IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

BRIXHAM SOLUTIONS, LTD.                              Civil Case No.: 13-CV-00616
       Plaintiff,

v.

JUNIPER NETWORKS, INC.
       Defendants.

I, Sandy Ginoza, based on my personal knowledge and information, hereby declare as follows:

1. I am an employee of Association Management Solutions, LLC (AMS), which acts under contract to the Internet Society (ISOC) as the operator of the RFC Publisher. The RFC Publisher is part of the “RFC Editor” function, which provides online access to the authoritative Request for Comments (RFC) series of documents (RFC Series), and provides storage and preservation of records relating to these documents. The RFC Series includes, among other things, the series of Internet standards developed by the Internet Engineering Task Force (IETF), an organized
activity of ISOC. I hold the position of Director of the RFC Publisher. I began employment with AMS in this capacity on 5 January 2010.

2. Among my responsibilities as Director of the RFC Publisher, I act as the custodian of records relating to the RFC Series.

3. From June 1999 to 4 January 2010, I was an employee of the Information Sciences Institute at University of Southern California (ISI). I held various position titles with the RFC Editor project at ISI, ending with Senior Editor.

4. The RFC Editor function was conducted by ISI under contract to the United States government prior to 1998. In 1998, ISOC, in furtherance of its IETF activity, entered into the first in a series of contracts with ISI providing for ISI’s performance of the RFC Editor function. Beginning in 2010, certain aspects of the RFC Editor function were assumed by the RFC Publisher operation of AMS under contract to ISOC (acting through its IETF function and, in particular, the IETF Administrative Oversight Committee). The business records of the RFC Editor function as it was conducted by ISI are currently housed on the computer systems of AMS, as contractor to ISOC.

5. I make this declaration based on my personal knowledge and information contained in the business records of the RFC Editor as they are
currently housed at AMS, or confirmation with other responsible RFC Editor personnel with such knowledge.

6. Since approximately 1998, the RFC Editor’s regular practice has been to publish RFCs and make them available to the public on its website at www.rfc-editor.org. The RFC Publisher currently maintains authoritative versions of all RFCs in the ordinary course of its regularly conducted activities on its website at www.rfc-editor.org.

7. The document identified as Exhibit 1 on the accompanying DVD is a true and correct copy of RFC 2401 titled “Security Architecture for the Internet Protocol.”

8. I hereby certify, in accordance with the requirements of Federal Rule of Evidence 902, that the attached Exhibit 1 constitutes 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.

9. Based on a search of RFC Editor records, I have determined that the RFC Editor maintained a copy of Exhibit 1 in the ordinary course of its regularly conducted activities.
10. Based on a search of RFC Editor records and the RFC Editor's course of conduct in publishing RFCs, I have also determined that Exhibit 1 was published on or about November 1998 on the RFC Editor website. At such time, such document was reasonably accessible to the public, and was 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.

11. The document identified as Exhibit 2 on the accompanying DVD is a true and correct copy of RFC 2663 titled "IP Network Address Translator (NAT) Terminology and Considerations."

12. I hereby certify, in accordance with the requirements of Federal Rule of Evidence 902, that the attached Exhibit 2 constitutes 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.

13. Based on a search of RFC Editor records, I have determined that the RFC Editor maintained a copy of Exhibit 2 in the ordinary course of its regularly conducted activities.
14. Based on a search of RFC Editor records and the RFC Editor’s course of conduct in publishing RFCs, I have also determined that Exhibit 2 was published on or about **August 1999** on the RFC Editor website. At such time, such document was reasonably accessible to the public, and was 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.

15. The document identified as Exhibit 3 on the accompanying DVD is a true and correct copy of **RFC 3036** titled “LDP Specification.”

16. I hereby certify, in accordance with the requirements of Federal Rule of Evidence 902, that the attached Exhibit 3 constitutes 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.

17. Based on a search of RFC Editor records, I have determined that the RFC Editor maintained a copy of Exhibit 3 in the ordinary course of its regularly conducted activities.
18. Based on a search of RFC Editor records and the RFC Editor’s course of conduct in publishing RFCs, I have also determined that Exhibit 3 was published on or about January 2001 on the RFC Editor website. At such time, such document was reasonably accessible to the public, and was 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.

19. The document identified as Exhibit 4 on the accompanying DVD is a true and correct copy of RFC 3209 titled “RSVP-TE: Extensions to RSVP for LSP Tunnels.”

20. I hereby certify, in accordance with the requirements of Federal Rule of Evidence 902, that the attached Exhibit 4 constitutes 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.

