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6 Attorneys for Defendant  
7 INTERNET CORPORATION FOR  
ASSIGNED NAMES AND NUMBERS  
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF LOS ANGELES**

11  
12 VERANDAGLOBAL.COM, INC., a Florida  
corporation, and BRYAN TALLMAN, a  
13 California citizen,

14 Plaintiffs,

15 v.

16 INTERNET CORPORATION FOR  
ASSIGNED NAMES AND NUMBERS, a  
17 California Corporation, and DOES 1-10,

18 Defendants.  
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Case No. 23STCV19554

Assigned to Hon. Stephen I. Goorvitch

**DECLARATION OF KELSEY A.  
LOBISSER REGARDING MEET-AND-  
CONFER EFFORTS UNDER  
CALIFORNIA CODE OF CIVIL  
PROCEDURE. SECTION 430.41 IN  
SUPPORT OF DEFENDANT ICANN'S  
DEMURRER TO PLAINTIFFS'  
VERIFIED COMPLAINT**

[[Proposed] Order Filed Concurrently  
Herewith]

Date: December 7, 2023

Time: 8:30 A.M.

Dept: 39

Complaint Filed: August 16, 2023

Reservation ID: 476305661011

1 I, Kelsey Lobisser, declare as follows:

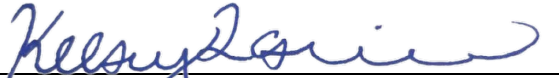
2 1. I am an attorney duly licensed to practice law in the State of California. My law  
3 firm, Jones Day, is counsel for Defendant, the Internet Corporation for Assigned Names and  
4 Numbers (“Defendant” or “ICANN”), in the above captioned matter. I make this declaration  
5 regarding compliance with the meet and confer provisions of California Code of Civil Procedure  
6 section 430.41. I have personal knowledge of the facts set forth in this declaration, and if called  
7 as a witness would competently testify concerning such matters.

8 2. On September 12, 2023, which was at least five days before filing the demurrer, I  
9 conferred in good faith with Christopher Hellmich, Talcott Franklin, and Jonathan Sahrbeck,  
10 collectively Plaintiffs’ counsel, via telephonic conference.

11 3. During the meet and confer I outlined the points that ICANN intended to raise in its  
12 planned demurrer. Plaintiffs’ counsel and I were unable to resolve the issues discussed at the  
13 meet and confer, and raised again in the concurrently filed demurrer.

14 I declare under penalty of perjury under the laws of the State of California that the foregoing  
15 is true and correct. Executed on this 18th day of September 2023 in Los Angeles, California.

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Kelsey A. Lobisser