

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

**DECLARATION OF THE INTERNET  
ENGINEERING TASK FORCE, AN  
ORGANIZED ACTIVITY OF THE  
INTERNET SOCIETY**

---

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 1-11 on the accompanying DVD.

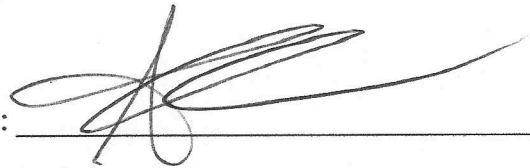
- 1 6. I personally reviewed the documents included as Exhibits 1-11 on the accompanying  
2 DVD.
- 3 7. I hereby certify, in accordance with the requirements of Federal Rule of Evidence 902,  
4 that Exhibits 1-11 on the accompanying DVD constitute a record of regularly conducted  
5 business activity 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 1-11 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 1-11 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.  
21  
22  
23  
24  
25  
26  
27  
28

1  
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:

April 3, 2015

By:



Alexa Morris

ATTACHMENT A

Authenticated Documents

Exhibit No.	Title	File Name	Publication Date
1	A SIP Application Level Gateway for Network Address Translation	draft-biggs-sip-nat-00.txt	3/6/00
2	Getting SIP through Firewalls and NATs	draft-rosenberg-sip-firewalls-00	2/23/00
3	H.323 and Firewalls: Problem Statement and Solution Framework	draft-shore-h323-firewalls-00	2/3/00
4	SIP Firewall Solution	draft-thernelius-sip-firewall-solution-00	7/14/00
5	Third Party Call Control in SIP	draft-rosenberg-sip-3pcc-00.txt	3/16/00
6	Architectural Framework for Signaling Transport	draft-ong-sigtran-framework-arch-00.txt	2/24/99
7	Where to terminate a phone call	draft-faltstrom-e164-00	7/1/98
8	Call Model Integration Framework	draft-vemuri-cmi-framework-00	1/21/00
9	Realm Specific IP: A Framework	draft-ietf-nat-rsip-framework-00.txt	2/12/99
10	SIP for Telephones (SIP-T): Context and Architectures	draft-vemuri-sip-t-context-00.txt	7/18/00
11	Session Initiation Protocol Service Examples	draft-ietf-sipping-service-examples-08	2/14/05

ATTACHMENT B

Documents that Could Not be Authenticated

No.	Requested Title and Filename
1.	"Firewall Control Protocol Framework and Requirements," by Jiri Kuthan <draft-kuthan-fcp-00.txt>
2.	"Firewall Control Protocol Framework and Requirements," by Jiri Kuthan and J. Rosenberg <draft-kuthan-fcp-01.txt>
3.	"Middlebox Communication: Framework and Requirements," by Jiri Kuthan and J. Rosenberg <draft-kuthan-fcp-02.txt>
4.	"H.323 Firewall Control Interface," by S. Mercer et al. <draft-rfced-info-mercer-00>
5.	"The SIP INFO Method," by Steven R. Donovan <draft-ietf-mmusic-sip-info-method-00.pdf>
6.	"Mapping between ISUP and SIP," by Schulzrinne/Kang <draft-schulzrinne-ss7-00>
7.	"Media Gateway Control Protocol (MGCP) Call Flows," by Huitema et al. <draft-huitema-megaco-mgcp-flows-01>
8.	"Media Gateway Control Protocol Architecture and Requirements," by Greene
9.	"Media Gateway Control Protocol (MGCP)," by Arango
10.	"A Proposal for Internet and Public Switched Telephone Networks (PSTN) Internetworking," by Faynberg, et al.
11.	"Analysis of Services and Interfaces used when Interworking Between the Internet and the Intelligent Network (I.N.)," by Conroy et al
12.	"SIP for Click-To-Dial-Back and Third-Party Control,"
13.	"Architectural Framework for Signaling Transport," by Ong et al
14.	"PSTN-Internet Internetworking - An Architecture Overview," by Krishnaswamy et al.
15.	"Pre-PINT Callback Service Implementation Experiences," by Conroy et al.
16.	"The PINT Profile of SIP and SDP: a Protocol for IP Access to Telephone Call Services," by Petrack et al.
17.	Toward the PSTN/Internet Inter-Networking--Pre-PINT Implementations," by Bellovin et al.
18.	"A Proposal for Internet Call Waiting Service using SIP An Implementation Report," by Brusilovsky et al.
19.	"A proposal for the provisioning of PSTN initiated services running on the Internet," by Buller
20.	"IP Access to PSTN Services: Basic Service Requirements, Definitions, and Architecture" by Petrack
21.	"An Architecture and Protocols for Initiation and Control of Telephone Calls From Terminals Connected to a CallBroker over a TCP/IP Connection," by Burg, et al
22.	"Negotiated Address Reuse (NAR)," by Montenegro
23.	IETF Internet Draft, "The IP Network Address Translator (NAT)," by Srisuresh and Egevang <draft-rfced-info-srisuresh-05.txt>

No.	Requested Title and Filename
24.	"The application/ISUP media type," by Hitema
25.	"Simple Gateway Control Protocol (SGCP)," by Arango and Huitema <draft-huitema-sgcp-v1-00.txt>
26.	"An RTP Simple Multiplexing Transfer Method for Internet Telephony Gateway," by Tanigawa, et al.
27.	"Session Initiation Protocol Service Examples," by Johnston, et al <draft-ietf-sipping-service-examples-08>