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13 **ZA Central Registry, NPC**

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES - CENTRAL**

12 DOTCONNECTAFRICA TRUST, a
13 Mauritius Charitable Trust,
14 Plaintiff,

15 v.

16 INTERNET CORPORATION FOR
17 ASSIGNED NAMES AND NUMBERS; a
18 California corporation; ZA Central Registry,
19 a South African non-profit company; DOES
20 1 through 50, inclusive,
21 Defendants.

CASE NO. BC607494

*Assigned to the Hon. Howard L. Halm,
Dept. 53*

**ZA CENTRAL REGISTRY, NPC'S
RESPONSE TO PLAINTIFF'S
EVIDENTIARY OBJECTIONS TO
DECLARATION OF MOKGABUDI
LUCKY MASILELA**

Date: December 22, 2016
Time: 8:29 a.m.
Dept.: 53

1 Defendant ZA Central Registry, NPC (“ZACR”) submits its responses to the evidentiary
 2 objections to the Declaration of Mokgabudi Lucky Masilela (“Masilela Declaration”) filed by
 3 Plaintiff DOTCONNECTAFRICA Trust (“DCA”). As an initial matter, DCA objects to the
 4 entire Masilela Declaration arguing that his declaration is misleading in that it fails to state that
 5 ZACR agreed to grant the African Union Commission (“AUC”) any rights to the gTLD .Africa
 6 and that the AUC is effectively itself an applicant for the .Africa gTLD. Plaintiff’s objection that
 7 Mr. Masilela’s testimony is “misleading” is argumentative and not a proper objection under §
 8 352 of the California Evidence Code. Plaintiff’s improper arguments in the guise of evidentiary
 9 objections should be disregarded. Moreover, whether ZACR agreed to grant any rights to the
 10 gTLD .Africa to the AUC or not is immaterial for purposes of this motion. ICANN does not
 11 prohibit such assignments. *See* Brantly Decl. Ex. 2 (Willett Tr. at 48:9-49:19); Ex. 3 (Attallah
 12 Tr. at 129:2-130:2).

| Masilela Decl. | DCA’s Objection | ZACR’s Response | Court’s Ruling |
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| <p>13 ¶ 3: Due to its well- 14 known reputation for 15 independence and 16 neutrality, as well as 17 technical competence 18 and operational 19 excellence, ZACR is 20 the single largest 21 domain name registry 22 on the African 23 continent.</p> | <p>1. Lacks personal knowledge (Evid. Code § 702) 2. Lacks foundation, irrelevant (Evid. Code § 403)</p> | <p>Mr. Masilela is the Chief Executive Officer of ZACR and has personal knowledge of ZACR’s reputation and operations. Mr. Masilela’s testimony is relevant to show that ZACR was an experienced applicant for .Africa.</p> | |

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| Masilela Decl. | DCA's Objection | ZACR's Response | Court's Ruling |
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| <p>¶ 4: After Internet Corporation For Assigned Names and Numbers (“ICANN”) formally launched the “New gTLD Program,” ZACR submitted an application for the .Africa gTLD. I am aware that both ZACR and DCA submitted their respective applications for the .Africa gTLD in the Spring/ Summer of 2012. At the same time, ZACR also applied for, and obtained, the .CapeTown, .Joburg and .Durban gTLDs, and these gTLDs have been launched to the Internet public.</p> | <p>1. Irrelevant (Evid. Code § 350)</p> | <p>Mr. Masilela’s testimony is relevant to show that ZACR was an experienced applicant for .Africa.</p> | |

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| Masilela Decl. | DCA's Objection | ZACR's Response | Court's Ruling |
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| <p>¶ 5: I am familiar with the ICANN selection criteria for the gTLD. ICANN set forth selection criteria in an Applicant Guidebook. Among other things, ICANN made clear that because the .Africa gTLD represented the name of a geographic region, an applicant would need to provide documentation showing support from at least 60% of the governments in the region. Further, ICANN criteria provided that no more than one objection from a government or public</p> | <p>1. The Application Guidebook is the best evidence of the document. (Evid. Code § 1520) 2. Lacks foundation (Evid. Code § 403) 3. Lacks personal knowledge. (Evid. Code §702)</p> | <p>The Court may refer to the Guidebook which, in addition to being accessible online, is part of the record. (Declaration of Sophia Bekele Eshete, Ex. 3) Additionally, Mr. Masilela is the Chief Executive Officer of ZACR and has personal knowledge of the process for the delegation of the .Africa gLTD.</p> | |

