

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

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

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 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.  
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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

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.

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

5 IT IS SO STIPULATED.

6 Dated: February 14, 2008

**LAVELY & SINGER PROFESSIONAL CORPORATION**

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8  
9 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.

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11  
12 Dated: February 14, 2008

**WENDEL, ROSEN, BLACK & DEAN LLP**

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14 By:  /s/ Garret D. Murai

Garret D. Murai  
Attorneys for Plaintiff  
DYNADOT, LLC

Wendel, Rosen, Black & Dean LLP  
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