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 11 **ZA Central Registry, NPC**

12 **UNITED STATES DISTRICT COURT**
 13 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

14 DOTCONNECTAFRICA TRUST, a
 15 Mauritius Charitable Trust,
 16
 17 Plaintiff,
 18
 19 v.

20 INTERNET CORPORATION FOR
 21 ASSIGNED NAMES AND
 22 NUMBERS; a California corporation;
 23 ZA Central Registry, a South African
 24 non-profit company; DOES 1 through
 25 50, inclusive,
 26
 27 Defendants.

CASE NO. 2:16-cv-00862 RGK (JCx)

*Assigned for all purposes to the
 Honorable R. Gary Klausner*

**DECLARATION OF DAVID W.
 KESSELMAN IN SUPPORT OF
 ZACR’S MOTION TO DISMISS
 FOR FAILURE TO STATE A
 CLAIM**

[Notice of Motion and Motion to
 Dismiss for Failure to State a Claim;
 Memorandum of Points and
 Authorities; Request for Judicial
 Notice; and [Proposed] Order Filed
 Concurrently Herewith]

Date: May 31, 2016
 Time: 9:00 a.m.
 Location: Courtroom 850

1 I, David W. Kesselman, hereby declare:

2 1. I am an attorney duly admitted to practice law before this Court, I am
3 a partner in the law firm of Kesselman Brantly Stockinger LLP, and I am counsel
4 of record for defendant ZA Central Registry, NPC (“ZACR”). If called upon to
5 do so, I could and would testify competently to the information set forth herein.

6 2. Pursuant to Central District Local Rule 7-3, I held a meet and confer
7 with Ms. Sara Colón, counsel for plaintiff DOTCONNECTAFRICA TRUST, on
8 April 5, 2016. Despite our good faith efforts the parties were unable to agree on
9 the issues raised by ZACR’s motion to dismiss.

10 I declare under penalty of perjury under the laws of the United States of
11 America that the foregoing is true and correct.

12 Executed this 26th day of April, 2016 at Manhattan Beach, California.

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/s/ David W. Kesselman
DAVID W. KESSELMAN