

1 Ethan J. Brown (SBN 218814)
2 ethan@bnslawgroup.com
3 Sara C. Colón (SBN 281514)
4 sara@bnslawgroup.com
5 **BROWN NERI & SMITH LLP**
6 11766 Wilshire Boulevard, Suite 1670
7 Los Angeles, California 90025
8 Telephone: (310) 593-9890
9 Facsimile: (310) 593-9980

10 *Attorneys for Plaintiff*
11 DOTCONNECTAFRICA TRUST

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **COUNTY OF LOS ANGELES - CENTRAL**

14 DOTCONNECTAFRICA TRUST,
15
16 Plaintiff,
17
18 v.
19
20 INTERNET CORPORATION FOR
21 ASSIGNED NAMES AND NUMBERS, et al.
22
23 Defendants.
24

Case No. BC607494

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

**DECLARATION OF SARA C. COLÓN
IN SUPPORT OF DCA'S OPPOSITION
TO DEFENDANT ICANN'S MOTION
FOR SUMMARY JUDGMENT**

Date: August 9, 2017
Hearing: 8:30 a.m.
Dept.: 53

[Filed concurrently: Opposition to Motion for Summary Judgment; Separate Statement of Material Disputed Facts and Additional Undisputed Material Facts; Declaration of Sophia Bekele; and Evidentiary Objections to Declaration of Jeffrey LeVee]

1 accessed from ICANN’s website at [https://www.icann.org/en/system/files/files/icann-response-](https://www.icann.org/en/system/files/files/icann-response-procedural-order-8-redacted-12oct15-en.pdf)
2 [procedural-order-8-redacted-12oct15-en.pdf](https://www.icann.org/en/system/files/files/icann-response-procedural-order-8-redacted-12oct15-en.pdf), on July 21, 2017.

3 7. Attached hereto as **Exhibit F** is a true and correct copy of “Supplementary
4 Procedures for Internet Corporation for Assigned Names and Numbers (ICANN) Independent
5 Review Process, accessed from ICANN’s website at
6 [https://community.icann.org/download/attachments/59643726/adrstage2014403.pdf?version=1&](https://community.icann.org/download/attachments/59643726/adrstage2014403.pdf?version=1&modificationDate=1467815667000&api=v2)
7 [modificationDate=1467815667000&api=v2](https://community.icann.org/download/attachments/59643726/adrstage2014403.pdf?version=1&modificationDate=1467815667000&api=v2), on July 20, 2017.

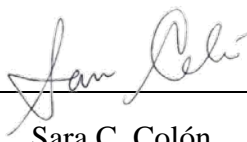
8 8. Attached hereto and **Exhibit G** is a true and correct copy of Exhibit D to the
9 Declaration of Kevin Espinola In Opposition to DCA’s Motion for Preliminary Injunction, dated
10 March 14, 2016.

11 9. Attached hereto as **Exhibit H** are true and correct copies of transcript excerpts of
12 ICANN’s Person Most Knowledgeable deponent, Christine Willet.

13 10. Attached hereto as **Exhibit I** is a true and correct copy of ICANN’s March 2017
14 Financial Results, accessed from ICANN’s website at
15 <https://www.icann.org/en/system/files/files/fy17-unaudited-financials-31mar17-en.pdf>, on July
16 20, 2017.
17

18
19
20 I declare under penalty of perjury under the laws of the State of California and the laws of
21 the United States that the foregoing is true and correct.

22
23 Executed on this 26th day of July 2017, at Los Angeles, California.

24
25
26 
27 Sara C. Colón