

**AFFIDAVIT OF DR. BRUCE HAJEK**

I, Dr. Bruce Hajek, declare as follows:

1. I am employed by the University of Illinois at Urbana-Champaign (“UIUC”). My address is 105 Coordinated Science Laboratory MC 228, 1308 W. Main St. Urbana Illinois 61801.
2. I received B.S. Math and M.S. EE degrees from University of Illinois in 1976 and 1977 respectively, and Ph.D. EE from University of California Berkeley in 1979. I joined the University of Illinois at Urbana-Champaign in 1979.
3. I am a Center for Advanced Study Professor of Electrical and Computer Engineering, Professor of the Coordinated Science Laboratory, and Hoeft Chair of Engineering at the University of Illinois.
4. For over 50 years, the University of Illinois at Urbana-Champaign has hosted the Annual Allerton Conference on Communication, Control, and Computing (“Allerton Conference”) at the Allerton Retreat Center. The Allerton Conference includes several days of technical programs by scholars on various technical subjects relating to the fields of communication, control and computing. All papers presented at the Allerton Conference are published in official Conference Proceedings each year.

5. I have been involved with the Allerton Conference in a number of official capacities since at least 1979, and have attended the conference nearly every year since 1976. I have also served as co-chair for the conference six times in 1985, 1988, 1998, 1999, 2011, and 2012.

6. Both from my own participation in the conference (as a presenter and author of conference papers), and from my service as co-chair of the Allerton Conference, I have become thoroughly familiar with the schedule and practices of the Allerton Conference as they relate to the submission of papers, presentation of papers at the conference, and the publication of the Conference Proceedings.

7. The Allerton Conference is held on an annual basis during the fall, typically at the end of September or in early October. The Allerton Conference is open to the public for attendance. Any person who wants to attend, and is able to pay the attendance fee, can attend the Allerton Conference. The 1998 and 1999 Allerton Conferences were among the premiere conferences on the topic of error correction coding theory, and those who were interested in this topic would have been aware of these conferences. Before each Allerton Conference, the conference issues a call for papers on particular areas of technical interest. The deadline for initial paper submissions is in the summer before the conference. Toward the end of the summer, at least a month prior to the conference, authors are notified whether their

papers are accepted for presentation at the Conference Proceedings. Those authors then present their paper during the conference itself.

8. Authors must deposit their final papers with the conference Secretariat on the Friday morning after the conference is over. Conference staff assemble the papers and then sends the assembled papers to a publisher for printing. The printed copies of the Conference Proceedings are shipped to all conference participants and any members of the public (including individuals and/or institutions) who have ordered a copy of the Conference Proceedings. Copies of the Conference Proceedings are also made available for purchase from the conference Secretariat by any member of the public as soon as printing is complete.

9. It takes no more than four to five months from the end of the conference to the final publication and shipment of the complete Conference Proceedings. Accordingly, the complete Conference Proceedings are published by no later than February of the year following the conference. I am aware of no instance in which the Conference Proceedings were not published by February of the year following the conference – *i.e.*, the Conference Proceedings for the 36th Annual Allerton Conference, held in September 1998, were published no later than February 1999, and the Conference Proceedings for the 37th Annual Allerton Conference, held in September 1999, were published no later than February 2000.

10. In addition, from the time that conference staff sends the assembled papers to the local publisher for publication, it only takes about 10 weeks for the publisher to print and ship the Conference Proceedings. As noted above, any member of the public can purchase a copy of the Conference Proceedings from the conference Secretariat as of the date printing is complete.

11. Attached as Appendix A is a true and accurate copy of a purchase order letter from Dr. Sreenivas (the co-chair of the 1999 conference) to Ms. Anderson at the Purchasing Division of the University of Illinois at Urbana-Champaign for the 37th Annual Allerton Conference on Communications Control and Computing Proceedings (“Sreenivas Purchase Order”). The Sreenivas Purchase Order is dated December 8, 1999, and I understand that Angie Marie Ellis (Office Manager, Decision and Control Laboratory University of Illinois at Urbana-Champaign) obtained the purchase order from the Allerton Conference records. The Sreenivas Purchase Order confirms that the conference staff sent the assembled papers for the 37<sup>th</sup> Annual Allerton Conference to the local publisher for publication on or about December 8, 1999.

12. Based on my experience, the Sreenivas Purchase Order is the final order from the conference before printing. Accordingly, printing of the 37th Annual Allerton Conference on Communications Control and Computing Proceedings was complete, and the Conference Proceedings shipped, about 10 weeks after the date

of this letter. Even accounting for possible delays due to the December holidays, the publication would have been done within 10 weeks after the date of this letter.

13. Based on my experience, this record confirms that the proceedings of the 37th Annual Allerton Conference on Communications Control and Computing were published and shipped no later than February 2000.

Date: July 12, 2017

Signed: Em Hyein

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