

ORIGINAL

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 13 **ZA Central Registry, NPC**

FILED
 Superior Court of California
 County of Los Angeles

IAN 04 2017 *[Signature]*

Sherril A. Carter, Executive Officer/Clerk
 By *[Signature]* Deputy
 K. Mason

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 COUNTY OF LOS ANGELES – CENTRAL**

12 DOTCONNECTAFRICA TRUST, a
 13 Mauritius Charitable Trust,

14 Plaintiff,

15 v.

16 INTERNET CORPORATION FOR
 17 ASSIGNED NAMES AND NUMBERS, a
 18 California corporation; ZA Central Registry,
 19 a South African non-profit company; and
 20 DOES 1 through 50, inclusive,

21 Defendants.

CASE NO. BC607494

*Assigned for all purposes to the Honorable
 Howard Halm*

**~~DEEMED BRIEF FOR: 1/31/17~~
 DECLARATION OF DAVID W.
 KESSELMAN IN SUPPORT OF ZACR'S
 OPPOSITION TO PLAINTIFF'S EX
 PARTE APPLICATION FOR A
 TEMPORARY RESTRAINING ORDER**

[Filed concurrently: Declaration of David W.
 Kesselman]

Date: January 4, 2017
 Time: 8:30 a.m.
 Dept.: 53

01/06/2017

1 I, David W. Kesselman, hereby declare:

2 1. I am an attorney duly licensed practice law in the State of California, a partner in
3 the law firm of Kesselman Brantly Stockinger LLP, and counsel of record for intervenor ZA
4 Central Registry, NPC ("ZACR"). If called upon to do so, I could and would testify
5 competently to the information set forth herein.

6 2. Attached hereto as **Exhibit A** is a true and correct copy of this Court's December
7 22, 2016 Minute Order denying plaintiff DotConnectAfrica Trust's ("DCA") motion for a
8 preliminary injunction.

9 3. Attached hereto as **Exhibit B** is a true and correct copy of the January 3, 2017
10 email that I received from DCA's counsel. DCA's counsel advised that DCA intends to move
11 for a temporary restraining order ("TRO") based upon the Second and Fifth Cause of Action.
12 As of 5pm on January 3, 2017, I had not received DCA's moving papers.

13 4. Attached hereto as **Exhibit C** are true and correct copies of excerpts from the
14 December 1, 2016 deposition of Sophia Bekele Escheat.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct.

17 Executed this 3rd day of January 2017, at Manhattan Beach, California.

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19 _____
20 DAVID W. KESSELMAN

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01/06/2017