IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

John Doe,	)	Case No. 3:07CV604
	)	
	)	Honorable Jack Zouhary
Plaintiff,	)	
	)	**DEFENDANT EXPERIENCED**
	)	**INTERNET.COM, INC.'S**
v.	)	**OPPOSITION TO PLAINTIFF'S**
	)	**MOTION FOR LEAVE TO**
	)	**ENGAGE IN LIMITED**
SexSearch.com, et al.,	)	**DISCOVERY TO MONIKER INC.**
	)	**PRIOR TO CIVIL RULE 26(f)**
	)	**CONFERENCE**
Defendants.	)	
	)	
	)	Richard M. Kerger (0015864)
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	)	
	)	Counsel for Specially Appearing
	)	Defendant Experienced Internet.com,
	)	Inc.

Specially appearing defendant Experienced Internet.com, Inc. hereby objects and opposes Plaintiff's motion for leave to conduct discovery directed to Moniker, Inc. prior to any Rule 26(f) conference with Defendants. As the reasons in support of this defendant's motion are exactly the same as the reasons put forth by Defendants Stallion.com FSC, Limited; Manic Media, Inc.; DNR; Fiesta Catering International Inc., and Mr. Damian Cross in their motion for the same relief, we respectfully, with the permission of counsel for those defendants, incorporate herein the arguments made in their motion as if stated anew herein.

Respectfully submitted,

/s/ Richard M. Kerger
RICHARD M. KERGER (0015864)
Counsel for Specially Appearing Defendant
Experienced Internet.com, Inc.

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

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been electronically filed this 5th 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