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entity associated with the geographic region would be permitted. These criteria are set forth in ICANN Application Guidebook Module 2, and available online at: <http://newgtlds.icann.org/en/applicants/agb> par 2.2.1.4.2.4.

| Masilela Decl. | DCA’s Objection | ZACR’s Response | Court’s Ruling |
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| <p>¶ 6: ZACR submitted its application to ICANN with the full support of African Union member states via the African Union Commission (“AUC”) endorsement. Specifically, the AUC, which serves as the Secretariat of</p> | <p>1. The letters are the best evidence of the letters. (Evid. Code § 1520)</p> | <p>The Court may refer to the letters, which are attached to the Masilela Declaration as Exhibits A and B.</p> <p>Mr. Masilela is the Chief Executive Officer of ZACR and has personal knowledge of ZACR’s application for the .Africa gLTD.</p> | |

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| <p>the African Union, provided a letter supporting ZACR's application. ZACR submitted a letter of support from the African Union dated July 4, 2012. In response, ICANN's Geographic Names Panel provided ZACR with Clarifying Questions relating to deficiencies in the AUC letter of support. Attached hereto as Exhibit A is a true and correct copy of the Geographic Names Panel Clarifying Questions. ZACR addressed the deficiencies and submitted an updated letter of support on or about July 2,</p> | | | |
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| <p>2013. A true and correct copy of the July 2, 2013 AUC letter is attached as Exhibit B. In addition, the only nonmember, Morocco, separately provided a letter supporting ZACR’s application. A true and correct copy of the March 28, 2012 Moroccan letter of support is attached as Exhibit C.</p> | | | |
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| Masilela Decl. | DCA’s Objection | ZACR’s Response | Court’s Ruling |
| <p>¶ 7: ZACR received the support of the African Union only after the AUC publicized a request for proposal (“RFP”). This was an open bid process. The AUC made clear that it was only going</p> | <p>1. Lacks personal knowledge (Evid. Code § 702) 2. Lacks foundation (Evid. Code § 403)</p> | <p>The Court may refer to the letter, which is attached to the Masilela Declaration as Exhibit D. Mr. Masilela is the Chief Executive Officer of ZACR and has personal</p> | |

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| <p>to support one applicant. By way of background, the AUC RFP process began because it was well known that ICANN was considering a new gTLD program, including .Africa. It was in anticipation of this new gTLD program that the AUC decided to hold an RFP to support a single, qualified applicant for the African Union. This is because the AUC was specifically mandated by member states to set up the structures and modalities for the implementation of the dotAfrica (.Africa) gTLD.</p> <p>Details of the process</p> | | <p>knowledge of the AUC RFP, which ZACR participated in.</p> | |
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are set forth in the
September 29, 2015
AUC letter, a true
and correct copy of
which is attached
hereto as **Exhibit D**.
This letter is also
available at:
http://africanonespace.org/downloads/GN_P.PDF

| Masilela Decl. | DCA’s Objection | ZACR’s Response | Court’s Ruling |
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| <p>¶ 8: I was informed by AUC officials that Plaintiff DotConnectAfrica Trust (“Plaintiff”) chose not to participate in the RFP.</p> | <p>1. Hearsay (Evid. Code § 1200, et seq.)</p> | <p>Mr. Masilela’s testimony is not offered for the truth of the matter asserted but rather as to what he was informed. It is also undisputed that DCA chose not to participate in the RFP.</p> | |

