

1 Richard A. Sipos (Bar No. 126982)
 Garret D. Murai (Bar No. 215667)
 2 **WENDEL, ROSEN, BLACK & DEAN LLP**
 1111 Broadway, 24th Floor
 3 Post Office Box 2047
 Oakland, CA 94607-4036
 4 Telephone: (510) 834-6600
 Facsimile: (510) 834-1928
 5 E-mail: gmurai@wendel.com

6
 7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11
 12 BANK JULIUS BAER & CO. LTD, a
 Swiss entity; and JULIUS BAER BANK
 13 AND TRUST CO. LTD, a Cayman Island
 entity,

14 Plaintiffs,

15 vs.

16 WIKILEAKS, an entity of unknown form;
 17 WIKILEAKS.ORG, an entity of unknown
 form; DYNADOT, LLC, a California
 18 limited liability company; and DOES 1
 through 10, inclusive,

19 Defendants.
 20

Case No. CV08-0824 JSW

**STIPULATION FOR ENTRY OF
 PERMANENT INJUNCTION AND ORDER**

Wendel, Rosen, Black & Dean LLP
 1111 Broadway, 24th Floor
 Oakland, CA 94607-4036

21
 22
 23
 24
 25
 26
 27
 28

1 Plaintiffs JULIUS BAER & CO. LTD and JULIUS BAER BANK AND TRUST CO.
2 LTD. and Defendant DYNADOT LLC, by and through their attorneys of record, stipulate as
3 follows:

4 A. WHEREAS, Plaintiffs JULIUS BAER & CO. LTD and JULIUS BAER BANK
5 AND TRUST CO. LTD (collectively “Julius Baer” and/or “Plaintiffs”) have brought an action
6 against Defendant WIKILEAKS, WIKILEAK.ORG, DYNADOT, LLC (“Dynadot” or
7 “Defendant”) and DOES 1 through 10 seeking among other things injunctive relief; and

8 B. WHEREAS, Plaintiffs and Dynadot seek to resolve all issues, claims, and
9 controversies between Plaintiff and Dynadot arising from this action;

10 Plaintiff and Dynadot, by and through their attorneys of record, stipulate as follows:

11 1. Dynadot stipulates and agrees to immediately lock the wikileaks.org domain name
12 to prevent transfer of the domain name to a different domain registrar, and to disable the
13 wikileaks.org domain name and account to prevent access to and any changes from being made to
14 the domain name and account information, until further order of this Court.

15 2. Dynadot stipulates and agrees to immediately disable the wikileaks.org domain
16 name and account such that the optional privacy who-is service for the domain name and account
17 remains turned off, until further order of this Court.

18 3. Dynadot stipulates and agrees to preserve a true and correct copy of both current
19 and any and all prior or previous administrative and account records and data for the
20 wikileaks.org domain name and account.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

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
28

4. Plaintiffs stipulate and agree that upon entry of the order attached hereto as Exhibit A that it will immediately file a dismissal with prejudice in favor of Dynadot. Provided, however, that Plaintiffs and Dynadot stipulate and agree that the Court shall retain jurisdiction to enforce the attached order.

IT IS SO STIPULATED.

Dated: February 14, 2008

LAVELY & SINGER PROFESSIONAL CORPORATION

By: /s/ William J. Briggs, II

William J. Briggs, II
Attorneys for Plaintiffs
BANK JULIUS BAER & CO. LTD. and
JULIUS BAER BANK AND TRUST CO.
LTD.

Dated: February 14, 2008

WENDEL, ROSEN, BLACK & DEAN LLP

By: /s/ Garret D. Murai

Garret D. Murai
Attorneys for Plaintiff
DYNADOT, LLC