analysis of the files to locate any additional contact/equitable registrant data for these domains?

Thank you -

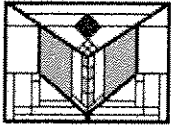
Sam

Samantha Eisner
Jones Day
555 South Flower Street, Fiftieth Floor
Los Angeles, CA 90071
(213) 243-2220
Fax: (213) 243-2539
seisner@JonesDay.com

=====

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=====



Samantha Eisner/JonesDay
Extension 32220
07/06/2007 05:58 PM

To hmcloskey@ecjlaw.com, kscott@ecjlaw.com
cc Jeffrey LeVee/JonesDay@JonesDay, lkatunich@ecjlaw.com
bcc
Subject ICANN v. RegisterFly - Audit data and other follow up

Dear Ms. McCloskey -

I write in follow up to a couple of items:

1. Audit Data

ICANN reviewed the audit data with the data field maps your client provided recently. Of the three files/data field maps, only one was usable.

The two others ((1) hrs-order_history.csv/t_history.txt and (2) hrs-payments.csv/t-pay.txt) have issues that keep ICANN from being able to perform an accurate review. For the first, it is not usable because though the map indicates 8 data fields, there are actually 22 fields per record in the corresponding file. For the second, it is not usable because though the data map indicates 7 fields per record, some fields either appear to be missing from the corresponding file's records or seem to be otherwise mismarked. In addition, we require an explanation of the abbreviations of the field names (e.g. does "exp" mean credit card expiration date?) so that ICANN can determine what information RegisterFly is attempting to provide.

I know that one of the files produced contained information from RegisterFly's ticketing systems. Please confirm that RegisterFly has provided ICANN with all of the written communications with customers it is required to maintain under the RAA and to provide under Section 3.4.2.2, including relevant emails, etc.

Because of the problems with the data mapping files, ICANN is not yet able to determine whether your client has provided all required information under Section 3.4 of the contract, exclusive of the information housed with Tucows. Please provide corrected data field maps as soon as possible, as well as field explanations. Please let me know when I can expect to receive these files.

2. Outstanding ICANN invoices

I recently forwarded outstanding invoices from ICANN. Please let me know when ICANN can expect payment on these invoices.

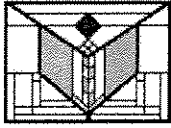
Thank you,

Samantha Eisner
Jones Day
555 South Flower Street, Fiftieth Floor
Los Angeles, CA 90071
(213) 243-2220
Fax: (213) 243-2539
seisner@JonesDay.com

=====

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=====



Samantha Eisner/JonesDay
Extension 32220
06/14/2007 05:54 PM

To hmcloskey@ecjlaw.com
cc kscott@ecjlaw.com, Jeffrey LeVee/JonesDay@JonesDay,
ikatunich@ecjlaw.com
bcc

Subject ICANN v. RegisterFly: Service copies of filings?

Ms. McCloskey -

I have not received any service copies (electronic or otherwise) of filings on behalf of your client today, so I wanted to confirm that nothing was filed with the Court today. If any filings were made, could you please have electronic copies forwarded to me immediately?

Based upon our conversation earlier, the fact that no filings were made may make it more likely that you intend to seek the ability to present witnesses to testify at the hearing. If you are intending bring witnesses with you, ICANN is entitled to know who you are planning to present and the topics they will be testifying about. Please provide me with that information as soon as possible.

Samantha Eisner
Jones Day
555 South Flower Street, Fiftieth Floor
Los Angeles, CA 90071
(213) 243-2220
Fax: (213) 243-2539
seisner@JonesDay.com

=====

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=====

JONES DAY

555 SOUTH FLOWER STREET • FIFTIETH FLOOR • LOS ANGELES, CALIFORNIA 90071
TELEPHONE: 213-489-3939 • FACSIMILE: 213-243-2539

Direct Number: (213) 243-2220
seisner@jonesday.com

JP002375:sse
172210-635001

July 2, 2007

BY FACSIMILE AND E-MAIL

Heather McCloskey, Esq.
Ervin Cohen & Jessup LLP
9401 Wilshire Blvd., 9th Floor
Beverly Hills, CA 90212

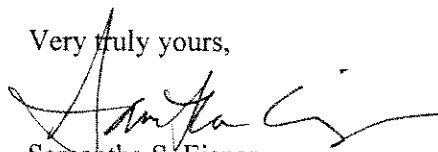
Re: ICANN v. RegisterFly: Violation of Permanent Injunction

Dear Ms. McCloskey:

This letter serves as notice that ICANN will be filing an ex parte application tomorrow seeking the imposition of further sanctions against your client for its renewed violations of the Court's June 12, 2007 Permanent Injunction. ICANN will seek \$5,000.00 in sanctions for every day your client is in violation of the Permanent Injunction.

Your client's webpage has been altered such that the Notice to Consumers required at Paragraph 11 of the Permanent Injunction is not visible. This is unacceptable. The scripting has been altered so that the space where the Notice to Consumers is to appear is blank, however if the webpage is printed the Notice to Consumers appears on a print out. RegisterFly is required to post the Notice to Consumers so that it is actually visible to consumers visiting www.registerfly.com, and ICANN will continue to enforce RegisterFly's compliance with this provision.

