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8 GODADDY.COM, INC.

9   UNITED STATES DISTRICT COURT

10   NORTHERN DISTRICT OF CALIFORNIA

11

12 PETROLIAM NASIONAL BERHAD,   )   CASE NO.: 09-CV-5939 PJH
)
13   Plaintiff,   )
)
14   vs.   )   **DECLARATION OF**
)   **JEFF MUNSON 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.   )
22 _____)

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J. MUNSON DECLARATION ISO GO DADDY'S
MOTION FOR SUMMARY JUDGMENT
Case No: 09-CV-5939 PJH

DECLARATION OF JEFF MUNSON

I, Jeff Munson, declare:

1.   I am a Development Manager at Go Daddy.com, Inc. ("Go Daddy"), and have held that position for over a year. I have worked at Go Daddy since 2004, as a programmer and as a Development Manager. In such capacity, I am responsible for the forwarding system at Go Daddy, and I am familiar with Go Daddy's policies and practices relating to forwarding domain names. In particular, I am responsible for the "back end" forwarding system at Go Daddy, meaning the system that responds to an Internet user's request to visit a domain name that is forwarded to an existing website at a different domain name. This is in contrast to "front end" services, which concern the interaction with the domain name registrant in requesting the forwarding service. I have personal knowledge of the facts set forth herein and, if called as a witness, I could and would testify competently thereto.

2.   Many domain name registrants "forward" multiple domain names to a single website.

3.   Forwarding is also referred to as a "301" or "302 redirect." A "301 redirect" means the domain name is set up for permanent forwarding, and the forwarding system instructs the web browser and any search engines that access the domain name to update their links permanently.

4.   A "302 redirect" provides the same routing instruction to a web browser, but on a temporary basis and without an instruction to update links permanently.

5.   The 301 redirect is the most direct and efficient way to forward a domain name to an existing website.

6.   A domain name registrant can easily set up forwarding for a particular domain name ("Domain A"). The registrant logs into his or her account on Go Daddy's dashboard and selects a pre-existing website at another domain name (or URL) to which Domain A will forward. Go Daddy must then communicate the forwarding directive to an Internet user's web browser, as part of the process of resolving Domain A to its associated website content.

1   7.   Go Daddy communicates this forwarding directive using its back-end forwarding

2   servers. Go Daddy's dashboard program takes the information the registrant provided and inputs

3   the information into a database kept on the forwarding servers. The forwarding servers look up the

4   requested domain name in the database to see if the registrant has decided to forward the domain

5   name. The database will then provide, or "return," two pieces of information to the web browser.

6   First, it returns whether the redirect is either permanent (a "301") or temporary (a "302"). Second,

7   it returns the exact URL location to which the Internet user's request should be forwarded.

8   8.   I am informed that the registrant for the petronastower.net and petronastowers.net

9   domain names requested permanent ("301") forwarding to an existing website. As with all

10   customers who request permanent forwarding, Go Daddy's back-end forwarding system

11   automatically entered the information into the forwarding databases and set up the 301 redirect.

12   The 301 (and 302) redirect functions are fully automated, based entirely on the instructions of the

13   registrant as entered on Go Daddy's dashboard. There is no involvement from Go Daddy

14   employees or anyone else in the redirect function.

15   9.   To an Internet user, there is no distinction between resolution to a website through

16   routing and resolution through forwarding. For both services, the user types in the domain name,

17   and ends up at the destination website.

18   I declare under penalty of perjury that the foregoing is true and correct. Executed at

19   Hiawatha, Iowa, on October 28, 2011.

21   By: _Jeff Munson_____.

22   Jeff Munson

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MUNSON DECLARATION