

EXHIBIT 20

HONORABLE JOHN ERICK
NOTED FOR HEARING: SEPTEMBER 12, 2007

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

1st Technology LLC,
Plaintiff,
v.
BODOG ENTERTAINMENT GROUP S.A.,
BODOG.NET, AND BODOG.COM,
Defendants.

Case No. 07-2-25305-0 SEA
1ST TECHNOLOGY LLC'S REPLY IN
SUPPORT OF WRIT OF
EXECUTION REGARDING
ADDITIONAL DOMAIN NAMES

INTRODUCTION

1st Technology LLC ("**1st Technology**") files this short reply in support of its Motion for Writ Regarding Additional Domain Names.

THE NEW DOMAIN NAMES ARE NOT REGISTERED THROUGH A LUXEMBOURG ENTITY

Bodog claims – without any supporting evidence (other than an irrelevant D&B Report) – that the new domain names (e.g., newbodog.com) are registered to a Luxemborg Registrar. This is incorrect. In any event, if the New Domain Names are registered to a Luxemborg entity this only illustrates 1st Technology's point that Bodog works to keep its operations off-shore.

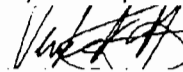
1 1st Technology had attached a WHOIS search result for newbodog.com to
2 its Opposition to Bodog's Request for a Stay. This result indicated that "[the]
3 whois service shows the information for .COM and .NET domains . . . [that] . . . are
4 registered *thru DotRegistrar.com*." (Balasubramani Decl., **Ex B**.) The WHOIS
5 information provided by EuroDNS (the same entity Bodog claims is located in
6 Luxemborg) reflects this identical information (that the domain names are
7 registered to DotRegistrar). "DOTREGISTRAR, LLC" (as reflected in the Secretary
8 of State Database for the State of Washington) is a Washington limited liability
9 company. The Court may take judicial notice of both of these facts,¹ which
10 show that Bodog is incorrect in its statement that the new domain names are
11 located off-shore.
12
13

14 In any event, this is a red herring. Bodog registered and utilized the new
15 domain names to frustrate 1st Technology's collection efforts and to migrate its
16 users to the new domain names. At a minimum, Bodog should be prevented
17 from further transferring these names (or siphoning users from Bodog's gambling
18 sites) pending resolution of the Nevada Motion.
19
20
21
22

23 ¹ The Court may take judicial notice of both WHOIS information and corporate residence,
24 both of which are publicly available on the internet. See, e.g., City of Monroe Employees Ret.
25 Sys. v. Bridgestone Corp., 399 F.3d 651, 655 n.1 (6th Cir. 2005) (taking judicial notice of a term
26 defined on the website of the National Association of Securities Dealers, Inc.); Schaffer v. Clinton,
27 240 F.3d 878, 885 n.8 (10th Cir. 2001) (taking judicial notice of information found in a political
reference almanac and citing to the almanac's website); Grimes Navigant Consulting, Inc., 185
F. Supp. 2d 906, 913 (N.D. Ill. 2002) (taking judicial notice of published stock prices found on the
world wide web).

1 with Bodog's public statements that it would work to frustrate creditors is
2 sufficient to warrant granting of 1st Technology's Motion. In any event, Bodog
3 should be required to post a bond equal to the amount of the judgment for
4 execution to obtain the relief it seeks. Absent posting of a bond, it is
5 inappropriate to halt 1st Technology's collections efforts pending resolution of
6 the Nevada Motion. This is particularly so, where 1st Technology is willing to
7 agree to not dispose of the domain names pending resolution of the Nevada
8 Motion.
9

10
11 Respectfully submitted, this 11th day of September, 2007.

12 

13 _____
14 Venkat Balasubramani
15 Counsel for 1st Technology LLC
16
17
18
19
20
21
22
23
24
25
26
27

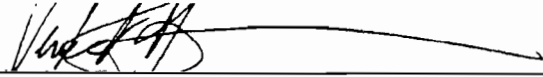
CERTIFICATE OF SERVICE

I, Venkat Balasubramani, hereby certify and declare, that I caused the foregoing 1st Technology LLC's Reply in Support of its Motion for Writ of Execution Regarding Additional Domain Names, to be filed in King County Superior Court, and transmitted to opposing counsel:

Derek A. Newman/Randall Moeller
505 Fifth Ave S., Suite 610
Seattle, WA 98104
(206) 274 2800

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

Dated this 11th day of September, 2007.



Venkat Balasubramani
Counsel for 1st Technology LLC

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27