



DECLARATION OF GERARD P. GRENIER

I, Gerard P. Grenier, am over twenty-one (21) years of age. I have never been convicted of a felony, and I am fully competent to make this declaration. I declare the following to be true to the best of my knowledge, information and belief:

1. I am Senior Director of Publishing Technologies of the Institute of Electrical and Electronics Engineers, Inc. (“IEEE”).
2. IEEE is a neutral third party in this dispute.
3. Neither I nor IEEE itself is being compensated for this declaration.
4. Among my responsibilities as Senior Director of Publishing Technologies, I act as a custodian of certain records for IEEE.
5. I make this declaration based on my personal knowledge, information contained in the business records of IEEE, or confirmation with other responsible IEEE personnel with such knowledge.
6. As part of its ordinary course of business IEEE publishes and makes available technical articles and standards. These publications are made available for public download through the IEEE digital library, IEEE Xplore.
7. It is the regular practice of IEEE to publish articles and other writings including article abstracts and make them available to the public through IEEE Xplore. IEEE maintains copies of publications in the ordinary course of its regularly conducted activities.
8. The article below, along with its abstract, has been attached as Exhibits A & B, respectively, to this declaration:

A.	Abstract – “Poison Java [data security]” Chen, E., IEEE Spectrum, Vol. 36, Issue 8, 1999.
B.	“Poison Java [data security]” Chen, E., IEEE Spectrum, Vol. 36, Issue 8, 1999.

9. I obtained copies of each of the attached Exhibits through IEEE Xplore, where they were maintained in the ordinary course of IEEE’s business. Each Exhibit is a true and correct copy of the Exhibit as it existed on or about September 10, 2015.
10. The article abstract from IEEE Xplore shows the date of publication. IEEE Xplore populates this information using the metadata associated with the publication.

11. "Poison Java [data security]" by E. Chen was published by IEEE as part of Volume 36, Issue 8 of IEEE Spectrum. The article abstract states that Volume 36, Issue 8 of IEEE Spectrum was published in August 1999. This publication happened no later than the last day of this month. The article is currently available for public download from the IEEE digital library, IEEE Xplore

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on: 10. Sept. 2015

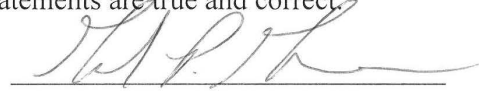
A handwritten signature in black ink, appearing to be 'M.P.H.', written over a horizontal line.

EXHIBIT A



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Poison Java [data security]

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1 Author(s)
Chen, E. ; Trend Micro Inc., Tokyo, Japan

Abstract

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In this paper, the author argues that antidotes to malicious code are required above and beyond Java's own antigens if the programming language is to be immunized against security breaches

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