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11 *Attorneys for Defendants Internet Corporation*  
*for Assigned Names and Numbers and Göran Marby*

12  
13 IN THE SUPERIOR COURT OF ARIZONA

14 COUNTY OF PINAL

15  
16 George Kelly and George Kelly as  
17 slingfantasy.com, slingfantasy.net,  
seuresite10.com, and slingframes.com,

18 Plaintiff,

19 v.

20 ICANN (Internet Corporation for  
21 Assigned Names and Numbers) Göran  
22 Marby its president, and CEO And John  
Doe's 1-15,

23 Defendants.

Case No. S-1100-CV-201700918

**DECLARATION OF AKRAM  
ATALLAH IN SUPPORT OF  
DEFENDANTS' MOTION TO  
DISMISS**

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2 **DECLARATION OF AKRAM ATALLAH**

3 I, Akram Atallah, declare the following:

4 1. I am the President, Global Domains Division, for the Internet Corporation for  
5 Assigned Names and Numbers (“ICANN”), a defendant in this action. I have personal  
6 knowledge of the matters set forth herein and am competent to testify as to those matters. I make  
7 this declaration in support of Defendants’ Motion to Dismiss plaintiff’s complaint.

8 2. ICANN is a California non-profit public benefit corporation with its principle  
9 place of business in Los Angeles, California.

10 3. ICANN does not engage in commercial business, but rather oversees the technical  
11 coordination of the Internet’s domain name system (“DNS”) on behalf of the Internet community.  
12 One of the DNS’s essential functions is to convert numeric IP addresses into easily-remembered  
13 domain names such as “azcourts.gov” and “ICANN.org.”

14 4. ICANN accredits the companies that act as “Registrars,” who assist consumers and  
15 businesses in obtaining the right to use second-level domain names. Beyond monitoring  
16 Registrars’ compliance with ICANN policies regarding the registration of second-level domain  
17 names, ICANN is not involved in the actual registration or de-registration of, or disputes  
18 regarding, individual domain names.

19 5. ICANN does maintain certain websites, such as those located at  
20 <http://www.icann.org> or <http://www.internic.net>, which contain information about ICANN, about  
21 the people who work for ICANN, and about the projects that ICANN has undertaken in  
22 connection with the Internet. ICANN does not offer anything for sale on its websites as ICANN  
23 does not sell anything.

24 6. ICANN has no office in Arizona and does not employ individuals to work in  
25 Arizona.

26 7. ICANN is not licensed or registered to do business in Arizona.

27 8. ICANN does not sell anything in Arizona.

28 9. ICANN does not have any phone listings or mailing addresses in Arizona.

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- 10. ICANN does not directly pay any taxes in Arizona.
- 11. ICANN does not have a registered agent for service of process in Arizona.
- 12. ICANN does not own any real property in Arizona.
- 13. ICANN does not hold any bank accounts in Arizona.

I declare under penalty of perjury under the laws of the State of Arizona that the foregoing is true and correct.

Executed this 13<sup>th</sup> day of July 2017, in Visby, Sweden

  
Akram Atallah