

Specially appearing defendants Experienced Internet.com, Inc. (“EIC”), Mauricio Bedoya and Patricia Quesada hereby request leave to file a memorandum up to 30 pages in support of its motion to dismiss the complaint pursuant to Rule 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure. This will save the Court and parties time. EIC’s counsel is cooperating with counsel for Cytek, Ltd., Stallion.com FSC, Limited; Manic Media, Inc.; DNR; Fiesta Catering International Inc., Mr. Damian Cross and Cyber Flow Solutions, Inc. to provide the Court with one brief, with short joinders filed by the others.

However, the 20-page limit (Local Rule 7.1(f)) is not enough to cover all of the defendants’ defenses to the complaint, which include the Court’s lack of jurisdiction over the defendants and failure to state a claim. If the parties separate the arguments into separate briefs and each join in the others, no party will exceed the 20-page limit. However, if the Court wishes, one main brief will be filed (with short joinders by the others) if leave to file a brief not to exceed 30 pages is granted.

Respectfully submitted,

/s/ Richard M. Kerger
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Experienced Internet.com, Inc.

/s/ Dana Milmeister
Dana Milmeister (*pro hac vice*)
Counsel for Specially Appearing Defendant
Experienced Internet.com, Inc.

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been electronically filed this 13th day of April, 2007. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's System.

/s/ Dana Milmeister