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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS

GENBAND US LLC,  
Plaintiff,

v.

METASWITCH NETWORKS LTD  
AND METASWITCH NETWORKS  
CORP.,

Defendants.

Civil Action No.: 2:14-cv-33

**SECOND 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](http://www.ietf.org). The IETF maintains copies of Internet-Drafts in the ordinary course of its regularly conducted activities.
5. Attachment A hereto lists eleven Internet-Drafts, true and correct copies of which are included as Exhibits 1-21 on the accompanying DVD.

- 1 6. I personally reviewed the documents included as Exhibits 1-21 on the accompanying  
2 DVD.
- 3 7. I hereby certify, in accordance with the requirements of Federal Rule of Evidence 902,  
4 that Exhibits 1-21 on the accompanying DVD constitute a record of regularly conducted  
5 business activity which was (A) made at or near the time of the occurrence of the matters  
6 set forth by, or from information transmitted by, a person with knowledge of those  
7 matters; (B) kept in the course of the regularly conducted activity; and (C) made by the  
8 regularly conducted activity as a regular practice.
- 9 8. Based on a search of IETF records, I have determined that the IETF maintained a copy  
10 of Exhibits 1-21 on the accompanying DVD in the ordinary course of its regularly  
11 conducted activities.
- 12 9. Based on a search of IETF records and the IETF's course of conduct in publishing  
13 Internet-Drafts, I have also determined that Exhibits 1-21 on the accompanying DVD  
14 were published on the IETF website ([www.ietf.org](http://www.ietf.org)) on or about the dates referenced in  
15 Attachment A. At such times, such documents were reasonably accessible to the public,  
16 and were disseminated or otherwise available to the extent that persons interested and  
17 ordinarily skilled in the subject matter or art exercising reasonable diligence could have  
18 located it.
- 19 10. Based on a search of IETF records, I hereby certify that the documents listed in  
20 Attachment B are not contained in IETF records and cannot be authenticated by me.
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2 Pursuant to Section 1746 of Title 28 of United States Code, I declare under penalty of  
3 perjury under the laws of the United States of America that the foregoing is true and correct and  
4 that the foregoing is based upon personal knowledge and information and is believed to be true.  
5

6  
7 Date: 12 May 2015 By:   
8 Alexa Morris  
9

## ATTACHMENT A

### Authenticated Documents

Exhibit No.	Title	File Name	Publication Date
1	Pre-PINT Callback Service Implementation Experiences	<a href="https://www.ietf.org/proceedings/42/I-D/draft-ietf-pint-internet-callcenter-00.txt">https://www.ietf.org/proceedings/42/I-D/draft-ietf-pint-internet-callcenter-00.txt</a>	24 November 1997
2	PSTN-Internet Internetworking - An Architecture Overview	<a href="https://www.ietf.org/proceedings/42/I-D/draft-ietf-pint-inweb-00.txt">https://www.ietf.org/proceedings/42/I-D/draft-ietf-pint-inweb-00.txt</a>	November 1997
3	The PINT Profile of SIP and SDP: a Protocol for IP Access to Telephone Call Services	<a href="https://www.ietf.org/proceedings/42/I-D/draft-ietf-pint-profile-00.txt">https://www.ietf.org/proceedings/42/I-D/draft-ietf-pint-profile-00.txt</a>	7 February 1998
4	SIP for Click-To-Dial-Back and Third-Party Control	<a href="https://www.ietf.org/proceedings/42/I-D/draft-ietf-pint-sip-00.txt">https://www.ietf.org/proceedings/42/I-D/draft-ietf-pint-sip-00.txt</a>	November 20, 1997
5	The IP Network Address Translator (NAT)	<a href="https://www.ietf.org/proceedings/42/I-D/draft-rfcd-info-srisuresh-05.txt">https://www.ietf.org/proceedings/42/I-D/draft-rfcd-info-srisuresh-05.txt</a>	February 1998
6	A Proposal for Internet Call Waiting Service using SIP An Implementation Report	<a href="https://www.ietf.org/proceedings/43/I-D/draft-ietf-pint-icw-00.txt">https://www.ietf.org/proceedings/43/I-D/draft-ietf-pint-icw-00.txt</a>	November 1998
7	The IP Network Address Translator (NAT)	<a href="https://www.ietf.org/proceedings/43/I-D/draft-rfcd-info-srisuresh-05.txt">https://www.ietf.org/proceedings/43/I-D/draft-rfcd-info-srisuresh-05.txt</a>	February 1998
8	Media Gateway Control Protocol (MGCP) Call Flows	<a href="https://www.ietf.org/proceedings/44/I-D/draft-huitema-megaco-mgcp-flows-01.txt">https://www.ietf.org/proceedings/44/I-D/draft-huitema-megaco-mgcp-flows-01.txt</a>	January 20, 1999
9	The SIP INFO Method	<a href="https://www.ietf.org/proceedings/44/I-D/draft-ietf-mmusic-sip-info-method-00.txt">https://www.ietf.org/proceedings/44/I-D/draft-ietf-mmusic-sip-info-method-00.txt</a>	February 8, 1999
10	Architectural Framework for Signaling Transport	<a href="https://www.ietf.org/proceedings/44/I-D/draft-ietf-sigtran-framework-arch-00.txt">https://www.ietf.org/proceedings/44/I-D/draft-ietf-sigtran-framework-arch-00.txt</a>	February 1999
11	H.323 Firewall Control Interface (HFCI)	<a href="https://www.ietf.org/proceedings/44/I-D/draft-rfcd-info-mercier-00.txt">https://www.ietf.org/proceedings/44/I-D/draft-rfcd-info-mercier-00.txt</a>	November 1998
12	The IP Network Address Translator (NAT)	<a href="https://www.ietf.org/proceedings/44/I-D/draft-rfcd-info-srisuresh-05.txt">https://www.ietf.org/proceedings/44/I-D/draft-rfcd-info-srisuresh-05.txt</a>	February 1998
13	Media Gateway Control Protocol (MGCP) Call Flows	<a href="https://www.ietf.org/proceedings/45/I-D/draft-huitema-megaco-mgcp-flows-01.txt">https://www.ietf.org/proceedings/45/I-D/draft-huitema-megaco-mgcp-flows-01.txt</a>	January 20, 1999