Very truly yours,



Samantha S. Eisner

cc: Jeff LeVee, Esq.
Kelly Scott, Esq.

LAI-2883386v1

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Exh E -15-



"Heather McCloskey"
<hmccloskey@ECJLAW.COM
>

07/03/2007 10:50 AM

To "Samantha Eisner" <seisner@JonesDay.com>
cc "Kelly Scott" <kscott@ECJLAW.COM>, "Lauren Katunich"
<lkatunich@ECJLAW.COM>

bcc

Subject RegisterFly Website Glitch

History: This message has been forwarded.

Ms. Eisner,

I can assure you with confidence that the "glitch" was truly unintentional. It impacted other critical parts of the website as well as the notice provision.

The normal webmaster of the RegisterFly website was not available and some enhancements/updates to the site were needed. The person who handled the duties over the weekend was not 100% familiar with the CSS structure the prior webmaster used and made some font/color changes that impacted other parts of the site unintentionally. He has taken precautions to ensure it does not occur again.

Heather McCloskey

Ervin, Cohen & Jessup LLP

9401 Wilshire Blvd, 9th Floor
Beverly Hills, CA 90212-2974
Phone: 310-281-6349
Direct Fax: 310-887-6853
Email: hmccloskey@ecjlaw.com



The information contained herein is confidential and privileged attorney-client information or work product intended only for the individual or entity to whom it is addressed. Any unauthorized use, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately.

iCann / RegisterFly (Case No. CV 07-2089 R (PLAx))
Costs Related to Motion for Attorneys' Fees and Costs from Bad Faith Conduct

Service-Related Fees		Costs	Total
5/4/2007	Ask Litigation Support	\$155.00	
5/11/2007	Ask Litigation Support	\$155.00	
5/16/2007	Ask Litigation Support	\$156.75	
5/2/2007	FedEx to Mitchell Novick	\$8.53	
5/2/2007	FedEx to Harold Rabner	\$8.53	
5/3/2007	FedEx to Mitchell Novick	\$8.53	
5/3/2007	FedEx to Harold Rabner	\$8.53	
5/2/2007	FedEx to Kevin Medina	\$15.49	
5/9/2007	FedEx to Harold Rabner	\$8.60	
5/9/2007	FedEx to Mitchell Novick	\$8.60	
5/9/2007	FedEx to Kevin Medina	\$8.60	
5/8/2007	FedEx to Harold Rabner	\$8.60	
5/8/2007	FedEx to Mitchell Novick	\$8.60	
5/8/2007	FedEx to Kevin Medina	\$8.60	
5/3/2007	FedEx to Kevin Medina	\$8.53	
			\$576.49
Duplicating			
5/24/2007	Copies	\$85.00	
			\$85.00
Reporter's Transcript			
5/25/2007	Copy of transcript of hearing	\$176.00	
6/12/2007	Copy of transcript of hearing (invoice forthcoming)	\$115.50	
6/15/2007	Copy of transcript of hearing (invoice forthcoming)	\$115.50	
			\$407.00
Total Costs			\$1,068.49

Exh 6 - 17-

INVOICE

ASK Litigation Support, Inc.
D/B/A Firm Service
211 East 43rd Street, Suite 1901
New York, NY 10017
Phone: (212) 481-9000
Fax: (212) 481-7057
E.I.N. #13-3723558

Inv. # 2007000311
05-21-2007

Samantha Eisner
Jones

220368

Case Number: Central CV 07-02089

Plaintiff:
THE INTERNET CORPORATION FOR ASSIGNED NAMES AND
NUMBERS

RECEIVED
JUN - 4 2007
JONES DAY

Defendant:
REGISTERFLY.COM, INC., and UNIFIEDNAMES, INC.

Completed: 5/12/2007
To be served on: UnifiedNames

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Fee (Per hour)			
Sub-contract fee	1.00	90.00	90.00
TOTAL CHARGED:	1.00	65.00	65.00
			\$155.00

BALANCE DUE:

\$155.00

Financial: Please Pay
172210635001
Samantha Eisner
JP002375

Please enclose a copy of this invoice with your payment.

THE INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS

Plaintiff(s) Petitioner(s)

against

REGISTERFLY.COM, INC

Defendant(s) Respondent(s)

Calendar No.

AFFIDAVIT OF SERVICE

STATE OF DELAWARE, COUNTY OF: NEW CASTLE

Ss:

The undersigned, being sworn, says: Deponent is not a party herein, is over 18 years of age and resides at Wilmington, DE

On 5/11/07 at 11:47 a.M., at C/O THE VALIS GROUP 501 SILVERSIDE RD. WILMINGTON, DE

deponent served the within

- summons and complaint
subpoena duces tecum
citation

NOTICE OF ENTRY OF ORDER GRANTING CIVIL SANCTIONS
(PROPOSED) ORDER TO SHOW CAUSE RE FURTHER CONTEMPT SANCTIONS

on REGISTERFLY.COM, INC

defendant witness hereinafter called there in
-espondent the recipient lamed

INDIVIDUAL

1. by delivering a true copy of each to said recipient personally; deponent knew the person so served to be the person described as said recipient therein.

