Report of Organizational Actions Affecting Basis of Securities

Part I  Reporting Issuer

1  Issuer's name  2  Issuer's employer identification number (EIN)

DUPONT FABROS TECHNOLOGY INC. 208-318331

3  Name of contact for additional information  4  Telephone No. of contact

JENNIFER XIAO, SVP 415-738-6500

5  Email address of contact

INVESTORRELATIONS@DIGITALREALTY.COM

6  Number and street (or P.O. box if mail is not delivered to street address) of contact

FOUR EMBARCADERO CENTER SUITE 3200

7  City, town, or post office, state, and ZIP code of contact

SAN FRANCISCO, CA 94111

8  Date of action

SEPTEMBER 14, 2017

9  Classification and description

COMMON STOCK

10  CUSIP number  11  Serial number(s)  12  Ticker symbol  13  Account number(s)

26613O106  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

For Paperwork Reduction Act Notice, see the separate Instructions.
17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶
SECTIONS 351(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 ▶

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.

[Signature]
Jennifer Xiao

Date ▶ 1/10/2018

Paid Preparer Use Only

Print/Type preparer's name ▶ [Name]
Preparer's signature ▶ [Signature]
Date ▶ 1/4/2018
Check □ if self-employed ▶
PTIN ▶ POO228414

Firm's name ▶ COHNREZNICK LLP
Firm's address ▶ 7501 WISCONSIN AVENUE, SUITE 400E BETHESDA, MD 20814
Firm's BIN ▶ 22-1478099
Phone no. ▶ 410-783-4900

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-9054
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.