

**REPLY DECLARATION OF ERICA L. REILLEY IN SUPPORT OF
RESPONDENT’S MOTION TO DISMISS**

I, Erica L. Reilley, declare the following:

1. I am a partner with the law firm of Jones Day, counsel to Defendant-Respondent Internet Corporation for Assigned Names and Numbers (“ICANN”) in the above-captioned action. 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 Reply in Support of its Motion to Dismiss Late-Filed Appeal (“Motion”) of Plaintiff-Appellant DotConnectAfrica Trust (“DCA”).

2. On January 2, 2020, I caused a court document retrieval service to obtain from the Santa Clara Superior Court all associated proofs of service filed by the trial court in *M’Guinness v. Johnson*, Case Number 1-13-CV-239996 and which were at issue in *M’Guinness v. Johnson* (2015) 243 Cal.App.4th 602. The court document retrieval service obtained two proofs of service that were filed and associated with the September 20, 2013 order at issue. A true and correct copy of first original proof of service is attached hereto as **Exhibit H**. A true and correct copy of the “corrected proof of service” is attached hereto as **Exhibit I**.

3. On January 2, 2020, I caused a court document retrieval service to obtain from the California Court of Appeal Sixth Appellate District all briefs filed and related to the appellate court’s decision in *M’Guinness v. Johnson* (2015) 243 Cal.App.4th 602. A true

and correct copy of the relevant excerpts from the respondent's brief concerning the timeliness of the appeal is attached as **Exhibit J**. A true and correct copy of the relevant excerpts from the appellant's reply brief concerning the timeliness of the appeal is attached as **Exhibit K**.

4. On October 3, 2019, the Executive Officer/Clerk of the Los Angeles Superior Court served filed-endorsed copies of the Final Judgment. A true and correct copy of the face page of the filed-endorsed Final Judgment served by the clerk on October 3 is attached as **Exhibit L**.

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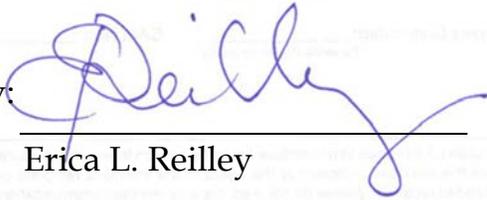
5. It is common current practice in the Los Angeles County Superior Court that, when a court clerk processes a hard copy filing and scans it into the court's electronic database, a date stamp is generated on the document to indicate the date the document was processed.

I declare under penalty of perjury that the foregoing is true and correct and that I executed this declaration on January 8, 2020, in Los Angeles, California.

Dated: January 8, 2020

Respectfully submitted,

JONES DAY

By: 
Erica L. Reilley

Attorney for Defendant-

Respondent

INTERNET CORPORATION
FOR ASSIGNED NAMES AND
NUMBERS