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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **FOR THE COUNTY OF LOS ANGELES – CENTRAL**

13 DOTCONNECTAFRICA TRUST, a  
14 Mauritius Charitable Trust,

15 Plaintiff,

16 v.

17 INTERNET CORPORATION FOR  
18 ASSIGNED NAMES AND NUMBERS, a  
19 California Corporation; ZA CENTRAL  
20 REGISTRY, a South African non-profit  
21 company; and DOES 1-50, inclusive;

22 Defendant.

[Assigned for all purposes to:  
Hon. Robert Broadbelt, Dep't 53]

Case No.: BC607494

**PLAINTIFF DCA'S REPSONSE TO  
DEFENDANT ICANN'S  
EVIDENTIARY OBJECTIONS TO  
DCA'S CLOSING TRIAL BRIEF**

Date: April 4, 2019  
Time: 8:30 a.m.  
Dep't.: 53


1 Plaintiff DCA responds to Defendant ICANN’s evidentiary objections submitted in  
2 response to DCA’s closing trial brief on March 28, 2019. ICANN’s evidentiary objections are  
3 improper and were filed more than three weeks after DCA filed its closing brief. No authority  
4 exists that provides for evidentiary objections to a brief. Furthermore, the evidence DCA  
5 cited in its closing brief has already been admitted as part of the trial record.

6 ICANN’s filing is effectively an opposition to DCA’s closing brief. However, the  
7 Court limited any post-trial briefing to the 20-page closing brief. ICANN had its opportunity  
8 to make its arguments and cite to its evidence in support of its closing brief. Notably ICANN  
9 also attached an extensive addendum to its 20-page closing brief. As an additional ground  
10 for rejecting ICANN’s improper filing, ICANN’s evidentiary objections are untimely. The  
11 Court set a deadline for all filings to be March 1, 2019. No grounds exist for the filing of  
12 ICANN’s evidentiary objections nor did the Court’s directive on the last day of trial allow for  
13 such a filing.

14 Nevertheless DCA is prepared to further respond to ICANN’s “evidentiary objections”  
15 upon order of the Court. DCA’s position remains that the Court ordered only a submission of  
16 20-page closing briefs, and that any other filings are improper and should be disregarded.

17  
18 Dated: March 29, 2019

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20 By:   
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23 DotConnectAfrica Trust