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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 26<sup>th</sup> day of April, 2016 at Manhattan Beach, California.

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/s/ David W. Kesselman  
DAVID W. KESSELMAN