| Masilela Decl. | DCA's Objection | ZACR's Response | Court's Ruling |
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| <p>¶ 9: Attached as Exhibit E are true and correct copies of the 17 "Early Warning Notices" from individual African countries to Plaintiff's application. These "Early Warning Notices" are also available online at: http://africanonespace.org/content.php?tag=13&title=Resources</p> | <p>1. Irrelevant (Evid. Code § 350)</p> | <p>The ICANN Guidebook requires that the applicant for .Africa demonstrate support from at least 60% of the countries in Africa.</p> <p>Declaration of Sophia Bekele Eschete Ex. 3 at 2-18. The Early Warning Notices are thus relevant to show that DCA did not have the support of the governments in Africa.</p> | |
| Masilela Decl. | DCA's Objection | ZACR's Response | Court's Ruling |
| <p>¶ 10: The Registry Agreement between ICANN and ZACR was effective on March 24, 2014 and runs for ten years. Yet, over two years into the Agreement,</p> | <p>1. Lacks personal knowledge (Evid. Code §702)</p> <p>2. Lacks foundation (Evid. Code § 403)</p> <p>3. Speculative (Evid. Code §702)</p> <p>4. Conclusory.</p> | <p>Mr. Masilela is the Chief Executive Officer of ZACR and has personal knowledge of the Registry Agreement between ZACR and ICANN, as well as</p> | |

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| <p>the .Africa gTLD has still not been delegated to ZACR. In effect, 20% of the period of the Agreement has already lapsed without any benefit to ZACR. This delay has resulted in unforeseen and mounting costs, as well as lost opportunities, for the .Africa project.</p> | <p>(Evinger v. MacDougall (1938) 28 Cal.App.2d 175.) 5. Biased and misleading in that it was entered into after the initiation of the IRP process by DCA, the day after DCA requested ICANN refrain from delegating the .Africa domain based on the IRP proceeding pending, and on the grounds that the IRP ordered ICANN to refrain from further processing ZACR's application until the IRP proceeding concluded. See (Bekele Decl. ¶10, Ex. 1, pp. 4, ¶¶ 16-20)</p> | <p>the business and economic consequences of the delayed implementation of that agreement. Plaintiff's objections that Mr. Masilela's testimony is "[b]iased" and "misleading" are argumentative and not proper objections under the California Evidence Code. Plaintiff's improper arguments in the guise of evidentiary objections should be disregarded.</p> | |
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| Masilela Decl. | DCA's Objection | ZACR's Response | Court's Ruling |
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| <p>¶ 11: ZACR has incurred considerable expenses both prior to and after entering into the Registry Agreement. The current and continuing cost due to the delay in the delegation is running at approximately \$16,632 per month. In May of 2016, ZACR previously estimated its average monthly costs at approximately \$18,386. Cost saving measures implemented by ZACR have brought the average amount of ZACR's costs down. A true and correct copy of a summary of average</p> | <p>1. Lacks foundation (Evid. Code § 403) 2. Lacks personal knowledge (Evid. Code §702) 3. Speculative (Evid. Code § 1200, et seq.) 4. Conclusory (<i>Evinger v. MacDougall</i> (1938) 28 Cal.App.2d 175.)</p> | <p>Mr. Masilela is the Chief Executive Officer of ZACR and has personal knowledge of ZACR's expenses in connection with the Registry Agreement. Mr. Masilela further testified that his estimate of monthly expenses was based on a review of actual costs incurred by ZACR. The calculations underlying Mr. Masilela's estimates are set forth in Exhibit F. Costs incurred by ZACR as a result of the delay in the delegation of the .Africa gLTD are</p> | |

