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NOTICE OF JOINDER CV16-00862-RGK

Defendant Internet Corporation for Assigned Names and Numbers 1 ("ICANN") joins in defendant ZA Central Registry's ("ZACR's") Motion to 2 Reconsider and Vacate Preliminary Injunction Ruling ("Motion"), filed on May 6, 3 4 2016 (ECF No. 85). ICANN joins ZACR's Motion on the same grounds as those set forth in 5 6 ZACR's Memorandum of Points and Authorities in support of the Motion, including but not limited to those explaining why plaintiff DotConnectAfrica Trust 7 ("Plaintiff") will not suffer irreparable harm in the absence of a preliminary 8 9 injunction due to ICANN's ability to "redelegate" the .AFRICA TLD in the event Plaintiff prevails in this action. (See Mot. at 13-14.) ICANN, however, takes no 10 position on the amount of any claimed damages in this action. 11 For all the reasons set forth in the Motion, in addition to all pleadings, papers 12 and other documents on file with this Court, ICANN respectfully requests that the 13 Court grant ZACR's Motion and vacate the preliminary injunction that was entered 14 on April 12, 2016 (ECF No. 75). 15 16 Dated: May 10, 2016 JONES DAY 17 By: /s/ Jeffrey A. LeVee Jeffrey A. LeVee 18 19 Attorneys for Defendant INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS 20 NAI-1501020894 21 22 23 24 25 26 27 28