

BUSINESS RECORDS DECLARATION

Request for information regarding:
[REDACTED], et al.

)
)
)

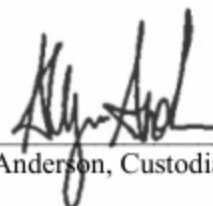
DECLARATION OF
Alyssa Anderson

I, Alyssa Anderson, declare:

1. I am a Custodian of Records for Oath Holdings Inc. ("Oath") (formerly Yahoo Holdings, Inc.), located in Sunnyvale, California. I am authorized to submit this declaration on behalf of Oath. I make this declaration pursuant to the Federal Rules of Evidence Rule 902(11) and the California Code of Evidence section 1561 and in response to a subpoena dated December 19, 2018 ("the request"). I have personal knowledge of the following facts, except as noted, and could testify competently thereto if called as a witness.
2. Attached hereto are true and correct copies of the following data pertaining to the user accounts identified in the request: (1) the user profile, as produced by the Yahoo Account Management Tool and (2) the dates, times, and Internet protocol addresses for logins and authentication events (if any), as produced by the Yahoo Login Tracker Tool. Oath's servers record this data automatically at the time, or reasonably soon after, it is entered or transmitted, and this data is kept in the course of this regularly conducted activity and was made by regularly conducted activity as a regular practice. Oath may not require or verify user information because it offers many of its services to users for free.
3. To the extent any document attached hereto contained information that exceeded the scope of the request, is protected from disclosure, or is otherwise not subject to production, such information has been redacted or otherwise removed.

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

DATED: January 15, 2019


Alyssa Anderson, Custodian of Records

Internal reference number: [REDACTED]

EFTA01660718