

## 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. 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.

5. 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.

6. 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.

7. 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.

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

9. Exhibit 1 is a true and correct copy of draft-eggert-tcpm-tcp-abort-timeout-option-00, titled "TCP Abort Timeout Option". The online email archives show that an announcement of the publication of this Internet-Draft was made on April 14, 2004. Therefore, based on the normal practice of the IETF, that Internet-Draft was reasonably available to the public within 24 hours of that announcement. At that time, the Internet-Draft would have been 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.

10. When Internet-Drafts are published, there are opportunities for discussion of those Internet-Drafts. IETF maintains an archive of those discussions and I am familiar with that

archive. Submitted with this Declaration as Exhibit 2 are documents bates stamped IETF-EGGERT-000001-15. These documents are true and accurate copies of discussion found in the TCPM working group mail list archive on the TCP Abort Timeout Option Internet Draft, appearing in 2004 and 2006. These comments were reasonably available to the public from the IETF website at the times they were submitted by the person who submitted the comment.

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: April 7, 2020

By:   
Alexa Morris

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