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| <p>costs from July 2015 to October 2016 is included as Exhibit F. This is based upon a review of the monthly costs incurred from July 2015 to October 2016 for the .Africa project, including the ongoing costs related to consultants, marketing, sponsorships and related expenses. In determining these figures, we averaged the monthly expenses for the .Africa project and where necessary converted expenditures from South African Rand to U.S. dollars. These figures were configured by ZACR's finance section based on</p> | | <p>directly relevant to hardship ZACR will suffer if the preliminary injunction is granted.</p> | |
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| ZACR's financial records. The summary of costs listed in Exhibit F does not include any fees due to ICANN under the Registry Agreement or legal fees that ZACR had previously incurred. If we were to include actual and expected legal fees for this litigation, the ZACR finance section projects the cost figures would increase significantly beyond \$16,632 per month. The importance of maintaining visibility for the .Africa project, coupled with the ongoing need to interface with government officials throughout the | | | |
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| 1 | African continent, | | | |
| 2 | makes clear that | | | |
| 3 | these ongoing | | | |
| 4 | expenses will | | | |
| 5 | continue during the | | | |
| 6 | course of this | | | |
| 7 | litigation. | | | |
| 8 | Masilela Decl. | DCA's Objection | ZACR's Response | Court's Ruling |
| 9 | ¶ 12: The Loss of | 1. Lacks foundation | Mr. Masilela is the | |
| 10 | Net Income after Tax | (Evid. Code § 403) | Chief Executive | |
| 11 | (opportunity costs) | 2. Lacks personal | Officer of ZACR and | |
| 12 | suffered by ZACR | knowledge (Evid. | has personal | |
| 13 | from the date of the | Code §702) | knowledge of the | |
| 14 | planned delegation | 3. Speculative (Evid. | economic | |
| 15 | following the | Code § 1200, et seq.) | consequences of the | |
| 16 | Registry Agreement | 4. Conclusory | delayed delegation of | |
| 17 | through December 1, | (Evinger v. | the .Afica gLTD. | |
| 18 | 2016, are now | MacDougall (1938) | | |
| 19 | estimated to be | 28 | Further, Mr. Masilela | |
| 20 | approximately \$15.5 | Cal.App.2d 175.) | testified that his | |
| 21 | million (U.S. | 5. Biased and | estimate of | |
| 22 | dollars). These | misleading in that it | opportunity costs | |
| 23 | estimates were | was entered into after | was based on a | |
| 24 | configured by | the initiation of the | review of projections | |
| 25 | ZACR's finance | IRP process by DCA, | made in the course of | |
| 26 | section. A true and | the day after DCA | ZACR's application | |
| 27 | correct copy of a | requested ICANN | for the .Africa gTLD, | |
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| <p>summary of the breakdown of ZACR’s opportunity costs are included in the attached Exhibit F. The estimated number of registration numbers are based on ZACR’s responses to ICANN’s 2012 application questions 46 – 50. ZACR researched these numbers at the time of application and the application passed ICANN evaluation. To be conservative, ZACR revised down some of these numbers based on trends in the launch of other new gTLDs. Of the \$15.5 million in lost opportunity costs, approximately \$5.8 million would</p> | <p>refrain from delegating the .Africa domain based on the IRP proceeding pending, and on the grounds that the IRP ordered ICANN to refrain from further processing ZACR’s application until the IRP proceeding concluded. See (Bekele Decl. ¶10, Ex. 1, pp. 4, ¶¶ 16-20).</p> | <p>and that ZACR had revised some of its projections downward based on recent trends. The calculations underlying Mr. Masilela’s estimate of the opportunity costs suffered by ZACR are set forth in Exhibit F. Plaintiff’s objections that Mr. Masilela’s testimony is “[b]iased” and “misleading” are argumentative and not proper objections. Plaintiff’s improper arguments in the guise of evidentiary objections should be disregarded.</p> | |
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| have been donated to the dotAfrica Foundation for African online development. Until such time as delegation takes place, the .Africa gTLD in effect stagnates and generates no income and no value in the marketplace. The ongoing delay is also prejudicial to the gTLD itself (no matter who the operator is) in that the initial interest surrounding the launch of this domain name will have faded, and persons who may have sought to register will have lost interest. | | | |
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| Masilela Decl. | DCA's Objection | ZACR's Response | Court's Ruling |
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| <p>¶ 13: Once a gTLD is delegated it starts increasing in value. The gTLD is at its lowest value prior to delegation and increases as the number of second level domain delegations (for example: xyz.africa) increases. If Plaintiff is redelegated the .Africa gTLD, it will suffer no irreparable harm as it will inherit a more valuable gTLD without incurring the cost to develop it.</p> | <p>1. Lacks foundation (Evid. Code § 403) 2. Lacks personal knowledge (Evid. Code §702) 3. Speculative (Evid. Code § 1200, et seq.) 4. Conclusory (Evinger v. MacDougall (1938) 28 Cal.App.2d 175.) 5. Irrelevant to the extent that the standard at issue is whether DCA would be harmed, not irreparably harmed. (Evid. Code § 403) 6. Biased and misleading in that it was entered into after the initiation of the IRP process by DCA, the day after DCA requested ICANN refrain from</p> | <p>Mr. Masilela is Chief Executive Officer of ZACR, the single largest domain name registry of the African continent. As such, he has personal knowledge of the economics of domain delegations. Courts have considered whether the plaintiff seeking an injunction would be irreparably harmed. See, e.g., Vo v. City of Garden Grove, 115 Cal. App. 4th 425, 435 (2004) (in evaluating harm and listing factors, court must consider "the degree of irreparable injury the denial of the</p> | |

