

1 Jeffrey A. LeVee (State Bar No. 125863)  
 jlevee@Jonesday.com  
 2 Kate Wallace (State Bar No. 234949)  
 kwallace@jonesday.com  
 3 Rachel Gezerseh (State Bar No. 251299)  
 rgezerseh@jonesday.com  
 4 Charlotte Wasserstein (State Bar No. 279442)  
 cswasserstein@jonesday.com  
 5 JONES DAY  
 555 South Flower Street  
 6 Fiftieth Floor  
 Los Angeles, CA 90071.2300  
 7 Telephone: +1.213.489.3939  
 Facsimile: +1.213.243.2539

8 Attorneys for Defendant  
 9 INTERNET CORPORATION FOR  
 ASSIGNED NAMES AND NUMBERS

10  
 11 UNITED STATES DISTRICT COURT  
 12 CENTRAL DISTRICT OF CALIFORNIA  
 13 WESTERN DIVISION

14  
 15 DOTCONNECTAFRICA TRUST,

16 Plaintiff,

17 v.

18 INTERNET CORPORATION FOR  
 ASSIGNED NAMES AND  
 19 NUMBERS, et al.,

20 Defendants.

Case No. CV 16-00862-RGK

Assigned for all purposes to the  
 Honorable R. Gary Klausner

**DEFENDANT INTERNET  
 CORPORATION FOR  
 ASSIGNED NAMES AND  
 NUMBERS' SUPPLEMENTAL  
 BRIEF RE INDISPENSABLE  
 PARTY**

1 Defendant Internet Corporation for Assigned Names and Numbers  
2 (“ICANN”) agrees with ZA Central Registry (“ZACR”) that ZACR is entitled to  
3 intervene as of right in this action and that, under the factors stated in Fed. R. Civ. P.  
4 19(b), this Court has the discretion to find that plaintiff DotConnectAfrica Trust’s  
5 claims for injunctive and declaratory relief make ZACR an indispensable party. As  
6 explained in ZACR’s supplemental brief, if this Court concludes that it lacks  
7 subject matter jurisdiction, this Court’s rulings must be vacated and the proper  
8 procedure is for the parties to seek an order from the Ninth Circuit to accomplish  
9 that result.

10  
11 Dated: September 27, 2016

JONES DAY

12 By: /s/ Jeffrey A. LeVee  
13 Jeffrey A. LeVee

14 Attorneys for Defendant  
15 INTERNET CORPORATION FOR  
16 ASSIGNED NAMES AND NUMBERS  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28