CORPORATION

2. a DELAWARE corporation, by delivering thereat a true copy of each to ROXANNE GANSTER

personally, deponent knew said corporation so served to be the corporation, described in same as said recipient and knew said individual to be PROCESS AGENT thereof

SUITABLE AGE PERSON

3. by delivering thereat a true copy of each to a person of suitable age and discretion. Said premises is recipient's actual place of business dwelling place usual place of abode within the state.

AFFIXING TO DOOR, ETC.

4. by affixing a true copy of each to the door of said premises, which is recipient's actual place of business dwelling place usual place of abode within the state. Deponent was unable, with due diligence to find recipient or a person of suitable age and discretion, thereat, having called there

MAILING TO RESIDENCE USE WITH 3 OR 4

5A. Deponent talked to at said premises who stated that recipient lived worked there. Within 20 days of such delivery or affixing, deponent enclosed a copy of same in a postpaid envelope properly addressed to recipient at recipient's last known residence, at and deposited said envelope in an official depository under exclusive care and custody of the U.S. Postal Service within New York State.

MAILING TO BUSINESS USE WITH 3 OR 4

5B. Within 20 days of such delivery or affixing, deponent enclosed a copy of same in a first class post paid envelope properly addressed to recipient at recipient's actual place of business, at in an official depository under the exclusive care and custody of the U.S. Postal Service

DESCRIPTION

- Male White Skin Black Hair White Hair 14-20 Yrs. Under 5' Under 100 Lbs.
Female Black Skin Brown Hair Balding 21-35 Yrs. 5'0"-5'3" 100- 130 Lbs.
Yellow Skin Blonde Hair Mustache 36-50 Yrs. 5'4"-5'8" 131-160 Lbs.
Brown Skin Gray Hair Beard 51-65 Yrs. 5'9"-6'0" 161-200 Lbs.
Red Skin Red Hair Glasses Over 65 Yrs. [- I Over 6' Over 200 Lbs.

Other identifying features:

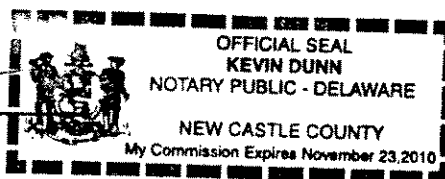
WITNESS FEES

\$ the authorizing traveling expenses was paid (tendered) to the recipient and one days' witness fee: was mailed to the witness with subpoena copy.

MILITARY SERVICE

I asked the person spoken to whether recipient was in active military service of the United States or of the State of New York in any capacity whatever and received a negative reply. Recipient wore ordinary civilian clothes and no military uniform. The source of my information and the grounds of my belief are the conversations and observations above narrated. Upon information and belief I aver that the recipient is not in military service of New York State or of the United States as that term is defined in either the State or in the Federal statutes.

Sworn to before me on 5/11/07



JAVIER SANCHEZ FIRM SERVICE License No.

INVOICE

ASK Litigation Support, Inc.
D/B/A Firm Service
211 East 43rd Street, Suite 1901
New York, NY 10017
Phone: (212) 481-9000
Fax: (212) 481-7057
E.I.N. #13-3723558

Inv. # 2007000309
05-17-2007

Samantha Eisner
Jones

Case Number: Central CV 07-02089

Plaintiff:
THE INTERNET CORPORATION FOR ASSIGNED NAMES AND
NUMBERS

Defendant:
REGISTERFLY.COM, INC., and UNIFIEDNAMES, INC.

Completed: 5/16/2007
To be served on: Novick, Mitchell

RECEIVED
JUN - 4 2007
JONES DAY

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Fee (Per hour)	1.50	90.00	135.00
Mileage	35.00	0.45	15.75
Transportation	1.00	6.00	6.00
TOTAL CHARGED:			\$156.75

BALANCE DUE:

\$156.75

*Financial: Please Pay
172210635001
Samantha Eisner
JP002375*

Please enclose a copy of this invoice with your payment.

ASK Litigation Support, Inc.
D/B/A Firm Service
211 East 43rd Street, Suite 1901
New York, NY 10017
Phone: (212) 481-9000
Fax: (212) 481-7057
E.I.N. #13-3723558

Inv. # 2007000308
05-17-2007

Samantha Eisner
Jones

Case Number: Central CV 07-02089

Plaintiff:
THE INTERNET CORPORATION FOR ASSIGNED NAMES AND
NUMBERS

Defendant:
REGISTERFLY.COM, INC., and UNIFIEDNAMES, INC.

Completed: 5/4/2007
To be served on: UnifiedNames

RECEIVED
JUN - 4 2007
JONES DAY

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Fee (Per hour)	1.00	90.00	90.00
Sub-contract fee	1.00	65.00	65.00
TOTAL CHARGED:			\$155.00

BALANCE DUE:

\$155.00

Financial: Please Pay.

172210 635001

Samantha Eisner

JP002375

Please enclose a copy of this invoice with your payment.