21. Based on a search of RFC Editor records, I have determined that the RFC Editor maintained a copy of Exhibit 4 in the ordinary course of its regularly conducted activities.
22. Based on a search of RFC Editor records and the RFC Editor’s course of conduct in publishing RFCs, I have also determined that Exhibit 4 was published on or about December 2001 on the RFC Editor website. At such time, such document was reasonably accessible to the public, and was 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.

23. The document identified as Exhibit 5 on the accompanying DVD is a true and correct copy of RFC 3386 titled “Network Hierarchy and Multilayer Survivability.”

24. I hereby certify, in accordance with the requirements of Federal Rule of Evidence 902, that the attached Exhibit 5 constitutes 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.

25. Based on a search of RFC Editor records, I have determined that the RFC Editor maintained a copy of Exhibit 5 in the ordinary course of its regularly conducted activities.
26. Based on a search of RFC Editor records and the RFC Editor’s course of conduct in publishing RFCs, I have also determined that Exhibit 5 was published on or about **November 2002** on the RFC Editor website. At such time, such document was reasonably accessible to the public, and was 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.

27. The document identified as Exhibit 6 on the accompanying DVD is a true and correct copy of **RFC 4090** titled “Fast Reroute Extensions to RSVP-TE for LSP Tunnels.”

28. I hereby certify, in accordance with the requirements of Federal Rule of Evidence 902, that the attached Exhibit 6 constitutes 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.

29. Based on a search of RFC Editor records, I have determined that the RFC Editor maintained a copy of Exhibit 6 in the ordinary course of its regularly conducted activities.
30. Based on a search of RFC Editor records and the RFC Editor’s course of conduct in publishing RFCs, I have also determined that Exhibit 6 was published on or about May 2005 on the RFC Editor website. At such time, such document was reasonably accessible to the public, and was 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.

31. The document identified as Exhibit 7 on the accompanying DVD is a true and correct copy of RFC 4447 titled “Pseudowire Setup and Maintenance Using the Label Distribution Protocol (LDP).”

32. I hereby certify, in accordance with the requirements of Federal Rule of Evidence 902, that the attached Exhibit 7 constitutes 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.

33. Based on a search of RFC Editor records, I have determined that the RFC Editor maintained a copy of Exhibit 7 in the ordinary course of its regularly conducted activities.
34. Based on a search of RFC Editor records and the RFC Editor’s course of conduct in publishing RFCs, I have also determined that Exhibit 7 was published on or about April 2006 on the RFC Editor website. At such time, such document was reasonably accessible to the public, and was 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.

35. The document identified as Exhibit 8 on the accompanying DVD is a true and correct copy of RFC 4762 titled “Virtual Private LAN Service (VPLS) Using Label Distribution Protocol (LDP) Signaling.”

36. I hereby certify, in accordance with the requirements of Federal Rule of Evidence 902, that the attached Exhibit 8 constitutes 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.

37. Based on a search of RFC Editor records, I have determined that the RFC Editor maintained a copy of Exhibit 8 in the ordinary course of its regularly conducted activities.
38. Based on a search of RFC Editor records and the RFC Editor's course of conduct in publishing RFCs, I have also determined that Exhibit 8 was published on or about January 2007 on the RFC Editor website. At such time, such document was reasonably accessible to the public, and was 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.

39. 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: 4/6/2014

By: [Signature]

Sandy Ginoza

Notarized: 02/06/2014

Please see attached CA Acknowledgment Notary Public form
CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California
County of Los Angeles

On February 6th, 2014 before me, Jennifer Ann Zarate - Notary Public
personally appeared Sandy Ginoza

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature: [Signature]

Place Notary Seal Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document
Title or Type of Document: PREPARATION OF THE RFC PUBLISHER FOR THE INTERNET ENGINEERING TASK FORCE, AN ORGANIZED ACTIVITY OF THE INTERNET SOCIETY
Document Date: February 6th, 2014
Number of Pages: 11 pages

Signer(s) Other Than Named Above: None

Capacity(ies) Claimed by Signer(s)

Signer's Name: [Signature]

☐ Corporate Officer — Title(s):
☐ Individual
☐ Partner — ☐ Limited ☐ General
☐ Attorney in Fact
☐ Trustee
☐ Guardian or Conservator
☐ Other: ____________________________

Signer Is Representing: ____________________________

Right Thumbprint of Signer
Top of thumb here

Right Thumbprint of Signer
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[Signature]