

1 Ethan J. Brown (SBN 218814)

2 *ethan@bnslawgroup.com*

3 Sara C. Colón (SBN 281514)

4 *sara@bnslawgroup.com*

5 **BROWN NERI & SMITH LLP**

6 11766 Wilshire Boulevard, Suite 1670

7 Los Angeles, California 90025

8 Telephone: (310) 593-9890

9 Facsimile: (310) 593-9980

10 *Attorneys for Plaintiff*

11 DOTCONNECTAFRICA TRUST

12 **UNITED STATES DISTRICT COURT**

13 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

14 DOTCONNECTAFRICA TRUST, a
15 Mauritius Charitable Trust,

16
17 Plaintiff,

18 v.

19
20 INTERNET CORPORATION FOR
21 ASSIGNED NAMES AND NUMBERS;
22 ZA Central Registry, a South African
23 non-profit company; DOES 1 through
24 50, inclusive,

25 Defendants.

Case No. 2:16-cv-00862-RGK (JCx)

26 **DECLARATION OF SARA C.
27 COLÓN**

28 [Filed concurrently: Plaintiffs’
Opposition to Defendant ZA Central
Registry, NPC’s Motion to
Reconsider and Vacate; Declaration
of Sophia Bekele Eschete; and
Evidentiary Objections to Declaration
of Mokgabudi Lucky Masilela]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF SARA C. COLÓN

I, Sara C. Colón, declare as follows:

1. I am a partner at the law firm of Brown Neri & Smith, LLP and licensed to practice law in California and before this court. I am counsel of record for Plaintiff DOTCONNECTAFRICA Trust (“DCA”). I make this declaration in support of DCA’s Reply In Support of Motion for Preliminary Injunction. I have personal knowledge of the facts set forth below, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Contract SA 1301-12-CN-0035 as I obtained it from https://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf.

3. Attached hereto as **Exhibit 2** is a true and correct copy of ICANN’s press release “Plan to Transition Stewardship of Key Internet Functions Sent to the U.S. Government” as I obtained it from <https://www.icann.org/news/announcement-2016-03-10-en>.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Internal Review Panel’s (“IRP”) Decision on Interim Measures of Protection as I obtained it from <https://www.icann.org/en/system/files/files/decision-interim-measures-of-protection-12may14-en.pdf>.

5. DCA’s application for a temporary restraining order and motion for preliminary injunction contained arguments that were almost identical.

6. Attached hereto as **Exhibit 4** is a true and correct copy of my March 8, 2016 email to Lucky Masilela attaching numerous filings in the case including DCA’s motion for preliminary injunction, DCA’s application for a temporary restraining order, ICANN’s opposition to the temporary restraining order and the first amended complaint.

1 7. I did not receive a response from Mr. Masilela to my email.

2 8. Attached hereto as **Exhibit 5** is a true and correct copy of the email
3 chain between myself and counsel for ZACR beginning on April 1, 2016.
4

5 I declare under penalty of perjury under the laws of the State of
6 California and the laws of the United States that the foregoing is true and
7 correct.
8

9 Executed on this 16th day of May 2016, at Los Angeles, California.

10 /s/ Sara C. Colón

11 Sara C. Colón
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I, Ethan J. Brown, hereby declare under penalty of perjury as follows:

I am a partner at the law firm of Brown Neri Smith LLP, with offices at 11766 Wilshire Blvd., Los Angeles, California 90025. On _____, 201____ I caused the foregoing **DECLARATION OF SARA C. COLÓN** to be electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on

/s/ Ethan J. Brown