

## Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

**Part I Reporting Issuer**

<b>1</b> Issuer's name		<b>2</b> Issuer's employer identification number (EIN)	
DUPONT FABROS TECHNOLOGY INC.		20-8718331	
<b>3</b> Name of contact for additional information	<b>4</b> Telephone No. of contact	<b>5</b> Email address of contact	
JENNIFER XIAO, SVP	415-738-6500	INVESTORRELATIONS@DIGITALREALTY.COM	
<b>6</b> Number and street (or P.O. box if mail is not delivered to street address) of contact		<b>7</b> City, town, or post office, state, and ZIP code of contact	
FOUR EMBARCADERO CENTER SUITE 3200		SAN FRANCISCO, CA 94111	
<b>8</b> Date of action		<b>9</b> Classification and description	
SEPTEMBER 14, 2017		COMMON STOCK	
<b>10</b> CUSIP number	<b>11</b> Serial number(s)	<b>12</b> Ticker symbol	<b>13</b> Account number(s)
26613Q106	N/A	DFT	N/A

**Part II Organizational Action** Attach additional statements if needed. See back of form for additional questions.

**14** Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶

ON SEPTEMBER 14, 2017, DUPONT FABROS TECHNOLOGY, INC. MERGED WITH AND INTO PENGUINS REIT SUB, LLC, A WHOLLY OWNED SUBSIDIARY OF DIGITAL REALTY TRUST, INC. WITH PENGUINS REIT SUB, LLC SURVIVING THE MERGER. IN THE MERGER, HOLDERS OF SHARES OF DUPONT FABROS TECHNOLOGY, INC. COMMON STOCK RECEIVED SHARES OF DIGITAL REALTY TRUST, INC. COMMON STOCK. IN ADDITION, HOLDERS OF SHARES OF DUPONT FABROS TECHNOLOGY, INC. COMMON STOCK RECEIVED CASH IN LIEU OF FRACTIONAL SHARES.

**15** Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ SEE ATTACHED STATEMENT

**16** Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ SEE ITEM 15

**Part II Organizational Action** (continued)

**17** List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶  
SECTIONS 354(a), 358 (a) and (b), 368(a)

**18** Can any resulting loss be recognized? ▶

DUPONT FABROS TECHNOLOGY, INC. SHAREHOLDERS WHO RECEIVED SHARES OF DIGITAL REALTY TRUST, INC. STOCK CANNOT RECOGNIZE LOSS BY REASON OF THE MERGER, EXCEPT WITH RESPECT TO CASH RECEIVED IN LIEU OF FRACTIONAL SHARES. SUCH SHARES SHOULD BE TREATED AS HAVING BEEN RECEIVED BY THE DUPONT FABROS TECHNOLOGY, INC SHAREHOLDERS AND THEN REDEEMED BY DIGITAL REALTY TRUST, INC. FOR CASH.

**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶

THE MERGER OCCURRED ON SEPTEMBER 14, 2017. THUS, THE BASIS ADJUSTMENT SHOULD BE MADE FOR CALANDER YEAR 2017.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

**Sign Here**  
 Signature ▶ *Jennifer Xiao* Date ▶ 1/10/2018  
 Print your name ▶ JENNIFER XIAO Title ▶ SVP TAX

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	DAVID NORTON	<i>David B. Norton</i>	1/4/2018		POO228414
	Firm's name ▶ COHNREZNICK LLP			Firm's EIN ▶	22-1478099
	Firm's address ▶ 7501 WISCONSIN AVENUE, SUITE 400E BETHESDA, MD 20814			Phone no.	410-783-4900

DUPONT FABROS TECHNOLOGY, INC.

ATTACHMENT TO FORM 8937

REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES

FORM 8937, PART II, LINE 15

THE MERGER WAS INTENDED TO QUALIFY AS A REORGANIZATION UNDER SECTION 368(A). IN THE MERGER, EACH SHARE OF DUPONT FABROS TECHNOLOGY, INC. COMMON STOCK WAS CONVERTED INTO (I) 0.545 SHARES OF COMMON STOCK OF DIGITAL REALTY TRUST, INC. THE TAX BASIS OF THE SHARES OF DIGITAL REALTY TRUST, INC. COMMON STOCK RECEIVED BY A DUPONT FABROS TECHNOLOGY, INC. SHAREHOLDER WILL BE THE SAME AS THE BASIS OF THE SHARES OF DUPONT FABROS TECHNOLOGY, INC. COMMON STOCK SURRENDERED IN EXCHANGE FOR THE SHARE OF DIGITAL REALTY TRUST, INC. COMMON STOCK, PLUS ANY GAIN RECOGNIZED BY SUCH SHAREHOLDER IN THE MERGER, AND MINUS ANY CASH RECEIVED BY THE SHAREHOLDER IN THE MERGER.