

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CAPITOL RECORDS, LLC, : 12 Civ. 0095 (RJS)  
Plaintiff, :  
-against- : **DECLARATION  
OF DOUG JACOBSON**  
REDIGI INC., : **REDACTED**  
Defendant. :  
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DOUG JACOBSON, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am employed as a Professor of Electrical and Computer Engineering at Iowa State University and as the Director of the Iowa State University Information Assurance Center. In addition, I am the founder of Palisade Systems, a high-tech computer security company, and served as Chief Technical Officer for that company until 2010. I submit this declaration on behalf of Plaintiff Capitol Records, LLC (“Capitol”) in opposition to the motion for summary judgment by Defendant ReDigi, Inc. (“ReDigi”).

**Qualifications and Background**

2. My employment with Iowa State University began in 1982 as a computer programmer. I completed my Ph.D. in Computer Engineering with a focus in computer networking in December 1985. In January 1986, I was hired by the Department of Electrical and Computer Engineering as an Assistant Professor to teach and research in the area of computer networks. Since that time, I have taught over 25 classes in computer networks at both the undergraduate and graduate level.

3. I have received over \$5 million in funding for my research, and have written several articles and made more than 50 presentations on computer security and networks at

conferences, workshops and various meetings.

4. I hold two patents in the area of computer network security and have won two R&D 100 awards for technologies I developed at Palisade Systems. In the early 1980's, I wrote software, which was used by ISU for several years, to transfer data from personal computers to mainframe computers.

5. A copy of my CV is attached hereto as Exhibit A.

**Analysis of ReDigi Technology**

6.

**REDACTED**

7.

**REDACTED**

**REDACTED**

8.

**REDACTED**

9.

**REDACTED**

**REDACTED**

10.

**REDACTED**

11.

**REDACTED**

12.

**REDACTED**

13.

**REDACTED**

14.

**REDACTED**

# REDACTED

15.

# REDACTED

16.

# REDACTED

17. In short, while ReDigi uses technical synonyms to describe its **REDACTED** process, the realities and limitations of data transfer and the Internet establish that ReDigi's process involves both copying and deletion of music files.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT. EXECUTED ON AUGUST 9, 2012 AT AMES, IOWA.



DR. DOUG JACOBSON