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CLERK, U.S. DISTRICT COURT
5/22/18
CENTRAL DISTRICT OF CALIFORNIA
BY: CS DEPUTY

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1 DAVID J. VAN HAVERMAAT (Cal. Bar No. 175761)
Email: vanhavermaatd@sec.gov
2 DAVID S. BROWN (Cal. Bar No. 134569)
Email: browndav@sec.gov

3 Attorneys for Plaintiff
4 Securities and Exchange Commission

5 Joseph G. Sansone, Unit Chief (Market Abuse Unit)
New York Regional Office
6 200 Vesey Street, Suite 400
New York, New York 10281

7 Robert A. Cohen, Unit Chief (Cyber Unit)
8 Headquarters
100 F Street, N.E.
9 Washington, District of Columbia 20549

10 Michele Wein Layne, Regional Director
Amy Jane Longo, Regional Trial Counsel
11 444 S. Flower Street, Suite 900
Los Angeles, California 90071
12 Telephone: (323) 965-3998
Facsimile: (213) 443-1904

13
14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **WESTERN DIVISION**

17 SECURITIES AND EXCHANGE
18 COMMISSION,

19 Plaintiff,

20 vs.

21 TITANIUM BLOCKCHAIN
22 INFRASTRUCTURE SERVICES,
23 INC.; EHI INTERNETWORK AND
24 SYSTEMS MANAGEMENT, INC.
aka EHI-INSM, INC.; and MICHAEL
25 ALAN STOLLERY aka MICHAEL
STOLLAIRE,

26 Defendants.

Case No. CV18-4315-DSF(JPRx)
27 **DECLARATION OF CHRISTINA Y.**
28 **LAI**

1 **DECLARATION OF CHRISTINA Y. LAI**

2 I, Christina Y. Lai, declare, pursuant to 28 U.S.C. § 1746, as follows:

3 1. I am employed by Applied Materials, Inc. (“Applied Materials”) as its
4 Vice President, Corporate Legal Affairs. I have personal knowledge of the matters
5 set forth below and, if called as a witness, would testify to these facts under oath.

6 2. I make this declaration at the request of the United States Securities and
7 Exchange Commission (“SEC”).

8 3. On or about February 9, 2018, the SEC’s Division of Enforcement
9 requested that Applied Materials provide it with certain information concerning
10 companies called Titanium Blockchain Infrastructure Services, Inc. (“TBIS”) and
11 EHI Internetwork and Systems Management, Inc. (“EHI”), and an individual named
12 Michael Stollaire aka Michael Stollery or Michael Stoller (“Stollaire”).

13 4. In my capacity as the Vice President, Corporate Legal Affairs of Applied
14 Materials, I am required, periodically and as needed, to become familiar with the
15 entities with which Applied Materials has contracts, agreements, and/or other
16 substantive business relationships including alliances and partnerships. In addition, I
17 share responsibility with other members of Applied Materials’ legal department,
18 intellectual property counsel, and others to protect Applied Materials’ trade name,
19 trademarks, and service marks from infringement and other unauthorized uses by
20 third parties. In response to the SEC’s request, and at my direction, Applied
21 Materials’ personnel reviewed the books, records, files, and computer systems of the
22 business units within Applied Materials that might reasonably be expected to have or
23 to have had any type of business relationship with TBIS or EHI or Stollaire, including
24 as a customer, client, vendor, employee, contractor or consultant.

25 5. Applied Materials keeps and maintains business records in the course of
26 its transactions and regularly conducted activities as a regular practice. It is Applied
27 Materials’ general practice to prepare such records at or near the time of the
28 occurrence of the matters set forth by, or from information transmitted by, a person

1 with knowledge of those matters. Applied Materials maintains records of entities and
2 persons with which it has contracts, agreements, and/or other substantive business
3 relationships, such as the purchase and sale of a product or service or entering into an
4 alliance or partnership, including authorized uses by third parties of its trade name,
5 trademarks, and service marks. Applied Materials also maintains records of entities
6 and persons with which it has engaged as an employee, vendor, contractor, or
7 consultant.

8 6. The search of these materials has not disclosed any current or past
9 business relationship of any kind between Applied Materials and TBIS or EHI.