14	A proposal for the provisioning of PSTN initiated services running on the Internet	<a href="https://www.ietf.org/proceedings/45/I-D/draft-ietf-pint-saint-00.txt">https://www.ietf.org/proceedings/45/I-D/draft-ietf-pint-saint-00.txt</a>	March, 1999
15	H.323 Firewall Control Interface (HFCI)	<a href="https://www.ietf.org/proceedings/45/I-D/draft-rfcd-info-mercer-00.txt">https://www.ietf.org/proceedings/45/I-D/draft-rfcd-info-mercer-00.txt</a>	November 1998
16	The IP Network Address Translator (NAT)	<a href="https://www.ietf.org/proceedings/45/I-D/draft-rfcd-info-srisuresh-05.txt">https://www.ietf.org/proceedings/45/I-D/draft-rfcd-info-srisuresh-05.txt</a>	February 1998
17	Media Gateway Control Protocol (MGCP) Call Flows	<a href="https://www.ietf.org/proceedings/46/I-D/draft-huitema-megaco-mgcp-flows-01.txt">https://www.ietf.org/proceedings/46/I-D/draft-huitema-megaco-mgcp-flows-01.txt</a>	January 20, 1999
18	A proposal for the provisioning of PSTN initiated services running on the Internet	<a href="https://www.ietf.org/proceedings/46/I-D/draft-ietf-pint-saint-00.txt">https://www.ietf.org/proceedings/46/I-D/draft-ietf-pint-saint-00.txt</a>	March, 1999
19	Firewall Control Protocol Framework and Requirements	<a href="https://www.ietf.org/proceedings/48/I-D/draft-kuthan-fcp-01.txt">https://www.ietf.org/proceedings/48/I-D/draft-kuthan-fcp-01.txt</a>	June, 2000
20	Middlebox Communication: Framework and Requirements	<a href="https://www.ietf.org/proceedings/49/I-D/draft-kuthan-fcp-02.txt">https://www.ietf.org/proceedings/49/I-D/draft-kuthan-fcp-02.txt</a>	November, 2000
21	Middlebox Communication: Framework and Requirements	<a href="https://www.ietf.org/proceedings/51/I-D/draft-kuthan-fcp-02.txt">https://www.ietf.org/proceedings/51/I-D/draft-kuthan-fcp-02.txt</a>	November, 2000

ATTACHMENT B

Documents that Could Not be Authenticated

No.	Requested Title and Filename
1.	draft-conroy-interfaces-in-net-00.txt
2.	draft-faynberg-telephone-sw-net-00.txt
3.	draft-ietf-pint-pre-implement-00.txt
4.	draft-ietf-pint-pre-implement-02.txt
5.	draft-kuthan-fcp-00.txt