RETURN OF SERVICE

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA CASE # CV07-2089R(PLAX)

UNIFIEDNAMES, INC.
By Serving its Registered Agent
CORPORATION SERVICE COMPANY
To Be Served

**NOTICE OF ENTRY OF ORDER
GRANTING CIVIL SANCTIONS
EXHIBITS 1 & 2**

1201 HAYS STREET, TALLAHASSEE, FLORIDA
ADDRESS

COURT DATE: N/A
COURT TIME: N/A

THE INTERNET CORPORATION etc.
PLAINTIFF

REGISTERFLY.COM, INC. et al.
DEFENDANT

ATTORNEY: JEFFREY A. LeVEE, ESQUIRE
555 S. FLOWER ST., FIFTIETH FLOOR
LOS ANGELES, CA 90071

Received this notice on 05/12/2007 at 09:00 hours and same was served on 05/14/2007 at 12:01 hours in Leon County, Florida as follows:

METHOD OF SERVICE

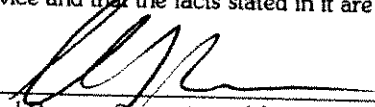
**Corporate Service
on a Registered Agent:**

By delivering a copy of this notice, with the date and hour of service endorsed thereon by me, to: CORPORATION SERVICE COMPANY as registered agent of the within-named corporation according to F.S. 48.081 (3) c/o KIM GLOVER, SERVICE CLERK.

Chris J. Colson
Certified Process Server #142

I certify that at the time of service, I placed on the face of that process my printed name, signature, identification number, a statement that I am a Certified Process Server in and for the Second Judicial Circuit of Florida; that I endorsed on all copies served, the date and hour of service.

Under penalties of perjury, I declare that I have read the foregoing Return of Service and that the facts stated in it are true.



Certified Process Server in and for the
Second Judicial Circuit of Florida
Leon County, Florida
Certified Pursuant to F.S. §48.29
Notary not required pursuant to F.S. §92.525

FIRM SERVICE
211 E. 43RD STREET, SUITE 1901
NEW YORK, NY 10017
212-481-9000

Exh G -22-

Jones Day

FedEx Cost Recovery Report

Invoice Number: 202192234
Invoice Date: May 07, 2007
Account Number: 120371207
Control Number: 07050903
Office: LOS

Ship Date: May 02, 2007 Payor: Shipper Reference: JP002375/172210-635001

Matter No.: 72210-635001
JP Number: JP002375
Tracking No.: 859507122569
Service Type: FedEx Priority Overnight®
Package Type: FedEx Envelope®
Zone: 08
Origin:
Destination:
Pieces: 1
Weight (lbs.): 0.00
Delivered: May 03, 2007 9:22 AM
Signed By: L.VIZZONE



Sender	Recipient
SAMANTHA KISNER JONES - DAY 555 S FLOWER ST FL 50 LOS ANGELES, CA 900712300 US	HAROLD RAENER ESQ RAENER ALLCORN BAUMGART & BEN 52 UPPER MONTCLAIR PLZ UPPER M MONTCLAIR, NJ 07043 US
Freight Charge	22.15
Fuel Surcharge	0.78
Discount Amount	- 14.40
	USD \$ 8.53

Jones Day

FedEx Cost Recovery Report

Invoice Number: 202192234
 Invoice Date: May 07, 2007
 Account Number: 120371207
 Control Number: 07050903
 Office: *LA* LOS

Ship Date: May 02, 2007 Payor: Shipper Reference: JP002375/172210-635001

Matter No.: 72210-535001
 JP Number: JP002375
 Tracking No.: 859507122558
 Service Type: FedEx Priority Overnight®
 Package Type: FedEx Envelope®
 Zone: 08

Sender	Recipient
SAMANTHA EISNER JONES - DAY 555 S FLOWER ST FL 50 LOS ANGELES, CA 900712300 US	MITCHELL NOVICK ESQ LAW OFFICES OF MITCHELL P NOVI 66 PARK ST MONTCLAIR, NJ 07042 US

Origin:	Freight Charge	22.15
Destination:	Fuel Surcharge	0.78
Pieces: 1	Discount Amount	-
Weight (lbs.): 0.00		USD \$ 8.53

Delivered: May 03, 2007 9:59 AM
 Signed By: R.ZINNA

Monark

Ship Date: May 03, 2007 Payor: Shipper Reference: JP002375/172210-635001

Matter No.: 72210-635001
 JP Number: JP002375
 Tracking No.: 859507122547
 Service Type: FedEx Priority Overnight®
 Package Type: FedEx Envelope®
 Zone: 08

Sender	Recipient
SAMANTHA EISNER JONES - DAY 555 S FLOWER ST FL 50 LOS ANGELES, CA 900712300 US	MITCHELL NOVICK ESQ LAW OFFICES OF MITCHELL P NOVI 66 PARK ST MONTCLAIR, NJ 07042 US

Origin:	Freight Charge	22.15
Destination:	Fuel Surcharge	0.78
Pieces: 1	Discount Amount	-
Weight (lbs.): 0.00		USD \$ 8.53