10 7. The search of these materials did indicate that Applied Materials used a
11 third party contractor to provide certain information technology (“IT”) services to
12 Applied Materials and that an individual named “Michael Stoller,” who was engaged
13 by the third party contractor, worked on the IT services between approximately
14 March 2002 and May 2002. These materials indicate the scope of the IT services
15 involved the use of commercially available IT products and services used by Applied
16 Materials, and did not include blockchain technology or digital currency.

17 8. The search of these materials has not disclosed that Applied Materials
18 has authorized TBIS or EHI or Stollaire to use Applied Materials’s name or logo in
19 their marketing or advertising. The “Applied Materials” name and logo are the
20 intellectual property of the company. Applied Materials considers a third-party’s
21 unauthorized use of the “Applied Materials” name or logo in marketing or advertising
22 as an infringement of its intellectual property.


23 9. Applied Materials sent Stollaire a cease and desist letter on March 16,
24 2018, a true and correct copy of which is attached hereto as Exhibit 1. Applied
25 Materials subsequently received an undated reply from Stollaire, a true and correct
26 copy of which is attached hereto as Exhibit 2.

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1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed this 30th day of March, 2018 at Santa Clara, California.

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5 _____
6 Christina Y. Lai

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EXHIBIT 1



APPLIED MATERIALS®

3225 Oakmead Village Drive
Santa Clara, CA 95052-8039
Phone: (408) 235-4519

March 16, 2018

Michael Stollaire
President and CEO
Titanium Blockchain Infrastructure Services Inc.
15027 Dickens St. Apt.4,
Sherman Oaks, CA 91403.

Re: *Statements on Website Regarding Applied Materials*

Dear Michael Stollaire:

I am an attorney in the Global Law Department at Applied Materials, Inc. ("Applied"). I am writing regarding representations by Titanium Blockchain Infrastructure Services Inc. ("TBIS") on its website representing a relationship with Applied. Applied has recently learned that TBIS publishes on its website under the "Whitepaper" tab that Applied is a client of TBIS.

Applied values its relationship with its suppliers, however our records do not reveal that any commercial relationship—past, present or contemplated—exists between Applied and TBIS. Accordingly, the statements on TBIS's website are inaccurate and misleading, and may confuse customers about the source and quality of the products and services offered by TBIS.

We trust that TBIS will take measures to remove any reference to Applied Materials or AMAT that suggests that a supplier, vendor or client relationship exists between Applied and TBIS from its website, marketing collateral, and any other publications. Upon removing these statements and references, we ask that you provide Applied with written confirmation that you have done so by Friday, March 23, 2018. We appreciate your prompt attention to this matter. Please contact me at (408) 563-4590 should you have any questions.

Very truly yours,

A handwritten signature in black ink that reads "Saul E. Arnold".

Saul E. Arnold
Segment Bus Counsel, Legal Services | Global Law Department
Applied Materials, Inc.

Cc: Elliot Kermani
EK Law
925 North La Brea Avenue
Fourth Floor
Los Angeles, CA 90038

EXHIBIT 2



APPLIED MATERIALS®

3225 Oakmead Village Drive
Santa Clara, CA 95052-8039
Phone: (408) 235-4519

This issue
has been
Fixed.

WE ARE THE REVOLUTION.

s Inc.

Applied Materials

Dear Michael Stollaire:

I am an attorney in the Global Law Department at Applied Materials, Inc. ("Applied"). I am writing regarding representations by Titanium Blockchain Infrastructure Services Inc. ("TBIS") on its website representing a relationship with Applied. Applied has recently learned that TBIS publishes on its website under the "Whitepaper" tab that Applied is a client of TBIS.

Applied values its relationship with its suppliers, however our records do not reveal that any commercial relationship—past, present or contemplated—exists between Applied and TBIS. Accordingly, the statements on TBIS's website are inaccurate and misleading, and may confuse customers about the source and quality of the products and services offered by TBIS.

We trust that TBIS will take measures to remove any reference to Applied Materials or AMAT that suggests that a supplier, vendor or client relationship exists between Applied and TBIS from its website, marketing collateral, and any other publications. Upon removing these statements and references, we ask that you provide Applied with written confirmation that you have done so by Friday, March 23, 2018. We appreciate your prompt attention to this matter. Please contact me at (408) 563-4590 should you have any questions.

Very truly yours,

Saul E. Arnold

Segment Bus Counsel, Legal Services | Global Law Department
Applied Materials, Inc.

Cc: Elliot Kermani
EK Law
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