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11 RUBY GLEN, LLC

12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 RUBY GLEN, LLC

15 Plaintiff,

16 vs.

17 INTERNET CORPORATION FOR
18 ASSIGNED NAMES AND NUMBERS
19 AND DOES 1-50

20 Defendant

Case No.: 2:16-cv-05505-PA-AS

**DECLARATION OF PAULA
ZECCHINI IN SUPPORT OF
PLAINTIFF’S MOTION FOR
LEAVE TO TAKE THIRD PARTY
DISCOVERY OR, IN THE
ALTERNATIVE, MOTION FOR
THE COURT TO ISSUE A
SCHEDULING ORDER**

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I, Paula Zecchini, hereby declare as follows:

1. I am a partner with the law firm of Cozen O’Connor and counsel of record for Plaintiff Ruby Glen, LLC. The matters referred to in this declaration are based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of email correspondence exchanged between August 31, 2016 and September 6, 2016 by myself and counsel for Defendant Internet Corporation for Assigned Names and Numbers (“ICANN”), Eric Enson.

3. Attached hereto as **Exhibit B** is a true and correct copy of the ICANN Applicant Guidebook for New gTLD Applicants, a copy of which is publicly available at <https://newgtlds.icann.org/en/applicants/agb>.

4. Attached hereto as **Exhibit C** is a true and correct copy of VeriSign, Inc.’s August 1, 2016 press release, “Verisign Statement Regarding .Web Auction Results,” a copy of which is publicly available at <https://investor.verisign.com/releasedetail.cfm?ReleaseID=981994>.

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

Executed on October 26, 2016 at Seattle, Washington.



Paula Zecchini

CERTIFICATE OF SERVICE

The undersigned hereby certifies, under penalty of perjury under the laws of the State of California, that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Electronic Mail Notice List

1
2 •Eric P Enson

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