

Honorable Thomas S. Zilly

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

VENICE PI, LLC,
Plaintiff,
v.
SEAN O'LEARY JR., et al.
Defendants.

Civil Action No. 17-cv-988TSZ

VENICE PI, LLC,
Plaintiff,
v.
JONATHAN DUTCZAK, et al.
Defendants.

Civil Action No. 17-cv-990TSZ

VENICE PI, LLC,
Plaintiff,
v.
MARTIN RAWLS, et al.
Defendants.

Civil Action No. 17-cv-991TSZ

VENICE PI, LLC,
Plaintiff,
v.
INA SICOTORSCHI, et al.
Defendants.

Civil Action No. 17-cv-1074TSZ

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VENICE PI, LLC,
Plaintiff,
v.
GREGORY SCOTT, et al.
Defendants.

Civil Action No. 17-cv-1075TSZ

VENICE PI, LLC,
Plaintiff,
v.
YELENA TKACHENKO, et al.
Defendants.

Civil Action No. 17-cv-1076TSZ

VENICE PI, LLC,
Plaintiff,
v.
CELINA POTTER, et al.
Defendants.

Civil Action No. 17-cv-1160TSZ

VENICE PI, LLC,
Plaintiff,
v.
TONJA LAIBLE, et al.
Defendants.

Civil Action No. 17-cv-1163TSZ

VENICE PI, LLC,
Plaintiff,
v.
VICTOR TADURAN, et al.
Defendants.

Civil Action No. 17-cv-1164TSZ

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VENICE PI, LLC,
Plaintiff,
v.
JESSE COOPER, et al.
Defendants.

Civil Action No. 17-cv-1211TSZ

VENICE PI, LLC,
Plaintiff,
v.
JASMINE PATTERSON, et al.
Defendants.

Civil Action No. 17-cv-1219TSZ

VENICE PI, LLC,
Plaintiff,
v.
DAVID MEINERT, et al.
Defendants.

Civil Action No. 17-cv-1403TSZ



DECLARATION OF DANIEL ARHEIDT

I, Daniel Arheidt, declare as follows:

1. My name is Daniel Arheidt.
2. I am over the age of 18 and am otherwise competent to make this declaration.

This declaration is based on my personal knowledge and, if called upon to do so, I will testify that the facts stated herein are true and accurate.

3. I am willing to travel to the State of Washington, and appear before Your Honor to answer any questions about this case and to discuss the statements in this declaration.

4. My native language is German. However, I can speak and write English fluently.

5. I understand that my existence has come into question. As such, I wanted to provide the Court with my background, work experience, and a form of legal identification.

6. I was born and grew up in Karlsruhe, Germany.

7. I am 35 years old. I live in Karlsruhe, Germany and I am married with children.

8. Between September 1989 and July 1993, I attended primary school in Karlsruhe-Durlach (Schloss-Schule).

9. Between September 1993 and July 2001, I went to school in Markgrafen-Gymnasium in Karlsruhe-Durlach, and from September 2001 to June 2003, I attended Helmholtz-Gymnasium in Karlsruhe.

10. I served in the military in Mengen and Leipheim from July 2003 to March 2004.

11. From October of 2004 to September of 2005, I completed two semesters of business informatics at Berufsakademie Karlsruhe.

12. I attended Vocational training at Baier Stahlhandel GmbH in Karlsruhe as industrial management assistant between September 2006 and June 2008.

13. Over the course of many years, I have had a number of internships which are listed below:

- a. June 1999 – July 2001 - Scheck-In Center in Karlsruhe-Durlach (2-3 times a week) as temporary staff

- b. February 2002 – December 2002 - Fitness Company Karlsruhe (2-3 times a week) Promotion-Team for acquisition of new customers
- c. January 2003 – May 2003 - Borchardt Bauservice as temporary staff
- d. November 14, 2005 – November 18, 2005 - Internship at advertising agency Redelstab for Graphic-Design
- e. April 3, 2006 – August 31, 2006 - Internship at Baier Stahlhandel GmbH in Karlsruhe

14. From July 2008 to October 2009, I worked at Molex Deutschland GmbH in Walldorf as an Inside Sales Representative.

15. I have been working at GuardaLey Limited (“GuardaLey”) as an IT Specialist and Project Manager since December 2009.

16. I have also been working for IPP International UG (“IPP”) as an IT Specialist and Project Manager since October, 19th, 2011.

17. I have also been hired by MaverickEye UG (“MaverickEye”) as Consultant on a project basis since 2013.

18. My work for GuardaLey, IPP, and MaverickEye, of reviewing data log files and verifying hashes, has always been performed in Germany. I never performed any of this work in the State of Washington.

19. The servers of MaverickEye do not detect or record evidence of infringement from within Washington State. Indeed, its servers and all employees or consultants are located in Germany and thus the detection and recording are completed in Germany.

20. The data processing and computer skills I possess are: Profound knowledge in Computer-Hard- and Software, MS-Windows-Operating systems, MS-Office, Network engineering, server administration, Basic Linux knowledge, and SAP R/3.

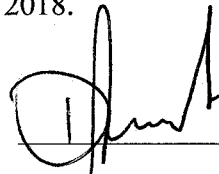
21. I have provided a copy of my government issued ID to Plaintiff’s attorney. I am willing to provide this identification to the Court as long as it is not publicly filed.

22. The Court asked about my relationship with the following individuals: Darren M. Griffin, Daniel Macek, Daniel Susac, Tobias Fieser, Michael Patzer. I am generally aware that certain of these individuals have performed work for one of more of the companies for which I

have provided services, some including similar work to which I perform. Although, the work I have performed, as outlined above, has been independent of any work these individuals may have previously performed, I have worked with Macek, Fieser and Patzer. In fact, I personally met Daniel Macek, Tobias Fieser, and Michael Patzer.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

EXECUTED the 5 day of February, 2018.

A handwritten signature in black ink, appearing to read 'Daniel Arheidt', is written over a horizontal line. The signature is stylized and cursive.

Daniel Arheidt

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served to all counsel or parties of record who are deemed to have consented to electronic service via the Court’s CM/ECF system, and to all Defendants at their last known address via U.S. mail.

s/ David A. Lowe