Delivered: May 04, 2007 10:22 AM
 Signed By: R.ZINNA

ExhG -24-

Jones Day

FedEx Cost Recovery Report

Invoice Number: 202192234
Invoice Date: May 07, 2007
Account Number: 120371207
Control Number: 07050903
Office: LOS

Ship Date: May 03, 2007 Payor: Shipper Reference: JP002375/172210-635001

Matter No.:	72210-635001	Sender	Recipient
JP Number:	JP002375	SAMANTHA EISNER	HAROLD RABNER ESQ
Tracking No.:	859507122710	JONES - DAY	RABNER ALLCORN BAUMGART & BEN
Service Type:	FedEx Priority Overnight®	555 S FLOWER ST FL 50	52 UPPER MONTCLAIR PLZ
Package Type:	FedEx Envelope®	LOS ANGELES, CA 900712300 US	MONTCLAIR, NJ 07043 US
Zone:	08		
Origin:		Freight Charge	22.15
Destination:		Fuel Surcharge	0.78
Pieces:	1	Discount Amount	14.40
Weight (lbs.):	0.00		USD \$ 8.53
Delivered:	May 04, 2007 9:15 AM		
Signed By:	K.MEYERS		

Jones Day

FedEx Cost Recovery Report

Invoice Number: 203509723
Invoice Date: May 14, 2007
Account Number: 120371207
Control Number: 07051603
Office: LOS

Ship Date: May 02, 2007 Payor: Shipper Reference: *JP002375* 172210-635001

Matter No.:	72210-635001	Sender	Recipient
JP Number:	JP002375	SAMANTHA EISNER	KEVIN MEDINA
Tracking No.:	859507122775	JONES - DAY	REGISTERELY COM INC
Service Type:	FedEx Priority Overnight®	555 S FLOWER ST FL 50	960 ARTHUR GODFREY RD STE 402
Package Type:	FedEx Pak®	LOS ANGELES, CA 900712300 US	MIAMI BEACH, FL 33140 US
Zone:	08		
Origin:		Freight Charge	36.10
Destination:		Fuel Surcharge	1.41
Pieces:	1	Discount Amount	22.02
Weight (lbs.):	1.00		USD \$ 15.49
Delivered:	May 07, 2007 5:35 PM		
Signed By:			

