

AFFIDAVIT OF DR. TAMER BAŞAR

I, Dr. Tamer Başar, declare as follows:

1. I am employed by the University of Illinois at Urbana-Champaign (“UIUC”). My address is 206 Center for Advanced Study, Levis Faculty Center—Suite 200, University of Illinois, 919 West Illinois Street MC-064, Urbana, Illinois 61801.
2. I received a B.S.E.E. degree from Robert College, Istanbul, in 1969, and M.S., M.Phil, and Ph.D. degrees in engineering and applied science from Yale University, in 1970, 1971 and 1972, respectively. I joined the University of Illinois at Urbana-Champaign in 1981.
3. I am currently Director of the Center for Advanced Study at the University of Illinois at Urbana-Champaign. I am also the Swanlund Endowed Chair for the University of Illinois at Urbana-Champaign, Department of Electrical and Computer Engineering. I also hold several professorship positions including positions as professor of the Department of Electrical and Computer Engineering, Information Trust Institute, Mechanical Science and Engineering, and the Coordinated Science Laboratory.
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 1983, and have attended the conference each year since 1983. I have also served as co-chair for the conference six times, in 1983, 1984, 1997, 1998, 2012, and 2013.
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 registration 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 papers during the conference itself.

8. Authors must deposit their final papers with the conference Secretariat on the Friday morning of the conference; in some special cases, upon request by an attendee, the deposit date could be extended by a couple of days.

Conference staff assembles 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.

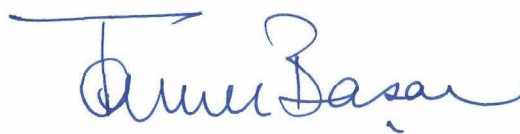
9. It takes no more than four to five months from the end of the conference to the final publication and shipment of the complete Conference Proceedings.

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. Even though I do not have an accurate record of the date, it is quite likely that I received my copy of the Conference Proceedings for the 36th Annual Allerton Conference in February 1999, and I received my copy of the Conference Proceedings for the 37th Annual Allerton Conference in 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 Exhibit 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 37th Annual Allerton Conference to the local publisher for publication on or about December 8, 1999.

12. 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. 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

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