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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
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12 BANK JULIUS BAER & CO. LTD, a
13 Swiss entity; and JULIUS BAER BANK
AND TRUST CO. LTD, a Cayman Island
14 entity,

15 Plaintiffs,

16 vs.

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

20 Defendants.

Case No. CV08-0824 JSW

**[PROPOSED] ORDER GRANTING
PERMANENT INJUNCTION**

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

26 IT IS HEREBY ORDERED:

27 1. Dynadot shall immediately lock the wikileaks.org domain name to prevent transfer
28 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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