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14 Attorneys for Plaintiffs
15 WHATSAPP INC. and FACEBOOK, INC.

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18

19 WHATSAPP INC., a Delaware corporation,
20 and FACEBOOK, INC., a Delaware
corporation,

21 Plaintiffs,

22 v.

23 NSO GROUP TECHNOLOGIES LIMITED
24 and Q CYBER TECHNOLOGIES LIMITED,

25 Defendants.
26

Case No. 4:19-cv-07123-PJH

**DECLARATION OF JOSEPH D. MORNIN IN
SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANTS' MOTION TO DISMISS**

Date: May 27, 2020
Time: 9:00 a.m.
Courtroom: 3
Judge: Hon. Phyllis J. Hamilton

1 I, Joseph D. Mornin, declare:

2 1. I submit this declaration in support of Plaintiffs Facebook Inc. and WhatsApp, Inc.'s
3 Opposition to Defendants' Motion to Dismiss the Complaint in the above-captioned matter. I am an
4 attorney with the law firm of Cooley LLP and counsel for Plaintiffs WhatsApp Inc. and Facebook,
5 Inc. in this matter. The information in this declaration is based on my personal knowledge of this
6 matter and information I obtained following a reasonable investigation of the events described
7 below. If called as a witness, I could competently testify to the truth of each statement.

8 2. Attached as **Exhibit 1** is a true and accurate screenshot from IP2Location.com
9 obtained on April 22, 2020, for IP address 104.223.76.220. Exhibit 1 shows that IP address
10 104.223.76.220 is currently located in Los Angeles, California, and is owned by QuadraNet
11 Enterprises LLC.

12 3. According to historical IP address location information from Maxmind.com for IP
13 address 104.223.76.220 obtained through the website archive.org, IP address 104.223.76.220 was
14 located in Los Angeles, California, and owned by QuadraNet Enterprises LLC as of May 28, 2019.
15 Attached as **Exhibit 2** is a true and accurate screenshot of the Maxmind.com csv.zip file available
16 for download at archive.org that contains historical IP location information. Attached as **Exhibit 3**
17 is a true and accurate screenshot of the unzipped Maxmind.com csv.zip file showing the date of the
18 files as May 28, 2019. Attached as **Exhibits 4a, 4b, and 4c** are true and accurate screenshots of the
19 netblock for IP address 104.223.76.220 showing the location and ownership of IP address
20 104.223.76.220 as of May 28, 2019.

21 4. Attached as **Exhibit 5** is a true and accurate screenshot from Quadranet.com obtained
22 on April 22, 2020. Exhibit 5 shows that QuadraNet Enterprise LLC owns a datacenter in Los
23 Angeles, California, where they host dedicated servers available for use by their customers.

24 5. Attached as **Exhibit 6** is a true and accurate screenshot from IP2Location.com
25 obtained on April 22, 2020, for IP address 54.93.81.200. Exhibit 6 shows that IP address
26 54.93.81.200 is located in Frankfurt Am Main, Germany.

27 6. Attached as **Exhibits 7, 8, and 9** are true and accurate screenshots from
28 SecurityTrails.com obtained on April 22, 2020, for IP address 54.93.81.200. Exhibits 7–9 show that

1 Amazon.com Inc. uses IP address 54.93.81.200 and that subdomains sip.nsogroup.com,
2 sip.qtechnologies.com, and sip.2access.xyz were all hosted on IP address 54.93.81.200 from at least
3 January 2, 2019, through at least November 24, 2019.

4 I declare under penalty of perjury that the foregoing is true and correct. Executed at Oakland,
5 California, on the 23rd day of April, 2020.

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7 /s/ Joseph D. Mornin
8 Joseph D. Mornin
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