

Declaration of Stefan Bühlmann

I, Stefan Bühlmann, hereby state the following under oath:


1. I live in Witterswil, Switzerland.
2. I am the General Manager of Joe Security LLC (“Joe Security”).
3. Joe Security is a Swiss entity located in Reinach, Switzerland.
4. Joe Security is in the computer security business. Specifically, Joe Security has developed a malware analysis and detection system that enables to detect and analyze computer viruses and malware threats.
5. I have been involved in computer security and malware detection for 15 years.
6. Joe Security’s malware analysis and detection system is named “Joe Sandbox.”
7. We carefully screen our customers and only license our product to reputable governmental security agencies and select corporations. The total number of Joe Security customers is limited. Our customer list is confidential.
8. All of our business and governmental partners agree to strict confidentiality restrictions as a condition of using our solution.
9. Our customers install our solution into their computer infrastructure to help protect against malware threats.
10. Customers who purchase our malware program are provided our (a) Installation Guide, (b) Interface Guide, and (c) User Guide.
11. Our Installation Guide and our Interface Guide contain highly confidential trade secrets including the password to our system, the otherwise secret IP and MAC addresses on which the system runs, file names, network ports and network protocols.

12. As a company that focuses on computer malware, we know that the efficacy of our product could be immediately, directly and completely compromised if this information is made public. Hackers would be able to use this information to modify their malware to circumvent our malware detection and prevention system.

13. We would prefer that no parts of our Installation Guide, Interface Guide or User Guide be made public as they contain a roadmap to our product and we believe that making our Guides public will compromise the efficacy of our malware prevention product.

14. In the event that the Court declines to allow our Guides to remain shielded from public view, we request in the alternative that redacted versions of our Installation Guide and Interface Guide be filed. I have personally reviewed our Installation Guide and Interface Guide and identified the specific references to our system access password, and the IP and MAC addresses and the file names, network ports and network protocols on which our system runs. I estimate that the specific items I identified for redaction constitute less than one percent of the text of the Installation Guide and Interface Guide.

Signed under the pains and penalties of perjury this 1 day of June, 2019.


Stefan Bühlmann