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

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
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)**
DECLARATION OF JOHN F.
MULLEN

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1 DECLARATION OF JOHN F. MULLEN

2 I, John F. Mullen, declare, pursuant to 28 U.S.C. § 1746, as follows:

3 1. I am employed by SAP ("SAP") as a Senior Counsel. I have personal
4 knowledge of the matters set forth below and, if called as a witness, would testify to
5 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. SAP is the world's largest business software company and is
9 headquartered in Walldorf, Germany.

10 4. On or about February 12, 2018, the SEC requested that SAP provide it
11 with certain information concerning companies called Titanium Blockchain
12 Infrastructure Services, Inc. ("TBIS") and EHI Internetwork and Systems
13 Management, Inc. ("EHI"), and an individual named Michael Stollaire aka Michael
14 Stollery or Michael Stoller ("Stollaire").

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

27 6. SAP keeps and maintains business records in the course of its
28 transactions and regularly conducted activities as a regular practice. It is SAP's

1 practice to prepare such records at or near the time of the occurrence of the matters
2 set forth by, or from information transmitted by, a person with knowledge of those
3 matters. SAP maintains books and records of entities and persons with which it has
4 contracts, agreements, and/or other substantive business relationships, such the
5 purchase and sale of a product or service, making an investment, or entering into an
6 alliance or partnership, including authorized uses by third parties of its trade name,
7 trademarks, and service marks. SAP also maintains books and records of entities and
8 persons with which it has engaged as an employee, vendor, contractor, or consultant.
9 For the purposes of this declaration, as a Senior Counsel at SAP, I am the custodian
10 of those records or am otherwise qualified to testify about them.

11 7. SAP's books and records are current as of the date of this declaration.
12 The search of these materials has not disclosed any current or past business
13 relationship of any kind between SAP and TBIS or EHI or Stollaire directly.

14 8. The search of these materials indicates that a subsidiary of SAP used the
15 services of a third party contractor to provide certain information technology ("IT")
16 services for the SAP subsidiary and that contractor subcontracted a portion of that
17 work to a subcontractor. These materials indicate that Stollaire worked as an
18 independent contractor on the IT services between late 2016 and early 2017 when the
19 contract was terminated. These materials indicate the scope of the IT services
20 involved the use of commercially available IT products and services used by the SAP
21 subsidiary, and did not include blockchain technology or digital currency.

22 9. The search of these materials has not disclosed that SAP has authorized
23 TBIS or EHI or Stollaire to use SAP's name or logo in their marketing or advertising
24 or for any other purpose. The "SAP" name and logo are the intellectual property of
25 the company. SAP considers a third-party's unauthorized use of the "SAP" name or
26 logo in marketing or advertising as an infringement of its intellectual property.

EXHIBIT 1

March 13, 2018

VIA MAIL AND EMAIL (info@tbis.io)
Titanium Blockchain Infrastructure Services, Inc.
15027 Dickens Street, Suite 4
North Hollywood, CA 91403

Re: Unauthorized Use of SAP Logo

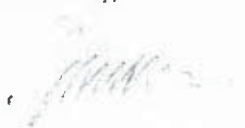
Dear Sir or Madam:

It has come to our attention that you are using the SAP logo at the following site (also see Attachment A):

SAP is the owner of the SAP trademark both in the U.S. and in many countries around the world. Use of the SAP logo may suggest to the public that your services are somehow endorsed by or affiliated with SAP, when they are not. Please cease all unauthorized use of the SAP logo and provide your written assurances to this effect within 10 days.

Thank you for your attention to this important matter.

Sincerely,


Senior IP Counsel | Global Trademarks, Anti-Piracy, Copyrights and Trade Secrets
SAP | 15 Wayside Road | Burlington, MA 01803 | USA
T: (781) 852-3054 | E: .

Attachment A

