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8 DOTCONNECTAFRICA TRUST

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

11  
12 **COUNTY OF LOS ANGELES - CENTRAL**

13 DOTCONNECTAFRICA TRUST, a Mauritius  
14 charitable trust,

15 Plaintiff,

16 v.

17 INTERNET CORPORATION FOR  
18 ASSIGNED NAMES AND NUMBERS, *et al*,

19 Defendants.

Case No. BC607494

[Assigned to Hon. Howard L. Halm]

20 **DECLARATION OF SARA C. COLÓN IN**  
21 **SUPPORT OF PLAINTIFF**  
22 **DOTCONNECTAFRICA TRUST'S**  
23 **REPLY IN SUPPORT OF MOTION FOR**  
**PRELIMINARY INJUNCTION**

Date: February 2, 2017

Hearing: 8:29 a.m.

Dept.: 53

[Reply in support of Motion for Preliminary  
Injunction and Reply Declaration of Sophia  
Bekele Eshete]

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. I am counsel of record for Plaintiff DotConnectAfrica Trust  
5 (“DCA”). I make this declaration in support of DCA’s Reply in support of its Motion for  
6 Preliminary Injunction. The matters referred to in this declaration are based upon my personal  
7 knowledge, and/or when referencing documents, such documents were reviewed by me, and if  
8 called as a witness, I could and would testify competently thereto.

9 2. Attached hereto as **Exhibit 1** is a true and correct copy of an email produced by  
10 ICANN in this action, bates stamped ICANN\_DCA00014253-54.

11 3. Attached hereto as **Exhibit 2** is a true and correct copy of ZACR’s endorsement  
12 letters produced by ICANN in this action, bates stamped ICANN\_AFRICA00000172-212 and  
13 ICANN\_AFRICA00000214-234.

14 4. Attached hereto as **Exhibit 3** is a true and correct copy of draft clarifying  
15 questions to ZACR produced by ICANN in this action, bates stamped ICANN\_DCA00018869-  
16 873.

17  
18  
19 I declare under penalty of perjury under the laws of the State of California and the laws  
20 of the United States that the foregoing is true and correct.

21  
22 Executed on this 26<sup>th</sup> day of January 2017, at Los Angeles, California.

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25  
26 Sara C. Colón