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7 DOTCONNECTAFRICA TRUST  
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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **COUNTY OF LOS ANGELES - CENTRAL**

12 DOTCONNECTAFRICA TRUST, a Mauritius  
13 charitable trust,

14 Plaintiff,

15 v.

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

19 Defendants.  
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Case No. BC607494

[Assigned for all purposes to Hon. Howard L.  
Halm, Dept. 53]

**SUPPLEMENTAL DECLARATION OF  
ETHAN J. BROWN SUPPORT OF  
PLAINTIFF'S MOTION FOR A  
PRELIMINARY INJUNCTION (FILED  
AS A TRO)**

Date: January 31, 2017  
Hearing: 8:30 a.m.  
Courtroom: 53

[Filed concurrently: Supplemental  
Memorandum of Points and Authorities in  
Support of Plaintiff's Motion for a  
Preliminary Injunction; Supplemental Bekele  
Declaration]

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2 SUPPLEMENTAL DECLARATION OF ETHAN J. BROWN

3 I, Ethan J. Brown, hereby declare as follows:

4 1. I am an attorney at law licensed to practice in California and a partner at the law  
5 firm of Brown, Neri, Smith & Khan LLP, counsel of record for Plaintiff DotConnectAfrica Trust  
6 (“DCA”). The matters referred to in this declaration are based upon my personal knowledge,  
7 and/or when reference documents, such documents were reviewed by me, and if called as a  
8 witness, I could and would testify competently thereto.

9 2. Attached hereto as **Exhibit A** is a copy of the document as produced to DCA from  
10 ICANN, marked ICANN\_DCA00011154 – ICANN\_DCA00011171.

11 3. Attached hereto as **Exhibit B** is a copy of the document as produced to DCA from  
12 ICANN, marked ICANN\_AFRICA00000476 - 477.

13 4. Attached hereto as **Exhibit C** is a copy of the June 15 2014 letter from the then  
14 President and CEO of ICANN, Fade Chehadé to the Commissioner of Infrastructure and Energy  
15 at the African Union.

16  
17 I declare under penalty of perjury under the laws of the State of California that the  
18 foregoing is true and correct. Executed on January 6, 2017, at Walnut Creek, California.

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Ethan J. Brown