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25 Attorneys for Plaintiffs
26 VERIZON CALIFORNIA INC.
27 VERIZON TRADEMARK SERVICES LLC
28 VERIZON LICENSING COMPANY

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

VERIZON CALIFORNIA INC.;
VERIZON TRADEMARK SERVICES
LLC; and VERIZON LICENSING
COMPANY,

Plaintiffs,

vs.

NAVIGATION CATALYST
SYSTEMS, INC.; and BASIC FUSION,
INC.,

Defendants.

Case No. CV 08-02463 ABC (Ex)

**NOTICE OF MOTION AND
MOTION FOR PRELIMINARY
INJUNCTION**

DATE: June 30, 2008
TIME: 10:00 a.m.
CTRM: 680

HON. AUDREY B. COLLINS

AND RELATED COUNTERCLAIMS.

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

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3 **PLEASE TAKE NOTICE** that on June 30, 2008 at 10:00 a.m., or as soon
4 thereafter as this matter may be heard, in Courtroom 680 of the United States
5 District Court for the Central District of California, Western Division, located at
6 255 East Temple Street, Los Angeles, California 90012 before the
7 Honorable Audrey B. Collins, Plaintiffs Verizon California Inc., Verizon
8 Trademark Services LLC, and Verizon Licensing Company (collectively
9 “Plaintiffs”) will bring on for hearing their Motion for a Preliminary Injunction.

10 Plaintiffs will move and hereby do move this Court, pursuant to Rule 65 of
11 the Federal Rules of Civil Procedure, for an order preliminarily enjoining
12 Defendants Navigation Catalyst Systems, Inc. and Basic Fusion, Inc. and their
13 officers, agents, servants, employees, and attorneys, and those persons in active
14 concert or participation with them who receive actual notice of the preliminary
15 injunction order, from:

16 1. Registering or using any domain name that is identical or
17 confusingly similar to the trade names and trademarks VERIZON, VERIZON
18 WIRELESS, VZ, VZACCESS, VZEMAIL, VZGLOBAL, VZVOICE, VZW,
19 FIOS, VERIZON FIOS;

20 2. Registering any domain name using an automated process; and

21 3. Assisting, aiding or abetting any other person or business entity in
22 engaging in or performing any of the activities referred to in subparagraphs
23 1 and 2, above.

24 This Motion is based upon the accompanying Memorandum of Points and
25 Authorities, the Declarations of Anne F. Bradley and Janis M. Manning, the

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complete record of this action and such other and further oral and documentary evidence as may be submitted in connection with this Motion.

DATED: June 9, 2008

Respectfully submitted,
CHRISTIE, PARKER & HALE, LLP

By /s/David J. Steele
David J. Steele

Attorney for Plaintiffs
VERIZON CALIFORNIA INC.; VERIZON
TRADEMARK SERVICES LLC; and
VERIZON LICENSING COMPANY

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