Report of Organizational Actions Affecting Basis of Securities

Part I Reporting Issuer

1 Issuer's name
DUPONT FABROS TECHNOLOGY INC.

2 Issuer's employer identification number (EIN)
20-3718331

3 Name of contact for additional information
JENNIFER XIAO, SVP

4 Telephone No. of contact
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
PREFERRED STOCK

10 CUSIP number
266130403

11 Serial number(s)
N/A

12 Ticker symbol
DFP

13 Account number(s)
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. PREFERRED STOCK RECEIVED SHARES OF DIGITAL REALTY TRUST, INC. PREFERRED STOCK.

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. PREFERRED STOCK CANNOT RECOGNIZE LOSS BY REASON OF THE MERGER.

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: [Signature]  Date: 11/10/2018

Print your name: JENNIFER XIAO  Title: SUP TAX

Paid Preparer Use Only

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

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054
FORM 8937, PART II, LINE 15