

1 Jeffrey A. LeVee (State Bar No. 125863)
 jlevee@Jonesday.com
 2 Eric Enson (State Bar No. 204447)
 eponson@jonesday.com
 3 Charlotte Wasserstein (State Bar No. 279442)
 cswasserstein@jonesday.com
 4 JONES DAY
 555 South Flower Street
 5 Fiftieth Floor
 Los Angeles, CA 90071.2300
 6 Telephone: +1.213.489.3939
 Facsimile: +1.213.243.2539
 7

8 Attorneys for Defendant
 INTERNET CORPORATION FOR
 ASSIGNED NAMES AND NUMBERS
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10 UNITED STATES DISTRICT COURT
 11 CENTRAL DISTRICT OF CALIFORNIA
 12

13 RUBY GLEN, LLC,

14 Plaintiff,

15 v.

16 INTERNET CORPORATION FOR
 ASSIGNED NAMES AND
 17 NUMBERS,

18 Defendant.
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Case No. CV 2:16-cv-5505 PA (ASx)

Assigned for all purposes to the
 Honorable Percy Anderson

**DECLARATION OF NICOLAI
 BEZSONOFF IN SUPPORT OF
 DEFENDANT ICANN'S
 OPPOSITION TO PLAINTIFF'S
 EX PARTE APPLICATION FOR
 TEMPORARY RESTRAINING
 ORDER**

DECLARATION OF NICOLAI BEZSONOFF

I, Nicolai Bezsonoff, declare as follows:

1. I am a manager and the Chief Operating Officer of NU DOTCO, LLC (“Nu Dotco”). I have personal knowledge of the facts set forth below and if called upon as a witness, I could and would testify competently thereto.

2. On March 19, 2012, Nu Dotco was formed as an LLC pursuant to the laws of the State of Delaware.

3. Nu Dotco was formed for the specific purpose of submitting applications to ICANN to acquire rights to operate certain generic top-level domains (“gTLDs”).

4. In June 2012, Nu Dotco applied for the .WEB gTLD, among others. As part of its .WEB application, Nu Dotco submitted to ICANN documentation concerning its status.

5. Nu Dotco’s application to ICANN designated me as a manager and the Chief Operating Officer of Nu Dotco, Juan Diego Calle as a manager and the Chief Executive Officer of Nu Dotco and Jose Ignacio Rasco III as a manager and the Chief Financial Officer of Nu Dotco. As officers and managers, Mr. Calle, Mr. Rasco and myself have been, and are, responsible for the overall affairs of Nu Dotco. Nu Dotco’s .WEB application also designated Jose Rasco as the “Primary Contact” for the application and me as the “Secondary Contact.”

6. There have been no changes or amendments made to Nu Dotco’s management since the time that Nu Dotco submitted its .WEB application to ICANN. Mr. Calle, Mr. Rasco, and I remain the only managers and officers of Nu Dotco. Accordingly, I recognize my duties as a manager of Nu Dotco and intend to continue to perform them in conjunction with Mr. Calle and Mr. Rasco.

7. Nu Dotco’s application to ICANN designated those “shareholders” (i.e. members) holding at least 15% percent of the “shares” (i.e. membership interests) of Nu Dotco to be Domain Marketing Holdings, LLC and NUCO LP,

1 LLC. Those entities were also the only members of Nu Dotco.

2 8. There have been no changes or amendments made to Nu Dotco's
3 membership, nor has any transfer of membership otherwise occurred, since the time
4 that Nu Dotco submitted its application to ICANN. Domain Marketing Holdings,
5 LLC and NUCO LP, LLC remain the only members of Nu Dotco.

6 9. My duties as an officer and manager of Nu Dotco, and backup or
7 "Secondary Contact" on the application are limited at this point because Nu Dotco
8 has not been awarded the .WEB gTLD. As Primary Contact Mr. Rasco devotes
9 more time to that enterprise. In addition to my Nu Dotco duties, I served as COO
10 of .CO Internet, the operator of the .co top level domain (country code TLD for
11 Colombia) until it was acquired by Neustar, Inc. in April of 2014, at which point I
12 began working for Neustar as a Strategic Advisor. Nu Dotco selected Neustar as its
13 registry services provider (as discussed at length in Nu Dotco's application to
14 ICANN) to assist Nu Dotco with operation of .WEB if Nu Dotco is awarded the
15 TLD.

16 I swear under penalty of perjury under the laws of the United States that the
17 foregoing is true and correct. Executed this 25th day of July, 2016.

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19 By: _____


Nicolai Bezonoff

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