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

7 UNITED STATES DISTRICT COURT
 8 NORTHERN DISTRICT OF CALIFORNIA

9
 10 MAINSTREAM MEDIA, EC, a Bahrain
 11 (Non-Resident) Exempt Closed Joint Stock
 Company,

Plaintiff,

12 vs.

13 PETER RIVEN, an individual; ALEXANDER
 14 HYDES, an individual; DYNADOT, LLC, a
 California corporation; ESCROW.COM, INC., a
 15 California corporation; FM.NET, an Internet
 Domain name; and DOES 1 through 10,

16 Defendants.
 17

Civil Action No.: C08-03623 PJH

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

18
 19 Whereas, all parties of record in this action who have appeared in this action to date, by and
 20 through their counsel of record, stipulate as follows:

- 21 1. A Case Management Conference (“CMC”) is presently scheduled to take place on
 22 November 6, 2008, at 2:30 p.m.;
- 23 2. Defendant Escrow.com has filed a Rule 12(b)(6) and alternatively a Rule 12(e)
 24 Motion which is presently schedule to be heard on November 12, 2008, at 9:00 a.m.;
- 25 3. All Defendants in the action have not been served. The Complaint alleges unserved
 26 Defendant Peter Riven resides in Australia and unserved Defendant Alexander
 27 Hydes resides in London, United Kingdom;
- 28 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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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

**[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

