UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS BAY
TRANSPORTATION AUTHORITY

        Plaintiff

v.

ZACK ANDERSON, RJ RYAN,
ALESSANDRO CHIESA, and the
MASSACHUSETTS INSTITUTE OF
TECHNOLOGY
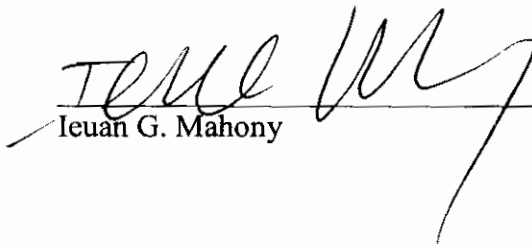
        Defendants

Civil Action No. _____

DECLARATION OF IEUAN G. MAHONY

1.   I am a partner at Holland & Knight, LLP, representing the Massachusetts Bay

Transportation Authority ("MBTA") in this matter.

2.   I certify to the following efforts made to notify the defendants of the present

Motion for Temporary Restraining Order ("TRO"):

      (a)   On Friday August 8, 2008, Joseph Kelley spoke with the MIT Undergrads'
            professor, Ron Rivest, to again request presentation materials.

      (b)   On Friday August 8, 2008, after the decision was made to proceed,
            William A. Mitchell, Jr., General Counsel for the MBTA contacted R.
            Gregory Morgan, Vice President and General Counsel of MIT to inform
            him of the planned Motion.

      (c)   On Friday August 8, 2008, once the papers were ready to be brought to
            court, Daniel Grabouskus, General Manager of the MBTA, made efforts to
            contact the President of MIT.

3.   The document included in the Exhibit Binder as Exhibit 6 is a true and accurate

comparison of the Initial Announcement (Exhibit 1) and the Revised Announcement (Exhibit 4),

using the software application Deltaview.

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4.   The documents included in the Exhibit Binder as Exhibit 7 are true and accurate copies of (i) a July 14, 2008 CNET New.com posting by R. Vamosi entitled "Column: The Man Who Changed Internet Security", located at http://news.cnet.com/8301-10789_3-9989292-57.html?tag=st.nl; and (ii) an August 7, 2008 CNET News.com posting by R. Vamosi entitled "Kaminsky Provides the Why of Attacking DNS", located at http://news.cnet.com/8301-1009_3-10009951-83.html?tag=st.nl .

5.   The document included in the Exhibit Binder as Exhibit 8 is a true and accurate copy of the Athena Rules of Use (including MITnet Rules of Use), located at http://web.mit.edu/olh/Rules/.

Signed under the penalties of perjury this _8th_ day of August, 2008.

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Ieuan G. Mahony