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8 Attorneys for Defendant, INTERNET ESCROW SERVICES, INC., a California corporation
9 erroneously sued as ESCROW.COM, INC., a California corporation

10 UNITED STATES DISTRICT COURT
11
12 NORTHERN DISTRICT OF CALIFORNIA

13 MAINSTREAM MEDIA, EC, a Bahrain
14 (Non-Resident) Exempt Closed Joint Stock
15 Company,
16 Plaintiff,
17 vs.

Civil Action No.: C08-03623 PJH

**STIPULATION AND [~~PROPOSED~~] ORDER
TO CONTINUE CASE MANAGEMENT
CONFERENCE DATE**

18 PETER RIVEN, an individual; ALEXANDER
19 HYDES, an individual; DYNADOT, LLC, a
20 California corporation; ESCROW.COM, INC., a
21 California corporation; FM.NET, an Internet
22 Domain name; and DOES 1 through 10,
23 Defendants.

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Whereas, all parties of record in this action who have appeared in this action to date, by and through their counsel of record, stipulate as follows:

1. A Case Management Conference (“CMC”) is presently scheduled to take place on November 6, 2008, at 2:30 p.m.;
2. Defendant Escrow.com has filed a Rule 12(b)(6) and alternatively a Rule 12(e) Motion which is presently schedule to be heard on November 12, 2008, at 9:00 a.m.;
3. All Defendants in the action have not been served. The Complaint alleges unserved Defendant Peter Riven resides in Australia and unserved Defendant Alexander Hydes resides in London, United Kingdom;
4. It would promote judicial economy to have the CMC after the November 12, 2008

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hearing, after the Court has an opportunity to rule on the Motion, and after Plaintiff has had further opportunity to complete service on all parties, including Peter Riven and Alexander Hydes;

- 5. The parties by and through their counsel of record are all available for a CMC hearing on December 4, 2008, at 2:30 p.m.;
- 6. A copy of a proposed Order approved by all counsel is being filed concurrent with this Stipulation.

KRONENBERGER BURGOYNE, LLP

Dated: October 16, 2008 By: /s/ Karl S. Kronenberger
Karl S. Kronenberger, Attorneys for Plaintiff
MAINSTREAM MEDIA, EC

WENDEL, ROSEN, BLACK & DEAN LLP

Dated: October 16, 2008 By: /s/ Garret D. Murai
Garret D. Murai, Attorneys for Defendant
DYNADOT, LLC

SANDERS, COLLINS & REHASTE, LLP

Dated: October 16, 2008 By: /s/ Thomas A. Collins
THOMAS A. COLLINS Attorneys for
Defendant ESCROW.COM

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15 Company,
16 Plaintiff,
17 vs.

Civil Action No.: C08-03623 PJH

**[PROPOSED] ORDER RE: STIPULATION
TO CONTINUE CASE MANAGEMENT
CONFERENCE DATE**

18 PETER RIVEN, an individual; ALEXANDER
19 HYDES, an individual; DYNADOT, LLC, a
20 California corporation; ESCROW.COM, INC., a
21 California corporation; FM.NET, an Internet
22 Domain name; and DOES 1 through 10,
23 Defendants.

24 HAVING CONSIDERED THE STIPULATION OF THE PARTIES AND GOOD CAUSE
25 APPEARING, THE COURT ORDERS AS FOLLOWS:

26 The Case Management Conference presently scheduled for November 6, 2008, at 2:30 p.m.,
27 is continued to December 4, 2008, at 2:30 p.m., in Courtroom 3.

28 DATED: October 20, 2008

PHYLLIS J. HAMILTON
Judge of the Court