Jones Day

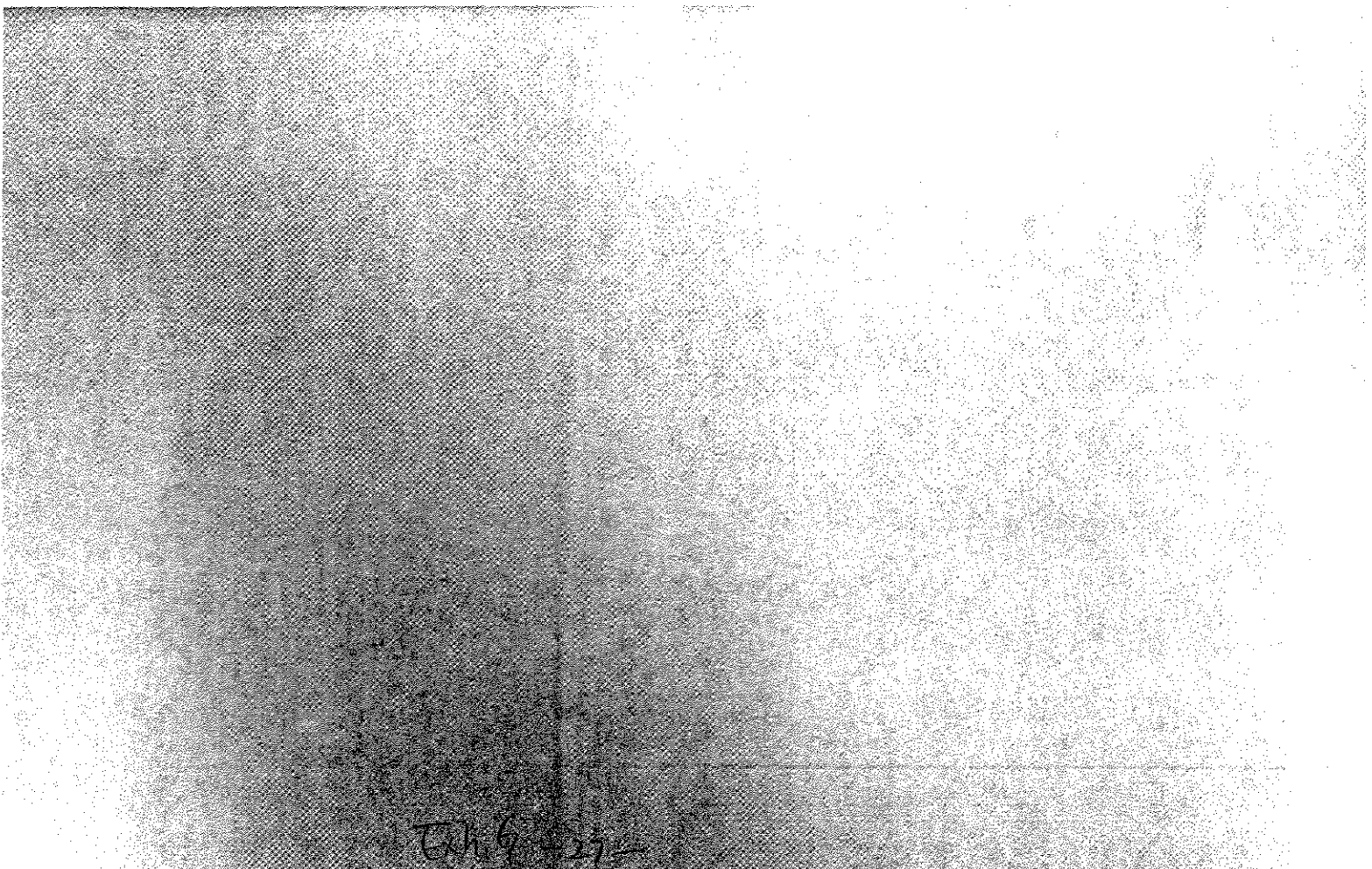
FedEx Cost Recovery Report

Invoice Number: 203509723
Invoice Date: May 14, 2007
Account Number: 120371207
Control Number: 07051603
Office: LOS

JP002375

Ship Date: May 09, 2007 Payor: Shipper Reference: JP002375/172210-635001

Matter No.:	72210-635001	Sender	Recipient
JP Number:	JP002375	SAMANTHA EISNER	HAROLD RABNER ESQ
Tracking No.:	859507122179	JONES - DAY	RABNER ALLOORN BAUNGART & BEN
Service Type:	FedEx Priority Overnight®	555 S FLOWER ST FL 50	52 UPPER MONTCLAIR PLZ UPPER M
Package Type:	FedEx Envelope®	LOS ANGELES, CA 900712300 US	MONTCLAIR, NJ 07043 US
Zone:	08		
Origin:		Freight Charge	22.15
Destination:		Fuel Surcharge	0.85
Pieces:	1	Discount Amount	14.40
Weight (lbs.):	0.00		USD \$ 8.60
Delivered:	May 10, 2007 9:12 AM		
Signed By:	K.MEYERS		



EMG 27

Jones Day

FedEx Cost Recovery Report

Invoice Number: 203509723
 Invoice Date: May 14, 2007
 Account Number: 120371207
 Control Number: 07051603
 Office: LOS

JP002375

Ship Date: May 09, 2007 Payor: Shipper Reference: ~~JP002375~~ 172210-635001

Matter No.:	72210-635001	Sender	Recipient
JP Number:	JP002375	SAMANTHA EISNER	MITCHELL NOVICK ESQ
Tracking No.:	859507122180	JONES - DAY	LAW OFFICES OF MITCHELL P NOVI
Service Type:	FedEx Priority Overnight®	555 S FLOWER ST FL 50	66 PARK ST
Package Type:	FedEx Envelope®	LOS ANGELES, CA 900712300 US	MONTCLAIR, NJ 07042 US
Zone:	08		
Origin:		Freight Charge	22.15
Destination:		Fuel Surcharge	0.85
Pieces:	1	Discount Amount	14.40
Weight (lbs.):	0.00		
Delivered:	May 10, 2007 9:39 AM		USD \$ 8.60
Signed By:	EISNER		

JP002375

Ship Date: May 09, 2007 Payor: Shipper Reference: ~~JP002375~~ 172210-635001

Matter No.:	72210-635001	Sender	Recipient
JP Number:	JP002375	SAMANTHA EISNER	KEVIN MADINA
Tracking No.:	859507122190	JONES - DAY	REGISTERFLY COM INC
Service Type:	FedEx Priority Overnight®	555 S FLOWER ST FL 50	960 ARTHUR GODFREY RD ST 402
Package Type:	FedEx Envelope®	LOS ANGELES, CA 900712300 US	MIAMI BEACH, FL 33140 US
Zone:	08		
Origin:		Freight Charge	22.15
Destination:		Fuel Surcharge	0.85
Pieces:	1	Discount Amount	14.40
Weight (lbs.):	0.00		
Delivered:	May 10, 2007 3:26 PM		USD \$ 8.60
Signed By:			

JP002375

Ship Date: May 08, 2007 Payor: Shipper Reference: ~~JP002375~~ 172210-635001

Matter No.:	72210-635001	Sender	Recipient
JP Number:	JP002315	SAMANTHA EISNER	HAROLD RBANER ESQ
Tracking No.:	859507122205	JONES - DAY	RABNER ALLOORN BAUMGART & BEN
Service Type:	FedEx Priority Overnight®	555 S FLOWER ST FL 50	52 UPPER MONTCLAIR PLZ
Package Type:	FedEx Envelope®	LOS ANGELES, CA 900712300 US	MONTCLAIR, NJ 07043 US
Zone:	08		
Origin:		Freight Charge	22.15
Destination:		Fuel Surcharge	0.85
Pieces:	1	Discount Amount	14.40
Weight (lbs.):	0.00		
Delivered:	May 09, 2007 9:20 AM		USD \$ 8.60
Signed By:	K.MEYERS		

