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7 Attorneys for Plaintiff  
beIN IP Ltd.  
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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 FOR THE COUNTY OF SANTA CLARA

11 beIN IP Ltd.,

12 Plaintiff,

13 vs.

14 BeoutQ, Saudi Selelevision Company LLC, Raed  
Reda Hassan Khusheim and DOES 1-20,  
15 Inclusive,

16 Defendants.  
17  
18  
19  
20  
21

Case No. 17CV316099

12 **DECLARATION OF** [REDACTED]  
[REDACTED]

22  
23 I, [REDACTED], declare as follows:

24 1. I am over 18 years of age, and have personal knowledge of the facts set forth herein.

25 If called upon to testify, I could and would competently testify to the following facts set forth below.

26 2. [REDACTED] and since then have held the title  
27 of Chief Technology Officer.  
28

1           3.       ██████████ is headquartered in ██████████ and provides website operators with  
2 a means to distribute their website content to website visitors all around the world by way of a  
3 worldwide network of content delivery servers. This worldwide network allows for reduced  
4 latency and improved download times for any website visitor, due to the reduced physical distance  
5 between the website visitor and the network of ██████████ content delivery servers.

6           4.       On October 24, 2017, beIN sent a subpoena to ██████████ requesting, among other  
7 things, an identification of the owners and operators of the Internet website beautq.se. *See*  
8 Exhibit A.

9           5.       On October 27, 2017, in my capacity as ██████████ co-founder and Chief Technology  
10 Officer, I responded to beIN's subpoena by telephoning the deposition officer, Ash Nagdev,  
11 attorney for beIN IP Ltd. In my conversation with Mr. Nagdev, I confirmed that the website  
12 "beoutq.se" uses ██████████ network of content delivery servers to support video streaming from the  
13 website beautq.se. In that conversation, I also stated that I would provide documents responsive  
14 to beIN's subpoena the following week.

15           6.       On October 31, 2017, I officially accepted service of the beIN subpoena, and in  
16 response to the beIN subpoena, I provided the attached Exhibit B to Mr. Nagdev.

17           7.       The attached Exhibit B is, in part, a credit card transaction receipt for beautq.se's  
18 use of ██████████ network of content delivery servers. The transaction details show that the  
19 payment was for ██████████ Account ID 34286. The payment for this Account ID was finalized on  
20 October 16, 2017 at 06:16 PM CDT, in the amount of \$2,125.00 U.S. Dollars. The payment was  
21 made with an American Express credit card ending in 6922, in the name of "Raed R Khusheim."

22           8.       Based on my own work with ██████████ Account ID 34286, I know that it is associated  
23 with the website beautq.se, and therefore Mr. Khusheim's payment was made for beautq.se's use  
24 of ██████████ network of content delivery servers.

25           9.       The attached Exhibit B also logs the date and time the administrator of beautq.se  
26 logged into ██████████ Administrative Panel that allows administrators to manage account settings.

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1           10.       On November 7, 2017, also in response to the beIN subpoena, I provided video  
2 streaming logs from the beautq.se website. The streaming logs associate beautq.se with  
3 cdn.neverdie.pw, which I also independently know is associated with [REDACTED] Account ID 34286.

4           11.       On March 6, 2018, in response to the beIN subpoena, I provided the attached  
5 Exhibit C to Mr. Nagdev.

6           12.       The attached Exhibit C refers to [REDACTED] Customer ID 34286, which is synonymous  
7 with [REDACTED] Account ID 34286 referred to in Exhibit B. The [REDACTED] Customer ID 34286 referred  
8 to in Exhibit C is associated with Primary Supersname cdn.neverdie.pw. This confirms my  
9 independent knowledge that beautq.se, cdn.neverdie.pw and [REDACTED] Customer/Account ID 34286  
10 are all associated with one another, and that Raed R Khusheim paid for beautq.se's use of  
11 [REDACTED] network of content delivery servers.

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Dated: June 20, 2018

[REDACTED]

\*\*\*\*\* 1. row \*\*\*\*\*

type: CreditCard  
expiration: 10/2019  
data\_description: [REDACTED]  
data\_identifier: American Express  
1 row in set (0.00 sec)

## Transaction 11wc0w28

### Transaction Information

Merchant	[REDACTED]
Amount	\$2,125.00 USD
Transaction Date	Oct 16 2017, 06:16 PM CDT
Authorization Code	944968
Status	Settled

### Payment Information

Payment Type	Credit Card
Card Type	American Express
Cardholder Name	Raed R Khusheim
Credit Card Ends With	6922

### Customer Information

