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 9 INTERNET CORPORATION FOR
 ASSIGNED NAMES AND NUMBERS

10
 11 UNITED STATES DISTRICT COURT
 12 CENTRAL DISTRICT OF CALIFORNIA
 13 WESTERN DIVISION

14
 15 DOTCONNECTAFRICA TRUST,

16 Plaintiff,

17 v.

18 INTERNET CORPORATION FOR
 ASSIGNED NAMES AND
 19 NUMBERS, et al.,

20 Defendants.

Case No. CV 16-00862-RGK

Assigned for all purposes to the
 Honorable R. Gary Klausner

**DEFENDANT INTERNET
 CORPORATION FOR
 ASSIGNED NAMES AND
 NUMBERS' SUPPLEMENTAL
 BRIEF RE INDISPENSABLE
 PARTY**

1 Defendant Internet Corporation for Assigned Names and Numbers
2 (“ICANN”) agrees with ZA Central Registry (“ZACR”) that ZACR is entitled to
3 intervene as of right in this action and that, under the factors stated in Fed. R. Civ. P.
4 19(b), this Court has the discretion to find that plaintiff DotConnectAfrica Trust’s
5 claims for injunctive and declaratory relief make ZACR an indispensable party. As
6 explained in ZACR’s supplemental brief, if this Court concludes that it lacks
7 subject matter jurisdiction, this Court’s rulings must be vacated and the proper
8 procedure is for the parties to seek an order from the Ninth Circuit to accomplish
9 that result.

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11 Dated: September 27, 2016

JONES DAY

12 By: /s/ Jeffrey A. LeVee
13 Jeffrey A. LeVee

14 Attorneys for Defendant
15 INTERNET CORPORATION FOR
16 ASSIGNED NAMES AND NUMBERS
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