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5 **UNITED STATES DISTRICT COURT**
6 **CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION**

7 REZA GANJAVI,) **Case Number:**
)
8 **Plaintiff,**) CV05- 8619 DDP (JWJx)
)
9 **v.**) **Plaintiff Reza Ganjavi's Written**
) **Statement Under Local Rule 7-9**
10 **Todd Tipton,**) **that Plaintiff Will Not Oppose**
) **Defendant Todd Tipton's Motion**
11 **William D. Jennings,**) **to Dismiss for Lack of Personal**
DOES 1-10,) **Jurisdiction**
)
12 **Defendants.**) **Date: August 21, 2006**
) **Time: 10:00 a.m.**
13) **Location: Courtroom 3**
14) **Honorable Dean D. Pregerson**

15 Pursuant to Local Rule 7-9, Plaintiff, REZA GANJAVI ("Plaintiff")
16 decides to not oppose Defendant Todd Tipton's Motion to Dismiss for Lack of
17 Personal Jurisdiction. Plaintiff would like to humbly point out, for the
18 sake of record, that the above mentioned motion contains several factual
19 errors. Some are outdated assertions based on pervious versions of the
20 Complaint and not the Second Amended Complaint. Some are errors in
21 presenting Plaintiff's allegations, e.g., the Plaintiff never alleged that
the Defendant created the mock website using Time Warner Cable.

22 This notice of non-opposition is not an admission of the contentions
23 or conclusions presented in Defendant's Motion. Plaintiff has notified
24 Defendants of this decision to not oppose this Motion to Dismiss.

25 DATED: August 4, 2006

26 Respectfully Submitted By:

27 **Frederic M. Douglas**
28 **Attorney for REZA GANJAVI, Plaintiff**

Plaintiff Notice of Non-Opposition