

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CAPITOL RECORDS, LLC, :

12 Civ. 0095 (RJS)

Plaintiff, :

-against- :

REDIGI INC., :

Defendant. :

**DECLARATION
OF DOUG JACOBSON
REDACTED**

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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

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REDACTED

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REDACTED

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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