1 | JOHN L. SLAFSKY, State Bar No. 195513
DAVID L. LANSKY, State Bar No. 199952
2 | HOLLIS BETH HIRE, State Bar No. 203651
WILSON SONSINI GOODRICH & ROSATI
3 | Professional Corporation
650 Page Mill Road
4 | Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
5 | Facsimile: (650) 493-6811
jslafsky@wsgr.com
6 | dlansky@wsgr.com
hhire@wsgr.com
7 |
Attorneys for Defendant/Counterclaimant
8 | GODADDY.COM, INC.

9 | UNITED STATES DISTRICT COURT

10 | NORTHERN DISTRICT OF CALIFORNIA

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12 | PETROLIAM NASIONAL BERHAD,   ) CASE NO.: 09-CV-5939 PJH
)
13 | Plaintiff,   )
)
14 | vs.   ) **DECLARATION OF**
) **JOHN ROLING IN SUPPORT OF**
15 | GODADDY.COM, INC.,   ) **GO DADDY'S MOTION FOR**
) **SUMMARY JUDGMENT**
16 | Defendant.   )
)
17 |)
GODADDY.COM, INC.,   )
18 |)
              Counterclaimant,   ) Date: December 7, 2011
19 |) Time: 9:00 a.m.
      vs.   ) Courtroom: 3
20 |)
PETROLIAM NASIONAL BERHAD,   ) Honorable Phyllis J. Hamilton
21 |)
              Counterclaim Defendant.   )
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J. ROLING DECLARATION ISO GO DADDY'S
MOTION FOR SUMMARY JUDGMENT
Case No: 09-CV-5939 PJH

DECLARATION OF JOHN ROLING

I, John Roling, declare:

Background

1.　I am a Software Development Manager at Go Daddy.com, Inc. ("Go Daddy"), and have held this position since October, 2008. I have been employed at Go Daddy since 2002, and have served as a senior application developer, a senior web developer and a Software Development Manager. In my current position, I am responsible for Go Daddy's domain and DNS "dashboards," the online user interfaces that allow Go Daddy customers to manage their domain names and the services they have enabled or purchased with Go Daddy. In such capacity, I am familiar with Go Daddy's policies and practices relating to routing and forwarding domain names. I have personal knowledge of the facts set forth herein and, if called as a witness, I could and would testify competently thereto.

Overview of registration, routing, and forwarding

2.　Go Daddy registers over 16 million domains each year, and transfers in over 1 million more domains each year. As part of its basic registrar services, Go Daddy facilitates registration of domain names, facilitates transfer of domain names between registrars (if registrants choose to transfer), and facilitates resolution of Internet traffic to the websites of the registrants' choice. To route a domain name to a website, a registrant who uses Go Daddy as its registrar can designate name servers to point the domain name to where the website resides, or can "forward" the domain name to an existing website by identifying the URL (web address) of the existing website. Website content is not hosted on name servers, but rather on website hosting servers. Website content could be hosted on Go Daddy's hosting servers, or on the hosting servers of another company. Go Daddy does not charge customers for domain forwarding, but rather offers this routing option as part of its registration services.

3.　In facilitating the resolution of Internet traffic, domain name registrars serve as an intermediary between domain name registrants and the registries, who ultimately keep track of the

information necessary for routing domain names. If registrars stopped performing the function of taking name server information and providing it to registries, the Internet would grind to a halt.

Domain Name Routing

4. When a domain name registrant wants to route a domain name to a website, he or she can log into his or her account through the dashboard on Go Daddy's website, then identify the name servers associated with the website (the hosting provider usually provides the names or IP addresses of the name servers). The information is automatically sent to a different server at Go Daddy (the application server), which in turn automatically sends the information to other computers at Go Daddy. In the case of routing without forwarding, the information is automatically sent from the dashboard application, to the application server, to the EPP service (for .net, the .net EPP service). The EPP service automatically sends the name server information to the registry (for .net, Verisign).

5. "Routing" a domain name, without forwarding, means that a domain name registrant has identified name servers that contain the information to lead an ISP to the destination website content. I have attached as Exhibit 1 a true and correct representation of the automated process a domain name registrant customer of Go Daddy would complete to direct Go Daddy to "route" a domain name, without forwarding, by providing name server information. Exhibit 1 shows the screen captures from July 27, 2011. The aesthetics of this user interface have been updated periodically over the past few years, but the functionality of the dashboard, in particular as it functions with respect to routing domain names via name server information, has not changed in any significant way since October 2006.

Domain Name Forwarding

6. Many entities "forward" multiple domain names to a single website; for example, the www.unitedairlines.com and www.ual.com domain names are both forwarded to the website that resides at www.united.com. I have attached as Exhibit 2 a true and correct representation of the automated process a domain name registrant customer of Go Daddy would complete to "forward" a domain name, or route it to an existing website. Exhibit 2 shows the screen captures from July 27, 2011. The aesthetics of this user interface have been updated periodically over the

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past few years, but the functionality of the dashboard, in particular as it functions with respect to forwarding domain names via name server information, has not changed in any significant way since October 2006.

7.   Forwarding is automated – no one from Go Daddy receives and processes requests from registrants to forward domain names. The process takes approximately 30 seconds and can be achieved in 3 clicks.

8.   In the case of forwarding, the information that the domain name registrant enters into the dashboard is automatically sent from the dashboard application to a Go Daddy application server, which in turn sends the information to the EPP service (for .net, the net EPP service) and the forwarding management database. The EPP service automatically sends the name server information to the registry (for .net, Verisign). A forwarding service automatically moves the information from the forwarding management database to the forwarding database.

9.   Sometimes, entities elect to forward a domain name with "masking," which means that the URL appearing in the web browser does not change when the domain name is forwarded. For example, if the domain name www.ual.com forwards to www.united.com:

- forwarding without masking would reveal www.united.com in the web browser window.

- forwarding with masking would continue to show www.ual.com in the browser window, even after the domain name is forwarded to www.united.com.

10.   Go Daddy can only provide domain name forwarding services to domain names for which Go Daddy is the registrar.

11.   Information about forwarding is available in a "help" article on Go Daddy's website. A true and correct copy of this article is attached as Exhibit 3.

12.   To an Internet user, there is no distinction between routing and forwarding. Either way, the user types in the URL, and ends up at the destination website.

13.   Go Daddy provides forwarding services to approximately 8.2 million domain names under its management, and has provided such service in combination with its domain name routing services since 2002 or before.

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14. Forwarding is essential to domain name registrants because it allows multiple domain names to resolve to the same website content. Though a domain name registrant could develop a separate copy of the website for each domain name, this procedure would be inefficient for numerous reasons:

- it would require hosting for each domain name, requiring extra space and cost to the domain name registrant;
- when the domain name registrant wanted to make a change to the website, he or she would have to make the change numerous times, instead of only once;
- it would affect the rank of the website in search engines like Google or Yahoo, because Internet traffic routed to each individual website would not be recognized as flowing to the same website.

The petronastowner.net and petronastowers.net Domain Names

15. After transferring the www.petronastower.net and www.petronastowers.net domain names to Go Daddy on April 1, 2007, later the same day the domain name registrant – Heiko Schoenekess – used the Go Daddy online dashboard to forward the Internet traffic for the domain names to an existing website. A true and correct copy of the page of the account information record indicating that the domain name registrant forwarded the domain names is attached as Exhibit 4.

I declare under penalty of perjury that the foregoing is true and correct. Executed at Hiawatha, Iowa, on October 31, 2011.

By: _____
John Roling

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