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8 DOTCONNECTAFRICA TRUST

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **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
18 California corporation; ZA Central Registry, a
19 South African non-profit company; and DOES
20 1 through 50, inclusive,

21 Defendants.

Case No. BC607494

[Assigned to Hon. Howard L. Halm]

**DECLARATION OF SARA C. COLÓN
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
INJUNCTION**

Date: December 22, 2016

Hearing: 8:30 a.m.

Dept.: 53

[Filed concurrently: Declarations of Sophia
Bekele Eshete & Ethan J. Brown]

RESERVATION ID: 161115174199

1 **DECLARATION OF SARA C. COLÓN**

2 I, Sara C. Colón, declare as follows:


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

9 2. On March 1, 2016 I emailed counsel for Defendant Internet Corporation for
10 Assigned Names and Numbers (“ICANN” or “Defendant”) to advise him that DCA would file an
11 *ex parte* application for a temporary restraining order on March 2, 2016 if ICANN did not agree
12 to refrain from delegating the rights to .Africa until after a ruling on DCA’s motion for a
13 preliminary injunction. A true and correct copy of my email is attached hereto as **Exhibit 1**.

14 3. Attached hereto as **Exhibit 2** is a true and correct copy of the Declaration of
15 Mokgabudi Lucky Masilela submitted by Intervenor ZA Central Registry (“ZACR”) in support
16 of its motion for reconsideration and to vacate the preliminary injunction.

17 4. On June 25, 2013, ICANN employee, Trang Nguyen prepared an endorsement
18 letter for the AUC in relation to their endorsement of ZACR. Attached hereto as **Exhibit 3** is a
19 true and correct copy of Trang Nguyen’s email and the letter ICANN wrote for the AUC to
20 endorse ZACR as produced by ICANN to DCA in previous proceedings.
21

22
23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct. Executed on this 15th day of November 2016, at Los Angeles,
25 California.

26 
27 Sara C. Colón
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