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| | <p>delegating the .Africa domain based on the IRP proceeding pending, and on the grounds that the IRP ordered ICANN to refrain from further processing ZACR's application until the IRP proceeding concluded. See (Bekele Decl. ¶10, Ex. 1, pp. 4, ¶¶ 16-20).</p> | <p>injunction will cause"); <i>Gleaves v. Waters</i>, 175 Cal. App. 3d 413, 417 (1985) ("An injunction is an extraordinary remedy which requires a showing of threatened irreparable injury and the inadequacy of other remedy at law"); see also <i>Intel Corp. v. Hamidi</i>, 30 Cal. 4th 1342, 1352 (2003) ("Indeed, in order to obtain injunctive relief the plaintiff must ordinarily show that the defendant's wrongful acts threaten to cause irreparable injuries, ones that cannot be adequately compensated in</p> | |
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| | | <p>damages") (emphasis in original) (citation omitted). In any event, Mr. Masilela’s testimony supports that DCA will not be harmed.</p> <p>Plaintiff’s objections that Mr. Masilela’s testimony is “[b]iased” and “misleading” are argumentative and not proper objections. Plaintiff’s improper arguments in the guise of evidentiary objections should be disregarded.</p> | |
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| Masilela Decl. | DCA’s Objection | ZACR’s Response | Court’s Ruling |
| <p>¶ 14: Attached hereto as Exhibit G are true and correct copies of exemplar printouts of redelegations</p> | <p>1. Irrelevant. (Evid. Code § 403)</p> | <p>The print outs of redelegations are relevant to show that DCA will not be harmed if an</p> | |

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| 1 | including gTLDs, | | injunction does not | |
| 2 | from the Internet | | issue. If DCA | |
| 3 | Assigned Numbers | | ultimately prevails in | |
| 4 | Authority (“IANA”) | | the case, .Africa can | |
| 5 | website, | | be redelegated to | |
| 6 | https://www.iana.org | | DCA. <i>See also</i> | |
| 7 | /reports. Additional | | Declaration of | |
| 8 | examples can be | | Akram Atallah ¶13. | |
| 9 | found on the website. | | | |
| 10 | Masilela Decl. | DCA’s Objection | ZACR’s Response | Court’s Ruling |
| 11 | ¶ 15: Attached | 1. Irrelevant. (Evid. | The print outs are | |
| 12 | hereto as Exhibit H | Code § 403) | relevant to show that | |
| 13 | are true and correct | | DCA will not be | |
| 14 | copies of printouts | | harmed if an | |
| 15 | from the following | | injunction does not | |
| 16 | websites which | | issue. If DCA | |
| 17 | discuss redelegation | | ultimately prevails in | |
| 18 | of gTLDs: | | the case, .Africa can | |
| 19 | http://domaincite.co | | be redelegated to | |
| 20 | m/18849-youmight- | | DCA. <i>See also</i> | |
| 21 | besurprised-how- | | Declaration of | |
| 22 | many-new-gtlds- | | Akram Atallah ¶13. | |
| 23 | havechanged-hands- | | | |
| 24 | already; | | | |
| 25 | http://domaincite.co | | | |
| 26 | m/20235-minds- | | | |
| 27 | machines-dumps- | | | |
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| <p>back-endand- registrar-in-nominet- uniregistry-deals; http://www.afilias.info/news/2003/01/02/public-interest-registry-assumes-controlorg-domain-name-registry.</p> | | | |
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| Masilela Decl. | DCA’s Objection | ZACR’s Response | Court’s Ruling |
| <p>¶ 16: I am aware that ICANN builds in time limits in its gTLD registry agreements. I am further informed, based upon my experience in the industry and discussions with technical personnel within ZACR, that a re-delegation of a gTLD is entirely feasible. In fact, ICANN has prepared for this precise</p> | <p>1. The manual itself is the best evidence of the manual. (Evid. Code § 1520)</p> | <p>The Court may refer to the manual, which is attached to the Masilela Declaration as Exhibit I. The Court can also review the manual on ICANN’s website at https://www.icann.org/en/system/files/files/gtld-drd-ui-10sep13-en.pdf.</p> | |

