

EXHIBIT A

From: [Amy Brantly](#)
To: [Melinda Quiane](#); [Augie Porras](#)
Subject: FW: ZACR Reply - Application to Seal Exhibit
Date: Monday, May 23, 2016 5:39:31 PM

From: Sara Colón [<mailto:sara@bnsklaw.com>]
Sent: Monday, May 23, 2016 5:37 PM
To: David Kesselman <dkesselman@kbslaw.com>
Cc: Amy Brantly <abrantly@kbslaw.com>; Kara McDonald <kmcdonald@kbslaw.com>; Charlotte S Wasserstein <cswasserstein@jonesday.com>; Jeffrey LeVee <jleee@JonesDay.com>; Ethan Brown <ethan@bnsklaw.com>; Kete Barnes <kete@bnsklaw.com>
Subject: RE: ZACR Reply - Application to Seal Exhibit

Counsel,

We oppose the filing under seal of this exhibit.

Further, we will oppose and move to strike any supplemental declaration and this exhibit as not timely filed on reply. This exhibit is also improper as it presumably purports to support a bond for PI related damages but includes irrelevant financial information from 2014 and 2015.

Best,
Sara

From: David Kesselman [<mailto:dkesselman@kbslaw.com>]
Sent: Monday, May 23, 2016 4:32 PM
To: Ethan Brown <ethan@bnsklaw.com>; Sara Colón <sara@bnsklaw.com>; Jeffrey LeVee <jleee@JonesDay.com>; Charlotte S Wasserstein <cswasserstein@jonesday.com>
Cc: Amy Brantly <abrantly@kbslaw.com>; Kara McDonald <kmcdonald@kbslaw.com>
Subject: ZACR Reply - Application to Seal Exhibit

Counsel,

With the filing of our reply brief today, we will be filing a supplemental declaration. We intend to file an application to file one exhibit to that declaration under seal. The exhibit (marked confidential – attorneys' eyes only) is attached and contains financial information relating to costs, projected revenues and lost profits. The application to seal is based upon our client viewing the information as confidential and competitively sensitive. Please advise whether you object to our application to file the exhibit under seal.

Thank you,
David

David W. Kesselman, Esq.
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Manhattan Beach, CA 90266
(310) 307-4556
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From: [Amy Brantly](#)
To: [Augie Porras](#); [Melinda Quiane](#)
Subject: FW: ZACR Reply - Application to Seal Exhibit
Date: Monday, May 23, 2016 5:08:05 PM

-----Original Message-----

From: Jeffrey LeVee [<mailto:jlevec@JonesDay.com>]
Sent: Monday, May 23, 2016 5:05 PM
To: David Kesselman <dkesselman@kbslaw.com>
Cc: Amy Brantly <abrantly@kbslaw.com>; Charlotte S Wasserstein <cswasserstein@jonesday.com>; Ethan Brown <ethan@bnsklaw.com>; Kara McDonald <kmcdonald@kbslaw.com>; Sara Colón <sara@bnsklaw.com>; Rachel Gezerseh <rgezerseh@jonesday.com>
Subject: Re: ZACR Reply - Application to Seal Exhibit

ICANN does not object.

Jeff LeVee
JONES DAY® - One Firm Worldwide
Telephone: 213.243.2572

From: David Kesselman <dkesselman@kbslaw.com>
To: Ethan Brown <ethan@bnsklaw.com>, Sara Colón <sara@bnsklaw.com>, Jeffrey LeVee <jlevec@JonesDay.com>, "Charlotte S Wasserstein" <cswasserstein@jonesday.com>
Cc: Amy Brantly <abrantly@kbslaw.com>, Kara McDonald <kmcdonald@kbslaw.com>
Date: 05/23/2016 04:33 PM
Subject: ZACR Reply - Application to Seal Exhibit

Counsel,

With the filing of our reply brief today, we will be filing a supplemental declaration. We intend to file an application to file one exhibit to that declaration under seal. The exhibit (marked confidential – attorneys' eyes only) is attached and contains financial information relating to costs, projected revenues and lost profits. The application to seal is based upon our client viewing the information as confidential and competitively sensitive. Please advise whether you object to our application to file the exhibit under seal.

Thank you,
David

David W. Kesselman, Esq.
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[attachment "Lucky Decl EXHIBIT A - AEO.PDF" deleted by Jeffrey LeVee/JonesDay]

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