

Richard A. Sipos (Bar No. 126982)
Garret D. Murai (Bar No. 215667)
WENDEL, ROSEN, BLACK & DEAN LLP
1111 Broadway, 24th Floor
Post Office Box 2047
Oakland, CA 94607-4036
Telephone: (510) 834-6600
Facsimile: (510) 834-1928
E-mail: gmurai@wendel.com

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BANK JULIUS BAER & CO. LTD, a
Swiss entity; and JULIUS BAER BANK
AND TRUST CO. LTD, a Cayman Island
entity,

Plaintiffs,

vs.

WIKILEAKS, an entity of unknown form;
WIKILEAKS.ORG, an entity of unknown
form; DYNADOT, LLC, a California
limited liability company; and DOES 1
through 10, inclusive,

Defendants.

Case No. CV08-0824 JSW

**STIPULATION FOR ENTRY OF
PERMANENT INJUNCTION AND ORDER**

1 Plaintiffs JULIUS BAER & CO. LTD and JULIUS BAER BANK AND TRUST CO.
 2 LTD. and Defendant DYNADOT LLC, by and through their attorneys of record, stipulate as
 3 follows:

4 A. WHEREAS, Plaintiffs JULIUS BAER & CO. LTD and JULIUS BAER BANK
 5 AND TRUST CO. LTD (collectively “Julius Baer” and/or “Plaintiffs”) have brought an action
 6 against Defendant WIKILEAKS, WIKILEAK.ORG, DYNADOT, LLC (“Dynadot” or
 7 “Defendant”) and DOES 1 through 10 seeking among other things injunctive relief; and

8 B. WHEREAS, Plaintiffs and Dynadot seek to resolve all issues, claims, and
 9 controversies between Plaintiff and Dynadot arising from this action;

10 Plaintiff and Dynadot, by and through their attorneys of record, stipulate as follows:

11 1. Dynadot stipulates and agrees to immediately lock the wikileaks.org domain name
 12 to prevent transfer of the domain name to a different domain registrar, and to disable the
 13 wikileaks.org domain name and account to prevent access to and any changes from being made to
 14 the domain name and account information, until further order of this Court.

15 2. Dynadot stipulates and agrees to immediately disable the wikileaks.org domain
 16 name and account such that the optional privacy who-is service for the domain name and account
 17 remains turned off, until further order of this Court.

18 3. Dynadot stipulates and agrees to preserve a true and correct copy of both current
 19 and any and all prior or previous administrative and account records and data for the
 20 wikileaks.org domain name and account.

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1 4. Plaintiffs stipulate and agree that upon entry of the order attached hereto as Exhibit
2 A that it will immediately file a dismissal with prejudice in favor of Dynadot. Provided, however,
3 that Plaintiffs and Dynadot stipulate and agree that the Court shall retain jurisdiction to enforce
4 the attached order.

5 IT IS SO STIPULATED.

6 Dated: February 14, 2008

**LAVELY & SINGER PROFESSIONAL
CORPORATION**

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9 By: /s/ William J. Briggs, II

William J. Briggs, II
Attorneys for Plaintiffs
BANK JULIUS BAER & CO. LTD. and
JULIUS BAER BANK AND TRUST CO.
LTD.

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12 Dated: February 14, 2008

WENDEL, ROSEN, BLACK & DEAN LLP

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14 By: /s/ Garret D. Murai

Garret D. Murai
Attorneys for Plaintiff
DYNADOT, LLC

Wendel, Rosen, Black & Dean LLP
1111 Broadway, 24th Floor
Oakland, CA 94607-4036

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BANK JULIUS BAER & CO. LTD, a
Swiss entity; and JULIUS BAER BANK
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entity,

Plaintiffs,

vs.

WIKILEAKS, an entity of unknown form;
WIKILEAKS.ORG, an entity of unknown
form; DYNADOT, LLC, a California
limited liability company; and DOES 1
through 10, inclusive,

Defendants.

Case No. CV08-0824 JSW

**[PROPOSED] ORDER GRANTING
PERMANENT INJUNCTION**

The Court, having considered the stipulation between Plaintiffs JULIUS BAER & CO. LTD and JULIUS BAER BANK AND TRUST CO. LTD. (collectively “Julius Baer” and/or “Plaintiff’s”) and Defendant DYNADOT LLC (“Dynadot”), the complaint, and other papers, evidence, and arguments presented by the parties, and finding that immediate harm will result to Plaintiffs in the absence of injunctive relief,

IT IS HEREBY ORDERED:

1. Dynadot shall immediately lock the wikileaks.org domain name to prevent transfer of the domain name to a different domain registrar, and shall immediately disable the

1 wikileaks.org domain name and account to prevent access to and any changes from being made to
2 the domain name and account information, until further order of this Court.

3 2. Dynadot shall immediately disable the wikileaks.org domain name and account
4 such that the optional privacy who-is service for the domain name and account remains turned
5 off, until further order of this Court.

6 3. Dynadot shall preserve a true and correct copy of both current and any and all
7 prior or previous administrative and account records and data for the wikileaks.org domain name
8 and account.

9 4. Dynadot shall immediately clear and remove all DNS hosting records for the
10 wikileaks.org domain name and prevent the domain name from resolving to the wikileaks.org
11 website or any other website or server other than a blank park page, until further order of this
12 Court.

13 5. Dynadot shall immediately produce both current and any all prior or previous
14 administrative and account records and data for the wikileaks.org domain name and account,
15 including, but not limited to, all data for the registrant; billing, technical and administrative
16 contacts; all account and payment records and associated data; and IP addresses and associated
17 data used by any person, other than Dynadot, who accessed the account for the domain name, to
18 the extent such information is maintained by Dynadot.

19 6. Plaintiffs shall immediately upon entry of this order file a dismissal with prejudice
20 in favor of Dynadot. Notwithstanding the foregoing, plaintiffs and Dynadot stipulate and agree
21 that the Court shall retain jurisdiction to enforce this order.

22 Dated: February ____, 2008

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24 Jeffrey S. White
25 United States District Judge
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