1 2 3 4 5 6 7 8	Ethan J. Brown (SBN 218814) ethan@bnslawgroup.com Sara C. Colón (SBN 281514) sara@bnslawgroup.com BROWN NERI & SMITH LLP 11766 Wilshire Boulevard, Suite 1670 Los Angeles, California 90025 Telephone: (310) 593-9890 Facsimile: (310) 593-9980 Attorneys for Plaintiff DOT CONNECT AFRICA TRUST	
9	UNITED STATES D	DISTRICT COURT
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11	CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION	
12	DOTCONNECT AFRICA TRUST	Case No. 2:16-cv-00862-RGK (JCx)
13	Plaintiff,	DECLARATION OF ETHAN J. BROWN IN SUPPORT OF
14	v.	PLAINTIF'S MOTION FOR PRELIMINARY INJUNCTION
15	INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS	·
16	and DOES 1 through 50, inclusive,	Date: April 4, 2016 Hearing: 9:00 a.m. Courtroom: 850
17	Defendants.	
18		[Filed concurrently: Declaration of Sophia Bekele; Motion for Preliminary
19		Injunction; [Proposed] Order]
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	BROWN DECLARATION	

DECLARATION OF ETHAN J. BROWN

I Ethan J. Brown hereby declare as follows:

- 1. I am an attorney at law licensed to practice in California and a partner at the law firm of Brown, Neri & Smith LLP, counsel of record for Plaintiff DotConnectAfrica Trust ("DCA"). The matters referred to in this declaration are based upon my personal knowledge, and/or when reference documents, such documents were reviewed by me, and if called as a witness, I could and would testify competently thereto.
- 2. On February 23, 2016 I spoke to Jeffrey Levee, counsel of record for Defendant Internet Corporation for Assigned Names and Numbers ("ICANN"). I asked Mr. Levee for the status of ICANN's granting of the .Africa gTLD and informed Mr. Levee that DCA would be forced to move for injunctive relief absent assurance that .Africa would not be granted to another party during the pendency of the litigation. Mr. Levee failed to give any such assurance and instead reminded me that ICANN had denied DCA's application and stated that the board of ICANN could take action on .Africa at any time and that ICANN had a scheduled board meeting in Marrakesh, Morocco that would begin on March 5, 2016.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 29, 2016 at Los Angeles, California.

Ethan J. Brown

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