Jones Day

FedEx Cost Recovery Report

Invoice Number: 203509723
 Invoice Date: May 14, 2007
 Account Number: 120371207
 Control Number: 07051603
 Office: LOS

Ship Date: May 08, 2007 Payor: Shipper Reference: JP002375/172210-635001

Matter No.: 72210-635001
 JP Number: JP002375
 Tracking No.: 859507122216
 Service Type: FedEx Priority Overnight®
 Package Type: FedEx Envelope®
 Zone: 08
 Origin:
 Destination:
 Pieces: 1
 Weight (lbs.): 0.00
 Delivered: May 09, 2007 10:02 AM
 Signed By: R.ZINNA

Sender
 SAMANTHA EISNER
 JONES - DAY
 555 S FLOWER ST FL 50
 LOS ANGELES, CA 900712300 US

Recipient
 MITCHELL NOVICK ESQ
 LAW OFFICES OF MITCHELL P NOVI
 66 PARK ST
 MONTCLAIR, NJ 07042 US

Freight Charge	22.15
Fuel Surcharge	0.85
Discount Amount	14.40
USD \$	8.60

Ship Date: May 08, 2007 Payor: Shipper Reference: JP002375/172210-635001

Matter No.: 72210-635001
 JP Number: JP002375
 Tracking No.: 859507122227
 Service Type: FedEx Priority Overnight®
 Package Type: FedEx Envelope®
 Zone: 08
 Origin:
 Destination:
 Pieces: 1
 Weight (lbs.): 0.00
 Delivered: May 10, 2007 3:26 PM
 Signed By:

Sender
 SAMANTHA EISNER
 JONES - DAY
 555 S FLOWER ST FL 50
 LOS ANGELES, CA 900712300 US

Recipient
 KEVIN MEDINA
 REGISTERFLY COM INC
 860 ARTHUR GODGREY RD ST 402
 MIAMI BEACH, FL 33140 US

Freight Charge	22.15
Fuel Surcharge	0.85
Discount Amount	14.40
USD \$	8.60

Jones Day

FedEx Cost Recovery Report

Invoice Number: 204862256
Invoice Date: May 21, 2007
Account Number: 120371207
Control Number: 07052303
Office: LOS

[Handwritten Signature]

Ship Date: May 03, 2007 Payor: Shipper Reference: JP002375/172210-635001

Matter No.:	72210-635001	Sender	Recipient
JP Number:	JP002375	SAMANTHA EISNER	KEVIN MEDINA
Tracking No.:	859507122525	JONES - DAY	REGISTERFLY COM
Service Type:	FedEx Priority Overnight®	555 S FLOWER ST FL 50	960 GODFREY RD STE 402
Package Type:	FedEx Envelope®	LOS ANGELES, CA 900712300 US	MIAMI BEACH, FL 33140 US
Zone:	08		
Origin:		Freight Charge	22.15
Destination:		Fuel Surcharge	0.78
Pieces:	1	Discount Amount	14.40
Weight (lbs.):	0.00		USD \$ 8.53
Delivered:			
Signed By:			

Exh 6 - 30 -

CHECK REQUEST

Rush Check

Date May 25, 2007

Need By Noon m.

On 5/29/07

Certified Check Money Order Cashier's Check Foreign Draft

Vendor No. (Financial Services Use Only) _____

Original Invoice Required
Normal Processing Time Is 24 Hours
Unless Otherwise Indicated

Please Issue Check Payable To:

Sheri Kleeger

(Tax ID # 546697519)

512 N. Spring St, Rm 402

Los Angeles CA

One Hundred seventy six -----

Dollars \$ 176.00

RECEIVED
MAY 25 2007
JONES DAY

For Transcript of Hearing of 5/25/07 w/Judge Real.

COST CODES

VAGENT	Gen. agents/consultants fees	VLD	Long distance charges
VAIR	Air Fare	VLENT	Local entertainment expenses
VAIRC	Air Fare credit	VLEXIS	Lexis search fees
VATTY	Attorneys fees	VLFB	Local food/beverage expense
VBIND	Binding	VLIT	General litigation expenses
VBLUE	Blue Sky filing fees	VLMILE	Local mileage charges
VCAR	Car rental charges	VLPARK	Local parking charges
VCASH	Cash Advance	VL TAXI	Local taxi charges
VCCC	Calling card charges	VL TELE	Local telephone charges
VCERTC	Certified copy charges	VMEET	Meeting room charges
VCERTD	Certified document charges	VMESS	Messenger services
VCOMM	General communication charges	VMILE	Mileage expenses
VCOMP	General computerized research	VMISC	Miscellaneous expenses
VCONS	Consultants fees	VNAME	Name reservation fees
VCOUR	Courier services	VPARK	Parking expenses
VCOURTC	Court costs	VPEN	Penalties
VCOURTR	Court reporter fees	VPOST	Postage charges
VCT	CT Corporation fees	VPRINT	Printing charges
VDELY	General delivery services	VPROB	Probate fees
VDIAL	Dialog search fees	VPUBL	Publication expenses
VDOCC	Docket copy charges	VRECD	Record Deed costs
VDOW	Dow Jones search fees	VRES	Research fees
VDUES	Dues	VSEM	Seminar costs
VDUP	Duplication charges	VSUPP	Supplies
VENT	Entertainment expenses	VTAXI	Taxi charges
VFB	Food and beverage expenses	VTC	Telecopy charges
VFEDX	Federal Express charges	VTEMP	Temporary Employee expenses
VFILA	Articles of Incorporation filing fee	VTKTS	Event tickets
VFIELD	Document filing charges	VTOLL	Toll charges
VFILEF	General filing fees and related	VTRAIN	Train Fare
VFINE	Fines	VTRAV	General travel costs
VGIFT	Gifts	VTRNSVC	Translation services
VGOOD	Certificate of Good Standing fee	VUCC	UCC filing fees
VGRAPH	Graphics/photography charges	VVID	Video and electronic expenses
VHOTEL	Hotel charges	VWEST	Westlaw search fees
VIMAG	Imaging services	VWIT	Witness fees
VINFO	Infosearch search fees		

