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6 INTERNET CORPORATION FOR ASSIGNED
NAMES AND NUMBERS

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

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11 DOTCONNECTAFRICA TRUST,

12 Plaintiff,

13 v.

14 INTERNET CORPORATION FOR
ASSIGNED NAMES AND NUMBERS,
15 *et al.*,

16 Defendant.

CASE NO. BC607494

Assigned for all purposes to
Hon. Robert B. Broadbelt

**DECLARATION OF ERIN L. BURKE
IN SUPPORT OF DEFENDANT
ICANN'S OPPOSITION TO
PLAINTIFF DCA'S MOTION TO
TAX COSTS OF INTERNET
CORPORATION FOR ASSIGNED
NAMES AND NUMBERS**

DECLARATION OF ERIN L. BURKE

I, Erin L. Burke, declare:

1. I am a partner of Jones Day, counsel to the Internet Corporation for Assigned Names and Numbers (“ICANN”), the defendant in this action. I am a member in good standing of the State Bar of California and am admitted to practice before the Courts in this State. I have personal knowledge of the matters set forth herein and am competent to testify as to those matters. I make this declaration in support of ICANN’s opposition to Plaintiff DotConnectAfrica Trust’s (“DCA”) Motion to Tax Costs of Internet Corporation for Assigned Names and Numbers.

2. In late May 2018, DCA noticed the deposition of Pierre Dandjinou for June 5, 2018 for Paris, France—a date and location mutually agreed to by the parties. This date was during the middle of the French Open. Because DCA did not serve the deposition notice until late May, I had to book travel to Paris on an expedited basis.

3. Mr. Dandjinou is a resident of Benin, Africa. Due to the expense and difficulty of traveling to that part of Africa, ICANN offered to make Mr. Dandjinou available for a deposition at the Jones Day office in Paris, France (a reasonable trip for the witness and counsel for both parties alike). DCA accepted ICANN’s offer. I represented Mr. Dandjinou at the deposition, and therefore it was both necessary and reasonable for me to travel to Paris to defend the deposition.

4. My costs for travel to Paris were, in my opinion, reasonable in amount. ICANN is seeking the following costs for travel to Mr. Dandjinou’s deposition:

Description	Cost	Rationale
Flights	\$10,598.11	I traveled business class to Paris, France. The travel time for the outgoing and returning flights between Los Angeles and Paris was nearly 11 hours each way. It was reasonably necessary to travel business class given the extensive travel required, as well as the time change.
Hotel	\$1,516.39	I spent five nights at a hotel in Paris, but only expensed four nights to ICANN. My four-night stay was reasonably necessary to adjust to the nine-hour time difference, to meet with the witness to prepare him for the deposition (the first time he had ever undergone such a procedure), and to produce his documents (from a personal laptop he brought from Benin with him) in response to DCA’s requests for production served with

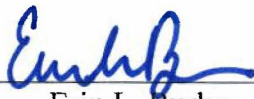
		<p>the deposition notice and due on the day of the deposition per that notice.</p> <p>The invoice from Buddha-Bar Hotel is listed in Euros. Based on the conversion rate at the time, the four-night stay at this hotel amounted to \$1,516.39. I chose this hotel, in part, because it was walking distance to the Jones Day Paris office, thus eliminating the need for additional transportation costs for trips to the office.</p>
Cab Fares	\$378.52	<p>I am seeking costs for my fares to and from the airport only.</p> <p>Lyft: \$33.54 for transfer from Jones Day Los Angeles to LAX before the deposition.</p> <p>Carry Diligent Limousine: The invoice from Carry Delight Limousine is listed in Euros. Based on the conversion rate at the time, this invoice amounted to \$214.98. This invoice covers my travel to and from the Charles de Gaulle airport in Paris.</p> <p>Airport Town Car Limousine: \$130.00 for transfer from LAX to my house after the deposition.</p>
Food	\$272.71	<p>I am seeking costs only for my meal the night before the deposition and the lunch provided at the deposition (not the several other meals I had during my four day stay to prepare for the deposition, etc.).</p> <p>L'Ardoise: I paid €86 in cash for dinner for ICANN in-house counsel and myself, which amounted to \$100.62. ICANN is only seeking \$50.31 in costs, to exclude all costs for ICANN's in-house counsel's meal.</p> <p>Clin d'Oeil: The invoice from Clin d'Oeil is listed in Euros. Based on the conversion rate at the time, this invoice amounted to \$222.40. This invoice covers lunch provided at the deposition for all participants – including Plaintiff Sophia Bekele, DCA's counsel, and the court reporter, the witness and ICANN's counsel.</p>

Attached hereto as **Exhibit 1** is a true and correct copy of the invoices for my travel expenses for attending the deposition of Pierre Dandjinou.

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I confirm under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed December 19, 2019, in Los Angeles, California.


Erin L. Burke

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