

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
GREENSBORO DIVISION

ANNE MARTINEZ, individually and)
on behalf of all other persons)
similarly situated,)

Plaintiffs,)

v.)

REGISTERFLY, INC.,)
UNIFIEDNAMES INC.)

HOSTING SERVICES GROUP INC.)

KEVIN MEDINA, in his personal capacity and)
as an agent of RegisterFly, Inc. and)

as an agent of Unifiednames Inc.)

John Naruszewicz, in his capacity as an agent)
of both Unifiednames and RegisterFly,)

ENOM, and)

ICANN,)

Defendants.)

Civil Action No 07-cv-188

**PLAINTIFF'S MOTION FOR
APPOINTMENT AS INTERIM LEAD
CLASS COUNSEL**

Counsel for Plaintiff, E. Clarke Dummit, moves the Court to appoint him interim lead counsel of the class, pending certification, pursuant to Rule 23(g)(2)(A) of the Federal Rules of Civil Procedure. Appointing Mr. Dummit Interim Class Counsel is important and necessary as it will permit counsel to immediately begin protecting the class through injunctive relief, immediately begin class wide discovery, engage *ex parte* with putative class members and Defendant ICANN, establish attorney client privilege with class members, and immediately argue motions on behalf of the class.

Respectfully submitted,
this the 19th day of March 2007.

E. CLARKE DUMMIT
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