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INTERNET CORPORATION FOR ASSIGNED
8 NAMES AND NUMBERS

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

11
12 DOTCONNECTAFRICA TRUST,

13 Plaintiff,

14 v.

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

17 Defendants.

CASE NO. BC607494

Assigned for all purposes to Hon. Robert
B. Broadbelt III

**DECLARATION OF AMANDA
PUSHINSKY IN SUPPORT OF
ICANN'S TRIAL BRIEF (JUDICIAL
ESTOPPEL BENCH TRIAL)**

*[ICANN'S Trial Brief (Judicial Estoppel
Bench Trial) filed concurrently herewith]*

FSC: January 25, 2019
Time: 8:30 a.m.
Dept.: 53

Complaint Filed: January 20, 2016
Bench Trial Date: February 6, 2019
Jury Trial Date: TBD

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DECLARATION OF AMANDA PUSHINSKY

I, Amanda Pushinsky, declare:

1. I am an associate at 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 Trial Brief (Judicial Estoppel Bench Trial).

2. Attached hereto as **Exhibit A** is a true and correct copy of the relevant portions of ICANN’s April 11, 2013 Bylaws.

3. Attached hereto as **Exhibit B** is a true and correct copy of the relevant portions of the ICANN gTLD Applicant Guidebook (Version 2012-06-04).

4. Attached hereto as **Exhibit C** is a true and correct copy of the relevant portions of the 12/1/2016 Deposition Transcript of Sophia Bekele Eshete (PMQ).

5. Attached hereto as **Exhibit D** is a true and correct copy of the relevant portions of the 11/3/2014 IRP Witness Statement of Sophia Bekele Eshete.

6. Attached hereto as **Exhibit E** is a true and correct copy of the relevant portions of the 9/6/2017 Deposition Transcript of Sophia Bekele Eshete.

7. Attached hereto as **Exhibit F** is a true and correct copy of the relevant portions of the 5/22/2015 IRP Hearing Transcript.

8. Attached hereto as **Exhibit G** is a true and correct copy of the relevant portions of the 5/23/2015 IRP Hearing Transcript.

9. Attached hereto as **Exhibit H** is a true and correct copy of DCA’s 3/28/2014 Request for Emergency Arbitrator and Interim Measures of Protection.

10. Attached hereto as **Exhibit I** is a true and correct copy of the relevant portions of the 7/9/2015 IRP Final Declaration.

11. Attached hereto as **Exhibit J** is a true and correct copy of 4/20/2014 Letter from

1 DCA to President and Members of the IRP Panel.

2 12. Attached hereto as **Exhibit K** is a true and correct copy of the relevant portions of
3 8/14/2014 IRP Panel Declaration on the IRP Procedure.

4 13. Attached hereto as **Exhibit L** is a true and correct copy of 5/5/2014 DCA's
5 Submission on Procedural Issues.

6 14. Attached hereto as **Exhibit M** is a true and correct copy of 5/20/2014 DCA's
7 Response to the Panel's Questions on Procedural Issues.

8 15. Attached hereto as **Exhibit N** is a true and correct copy of the relevant portions of
9 5/29/2014 DCA's Letter Brief Regarding Procedural Order No. 2.

10 16. Attached hereto as **Exhibit O** is a true and correct copy of the relevant portions of
11 DCA's 7/1/2015 Submission on Costs.

12 17. Attached hereto as **Exhibit P** is a true and correct copy of the 7/16/2015 ICANN
13 Board Resolution.

14 18. Attached hereto as **Exhibit Q** is a true and correct copy of the relevant portions of
15 2/28/2018 Bench Trial Transcript (Day 1).

16 19. Attached hereto as **Exhibit R** is a true and correct copy of the relevant portions of
17 3/1/2018 Bench Trial Transcript (Day 2).

18 20. Attached hereto as **Exhibit S** is a true and correct copy of 9/5/2014 IRP Procedural
19 Order Number 3.

20 21. Attached hereto as **Exhibit T** is a true and correct copy of 2/21/2013 DCA Letter
21 to Congress.

22 22. Attached hereto as **Exhibit U** is a true and correct copy of 1/10/2014 Amended
23 Notice of the Independent Review Process.

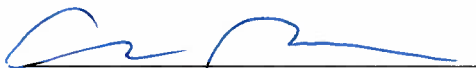
24 23. Attached hereto as **Exhibit V** is a true and correct copy of the relevant portions of
25 DCA's Memorial on the Merits.

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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 January 17, 2019, in Los Angeles, California.



Amanda Pushinsky

NAI-1506199799