



6. Prior to performing any examination of the Work for Hire document or the Technical Specification, I captured high-resolution color digital photographs and scans of both documents. True and correct copies of my initial scans are attached hereto as Exhibit A.

7. The Work for Hire document contained two areas of handwriting: a handwritten interlineation and a set of two initials on page 1 and two signatures in the bottom right side of page 2.

8. Upon taking possession of the Work for Hire document on the morning of July 16, 2011, and before conducting any examinations, I immediately observed that the ink in the handwritten areas on the Work for Hire document was noticeably faded.

9. I also observed that the paper on which the Work for Hire document was printed was atypical. The paper appeared noticeably discolored, and both pages 1 and 2 were unusually tensile (stiff).

10. In contrast, the ink and paper of the Technical Specification did not exhibit any obvious visible signs of deterioration or discoloration.

11. The last time I observed and scanned the Work for Hire document on August 27, 2011, which was the last day of Defendants' inspection of the Hard-Copy Documents, the appearance of the ink and paper had not changed from the time I first observed and scanned it on the morning of July 16, 2011, with the exception of sampling conducted by both parties' experts.

12. In the course of Defendants' examination, I and other experts used a Foster & Freeman VSC-400. A Video Spectral Comparator (VSC) is standard digital imaging equipment used in forensic document examinations. A VSC includes visible, ultraviolet and infrared light sources, among others, the use of which is standard practice in the field of document examination. A VSC is common laboratory equipment that has been used for decades by thousands of examiners worldwide. I am not aware of any reports or documented findings that

suggest that this type of lab equipment would result in deterioration of inks or paper during the course of an examination. I have examined thousands of documents using standard laboratory equipment such as the VSC and other UV and IR sources. I have never witnessed any damage caused by this equipment, let alone damage similar to the deterioration in the ink and paper that I immediately observed in the Work for Hire document.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th day of November 2011, in Vienna, Virginia.



Gerald M. LaPorte, M.S.F.S, B.Sc.