

# EXHIBIT A

1 MinJie Zheng  
c/o Daniel Zheng  
2 950 Diaz Lane  
San Mateo, CA 94404, USA  
3 Tel: (650)918-6198  
Tel: 0086-13910612445  
4 Email: 36502860@qq.com  
5 Plaintiff in Pro Per

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County of Los Angeles  
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By S. Yong-Tim, Deputy Clerk

6  
7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **COUNTY OF LOS ANGELES**

10 MINJIE ZHENG, )

Case No.: **25STLC04013**

11 Plaintiff, )

**COMPLAINT FOR:**

12 vs. )

- 1. ANTITRUST VIOLATIONS
- 2. DECLARATORY RELIEF
- 3. BREACH OF CONTRACT
- 4. UNFAIR BUSINESS PRACTICES

13 1. INTERNET CORPORATION FOR )  
14 ASSIGNED NAMES AND NUMBERS )

16 2. VERISIGN, INC., )

17 3. BEIJING XINNET DIGITAL )  
18 INFORMATION TECHNOLOGY CO., )  
19 LTD., )  
20 )

21 Defendants. )  
22 )

# **I. Plaintiff and Defendant Information**

1. Plaintiff Minjie Zheng is a Chinese citizen, for the sake of single-character COM domain files antitrust lawsuit.

2. Defendant INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS (ICANN) is a California nonprofit public benefit corporation.

Add : 12025 Waterfront Drive, Suite 300 Los Angeles USA

Phone: +1 310 301 5800 Fax: +1 310 823 864

3. Defendant VeriSign, Inc is a domain name registration management agency

Add : 12061 Bluemont Way Reston , VA 20190

Phone: : 1-703-948-3200

4. Defendant Beijing Xinwang Digital Information Technology Co., Ltd (xinnet). It is a domain name registration service agency

Add : 3rd Floor, Building B1, Digital Manor, No.1 Disheng West Road, Beijing Economic and Technological Development Zone CHINA

Phone: 010-58022233 EMAILbj@xinnet.COM

## **ii. Court jurisdiction**

ICANN is a non-profit organization headquartered in Los Angeles, California,

The Los Angeles Superior Court has jurisdiction, see 23STCV19554

As a domain name registration authority, Verisign should participate in

litigation for illegal activities carried out jointly with ICANN.

XINNET is a domain name registration service provider that has contracts

with both ICANN and Verisign, and therefore must participate in the lawsuit.

### **iii. Process**

1. A technician from IANA retained a single character domain name, which later became ICANN

2. Two single characters. Com domain registration information

z.com Creation Date: 1997-12-19T05:00:00Z

q.com Creation Date: 1999-03-30T05:00:00Z

3. Two single characters. Com domain registration information

<https://www.icann.org/en/registry-agreements/multiple/icann-nsi-registry-agreement-10-11-1999-en>

No request to retain

4. Revised VeriSign .com Registry Agreement: Appendix K

<https://www.icann.org/en/registry-agreements/com/revised-verisign-com-registry-agreement-appendix-k-16-4-2001-en>

All single-character labels.

All two-character labels shall be initially reserved. The reservation of a two-character label string shall be released to the extent that the Registry Operator reaches agreement with the government and country-code manager, or the ISO 3166 maintenance agency, whichever appropriate. The Registry Operator may also propose release of these reservations based on its implementation of measures to avoid confusion with the corresponding country codes.

5. Poland country code PL.COM

Domain Name: PL.COM

Updated Date: 2023-01-27T22:31:48Z

Creation Date: 2001-06-17T10:31:19Z

1 6. Poland country code CM.COM

2 Domain Name: CM.COM

3 Updated Date: 2022-12-30T08:14:10Z

4 Creation Date: 2015-01-16T19:52:55Z

5

6 7. October 16, 2007 ICANN Establishes Forum on Allocation Methods for  
7 Single-Letter and Single-Digit Domain Name

8 [https://www.icann.org/en/announcements/details/icann-establishes-forum-on-](https://www.icann.org/en/announcements/details/icann-establishes-forum-on-allocation-methods-for-single-letter-and-single-digit-domain-names-16-10-2007-en)  
9 [allocation-methods-for-single-letter-and-single-digit-domain-names-16-10-](https://www.icann.org/en/announcements/details/icann-establishes-forum-on-allocation-methods-for-single-letter-and-single-digit-domain-names-16-10-2007-en)  
10 [2007-en](https://www.icann.org/en/announcements/details/icann-establishes-forum-on-allocation-methods-for-single-letter-and-single-digit-domain-names-16-10-2007-en)

11

12 8. ICANN Seeks Expressions of Interest from Auction Design Experts

13 [https://www.icann.org/en/announcements/details/icann-seeks-expressions-of-](https://www.icann.org/en/announcements/details/icann-seeks-expressions-of-interest-from-auction-design-experts-18-1-2008-en)  
14 [interest-from-auction-design-experts-18-1-2008-en](https://www.icann.org/en/announcements/details/icann-seeks-expressions-of-interest-from-auction-design-experts-18-1-2008-en)

15 ICANN is seeking expressions of interest from entities experienced in  
16 developing and managing auction processes. ICANN has identified several  
17 areas where auctions might be an appropriate tool, such as the efficient  
18 disposition of data from terminated registrars and registries, the allocation  
19 of single-character second-level domain names, and perhaps, resolution of  
20 contention between competing commercial applicants for identical strings  
21 in the application process for new generic Top Level Domains.

22 A number of commenters and academics have recommended auctions as  
23 the preferred method of objectively allocating scarce resources such as  
24 popular second-level domain names or gTLD strings. Also, ICANN received  
25 substantial public comment in the discussion on allocation of single-  
26 character second-level names that the names should be allocated through  
27 an auction model.

28 ICANN is an internationally organized non-profit public benefit organization  
that administers certain features of the Internet ' s unique identifiers. As a  
private-public partnership, ICANN is dedicated to preserving the operational

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