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13 DotConnectAfrica Trust

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 FOR THE COUNTY OF LOS ANGELES – CENTRAL

16 DOTCONNECTAFRICA TRUST, a
17 Mauritius charitable trust,

18 Plaintiff,

19 v.

20 Internet Corporation for Assigned Names and
21 Numbers, *et al.*

22 Defendants.

Case No. BC607494

*[Assigned for all purposes to the Hon. Robert
B. Broadbelt III – Dept. 53]*

**DECLARATION OF ETHAN J. BROWN
IN SUPPORT OF PLAINTIFF'S REPLY
TO MOTION TO TAX ICANN'S COSTS**

DECLARATION OF ETHAN J. BROWN

I, Ethan J. Brown, declare as follows:

1. I am an attorney duly licensed to practice in all courts of the State of California. 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 Reply in support of Motions to Tax Costs of Defendant Internet Corporation for Assigned Names and Numbers (“ICANN”). I have personal knowledge of the facts set forth herein and if called, could and would competently testify as to such facts.

2. A January 6, 2020 online search regarding round trip airfare to Cape Town, South Africa for the dates of October 20 through October 25, 2020 resulted in flights at approximately \$696 to \$1,434. Attached hereto as **Exhibit 9** is a true and correct copy of the results of said search.

3. A January 6, 2020 online search regarding four and five star hotel rates in Cape Town, South Africa near the location of the deposition for the dates of October 20 through October 25, 2020 resulted in hotel rates at approximately \$77 to \$136 a night. Attached hereto as **Exhibit 10** is a true and correct copy of the results of said search.

4. Counsel for DCA uniformly took economy or premium economy flights for travel associated with depositions, with the exception of the travel to Cape Town, South Africa. However, DCA was charged a reduced amount that was commensurate with a premium economy round trip flight to and from Cape Town.

5. For the Court’s convenience, DCA has attached a copy of ICANN’s Memorandum of Costs, identifying which costs DCA is specifically challenging as **Exhibit 11**.

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 6th day of January 2020, at Los Angeles, California.



Ethan J. Brown