Charge To: _____

CAM # 172210-635001

CAM Name ICANN RE REGISTERFLY

Cost Code VCOURTR

JP Number JP002375

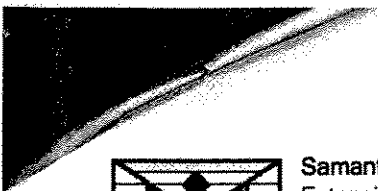
Requested By Samantha Eisner
Samantha Eisner

Approved By _____

CHECK DISTRIBUTION

- Mail to Vendor
- Call Futrowsky At Ext. 32664
For Pickup
- Other _____





Samantha Eisner /JonesDay
Extension 32220
05/25/2007 11:52 AM

To dfutrowsky@JonesDay.com
cc
bcc
Subject Fw: ICANN v. REGISTERFLY.COM CV 07-2089 R

Samantha Eisner
Jones Day
555 South Flower Street, Fiftieth Floor
Los Angeles, CA 90071
(213) 243-2220
Fax: (213) 243-2539
seisner@JonesDay.com

----- Forwarded by Samantha Eisner/JonesDay on 05/25/2007 11:52 AM -----

mykuippo@aol.com

05/25/2007 11:34 AM

To seisner@JonesDay.com
cc
Subject Re: ICANN v. REGISTERFLY.COM CV 07-2089 R

Ms. Eisner,

Yes, it's the total estimated cost. The check is made to me Sheri Kleeger 312 N. Spring St. Rm 402 LA; TIN 546697519. It will be emailed to you Tuesday, May 29, 2007.

You too, have a nice weekend.....

Thanks, Sheri Kleeger

-----Original Message-----

From: Samantha Eisner
To: mykuippo@aol.com
Cc: jlevec@JonesDay.com; dfutrowsky@JonesDay.com
Sent: Fri, 25 May 2007 11:26 am
Subject: Re: ICANN v. REGISTERFLY.COM CV 07-2089 R

Ms. Kleeger -

Thank you for your prompt email. We would like the transcript expedited, and I'm having a check ordered today. Is \$176 the total cost? In addition, should the check be made payable to you, or to the Court? If it

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is for you, can you please give me your TIN number?

As to the delivery date, will it be by May 30 (Wednesday)?

Thanks again, and have a good holiday weekend -

Samantha Eisner
Jones Day
555 South Flower Street, Fiftieth Floor
Los Angeles, CA 90071
(213) 243-2220
Fax: (213) 243-2539
seisner@JonesDay.com

mykuippo@aol.com

05/25/2007 11:16 AM

To seisner@jonesday.com

cc

Subject ICANN v. REGISTERFLY.COM CV 07-2089 R

MS. EISNER,

THE COST FOR THE TRANSCRIPT IS \$176. IT WILL BE EMAILED TO YOU AND MR. LEVEE ON TUESDAY JUNE 30, 2007. I'LL NEED THE DEPOSIT ASAP. LET ME KNOW IF YOU STILL WANT THE TRANSCRIPT ASAP. I'LL NEED TO START WORKING ON IT.

THANKS,

SHERI KLEEGER

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This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

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PROOF OF SERVICE BY PERSONAL 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 July 16, 2007, I caused to be served the foregoing document:

**DECLARATION OF SAMANTHA EISNER IN
SUPPORT OF MOTION FOR ATTORNEYS' FEES**

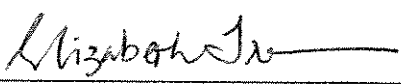
on the interested party by placing a true copy in envelope(s) addressed as follows:

Heather McCloskey, Esq.	Attorney for Defendant,
Ervin Cohen & Jessup LLP	RegisterFly.Com, Inc.
9401 Wilshire Blvd., 9th Floor	
Beverly Hills, CA 90212	

I caused such envelope(s) to be delivered by hand to the addressee(s).

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

Executed on July 16, 2007, at Los Angeles, California.



Elizabeth Tran