

1 Jeffrey A. LeVee (State Bar No. 125863)
Kelsey A. Lobisser (State Bar No. 346618)
2 JONES DAY
555 South Flower Street
3 Fiftieth Floor
Los Angeles, California 90071.2452
4 Telephone: +1.213.489.3939
Facsimile: +1.213.243.2539
5 Email: jlevec@JonesDay.com

6 Attorneys for Defendant
INTERNET CORPORATION FOR
7 ASSIGNED NAMES AND NUMBERS

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**

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

13 Plaintiffs,

14 v.

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

17 Defendants.

Case No. 23STCV19554

Assigned to Hon. Stephen I. Goorvitch

**DECLARATION OF JEFFREY A.
LEVEE REGARDING MEET-AND-
CONFERENCE EFFORTS UNDER
CALIFORNIA CODE OF CIVIL
PROCEDURE SECTION 430.41 IN
SUPPORT OF DEFENDANT ICANN'S
DEMURRER TO PLAINTIFFS'
VERIFIED FIRST AMENDED
COMPLAINT**

[[Proposed] Order Filed Concurrently
Herewith]

Date: May 13, 2024
Time: 8:30 A.M.
Dept: 39

Complaint Filed: August 16, 2023

Reservation ID: 379209426336

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

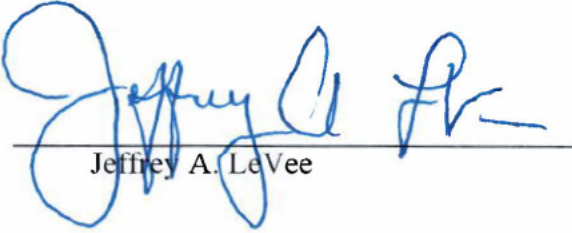
I, Jeffrey A. LeVee, declare as follows:

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

2. On April 8, 2024, which was at least five days before the filing of ICANN’s Demurrer to Plaintiffs’ First Amended Complaint, I conferred in good faith with Christopher Hellmich, Talcott Franklin, and Jonathan Sahrbeck, Plaintiffs’ counsel, via telephonic conference.

3. During the meet and confer, I outlined the points that ICANN intended to raise in its planned Demurrer to Plaintiffs’ First Amended Complaint. Plaintiffs’ counsel and I were unable to resolve the issues discussed at the meet and confer and, accordingly, ICANN is filing its Demurrer.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 15th day of April 2024 in Los Angeles, California.


Jeffrey A. LeVee