1 2 3 4 5 6 7 8 9 10	Ethan J. Brown (SBN 218814) <u>ethan@bnsklaw.com</u> Sara C. Colón (SBN 281514) <u>sara@bnsklaw.com</u> Nona Yegazarian (SBN 316458) <u>nona@bnsklaw.com</u> BROWN NERI, SMITH & KHAN LLP 11601 Wilshire Boulevard, Suite 2080 Los Angeles, California 90025 Telephone: (310) 593-9890 Facsimile: (310) 593-9980 <i>Attorneys for Plaintiff</i> DotConnectAfrica Trust SUPERIOR COURT OF TH	E STATE OF CALIFORNIA
11	FOR THE COUNTY OF LOS ANGELES – CENTRAL	
 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 	DOTCONNECTAFRICA TRUST, a Mauritius charitable trust, Plaintiff, v. Internet Corporation for Assigned Names and Numbers, <i>et al.</i> Defendants.	Case No. BC607494 [Assigned for all purposes to the Hon. Robert B. Broadbelt III – Dept. 53] SECOND DECLARATION OF ETHAN J BROWN IN SUPPORT OF PLAINTIFF'S REPLY TO MOTION TO TAX ZACR'S COSTS
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	SECOND BROWN DECLARATION	

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SECOND 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 Intervenor ZA Central Registry, NPC ("ZACR"). 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.

15 4. Counsel for DCA uniformly took economy or premium economy flights for travel 16 associated with depositions, with the exception of the travel to Cape Town, South Africa. However, 17 DCA was charged a reduced amount that was commensurate with a premium economy round trip 18 flight to and from Cape Town.

19 I declare under penalty of perjury under the laws of the State of California and the laws of 20 the United States that the foregoing is true and correct. Executed on this 6th day of January 2020, at Los Angeles, California. 21

Ethan J. Brown

SECOND BROWN DECLARATION

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