

## DECLARATION

I, Alexa Morris, based on my personal knowledge and information, hereby declare as follows:

1. I am Managing Director of the IETF Administration LLC and have held that position since the LLC was formed in August 2018. Prior to that, starting on January 1, 2008, I was the Executive Director of the Internet Engineering Task Force, which was an activity of the Internet Society. Since the business of IETF did not change in any materially relevant manner with the formation of the LLC, I will collectively refer to both the activity and the LLC as IETF.

2. One of my responsibilities with IETF has been to act as the custodian of Internet-Drafts and records relating to Internet-Drafts. I am familiar with the record keeping practices relating to Internet-Drafts, including the creation and maintenance of such records.

3. I hereby declare that all statements made herein are of my own knowledge and information contained in the business records of IETF and are true, and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements may be punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

4. If depositions regarding the information in this declaration are required, the deposition should be taken by phone or videoconference or, if it must be in person, should be in California.

5. Since 1998, it has been 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 website). The IETF maintains copies of Internet-Drafts in the ordinary course of its regularly conducted activities.

6. Any Internet-Draft published on the IETF website 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. In particular, the Internet-Drafts were indexed and searchable on the IETF website.

7. Internet-Drafts are posted to an IETF online directory. When an Internet-Draft is published, an announcement of its publication that describes the Internet-Draft is disseminated. Typically, that dated announcement is made within 24 hours of the publication of the Internet-Draft. The announcement is kept in the IETF email archive, and the date is affixed automatically.

8. The records of posting the Internet-Drafts in the IETF online repository are kept in the course of the IETF's regularly conducted activity and ordinary course of business. The records are made pursuant to established procedures and are relied upon by the IETF in the performance of its functions.

9. It is the regular practice of the IETF to make and keep the records in the online repository.

10. Exhibit 1 is a true and correct copy of an unpublished Internet-Draft that, according to IETF records, was submitted on June 21, 2008. When initially submitted, the document, Bidirectional Address Borrowing (IVI) draft-xli-ivi-00.txt, was in the Internet-Draft staging directory. That directory held (and currently holds) drafts that are pending submissions. When someone starts the submission process, a copy of their submission lands there and checks are run against it, and email is sent to the authors asking them to confirm the submission. When the authors confirm, it moves from staging into the official repository, and the draft is announced to the community.

11. This Internet-Draft was cancelled by the author following its submission and therefore never became an official Internet-Draft published in the IETF directory. If an author cancels the submission (which is what happened here) the datatracker notes that the submission was withdrawn (i.e., cancelled). That withdrawn state only means the attempt to submit was cancelled. The draft is not removed from the staging directory. Nothing in the staging directory has actually finished submission to the IETF. That means that nothing in the staging directory was announced to the community. Nevertheless, to date, the URL remains publicly available in the staging directory and is available as of this declaration at [www.ietf.org/staging/draft-xli-ivi-00-7430-cancelled.txt](http://www.ietf.org/staging/draft-xli-ivi-00-7430-cancelled.txt). This availability is likely to change in the future. The document at the URL is not an official Internet-Draft of the IETF and therefore did not move from the staging directory into the official repository and was not announced to the community. As of this declaration, it can be accessed by anyone with the URL or who could come across the URL with appropriate searches.

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: January 17, 2024

By: *Alexa Morris*  
Alexa Morris

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