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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**
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12 FEGISTRY, LLC, RADIX DOMAIN
13 SOLUTIONS PTE. LTD., and DOMAIN
VENTURE PARTNERS PCC LIMITED,

14 Plaintiffs,

15 v.

16 INTERNET CORPORATION FOR
17 ASSIGNED NAMES AND NUMBERS,

18 Defendant.
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CASE NO. 20STCV42881

Assigned for all purposes to
Hon. Craig D. Karlan

**DECLARATION OF ERIC P. ENSON
IN SUPPORT OF DEFENDANT
ICANN'S DEMURRER TO
PLAINTIFFS' COMPLAINT**

Date: T.B.D.
Time: T.B.D.
Dept: N

Complaint Filed: November 9, 2020

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DECLARATION OF ERIC P. ENSON

I, Eric P. Enson, declare:

1. I am a partner of 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 demurrer to Plaintiffs’ Complaint (“Demurrer”).

2. On January 11, 2021, I emailed counsel for Plaintiffs asking to meet and confer before filing the Demurrer to ascertain whether the parties could resolve any issues. In that email, I included ICANN’s arguments setting forth why each cause of action is subject to dismissal, and provided the legal basis for those arguments.

3. On January 14, 2021, my colleague and I participated in a meet-and-confer with Plaintiffs’ counsel by phone, but were unable to resolve the outstanding issues prompting the Demurrer. Therefore, ICANN is proceeding with filing its Demurrer.

I confirm under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed January 22, 2021, in Los Angeles, California.



Eric P. Enson