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8	Attorneys for Plaintiff DotConnectAfrica Trust	
9	SUPERIOR COURT OF TH	E STATE OF CALIFORNIA
10	FOR THE COUNTY OF LOS ANGELES – CENTRAL	
11	TOK THE COUNT OF EX	DO ANGLES - CENTRAL
12	DOTCONNECTA EDICA TRUCT	C N DCC07404
13	DOTCONNECTAFRICA TRUST, a Mauritius charitable trust,	Case No. BC607494
14	Plaintiff,	[Assigned for all purposes to the Hon. Robert B. Broadbelt III – Dept. 53]
15	v.	DECLARATION OF ETHAN J. BROWN
16	Internet Corporation for Assigned Names and	IN SUPPORT OF PLAINTIFF'S MOTIONS TO TAX COSTS
17	Numbers, et al.	
18	Defendants.	
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BROWN DECLARATION

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DECLARATION OF ETHAN J. BROWN

I, Ethan J. Brown, declare as follows:

- 1. I am an attorney duly licensed to practice in all court of the State of California. I have personal knowledge of the facts set forth herein and if called, could and would competently testify as to such facts. I am the managing partner at Brown Neri Smith & Khan, LLP, attorneys of record for Plaintiff DotConnectAfrica Trust ("DCA") in the above captioned matter. I make this declaration in support of DCA's Motions to Tax Costs of Defendant Internet Corporation for Assigned Names and Numbers ("ICANN") and Intervenor ZA Central Registry, NPC ("ZACR").
- 2. An October 31, 2019 online search regarding round trip airfare to Johannesburg, South Africa for the dates of November 16 through November 20, 2019 resulted in flights at approximately \$810 to \$1,534. Attached hereto as **Exhibit 1** is a true and correct copy of the results of said search.
- 3. An October 31, 2019 online search regarding four and five star hotel rates in Johannesburg, South Africa for the dates of November 16 through November 20, 2019 resulted in hotel rates at approximately \$78 to \$188 a night. Attached hereto as Exhibit 2 is a true and correct copy of the results of said search.
- 4. A November 5, 2019 online search regarding round trip airfare to Paris for the dates of June 3, 2020 through June 5, 2020 resulted in a flight price range of approximately \$860 to \$1,300 for similar trips. Attached hereto as **Exhibit 3** is a true and correct copy of the results of said search.
- 5. A November 5, 2019 online search regarding four and five star hotel rates in Paris for the dates of June 3, 2020 through June 5, 2020 resulted in hotel rates at approximately \$114 to \$230 a night. Attached hereto as **Exhibit 4** is a true and correct copy of the results of said search.
- 6. A November 5, 2019 online search regarding round trip airfare to Washington D.C. for the dates of April 1, 2020 through April 2, 2020 resulted in a flight price range of approximately \$185 to \$310 for similar trips. Attached hereto as **Exhibit 5** is a true and correct copy of the results of said search.

- 7. A November 5, 2019 online search regarding four and five star hotel rates in Paris for the dates of June 3, 2020 through June 5, 2020 resulted in hotel rates at approximately \$150 to \$250 a night. Attached hereto as **Exhibit 6** is a true and correct copy of the results of said search.
- 8. Attached hereto as **Exhibit 7** is a true and correct copy of the email where ICANN and DCA agreed that electronic service would constitute proper service for this proceeding.
- 9. Attached hereto as **Exhibit 8** are true and correct copies of the emails confirming the electronic service agreement with ICANN after remand from federal court and confirming the electronic service agreement including Intervenor ZACR.

I declare under penalty of perjury under the laws of the State of California and the laws of the United States that the foregoing is true and correct. Executed on this 5th day of November 2019, at Los Angeles, California.

Ethan J. Brown