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| <p>eventuality and issued a manual in 2013 providing step-by-step instructions for how to redelegate a gTLD. The manual, titled “User Documentation on Delegating and Redelegating a Generic Top Level Domain (gTLD),” makes clear that the process is available and feasible if necessary. A true and correct copy of the manual is attached hereto as Exhibit I. It is also available on ICANN’s website: https://www.icann.org/en/system/files/files/gtld-drd-ui-10sep13-en.pdf</p> | | | |
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| Masilela Decl. | DCA’s Objection | ZACR’s Response | Court’s Ruling |
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| <p>¶ 17: In my role as ZACR’s CEO, and based upon my numerous and ongoing discussions with political, business and civic leaders from throughout the African Union, it is my firm understanding and belief that the ongoing delay in the delegation of .Africa is depriving the people of the Africa continent of an important opportunity to expand internet domain name capabilities. The .Africa domain name would add brand value to the continent</p> | <p>1. Lacks foundation (Evid. Code § 403) 2. Lacks personal knowledge (Evid. Code §702) 3. Speculative (Evid. Code § 1200, et seq.) 4. Conclusory (<i>Evinger v. MacDougall</i> (1938) 28 Cal.App.2d 175.) 5. Hearsay (Evid. Code § 1200, et seq.)</p> | <p>Mr. Masilela is Chief Executive Officer of ZACR, the single largest domain name registry of the African continent. He has personal knowledge of the economics of domain delegations and the value of the .Africa domain.</p> <p>That Mr. Masilela’s understanding was formed in part by conversations with political, business, and civic leaders does not make his testimony about his own conclusions hearsay.</p> | |

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| and would provide a platform that connects products, businesses and individuals that have interests in Africa. The African people are further harmed because the agreement between ZACR and the AUC required that a foundation be created upon delegation and that a significant portion of the revenues received from second level domain delegations (for example: xyz.africa) be directed to the “dotAfrica Foundation.” The Foundation would use the revenues to fund various African domain name and | | | |
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| Internet related developmental projects which are now delayed as a result of the preliminary injunction. | | | |
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DATED: December 21, 2016

KESSELMAN BRANTLY STOCKINGER LLP

By: 

David W. Kesselman
Amy T. Brantly
Kara D. McDonald
Attorneys for Intervenor
ZA Central Registry, NPC

1 **PROOF OF SERVICE**

2 *Dotconnectafrica Trust v. ICANN, et al.*
3 Los Angeles Superior Court, Central District Case No. BC607494

4 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

5 At the time of service, I was over 18 years of age and not a party to this action. I am
6 employed in the County of Los Angeles, State of California. My business address is 1230
7 Rosecrans Avenue, Suite 690, Manhattan Beach, California 90266.

8 On December 21, 2016, I served true copies of following document(s) described as
9 **ZA CENTRAL REGISTRY, NPC'S RESPONSE TO PLAINTIFF'S EVIDENTIARY
10 OBJECTIONS TO DECLARATION OF MOKGABUDI LUCKY MASILELA** on the
11 interested parties in this action as follows:

10 Ethan J. Brown, Esq. Attorneys for Plaintiff
11 Sara C. Colón, Esq. DOTCONNECTAFRICA TRUST
12 BROWN NERI SMITH & KHAN LLP
13 11766 Wilshire Blvd., Ste. 1670
14 Los Angeles, CA 90025

13 Email addresses: ethan@bnsklaw.com
sara@bnsklaw.com

14 Jeffrey LeVee, Esq. Attorneys for Defendant
15 Rachel Gezerseh, Esq. INTERNET CORPORATION FOR
16 Charlotte S. Wasserstein, Esq. ASSIGNED NAMES AND
17 Amanda Pushinsky, Esq. NUMBERS
18 JONES DAY
19 555 S. Flower Street, 50th Floor
20 Los Angeles, CA 90071

18 Email addresses: jleee@jonesday.com
19 rgezerseh@jonesday.com
20 cswasserstein@jonesday.com
21 apushinsky@jonesday.com

21 **BY ELECTRONIC SERVICE:** Pursuant to agreement of the parties, I caused the
22 document to be sent to the email addresses listed above.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24 Executed on December 21, 2016, at Manhattan Beach, California.

25 

26 Melinda Quiane