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INTERNET CORPORATION FOR
7 ASSIGNED NAMES AND NUMBERS

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**

11 NAMECHEAP, INC., a Delaware Corporation,

12 Plaintiff,

13 v.

14 INTERNET CORPORATION FOR
15 ASSIGNED NAMES AND NUMBERS, a
California Nonprofit Corporation

16 Defendant.

Case No. 24SMCP00066

Assigned to Hon. H. Jay Ford

**DECLARATION OF JEFFREY A.
LEVEE IN SUPPORT OF ICANN'S
OPPOSITION TO PLAINTIFF'S
MOTION TO ENFORCE JUDGMENT**

[ICANN's Opposition to Plaintiff's Motion
to Enforce Judgment Filed Concurrently
Herewith]

Date: July 31, 2025

Time: 8:30 a.m.

Dept: O

Complaint Filed: January 31, 2024

1 I, Jeffrey A. LeVee, declare as follows:

2 1. I am a partner at Jones Day, attorney of record for Defendant/Respondent the
3 Internet Corporation for Assigned Names and Numbers (“ICANN”) in the above-referenced
4 action. I have personal knowledge of the facts set forth in this declaration and if called upon to
5 testify under oath, I could and would testify competently thereto.

6 2. I make this declaration in support of ICANN’s Opposition to Plaintiff/Petitioner
7 Namecheap, Inc.’s (“Namecheap”) Motion to Enforce Judgment (“Motion”).

8 3. On July 15, 2025, I visited ICANN’s website at [https://www.icann.org/en/board-
9 activities-and-meetings/materials/minutes-regular-meeting-of-the-icann-board-11-06-2023-en](https://www.icann.org/en/board-activities-and-meetings/materials/minutes-regular-meeting-of-the-icann-board-11-06-2023-en) and
10 reviewed the Minutes of the Regular Meeting of the ICANN Board, dated June 11, 2023. This
11 meeting is referenced in the Motion at page 5, and this link is cited in Namecheap’s original
12 Complaint, ¶ 47, footnote 5. A true and correct copy of these minutes is attached hereto as
13 **Exhibit A** and incorporated herein.

14 4. On July 15, 2025, I visited ICANN’s website at [https://www.icann.org/en/board-
15 activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-
16 committee-bamc-22-02-2024-en](https://www.icann.org/en/board-activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-committee-bamc-22-02-2024-en) and reviewed the Minutes of the ICANN Board Accountability
17 Mechanisms Committee, dated February 22, 2024. This meeting is referenced in ICANN’s
18 Opposition to Plaintiff’s Opening Brief to Confirm the Arbitration Award at page 8, and this link
19 is cited in ICANN’s Demurrer at page 13, footnote 7. A true and correct copy of these minutes is
20 attached hereto as **Exhibit B** and incorporated herein.

21 5. On July 15, 2025, I visited ICANN’s website at
22 <https://www.icann.org/en/system/files/correspondence/sanchez-to-namecheap-05mar24-en.pdf>
23 and reviewed the letter from León Sanchez, Chair of the ICANN Board Accountability
24 Mechanisms Committee, to Namecheap, Inc. regarding the economic analysis pursuant to Board
25 Resolution 2023.06.11.07. This meeting is referenced in ICANN’s Opposition to Plaintiff’s
26 Opening Brief to Confirm the Arbitration Award at page 8, and this link is cited in ICANN’s
27 Demurrer at page 15, footnote 8. A true and correct copy of this letter is attached hereto as
28 **Exhibit C** and incorporated herein.

1 6. On July 15, 2025, I visited ICANN’s website at [https://www.icann.org/en/board-](https://www.icann.org/en/board-activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-committee-bamc-08-06-2024-en)
2 [activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-](https://www.icann.org/en/board-activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-committee-bamc-08-06-2024-en)
3 [committee-bamc-08-06-2024-en](https://www.icann.org/en/board-activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-committee-bamc-08-06-2024-en) and reviewed the Minutes of the ICANN Board Accountability
4 Mechanisms Committee, dated June 8, 2024. This meeting is referenced in ICANN’s Opposition
5 to Plaintiff’s Opening Brief to Confirm the Arbitration Award at page 8, and a true and correct
6 copy of these minutes is attached hereto as **Exhibit D** and incorporated herein.

7 7. On July 15, 2025, I visited ICANN’s website at
8 [https://www.icann.org/en/system/files/files/irp-namecheap-economist-supplemental-report-](https://www.icann.org/en/system/files/files/irp-namecheap-economist-supplemental-report-31aug24-en.pdf)
9 [31aug24-en.pdf](https://www.icann.org/en/system/files/files/irp-namecheap-economist-supplemental-report-31aug24-en.pdf) and reviewed the Supplemental Report prepared by the economist retained by
10 ICANN, Dr. Gregory K. Leonard, dated August 31, 2024. This report is referenced in ICANN’s
11 Opposition to Plaintiff’s Opening Brief to Confirm the Arbitration Award at page 8, and a true
12 and correct copy of the Supplemental Report is attached hereto as **Exhibit E** and incorporated
13 herein

14 8. On July 15, 2025, I visited ICANN’s website at [https://www.icann.org/en/board-](https://www.icann.org/en/board-activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-committee-bamc-17-09-2024-en)
15 [activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-](https://www.icann.org/en/board-activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-committee-bamc-17-09-2024-en)
16 [committee-bamc-17-09-2024-en](https://www.icann.org/en/board-activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-committee-bamc-17-09-2024-en) and reviewed the Minutes of the ICANN Board Accountability
17 Mechanisms Committee, dated September 17, 2024. This meeting is referenced in ICANN’s
18 Opposition to Plaintiff’s Opening Brief to Confirm the Arbitration Award at page 8, and a true
19 and correct copy of these minutes is attached hereto as **Exhibit F** and incorporated herein.

20 9. On July 15, 2025, I visited ICANN’s website at [https://www.icann.org/en/board-](https://www.icann.org/en/board-activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-committee-bamc-17-10-2024-en)
21 [activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-](https://www.icann.org/en/board-activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-committee-bamc-17-10-2024-en)
22 [committee-bamc-17-10-2024-en](https://www.icann.org/en/board-activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-committee-bamc-17-10-2024-en) and reviewed the Minutes of the ICANN Board Accountability
23 Mechanisms Committee, dated October 17, 2024. This meeting is referenced in ICANN’s
24 Opposition to Plaintiff’s Opening Brief to Confirm the Arbitration Award at page 8, and a true
25 and correct copy of these minutes is attached hereto as **Exhibit G** and incorporated herein.

26 10. For the Court’s convenience, attached hereto as **Exhibit H** is a chronology of the
27 exhibits cited by both Plaintiff and ICANN regarding Plaintiff’s Motion.
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 17, 2025 in Los Angeles, California

/s/ Jeffrey A. LeVee
Jeffrey A. LeVee