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7 DOT CONNECT AFRICA TRUST
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10 **UNITED STATES DISTRICT COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

12 DOTCONNECT AFRICA TRUST

13 Plaintiff,

14 v.

15 INTERNET CORPORATION FOR
16 ASSIGNED NAMES AND NUMBERS
and DOES 1 through 50, inclusive,

17 Defendants.
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Case No. 2:16-cv-00862-RGK (JCx)

**DECLARATION OF ETHAN J.
BROWN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

Date: April 4, 2016
Hearing: 9:00 a.m.
Courtroom: 850

[Filed concurrently: Declaration of
Sophia Bekele; Motion for Preliminary
Injunction; [Proposed] Order]

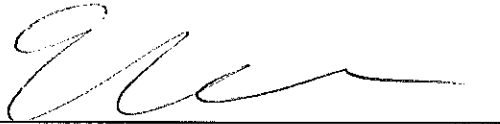
DECLARATION OF ETHAN J. BROWN

I Ethan J. Brown hereby declare as follows:

1. I am an attorney at law licensed to practice in California and a partner at the law firm of Brown, Neri & Smith LLP, counsel of record for Plaintiff DotConnectAfrica Trust ("DCA"). The matters referred to in this declaration are based upon my personal knowledge, and/or when reference documents, such documents were reviewed by me, and if called as a witness, I could and would testify competently thereto.

2. On February 23, 2016 I spoke to Jeffrey Levee, counsel of record for Defendant Internet Corporation for Assigned Names and Numbers ("ICANN"). I asked Mr. Levee for the status of ICANN's granting of the .Africa gTLD and informed Mr. Levee that DCA would be forced to move for injunctive relief absent assurance that .Africa would not be granted to another party during the pendency of the litigation. Mr. Levee failed to give any such assurance and instead reminded me that ICANN had denied DCA's application and stated that the board of ICANN could take action on .Africa at any time and that ICANN had a scheduled board meeting in Marrakesh, Morocco that would begin on March 5, 2016.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 29, 2016 at Los Angeles, California.



Ethan J. Brown