

1 Ethan J. Brown (SBN 218814)
ethan@bnslawgroup.com

2 Sara C. Colón (SBN 281514)
sara@bnslawgroup.com

3 **BROWN NERI & SMITH LLP**
4 11766 Wilshire Boulevard, Suite 1670
5 Los Angeles, California 90025
6 Telephone: (310) 593-9890
7 Facsimile: (310) 593-9980

8 *Attorneys for Plaintiff*
9 **DOTCONNECTAFRICA TRUST**

10
11 **UNITED STATES DISTRICT COURT**

12
13 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

14 **DOTCONNECTAFRICA TRUST**

15
16 **Plaintiff,**

17 **v.**

18
19 **INTERNET CORPORATION FOR**
20 **ASSIGNED NAMES AND NUMBERS**
21 **and DOES 1 through 50, inclusive,**

22 **Defendants.**

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

23
24 **DECLARATION OF SARA C.**
25 **COLÓN**

26
27 [Filed concurrently: Notice of *Ex Parte*
28 Application for Temporary Restraining
Order; Application for Leave to File
Under Seal; [Proposed] Temporary
Restraining Order; [Proposed] Order to
Show Cause; and [Proposed] Order Re
Application for Leave to File Under
Seal]

1 **DECLARATION OF SARA C. COLÓN**

2 I, Sara C. Colón, declare as follows:

3 1. I am a partner at the law firm of Brown Neri & Smith, LLP and
4 licensed to practice law in California and before this court. I am counsel of record
5 for Plaintiff DOTCONNECTAFRICA Trust (“DCA”). I make this declaration in
6 support of DCA’s *ex parte* application for a temporary restraining order. The
7 matters referred to in this declaration are based upon my personal knowledge,
8 and/or when referencing documents, such documents were reviewed by me, and if
9 called as a witness, I could and would testify competently thereto.

10 2. On March 1, 2016 I emailed counsel for Defendant Internet
11 Corporation for Assigned Names and Numbers (“ICANN” or “Defendant”) to
12 advise him that DCA would file an *ex parte* application for a temporary restraining
13 order on March 2, 2016 if ICANN did not agree to refrain from delegating the
14 rights to .Africa until after a ruling on DCA’s motion for a preliminary injunction.
15 Counsel for ICANN has not responded to my email at the time of this writing. A
16 true and correct copy of my email is attached hereto as **Exhibit A**.

17 3. A true and correct copy of the Declaration of Ethan J. Brown, filed in
18 support of Plaintiff’s Motion for Preliminary Injunction, filed March 1, 2016, is
19 attached hereto as **Exhibit B**.

20 4. A true and correct copy of the Declaration of Sophia Bekele Eshete,
21 filed in support of Plaintiff’s Motion for Preliminary Injunction, filed March 1,
22 2016, is attached hereto as **Exhibit C**.

23 5. A true and correct copy of the March 1, 2016 email from counsel for
24 ICANN to counsel for DCA is attached hereto as **Exhibit D**.

25
26
27 I declare under penalty of perjury under the laws of the State of California
28 and the laws of the United States that the foregoing is true and correct.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Executed on this 2nd day of March 2016, at Los Angeles, California.

 /s/ Sara C. Colón
Sara C. Colón

CERTIFICATE OF SERVICE

I, Ethan J. Brown, hereby declare under penalty of perjury as follows:

I am a partner at the law firm of Brown, Neri & Smith LLP, with offices at 11766 Wilshire Blvd., Los Angeles, California 90025. On March 2, 2016, I caused the foregoing **DECLARATION OF SARA C. COLÓN** to be electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on March 2, 2016

/s/ Ethan J. Brown