IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

BRIXHAM SOLUTIONS, LTD.
 	
    Plaintiff,
 	
v.
 	
JUNIPER NETWORKS, INC.
 	
    Defendants.
	Civil Case No.: 13-CV-00616
	
	DECLARATION OF THE INTERNET ENGINEERING TASK FORCE, AN ORGANIZED ACTIVITY OF THE INTERNET SOCIETY
	
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I, Alexa Morris, based on my personal knowledge and information, hereby declare as follows:

1. I am Executive Director of the Internet Engineering Task Force ("IETF") and have held this position since January 1, 2008.

2. Among my responsibilities as Executive Director, I act as the custodian of Internet-Drafts for the IETF.

3. I make this declaration based on my personal knowledge and information contained in the business records of the IETF, or confirmation with other responsible IETF personnel with such knowledge.

4. It is the regular practice of the IETF to publish Internet-Drafts and make them available to the public on its website at www.ietf.org. The IETF

maintains copies of Internet-Drafts and IETF meeting proceedings in the ordinary course of its regularly conducted activities.

5. I personally reviewed the document identified as Exhibits 1.0-1.7, 2.0-2.9, and 3.0-3.17 on the accompanying DVD.

6. The documents identified as Exhibits 1.0-1.7 are true and correct copies of Internet-Drafts titled "Fast Reroute Extensions to RSVP-TE for LSP Tunnels" and identified by the file names indicated in the below table.

Ex	Title/Version	Date Published
1.0	Draft-ietf-mpls-rsvp-lsp-fastreroute-00.txt	February 2002
1.1	Draft-ietf-mpls-rsvp-lsp-fastreroute-01.txt	November 2002
1.2	Draft-ietf-mpls-rsvp-lsp-fastreroute-02.txt	March 2003
1.3	Draft-ietf-mpls-rsvp-lsp-fastreroute-03.txt	July 2003
1.4	Draft-ietf-mpls-rsvp-lsp-fastreroute-04.txt	February 2004
1.5	Draft-ietf-mpls-rsvp-lsp-fastreroute-05.txt	May 2004
1.6	Draft-ietf-mpls-rsvp-lsp-fastreroute-06.txt	June 2004
1.7	Draft-ietf-mpls-rsvp-lsp-fastreroute-07.txt	September 2004

7. The documents identified as Exhibits 2.0-2.9 are true and correct copies of Internet-Drafts titled "Virtual Private LAN Services over MPLS" and identified by the file names indicated in the below table.

Ex.	Title/Version	Date Published
2.0	Draft-ietf-l2vpn-vpls-ldp-00	July 2003
2.1	Draft-ietf-l2vpn-vpls-ldp-01	October 2003
2.2	Draft-ietf-l2vpn-vpls-ldp-02	April 2004
2.3	Draft-ietf-l2vpn-vpls-ldp-03	April 2004
2.4	Draft-ietf-l2vpn-vpls-ldp-04	August 2004
2.5	Draft-ietf-l2vpn-vpls-ldp-05	September 2004
2.6	Draft-ietf-l2vpn-vpls-ldp-06	February 2005
2.7	Draft-ietf-l2vpn-vpls-ldp-07	July 2005
2.8	Draft-ietf-l2vpn-vpls-ldp-08	November 2005
2.9	Draft-ietf-l2vpn-vpls-ldp-09	June 2006

8. The documents identified as Exhibits 3.0-3.17 are true and correct copies of Internet-Drafts titled "Transport of Layer 2 Frames over MPLS" and identified by the file names indicated in the below table.

Ex.	Title/Version	Date Published
3.0	Draft-ietf-pwe3-control-protocol-00.txt	August 2002
3.1	Draft-ietf-pwe3-control-protocol-01.txt	November 2002
3.2	Draft-ietf-pwe3-control-protocol-02.txt	March 2003

3.3	Draft-ietf-pwe3-control-protocol-03.txt	July 2003
3.4	Draft-ietf-pwe3-control-protocol-04.txt	October 2003
3.5	Draft-ietf-pwe3-control-protocol-05.txt	December 2003
3.6	Draft-ietf-pwe3-control-protocol-06.txt	March 2004
3.7	Draft-ietf-pwe3-control-protocol-07.txt	June 2004
3.8	Draft-ietf-pwe3-control-protocol-08.txt	July 2004
3.9	Draft-ietf-pwe3-control-protocol-09.txt	September 2004
3.10	Draft-ietf-pwe3-control-protocol-10.txt	September 2004
3.11	Draft-ietf-pwe3-control-protocol-11.txt	October 2004
3.12	Draft-ietf-pwe3-control-protocol-12.txt	October 2004
3.13	Draft-ietf-pwe3-control-protocol-13.txt	November 2004
3.14	Draft-ietf-pwe3-control-protocol-14.txt	November 2004
3.15	Draft-ietf-pwe3-control-protocol-15.txt	February 2005
3.16	Draft-ietf-pwe3-control-protocol-16.txt	March 2005
3.17	Draft-ietf-pwe3-control-protocol-17.txt	June 2005

9. I hereby certify, in accordance with the requirements of Federal Rule of Evidence 902, that the attached Exhibits 1.0-1.7, 2.0-2.9, and 3.0-3.17 constitute a record of regularly conducted business activity which was (A) made at or near the time of the occurrence of the matters set forth by, or

from information transmitted by, a person with knowledge of those matters; (B) kept in the course of the regularly conducted activity; and (C) made by the regularly conducted activity as a regular practice.

10. Based on a search of IETF records, I have determined that the IETF maintained a copy of Exhibits 1.0-1.7, 2.0-2.9, and 3.0-3.17 in the ordinary course of its regularly conducted activities.

11. Based on a search of IETF records and the IETF's course of conduct in publishing Internet Drafts, I have also determined that Exhibits 1.0-1.7, 2.0-2.9, and 3.0-3.17 were published on the IETF website (www.ietf.org) on or about the dates referenced in the above tables. At such times, such documents were reasonably accessible to the public, and were disseminated or otherwise available to the extent that persons interested and ordinarily skilled in the subject matter or art exercising reasonable diligence could have located it.

Pursuant to Section 1746 of Title 28 of United States Code, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that the foregoing is based upon personal knowledge and information and is believed to be true.

Date: _February 6, 2014_   By: _____

Alexa Morris

Notarized: